# Part 2: Balance sheet, capital expenditures, and rate base (CAPEX)

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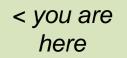
## MICHIGAN STATE UNIVERSITY

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2.0 Utility, enterprise, or investment basis: private and some public

$$RR = r_a(RB) + O&M + D + T$$

where:



- RR = total test year (annualized) revenue requirements
- r<sub>a</sub> = authorized (not guaranteed) rate of return to compensate debt holders and equity shareholders
- RB = rate base (original cost of invested utility plant in service net of accumulated depreciation and adjustments)
- O&M = operation & maintenance expenses, including administrative & general
- D = depreciation and amortization expense
  - = taxes other than income and income tax expense

Cost-based rates and revenue sufficiency are a function of both the numerator and denominator:

<u>Revenue requirements (RR)</u> Estimated sales (billing determinants)

Т



## 2.0 Topics

- 1. Balance sheet overview
- 2. Capital planning & asset management
- 3. Certificates of need
- 4. Utility plant in service
- 5. Contributed capital (CIAC, Advances)
- 6. Funds for construction (AFUDC, CWIP)
- 7. Asset valuation methods
- 8. Acquisition adjustments
- 9. Plant service lives and depreciation
- 10. Accumulated depreciation
- 11. Accumulated deferred income taxes
- 12. Working capital
- 13. Operating reserve accounts

- 14. Regulatory assets and liabilities
- 15. Deriving the rate base
- 16. Ratemaking scenarios

## 2.1 Balance sheet overview

- A financial statement detailing a company's assets, liabilities, and owner equity
  - ▶ As of a point in time (typically at year end) static ("snapshot") view
  - Utility balance sheets place assets before cash ("upside down")
  - Value of assets must be equal to the value of liabilities plus owners' equity
  - > Assets are what entities own; liabilities and owners' equity are how they own them

#### Assets and other debits

- Utility plant and accumulated depreciation
- Other property and investments
- Current and accrued assets
- Deferred debits

### Liabilities and shareholder (owner) equity

- Long-term debt
- Current and accrued liabilities
- Deferred credits
- Contributions in aid of construction (CIAC)
- Accumulated deferred income taxes
- Equity capital

### Q. Where in a utility's financial statements can we find the rate base?



## 2.1 Poll: Balance sheet

- Which of the following is *not* recorded on the balance sheet?
  - A. Property held for future use
  - B. Executive compensation
  - c. Income taxes payable
  - D. Deferred rate case expense

## 2.1 Balance sheet definitions

#### Long-term assets

- Resources, property and property rights owned by a business that have value and will provide benefits over more than one year (e.g., land, inventory)
- For regulatory purposes, assets are recorded at "original (book) cost" and net of depreciation (not "fair value") - and listed before current assets on the balance sheet

### Current assets

- Cash or other short-term assets that can be turned into cash relatively rapidly in the normal course of business (such as liquid assets)
- Intangible assets
  - Assets that are neither physical nor financial in character (e.g., franchises, licenses, and rights of way) and may be amortized (but not depreciated)
- Liabilities
  - Current or future economic obligations that an entity is required or expected to pay
- Current liabilities
  - Obligations of the business that are to be settled and/or payable within one year
- Deferred assets and deferred liabilities
  - The postponement of the recognition of revenue already earned or an expense already incurred – such as purchased gas expense subject to a purchased gas adjustment)

## 2.1 Balance sheet definitions (continued)

#### Regulatory assets and liabilities

- Assets or liabilities recorded on financial statements resulting from a regulatory requirement specifying that certain amounts are to be recovered or paid by the utility in the future
- Approved and pending approval differences in cost recovery

### Owners' equity

 Ownership shares in a company plus or minus earnings and losses since inception less distributed dividends – listed before debt

### Capital stock

- A unit of ownership in a corporate entity
- > Par value of the stock is the per share amount paid by the original shareholders

#### Retained earnings

• The accumulated earnings of a corporation from its inception minus any losses or dividends

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## 2.1 Balance sheet: assets

THE YORK WATER COMPANY

For the Year Ended December 31, 2018

(Company Name)

#### 200. COMPARATIVE BALANCE SHEET **ASSETS AND OTHER DEBITS**

#### Balances at Beginning of Year must be consistent with balances at end of previous year

Line	Account Number and Title	Schedule No.	Balance Beginning of Year	Balance End of Year	Increase/ Decrease
No.	(a) UTILITY PLANT	(b)	(c) xxx	(d) xxx	(e) xxx
2	101.0 Utility Plant in Service	201	349,669,833	371,879,339	22,209,506
3	102.0 Utility Plant Leased To Others	201	349,009,833	3/1;0/9,339	22,209,300
4	102.0 Unity Flant Leased to Others	202			
5	105.0 Property Held for Purchased or Sold	203			
5	104.0 Unity Plant Purchased or Sold	204	11,981,233	4,612,564	(7,368,669)
7	106.0 Completed Construction Not Classified	204	11,981,235	4,012,304	(7,300,009)
8	Total Utility Plant		361,651,066	376,491,903	14,840,837
9	ACCUMULATED DEPRECIATION		xxx	xxx	XXX
10	108.1 Utility Plant in Service	205	72,240,231	76,920,413	4,680,182
11	108.2 Utility Plant Leased to Others	205	12,240,231	70,920,413	4,000,102
12	108.3 Property Held for Future Use	205			
12	Total Accumulated Depreciation	205	72,240,231	76,920,413	4,680,182
14	ACCUMULATED AMORTIZATION	1 1	XXX	XXX	4,030,132
15	110.1 Utility Plant In Service		XXX	AAA	***
16	110.2 Utility Plant Leased to Others	1			
17	Total Accumulated Amortization	-			
18	UTILITY PLANT ADJUSTMENTS	-	xxx	XXX	xxx
19	114.0 Utility Plant Acquisition Adjustments	206	(3,360,459)	(3,292,572)	67,887
20	115.0 Accumulated Amortization of Utility Plant Acquisition Adjustments	200	766,397	814,419	48.022
21	116.0 Other Utility Plant Adjustments	-	100,571	014,417	40,022
22	Total Utility Plant Adjustments		(2,594,062)	(2,478,153)	115,909
23	117.0 Pending Reclass of Utility Plant	205	12,294,0021	(a)(7/0,100)	115,909
24	TOTAL NET UTILITY PLANT	200	286,816,773	297,093,337	10.276.564

25	OTHER PROPERTY AND INVESTMENTS		xxx	XXX	XXX
26	OTHER PROPERTY		XXX	XXX	XXX
27	121.0 Non-Utility Property		1,035,849	1,035,849	
28	122.0 Accumulated Depreciation & Amortization of Non-Utility Property		(353,476)	(371,029)	(17,553)
29	Total Other Property		682,373	664,820	(17,553)
30	INVESTMENTS	1	XXX	XXX	XXX
31	123.0 Investments in Affiliated Companies	210			
32	123.1 Other Investments	210			
33	123.2 Sinking Funds	210			
34	123.3 Other Special Funds	210			
35	124.0 Utility Investments	210			
36	125.0 Other Investments	210	59,724	59,724	
37	126.0 Sinking Funds				
38	127.0 Other Special Funds				
39	Total Investments		59,724	59,724	
40	TOTAL OTHER PROPERTY AND INVESTMENTS	1	742,097	724,544	(17,553)

#### THE YORK WATER COMPANY

(Company Name)

For the Year Ended December 31, 2018

#### 200. COMPARATIVE BALANCE SHEET CURRENT ASSETS AND OTHER DEBITS

Balances at Beginning of Year must be consistent with balances at end of previous year

U		Schedule No.	Balance Beginning	Balance End of	Increase/
Line	Account Number and Title		of Year	Year	Decrease
No.	(a)	(b)	(c)	(d)	(e)
1	CURRENT AND ACCRUED ASSETS		XXX	XXX	XXX
2	131.1 Cash on Hand		600	600	
3	131.2 Cash in Bank		(1,692,272)	(3,144,675)	(1,452,403)
4	132.0 Special Deposits - Interest and Dividends				
5	133.0 Other Special Deposits		40,413	39,362	(1,051)
6	134.0 Working Funds		600	600	
7	135.0 Temporary Cash Investments	210	652	652	
8	141.0 Customers Accounts Receivable		4,545,619	4,606,001	60,382
9	142.0 Other Accounts Receivable	211	191,512	385,276	193,764
10	143.0 Accumulated Provision for Uncollectible Accounts-Credit		(305,000)	(305,000)	1.
11	144.0 Notes Receivable	211	255,481	255,481	
12	145.0 Accounts Receivable from Affiliated Company	213	3,397,808	5,013,185	1,615,377
13	146.0 Notes Receivable from Affiliated Company	212			
14	151.0 Plant Materials and Supplies	214	905,621	875,569	(30,052)
15	152.0 Merchandise				
16	153.0 Other Materials and Supplies				
17	161.0 Stores Expense				
18	162.0 Prepayments	215-418	700,578	926.656	226,078
19	171.0 Accrued Interest & Dividends Receivable				
20	172.0 Rents Receivable				
21	173.0 Accrued Utility Revenues		2,459,245	2,426,681	(32,564)
22	174.0 Miscellaneous Current & Accrued Assets	216			
23	TOTAL CURRENT & ACCRUED ASSETS		10,500,857	11,080,388	579,531

24	DEFERRED DEBITS		XXX	XXX	XXX
25	181.0 Unamortized Debt Discount and Expense	217	2,691,091	2,549,418	(141,673
26	182.0 Extraordinary Property Losses	218			
27	183.0 Preliminary Survey and Investigation Charges	219	93,780	156,920	63,140
28	184.0 Clearing Accounts	220			
29	185.0 Temporary Facilities				
30	186.1 Deferred Rate Case Expense	221	4,708	310,864	306,156
31	186.2 Other Deferred Debits	222	3,151,644	3,402,475	250,831
32	186,3 Regulatory Assets		30,292,810	31,993,427	1,700,617
33	187.0 Research & Development Expenditures				
34	190.1 Accumulated Deferred Federal Income Taxes	419-420			
35	190.2 Accumulated Deferred State Income Taxes	419-420			
36	TOTAL DEFERRED DEBITS		36,234,033	38,413,104	2,179,071
37	TOTAL ASSETS & OTHER DEBITS		334,293,760	347,311,373	13,017,613

## 2.1 Accounts receivable (USoA, 1996)

#### 141. Customer Accounts Receivable

- A. This account shall include amounts due from customers for utility service. This account shall not include amounts due from associated companies.
- B. This account shall be maintained so as to show separately amounts due from each type of utility service.

#### 143. Accumulated Provision for Uncollectible Accounts - Cr

- A. This account shall be credited with amounts provided for losses on accounts receivable which may become uncollectible, and also with collections on accounts previously charged hereto. Concurrent charges shall be made to account 670 - Bad Debt Expense, for amounts applicable to utility operations, and to corresponding accounts for other operations. Records shall be maintained so as to show the write-offs of accounts receivable for each utility department.
- B. This account shall be subdivided to show the provision applicable to the following classes of accounts receivable:
  - Utility Customers
  - Merchandising, Jobbing and Contract Work Officers and Employees
  - Other
- Note A: Accretions to this account shall not be made in excess of a reasonable provision against losses of the character provided for.
- Note B: If provisions for uncollectible notes receivable or for uncollectible receivables from associated companies are necessary, separate subaccounts therefor shall be established under the account in which the receivable is carried.

# 2.1 Uncollectible accounts

- Customer accounts receivable reflect amounts billed but not received
  - Normal in business operations
- Uncollectible accounts are also a cost of business and recorded separately
  - Some percentage of customers will not (be able to) pay their water bills
  - Rate design and assistance programs may be helpful (see Part 5)

## Consequences of nonpayment by customers

- Growing arrearages and penalties
- Possible property liens (municipal utilities)
- Service termination (disconnection or "shut-off") absolute last resort

## Ratemaking issues

- Accounts receivable are amounts owed to the utility and a current asset
- Balance sheet provides for accounts receivables and a provision for accumulated uncollectible accounts (bad debt)
- Bad debt can be expensed (O&M) subject to review and approval (write-off)
- Revenue requirements can be "grossed up" to account for the effect of uncollectible accounts (see Part 4)

## Q. Where are some of the trends and issues related to uncollectible accounts?

# 2.1 York: accounts receivable (SEC)

Accounts Receivable and Contract	12 Months Ended	
Assets (Details) - USD (\$) \$ in Thousands	Dec. 31, 2021	Dec. 31, 2020
Accounts Receivable and Contract Assets [Abstract]		
Accounts receivable - customers	\$ 5,034	\$ 5,633
Other receivables	455	206
Accounts receivable	5,489	5,839
Less: allowance for doubtful accounts	(855)	(655)
Accounts receivable, net	4,634	5,184
Unbilled revenue	2,784	\$ 2,847
Change in accounts receivable - customers	(599)	
Change in other receivables	249	
Change in accounts receivable	(350)	
Change in allowance for doubtful accounts	(200)	
Change in accounts receivable, net	(550)	
Change in unbilled revenue	\$ (63)	

## 2.1 Deferred rate case expense (debit)

#### THE YORK WATER COMPANY

For the Year Ended December 31, 2018

(Company Name)

#### 221. DEFERRED RATE CASE EXPENSE SUPPORTING SCHEDULE Account No. 186.1

Please provide particulars regarding activity associated with the ending balance in Account No. 186.1 - Deferred Rate Case Expense.

		Total	Total			Unamortized
	Rate Case	Amount	Amount	Normalize.	Annual	Ending
Line	Docket No.	Claimed	Allowed	Period	Expense	Balance
No.	(a)	(b)	(c)	(d)	(e)	(f)
1	R-2018-3000019	759,500	310,864	36 months		310,864
2						
3						
4						
5						
6						
7						
8	TOTALS	759,500	310,864		-	310,864

## 2.1 Balance sheet: liabilities

#### THE YORK WATER COMPANY

For the Year Ended December 31, 2018

(Company Name)

#### 200. COMPARATIVE BALANCE SHEET LIABILITIES AND OTHER CREDITS

Line No.	Account Number and Title (a)	Schedule No. (b)	Balance Beginning of Year (c)	Balance End of Year (d)	Increase/ (Decrease) (e)
1	EQUITY CAPITAL & LIABILITIES		XXX	XXX	XXX
2	EQUITY CAPITAL	1	XXX	XXX	XXX
3	201.0 Common Stock Issued		81,471,319	83,574,663	2,103,344
4	202.0 Common Stock Subscribed	1.1			
5	203.0 Common Stock Liability for Conversion				
6	204.0 Preferred Stock Issued	1			
7	205.0 Preferred Stock Subscribed	1.1.1			
8	206.0 Preferred Stock Liability for Conversion				
9	207.0 Premium on Capital Stock				
10	209.0 Reduction in Par or Stated Value of Capital Stock				
11	210.0 Gain on Resale or Cancellation of Reacquired Capital Stock	1.11			
12	211.0 Other Paid-In Capital				
13	212.0 Discount on Capital Stock				
14	213.0 Capital Stock Expense		(2,269,968)	(2,269,968)	
15	214.0 Appropriated Retained Earnings	223			
16	215.0 Unappropriated Retained Earnings	223	40,667,290	45,709,977	5,042,687
17	216.0 Reacquired Capital Stock				
18	218.0 Proprietary Capital (proprietorships & partnerships	)			
19	TOTAL EQUITY CAPITAL		119,868,641	127,014,672	7,146,031

20	LONG-TERM DEBT	· · · · · · · · · · · · · · · · ·	XXX	XXX	XXX
21	221.0 Bonds	224	87,370,000	87,370,000	
22	222.0 Reacquired Bonds	224			
23	223.0 Advances from Affiliated Companies				
24	224.0 Other Long-term Debt	224	5,419,252	8,507,719	3,088,467
25	TOTAL LONG-TERM DEBT		92,789,252	95,877,719	3,088,467

THE YORK WATER COMPANY (Company Name)

For the Year Ended December 31, 2018

#### 200. COMPARATIVE BALANCE SHEET LIABILITIES AND OTHER CREDITS

Balances at Beginning of Year must	be consistent with balances at end of	previous year

(-1)		Schedule	Balance	Balance	
100	and the second second second	No.	Beginning	End of	Increase/
Line	Account Number and Title		of Year	Year	Decrease
No.	(a)	(b)	(c)	(d)	(e)
1	CURRENT AND ACCRUED LIABILITIES	· · · · · · ·	XXX	XXX	XXX
2	231.00 Accounts Payable	C 11	2,407,073	1,998,910	(408,163)
3	232.00 Notes Payable	225	1,044,445	1,029,879	(14,566)
4	233.00 Accounts Payable to Affiliated Companies	226			
5	234.00 Notes Payable to Affiliated Companies	227			
6	235.00 Customers' Deposits-Billing				
7	236.11 Accrued Taxes, Taxes Other Than Income	418	10,044	12,913	2,869
8	236.12 Accrued Taxes, Income Taxes	419-420	531,303	150,191	(381,112)
9	236.20 Accrued Taxes, Other Income & Deductions	419-420			
10	237.10 Accrued Interest on Long-term Debt		988,814	992,315	3,501
11	237.20 Accrued Interest on Other Liabilities	10 - 10 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1			
12	238.00 Accrued Dividends		1,891,760	1,999,344	107,584
13	239.00 Matured Long-term Debt	Sec. 2.			
14	240.00 Matured Interest	1. State 1.			
15	241.00 Miscellaneous Current and Accrued Liabilities	228	1.543.444	3.627.047	2,083,603
16	TOTAL CURRENT AND ACCRUED LIABILITIES	5 TT 1 1	8,416,883	9,810,599	1,393,716
17	DEFERRED CREDITS	r	xxx	xxx	XXX
18	251.00 Unamortized Premium on Debt	217			- 190101-
19	252.00 Advances for Construction	229	6,323,876	6,849,139	525,263
20	252.10 Accumulated Amortization of Advances for Construction		0,000,010	0,017,155	5451005
21	253.00 Other Deferred Credits	230	19,276,357	17.039.319	(2.237,038)
22	255.10 Accumulated Deferred Investment Tax Credit (Utility Operations)		617,725	578,478	(39,247
23			011,120	Sire, are	(argan)
	255.20 Accumulated Deferred Investment Tax Credit (Non-Utility Operations)				
24	255.20 Accumulated Deferred Investment Tax Credit (Non-Utility Operations) TOTAL DEFERRED CREDITS	-	26,217,958	24,466,936	(1,751,022)
24	TOTAL DEFERRED CREDITS				
24 25	TOTAL DEFERRED CREDITS OPERATING RESERVES		26,217,958 XXX	24,466,936 XXX	(1,751,022) XXX
24 25 26	TOTAL DEFERRED CREDITS OPERATING RESERVES 261.00 Property Insurance Reserve				
24 25 26 27	TOTAL DEFERRED CREDITS OPERATING RESERVES 261.00 Property Insurance Reserve 262.00 Injuries & Damages Reserve				
24 25 26	TOTAL DEFERRED CREDITS OPERATING RESERVES 261.00 Property Insurance Reserve				(1,751,022) XXX

31	CONTRIBUTIONS IN AID OF CONSTRUCTION (CIAC)	XXX	XXX	XXX
32	271.10 Customer Contributions	3,776,313	4,161,033	384,720
33	271.20 Developer Contributions	34,853,568	35,531,035	677,467
34	271.30 Grant(s) in Aid			
35	271.40 Other		10	
36	272.00 Accumulated Amortization			
27	TOTAL NET IGLICO	20 (20 001	20 (02 0(0	1 0 00 100
37	TOTAL NET (CIAC)	38,629,881	39,692,068	1,062,187
38	ACCUMULATED DEFERRED INCOME TAXES	38,629,881	39,692,068	1,062,187 XXX
38				
38	ACCUMULATED DEFERRED INCOME TAXES			
1	ACCUMULATED DEFERRED INCOME TAXES 281.00 Accelerated Amortization	XXX	xxx	xxx
38 39 40	ACCUMULATED DEFERRED INCOME TAXES 281.00 Accelerated Amortization 282.00 Liberalized Depreciation	XXX 36,393,401	XXX 36,685,020	XXX 291,619
38 39 40 41	ACCUMULATED DEFERRED INCOME TAXES 281.00 Accelerated Amortization 282.00 Liberalized Depreciation 283.00 Other	XXX 36,393,401 11,977,744	XXX 36,685,020 13,764,359	XXX 291,619 1,786,615

## 2.1 Advances for construction

#### THE YORK WATER COMPANY

For the Year Ended December 31, 2018

(Company Name)

#### 229. ADVANCES FOR CONSTRUCTION SUPPORTING SCHEDULE -Account No. 252.0

This schedule should include a breakdown of the accounts that constitute the ending balance in Account No. 252.0 - Advances for Construction.

		Balance at		Reductions		Balance at
Line	Account	Beg of Year	Additions	or Deletions	Adjustments	End of Year
No.	(a)	(b)	(c)	(d)	(e)	(f)
1	25200001 Builders Deposit	60,900	26,140	24,240		62,800
2	25200002 Meter Deposits	200	5,800	900		5,100
3	25200003 Developers Adv	5,956,924	1,606,273	1,087,395		6,475,802
4	25200100 Mt. Zion Adv	305,852		415		305,437
5						
6						
7						
8	TOTALS	6,323,876	1,638,213	1,112,950		6,849,139

## 2.1 York: customer advances for line extension

#### **Extension of Service to Bona Fide Service Applicant**

- 3.11.2 Upon written request by a bona fide service applicant, the Company shall construct a line extension within its certificated service territory consistent with the following:
  - (A) A line extension to a bona fide service applicant shall be funded without a Customer Advance where the annual revenue from the line extension will equal or exceed the Company's annual line extension costs.
  - (B) If the annual revenue from the line extension will not equal or exceed the Company's annual line extension costs, a bona fide service applicant may be required to provide a Customer Advance to the Company's cost of construction for the line extension, pursuant to a Main Extension Agreement. The Company's investment for the line extension shall be the portion of the total construction costs which generate annual line extension costs equal to annual revenue from the line extension. The Customer Advance amount shall be determined by subtracting the Company's investment for the line extension from the total construction costs.
  - (C) The Company's investment for the line extension shall be based on the following formula, where X equals the Company's investment attributed to each bona fide service applicant:
    - X = [AR OM] divided by [I + D]; and
    - AR = the Company's annual revenue from the customer
    - OM = the Company's operating and maintenance costs for the line extension
    - I = the Company's current debt ratio multiplied by the Company's weighted long-term debt cost rate
    - D = the Company's current depreciation accrual rate
  - (D) Two or more bona fide service applicants may join in a request for service with the AR and OM components of the above formula adjusted to reflect the number of applicants. Joint requests may include only bona fide service applicants to be subject to this rule. A joint request that includes any non bona fide service applicant shall be subject to Rule 3.11.4.

The Company shall require a bona fide service applicant to pay, in advance, a reasonable charge for service lines and equipment installed on private property for the exclusive use of the applicant.

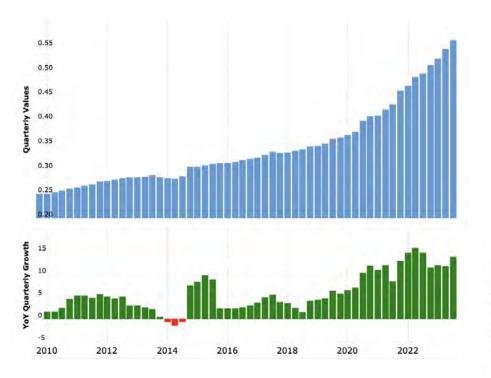
(C) Indicates Change

ISSUED: November 4, 1996

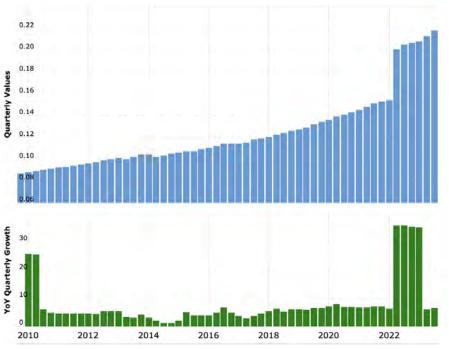
EFFECTIVE: January 3, 1997

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## 2.1 York: balance sheet over time



Total assets



Shareholder equity

## 2.1 York: common stock offering in 2022



## The York Water Company Announces Closing of its Common Stock Public Offering

April 05, 2022 10:11 ET | Source: The York Water Company

YORK, Pa., April 05, 2022 (GLOBE NEWSWIRE) -- The York Water Company ("York Water" or the "Company") (NASDAQ: YORW), a provider of water and wastewater utility services, today announced the closing of its previously-announced public offering of 975,600 shares of its common stock at a price to the public of \$41 per share. The net proceeds to York Water from the offering, after deducting the underwriting discounts and commissions and other offering expenses, are approximately \$38.2 million.

York Water intends to use the net proceeds from the offering for general corporate purposes, including our capital investment program, repayment of outstanding indebtedness, and potential acquisitions.

# 2.2 Capital planning and asset management

## Strategic planning (USEPA, 2003)

- A management concept that helps you address and prepare for both anticipated and unexpected problems
- Strategic planning utilizes asset management to evaluate your system's current physical situation, and it also evaluates your system's financial and managerial situation
- It requires you to make fundamental decisions about your water system's purpose, structure, and functions

## Asset management (USEPA, 2003)

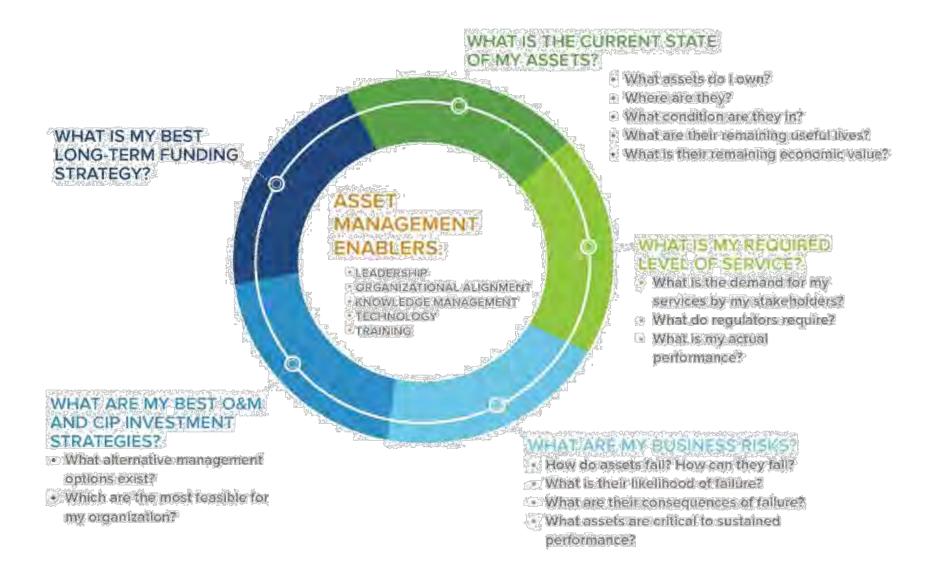
- A planning process that ensures that you get the most value from each of your assets and have the financial resources to rehabilitate and replace them when necessary.
- Asset management also includes developing a plan to reduce costs while increasing the efficiency and the reliability of your assets
- Successful asset management depends on knowing about your system's assets and regularly communicating with management and customers about a system's future needs

### Governmental Accounting Standards Board's Statement 34 (USEPA, 2003)

- Following GASB 34 standards requires publicly-owned water systems to report the value of infrastructure assets and the cost of deferred maintenance
- An accurate and up-to-date asset management plan will help systems comply
- Integrated resource planning (IRP) processes (energy and water)
  - Can be linked to certificates of need and prudence reviews

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# 2.2 Asset management framework (AWWA)

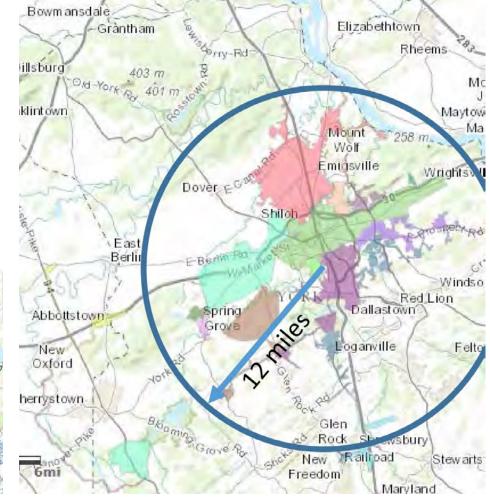


# 2.2 York: regional water system (J. Hines)

## Regional system

- ▶ 117 square miles
- One water treatment plant
- 21 repump systems (below)
- 29 booster stations
- 31 storage tanks
- ▶ 5 chlorine boosters
- Average distance from WTP to edge of service area is 12 miles
  - As the "pipe flows" about 15 miles





## 2.2 York: asset optimization plan (2021)

Table 1 - Water Main Replacements - LTHP Versus Actual for 2017-2021

Year	Projected Miles of Main to Be Replaced or Rehabilitated	Actual Miles of Main Replaced or Rehabilitated
2017	8	8.2
2018	8	9.5
2019	8	9.5
2020	8	10.6
2021	8	11.5

Table 2 - Replacement of Other Facilities - LTIIP Versus Actual for 2017-2021

Year	Services		Valves		Hyd	rants	Meters	
	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual
2017	1,054	1,483	215	120	64	62	3,155	3,088
2018	1,264	1,281	258	147	77	92	2,547	2,963
2019	1,264	498	258	194	77	85	2,636	2,210
2020	864	426	258	206	77	179	2,484	2,186
2021	784	586	258	286	77	94	2.815	3,022

Table 3 - Projected Budget for 2017, 2018, 2019, 2020 & 2021 Versus Actual

Expenditures (in thousands of dollars)

Group	Projected 2017	Actual 2017	Projected 2018	Actual 2018	Projected 2019	Actual 2019	Projected 2020	Actual 2020
Mains	4,524	2,670	4,493	3,760	5,410	5,396	9,384	8,882
Valves	670	613	817	860	900	1,312	1,145	1,432
Hydrants	239	177	244	306	249	282	304	605
Services	1,175	1,695	1,152	1,808	956	928	1,125	902
Meters	516	657	429	605	457	561	569	729
Group	Projected 2021	Actual 2021						
Mains	12,740	12,000					1	-
Valves	1,389	2,196				1		
Hydrants	310	400						
Services	1,125	2,402						
Meters	586	752						

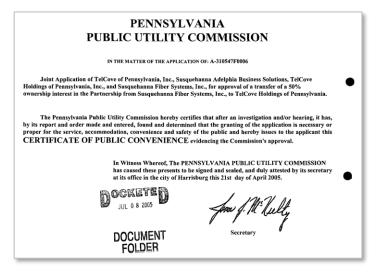
## 2.2 Infrastructure needs in the rate case

- York Water sought recovery of \$77 million in non-revenue producing capital expenditures, including the following major items:
- Replaced 40 miles of pipe. Replacement, reinforcement, and relining of aging water mains, replacement of service lines, meters, and hydrants. Nearly 40 miles of aging pipeline, about 4% of our total, was replaced which extends the life of our infrastructure, reduces costs associated with main breaks and leaks, and provides improved customer service and reliability.
- Enhanced security. System monitoring and computer system upgrades.
- Constructed a new pumping station. Construction of an untreated water pumping station on Lake Redman increases security, reduces costs, and provides redundancy during emergencies.
- Distribution system improvements. Improvements to standpipes and pumping equipment to ensure customers have a safe and reliable supply of water that meets current and proposed regulations.
- Improvements to dams. Construction projects required by the Department of Environmental Protection to ensure that the dams continue to be safe and effective for many years into the future.
- Upgrades to water and wastewater treatment equipment and facilities. These projects are necessary to maintain compliance with existing and proposed regulations and provide resiliency in operations.
- Source: York Water, "Statement of Reasons for the 2018 Rate Increase Request" (2018)



## 2.3 Certificates of need

- Major capital projects are subject to two separate forms of regulatory review
  - To ensure that projects are in the public interest over the long term, justified by forecasting and planning and identified gaps in need
  - Ex-ante certificate of need or certificate of public convenience [and necessity] to ensure that the project is needed – it should not constitute preapproval of spending (no blank checks)
  - > Ex-post prudence review of expenditures to ensure that the project is well executed
- Utilities may hold property (particularly land) for future use
  - If allowed in rate base, any gains from sales may be shared with ratepayers
- Sales forecasts for need and rates should be consistent not two stories
  - Rate case may be short-term focused
  - Capital planning may be long-term focused



# 2.4 Utility plant in service (USoA, 1996)

### • 101. Utility Plant in Service (USoA, 1996)

- A. This account is the control account for plant accounts 301 through 348.
- B. This account shall include the original cost of utility plant, included in the plant accounts prescribed herein and in similar accounts for other utility departments, owned and used by the utility in its utility operations, and having an expected life in service of more than one year from date of installation, including such property owned by the utility but held by nominees. Separate subaccounts shall be maintained hereunder for each utility department and/or division.
- C. The cost of additions to and betterments of property leased from others, which are includible in this account, shall be recorded in subdivisions separate and distinct from those relating to owned property (See Accounting Instruction 22).

### 103. Property Held for Future Uses (USoA, 1996)

This account shall include the original cost of property owned and held for future use in utility service under a definite plan for such use. There shall be included herein property acquired but never used by the utility in utility service, but held for such service in the future under a definite plan, and property previously used by the utility in utility service, but retired from such service and held pending its reuse in the future, under a definite plan, in utility service.



## 2.4 Utility plant in service (USoA, 1996)

#### Operational Functions

- 1. Intangible plant
- 2. Source of supply and pumping plant
- 3. Water treatment plant
- 4. Transmission and distribution plant
- 5. General Plant

#### Water Utility Plant Accounts

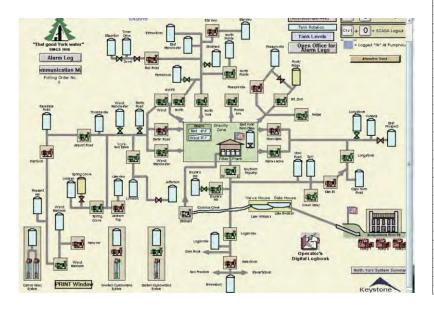
- 301. Organization
- 302. Franchises
- 303. Land and Land Rights
- 304. Structures and Improvements
- 305. Collecting & Impounding Reservoirs
- 306. Lake, River and Other Intakes
- 307. Wells and Springs
- 308. Infiltration Galleries and Tunnels
- 309. Supply Mains
- 310. Power Generation Equipment
- 311. Pumping Equipment
- 320. Water Treatment Equipment
- 330. Distribution Reservoirs & Standpipes

- 331. Transmission and Distribution Mains
- 333. Services
- 334. Meters and Meter Installations
- 335. Hydrants
- 336. Backflow Prevention Devices
- 339. Other Plant and Misc. Equipment
- 340. Office Furniture and Equipment
- 341. Transportation Equipment
- 342. Stores Equipment
- 343. Tools, Shop, and Garage Equipment
- 344. Laboratory Equipment
- 345. Power Operated Equipment
- 346. Communication Equipment
- 347. Miscellaneous Equipment
- 348. Other Tangible Plant

#### IPUMSU

## 2.4 Utility plant in service

Intangible plant	\$10,230	0%
Source of supply	\$26,896,359	8.1%
Water treatment	\$22,365,178	6.7%
Transmission and distribution	\$264,856,309	79.9%
General plant	\$17,458,127	5.3%
Total plant in service	\$331,586,193	100.0%



#### 201. UTILITY PLANT IN SERVICE - Account No. 101.0

Report by prescribed accounts the original cost of utility plant in service and the additions and retirements of such plant during the year.
 Do not include as adjustments, corrections to additions and retirements for the current or preceding year.
 Credit adjustments in Column (e) should be shown in red, or in black enclosed in parenthesis. State in a footnote the general character of any adjustments in Column (e).
 Subtity in a footnote, an explanation of amounts included in Columns (e) and/or (f), Line 34, for lowering or changing the location of mains.

2         301.10         Organiz           3         302.10         Franchi           4         339.10         Other P           5         Total         6           6         2         SOUlo Uher P           7         303.20         Land an           8         304.20         Structur           9         305.20         Calcel Lake, R           11         307.20         Wells and           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         33.20         Other P           17         Total         8           20         304.30         Structur           21         310.30         Power C           23         304.30         Structur           21         310.30         Other P           27         Total         333.40         Structur           21         310.30         Power C         333.40         Structur           31         30.40         Distrubu         34         331.40 <t< th=""><th></th><th>Balance</th><th></th><th></th><th></th><th>Balance</th></t<>		Balance				Balance
No.           1         1         INTAN           2         301.10         Organiz           3         302.10         Franchi           4         339.10         Other P           5         Total         6           7         303.20         Land an           8         304.20         Structur           9         305.20         Collect           10         306.20         Lake, R           11         307.20         Wells an           12         308.20         Infiltrati           309.20         Supply         14           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         18           3         WATE         2           310.30         Power C         2           21         310.30         Structur           23         303.30         Land an           23         303.40         Structur           23         303.40         Land an           30         304.40         Structur		Previous			Adjustments	End of
1         I INTAN           2         301.10         Organizi           3         302.10         Organizi           4         339.10         Other P           5         Total         Other P           6         2         SOUR           7         303.20         Land an           8         304.20         Structur           9         305.20         Collecti           10         306.20         Lake, R           11         307.20         Wells an           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power O           15         311.20         Pumpin           16         339.20         Other P           17         Total         303.30         Land an           20         32.03         Water         23           21         311.30         Power O         23           23         303.40         Bottrut         31           23         303.40         Meters :         333.40           23         314.0         Purspin           23 <td< td=""><td>Account Number and Title</td><td>Year</td><td>Additions</td><td>Retirements</td><td>+/-</td><td>Year</td></td<>	Account Number and Title	Year	Additions	Retirements	+/-	Year
1         I INTAN           2         301.10         Organizi           3         302.10         Organizi           4         339.10         Other P           5         Total         Other P           6         2         SOUR           7         303.20         Land an           8         304.20         Structur           9         305.20         Collecti           10         306.20         Lake, R           11         307.20         Wells an           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power O           15         311.20         Pumpin           16         339.20         Other P           17         Total         303.30         Land an           20         32.03         Water         23           21         311.30         Power O         23           23         303.40         Bottrut         31           23         303.40         Meters :         333.40           23         314.0         Purspin           23 <td< td=""><td>(a)</td><td>(b)</td><td>(c)</td><td>(d)</td><td>(e)</td><td>(f)</td></td<>	(a)	(b)	(c)	(d)	(e)	(f)
3         302.10         Franchii           4         339.10         Other P           5         Total           6         2         SOUR           7         303.20         Land an           8         304.20         Structur           9         305.20         Collection           10         306.20         Lake, R           11         307.20         Wells an           12         308.20         Infiltrating           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         Total           18         3         WATE           20         304.30         Structur           21         310.30         Power C           23         303.40         Durpin           23         303.40         Structur           20         304.30         Structur           21         313.30         Hower C           23         303.40         Distribu           333.40         Other P	NTANGIBLE PLANT	XXX	XXX	XXX	XXX	XXX
3         302.10         Franchi           4         339.10         Other P           5         Total         6         2         SOUR           7         303.20         Land an         8         304.20         Structur           9         305.20         Collection         10         306.20         Lake, R           11         307.20         Wells an         12         308.20         Infiltrating           13         309.20         Supply         14         310.20         Power C           15         311.20         Pumpin         16         339.20         Other P           16         339.20         Other P         17         Total         18         3         WATE           19         303.30         Land an         20         304.30         Structur         21         310.30         Power C           23         31.30         John Pumpin         23         320.30         Water         22         349.30         Instrum         26         350.30         Water         33         30.40         Structur         31         30.40         Structur         31         30.40         Structur         31         33.40		5,302				5,302
5         Total           6         -2         SOUL           7         303.20         Land an           8         304.20         Structur           9         305.20         Collect           10         306.20         Lake, R           11         307.20         Wells at           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         33.20         Other P           17         Total         8           20         304.30         Structur           21         310.30         Power C           22         311.30         Pumpin           23         30.30         Metr           23         30.30         Other P           23         30.30         Metr           310.30         Power C <td< td=""><td></td><td>4,918</td><td></td><td></td><td></td><td>4,918</td></td<>		4,918				4,918
5         Total           6         -2         SOUL           7         303.20         Land an           8         304.20         Structur           9         305.20         Collect           10         306.20         Lake, R           11         307.20         Wells at           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         33.20         Other P           17         Total         8           20         304.30         Structur           21         310.30         Power C           22         311.30         Pumpin           23         30.30         Metr           23         30.30         Other P           23         30.30         Metr           310.30         Power C <td< td=""><td>ther Plant and Miscellaneous Equipment</td><td></td><td></td><td></td><td></td><td>, , , , , , , , , , , , , , , , , , , ,</td></td<>	ther Plant and Miscellaneous Equipment					, , , , , , , , , , , , , , , , , , , ,
6         2         SOUR           7         303.20         Land an           8         304.20         Structur           9         305.20         Collecti           10         306.20         Collecti           13         309.20         Supply           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         303.20           18 <b>3</b> WATE           20         304.30         Structur           21         310.30         Power C           23         310.30         Power C           23         303.40         Structur           24         39.30         Ohter P           25         349.30         Instrum           26         350.30         Water           27         Total         311.40           30         304.40         Structur           31         310.30         Power C           32         311.40         Pumpin           333.40 <t< td=""><td>Total Intangible Plant</td><td>10,220</td><td></td><td></td><td></td><td>10,220</td></t<>	Total Intangible Plant	10,220				10,220
8         304.20         Structur           9         305.20         Collecti           10         306.20         Callection           11         307.20         Wells at           12         308.20         Lake, R           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumptin           16         331.20         Other P           17         Total         30           23         304.30         Structur           21         310.30         Power C           23         31.30         Structur           23         304.30         Structur           23         303.30         Land at           26         350.30         Water           27         Total         28         4           28         4         TRANS           29         303.40         Land an           310.30         Power C         23           311.40         Pumptin         333.40           333.40         Structur         333.40           333.40         Metras         333.40      <	OURCE OF SUPPLY AND PUMPING PLANT	XXX	XXX	XXX	XXX	XXX
9         305.20         Collecti           10         306.20         Lake, R           11         307.20         Wells and           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         Total           18 <b>3</b> WATE           20         304.30         Structur           21         310.30         Power C           23         310.30         Power C           23         304.30         Structur           23         30.30         Oster P           24         339.30         Oster P           25         349.30         Instrum           26         350.30         Wastew           27         Total         303.40           28 <b>4</b> TRANS           28         333.40         Structur           311.40         Transm           333.40         Services           333.40         Other P	and and Land Rights	2,015,249	3,010			2,018,259
9         305.20         Collecti           10         306.20         Lake, R           11         307.20         Wells and           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         30           20         304.30         Structur           21         310.30         Power C           23         310.30         Power C           23         310.30         Power C           23         310.30         Power C           23         30.30         Other P           24         339.30         Other P           25         349.30         Instrum           26         350.30         Wastew           27         Total         303.40           28         4         TRANS           23         311.40         Pumpin           333.40         Services           333.40         Other P           333.40         Other P      <	tructures and Improvements	9,168,151	5,812,990	1,738		14,979,403
11         307.20         Wells at           12         308.20         Infiltrati           13         309.20         Supply           14         310.20         Power C           15         311.20         Power C           16         331.20         Power C           16         339.20         Other P           17         Total         3           20         304.30         Structur           21         310.30         Power C           23         31.30         Structur           24         339.30         Other P           25         349.30         Instrum           26         350.30         Watte           27         Total         333.40           28         4         TRANS           29         303.40         Land an           310.30         Power C         333.40           333.40         Structur         31           310.30         Power C         333.40           333.40         Structur         31           333.40         Other P         4           333.40         Other           333.40         Ot	ollection and Impounding Reservoirs	4,640,397				4,640,397
12         308.20         Infiltrati           13         309.20         Supple           14         310.20         Puppin           14         310.20         Puppin           15         311.20         Pumpin           16         339.20         Other P           17         Total         18 <b>3</b> 18 <b>3</b> WATE         20           20         304.30         Structur         21           21         310.30         Power (         23           23         320.30         Water T         24           23         320.30         Water T         25           24         339.30         Other P           25         349.30         Instrum           26         350.30         Water           27         Total         30         304.40           28 <b>4</b> TRANS         333.40           28 <b>33</b> 3.40         Structur           31         30.30         Power (           33         33.40         Services           33         33.40         Other P           40         Total	ake, Rivers and Other Intakes	3,683,677				3,683,677
13         309.20         Supply 1           14         310.20         Power C           15         311.20         Pumpin           16         339.20         Other P           17         Total         Total           20         304.30         Land an           20         304.30         Structur           13         0.30         Power C           23         20.30         Watter           23         320.30         Watter           24         339.30         Other P           25         349.30         Other P           26         350.30         Watter           27         Total         30           28         4         TRANS           29         303.40         Add Structur           31         310.30         Power C           32         311.40         Pumerin           33         33.40         Structur           31         33.40         Other P           40         Total         33.40           29         33.40         Other S:           33.40         Other S:         33.40           33.30	/ells and Springs	50,350				50,350
14         310.20         Power (           15         311.20         Pumpin           16         339.20         Other P           17         Total           18 <b>3</b> WATE           19         303.30         Land an           20         304.30         Structur           21         310.30         Power (           23         31.30         Power (           23         339.30         Other P           24         339.30         Other P           25         349.30         Instrum           26         350.30         Water           27         Total         30           28 <b>4</b> TRANS         29           303.40         Land an         310.30           310.30         Power (         313.33.40           313.33.40         Other P         333.40           333.40         Destrubu         333.40           333.40         Other P         40           333.40         Other P         40           41 <b>5</b> GENE1         43           42         303.50         Land an           43         340.50	filtration Galleries and Tunnels					,
15         311.20         Pumpin           16         33.9.20         Ohr           17         Total         18 <b>3</b> 19         303.30         Land an         20         304.30         Structur           20         304.30         Structur         21         311.30         Power C           22         311.30         Power C         22         311.30         Power C           23         320.30         Water T         23         320.30         Water T           24         339.30         Other P         23         349.30         Instrum           26         350.30         Wastew         27         Total         30           28 <b>4 TRANS</b> 23         33.40         Dower C           28 <b>331.40</b> Power G         33.34.0         Structur           333.40         Dower C         33.34.0         Structur         33.34.0         Structur           33.36.40         Backho Ohter P         40         Total         4         30.4.50         Structur           41 <b>5 GENEL</b> 33.30.50         Structur           42	upply Mains	6,576,484	1,767,451			8,343,935
16         339.20         Other P           17         Total           18 <b>3</b> WATE           19         303.30         Land an           20         304.30         Structur           21         310.30         Power C           22         311.30         Power Q           23         320.30         Water           24         339.30         Other P           25         349.30         Instrum           26         350.30         Other P           27         Total         Total           28 <b>4 TRANS</b> 29         303.40         Structur           31         310.30         Power C           32         314.40         Pumpin           33         33.40         Other P           33         33.40         Other Si           33         33.40         Other Si           33         33.40         Other Si           33         30.40         Other P           41 <b>5</b> GENEI           42         30.350         Land an           33         Structur <td< td=""><td>ower Generation Equipment</td><td>1,479,036</td><td>1,033,115</td><td></td><td></td><td>2,512,151</td></td<>	ower Generation Equipment	1,479,036	1,033,115			2,512,151
16         392.00         Other P1           17         Total           18 <b>3</b> WATE           19         303.30         Land an           20         304.30         Structur           13         10.30         Power C           23         320.30         Water           24         339.30         Other P           25         349.30         Other P           24         339.30         Other P           25         349.30         Other P           26         350.30         Watew           27         Total         28           29         303.40         Add D           31         30.40         Dotter D           32         311.40         Pumpin           33         30.40         Distribu           33         33.40         Distribu           34         334.40         Meters :           33         33.40         Backflo           30         34.44         Meters :           33         30.45         Structur           43         30.45         Structur           43         341.50 <td< td=""><td>umping Equipment</td><td>5,867,401</td><td>546,678</td><td>29,866</td><td></td><td>6,384,213</td></td<>	umping Equipment	5,867,401	546,678	29,866		6,384,213
18         3         WATE           19         303.30         Land an           20         304.30         Structur           21         310.30         Power G           22         311.30         Pumpin           23         20.30         Water T           24         339.30         Other P           25         349.30         Instrum           26         350.30         Wastew           27         Total         28           29         303.40         Land an           30         304.40         Structur           31         310.30         Power G           23         314.40         Pumpin           33         30.40         Distribu           33         30.40         Structur           43         30.50         Land an           42         30.50         Structur           43	ther Plant and Miscellaneous Equipment					
19         303.30         Land an           20         304.30         Structur           21         310.30         Power C           22         311.30         Power C           22         311.30         Power C           23         320.30         Other P           24         339.30         Other P           25         349.30         Instrum           26         350.30         Water           27         Total         Total           28 <b>A TRANS</b> 29         303.40         Structur           31         310.30         Power C           32         314.00         Transm           33         33.40         Meters :           33         33.40         Meters :           33         33.40         Meters :           33         33.40         Other P           41         -5         GENEI           42         30.350         Land an           43         340.50         Other P           40         Total         -5           42         30.350         Land an           43 <td< td=""><td>Total Source of Supply and Pumping Plant</td><td>33,480,745</td><td>9,163,244</td><td>31,604</td><td></td><td>42,612,385</td></td<>	Total Source of Supply and Pumping Plant	33,480,745	9,163,244	31,604		42,612,385
20         304.30         Structur           21         311.30         Power (1)           22         311.30         Poumpin           23         320.30         Water T           24         339.30         Ohter T           25         349.30         Instrum           26         350.30         Wastew T           27         Total         28           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power (1)           32         331.40         Prumpin           333.40         Distribu         333.40           333.40         Other P         40           333.40         Other P           41         5         GENEL           43         304.50         Structur           43         3	VATER TREATMENT EQUIPMENT	XXX	XXX	XXX	XXX	XXX
21         310.30         Power G           22         311.30         Pumpin           23         320.30         Water T           24         339.30         Other P           25         330.30         Instrum           26         350.30         Wastew           27         Total         30           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power G           23         311.40         Pumpin           33         30.40         Distribu           34         31.40         Pumpin           35         33.40         Services           36         34.40         Mcters i           33         30.40         Distribu           39         39.40         Other P           40         Total         41           43         30.50         Structur           44         340.50         Structur           43         341.50         Transpo           46         342.50         Stones, S           47	and and Land Rights	26,734				26,734
22         311.30         Pumpin           23         320.30         Water           24         339.30         Other P           25         349.30         Instrum           26         350.30         Watew           27         Total         Total           29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           32         311.40         Pumpin           33         33.40.40         Structur           33         33.40         Distribu           34         334.40         Mcters :           33         33.40         Distribu           33         33.40         Other P           40         Total         41           41         5         GENEI           42         30.350         Land an           43         340.50         Structur           44         340.50         Structur           43         341.50         Transpo           46         342.50         Stores, S           48         344.50         Laboratt	tructures and Improvements	3,111,946	116,441	121,706		3,106,681
23         320.30         Water T           24         339.30         Ohstrum           25         349.30         Instrum           26         349.30         Instrum           27         Total         30.30           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           32         311.40         Pumpin           33         336.40         Distribu           33         336.40         Meters           33         336.40         Meters           33         33.40         Other P           40         Total         4           41         5         GENEL           43         304.50         Structur           43         304.50         Structur           43         341.50         Transpo           45         Stal.50         Structur           43         344.50         Laborat           44         344.50         Laborat           45         Stal.50         Structur           44 <td< td=""><td>ower Generation Equipment</td><td></td><td></td><td></td><td></td><td></td></td<>	ower Generation Equipment					
24         339.30         Other P           25         349.30         Instrum           26         350.30         Wastew           27         Total         Total           28         4.         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power G           23         311.40         Pumpin           33         330.40         Distribu           34         331.40         Presers           35         333.40         Services           36         334.40         Meters i           335.40         Backflo         39           39         39.40         Other P           40         Total         41           42         30.50         Structur           43         304.50         Structur           43         340.50         Chreat           44         340.50         Structur           43         341.50         Transpe           46         341.50         Totals           47         343.50         Totals           48	umping Equipment	74,628	3,656			78,284
25         349.30         Instrum           26         350.30         Wastew           27         Total         Total           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power G           32         311.40         Pumpin           33         330.40         Distribu           34         331.40         Transmi           35         334.40         Meters :           36         344.40         Meters :           33         30.40         Meters :           41         .50         Structur           42         30.350         Land an           43         340.50         Structur           44         340.50         Structur           45	/ater Treatment Equipment	19,396,617	544,883	18,091		19,923,409
25         349.30         Instrum           26         350.30         Wastew           27         Total         Total           28 <b>A TRANS</b> 29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           32         311.40         Pumpin           33         33.40.40         Distribu           36         334.40         Otters 1           36         334.40         Otters 1           33         30.40         Other P           41 <b>5 GENEI</b> 42         30.350         Land an           43         340.50         Otfrier           43         341.50         Transpo           44         340.50         Structur           43         342.50         Stores 2           44         344.50         Laborat	ther Plant and Miscellaneous Equipment					
27         Total           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           23         31.40         Pumpin           33         30.40         Distribu           34         331.40         Pomeric           35         334.40         Services           36         334.40         Meters at           37         335.40         Backflo           39         39.40         Other P           40         Total         Total           41         55         GENEH           42         303.50         Land an           43         304.50         Structur           43         341.50         Transpo           45         341.50         Transpo           46         342.50         Stores L           47         343.50         Tools, S           48         344.50         Laborat	strumentation					
27         Total           28         4         TRANS           29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           23         31.40         Pumpin           33         30.40         Distribu           34         331.40         Pomeric           35         334.40         Services           36         334.40         Meters at           37         335.40         Backflo           39         39.40         Other P           40         Total         Total           41         55         GENEH           42         303.50         Land an           43         304.50         Structur           44         340.50         Coffice F           45         341.50         Transpo           46         342.50         Stores L           47         343.50         Tools, S           48         344.50         Laborat	/astewater Treatment Equipment					
29         303.40         Land an           30         304.40         Structur           31         310.30         Power C           32         311.40         Pumpin           33         330.40         Distribut           34         331.40         Transmi           35         333.40         Services           36         334.40         Metro:           37         335.40         Hydrant           38         364.40         Metro:           39         39.40         Other P           40         Total           41         55         CENEI           42         303.50         Land an           43         304.50         Structur           43         304.50         Office F           43         43.40.50         Office F           45         341.50         Transpo           46         342.50         Storestur           47         343.50         Tools, S           48         344.50         Laborat	Total Water Treatment Equipment	22,609,925	664,980	139,797		23,135,108
30         304.40         Structur           31         310.30         Power Of           32         311.40         Pumpin           33         330.40         Distribu           34         331.40         Transm           35         334.40         Services           36         334.40         Meters at 335.40           38         356.40         Backflo           39         339.40         Other P           40         Total         Total           41         45         GENEH           42         303.50         Land at           43         340.50         Offree F           43         341.50         Transpo           46         342.50         Struetur           47         343.50         Tools, S           48         344.50         Laborat	RANSMISSION AND DISTRIBUTION PLANT	XXX	XXX	XXX	XXX	XXX
31         310.30         Power C           32         311.40         Pumpin           33         330.40         Distribulation           34         331.40         Transmi           35         333.40         Meters           36         34.40         Meters           36         334.40         Meters           37         335.40         Hydrant           38         36.40         Backho           39         394.00         Other P           40         Total         41           42         303.50         Land an           43         340.50         Office F           43         340.50         Office F           43         340.50         Structure           44         340.50         Office F           47         343.50         Transpo           48         344.50         Laborati	and and Land Rights	741,571	3,174			744,745
32         311.40         Pumpin           33         330.40         Distribut           34         314.01         Transm           35         333.40         Services           36         334.40         Meters:           37         335.40         Hydrant           38         36.40         Backflo           39         39.40         Other PI           40         Total         5           42         303.50         Land an           43         304.50         Structur           44         304.50         Other PI           44         340.50         Other Office F           45         341.50         Transpo           46         342.50         Storestru           47         343.50         Tools, S           48         344.50         Laborat	tructures and Improvements					
33         330.40         Distribu           34         331.40         Transmi           35         333.40         Services           36         334.40         Meters at           37         335.40         Hydrant           38         36.40         Backflo           39         39.40         Other P           40         Total         Total           42         303.50         Land an           43         304.50         Structur           44         340.50         Offree F           45         341.50         Transpo           46         342.50         Storestr           47         343.50         Tools, S           48         344.50         Laborat	ower Generation Equipment		203,539			203,539
34         331.40         Transmi           35         333.40         Services           36         334.40         Meters :           37         335.40         Hydrant           38         336.40         Backho           39         394.00         Other P           40         Total         -5           42         303.50         Land an           43         304.50         Structure           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores L           47         343.50         Tools, S           48         344.50         Laborat	umping Equipment	4,531				4,531
35         333.40         Services           36         334.40         Meters:         37           37         335.40         Hydrant         38           38         36.40         Backflo         39           39         339.40         Other PI         40           40         Total         41         5         GENEI           42         303.50         Land an         43         304.50         Structure           43         304.50         Office F         45         341.50         Transpo           46         342.50         Storest         48         344.50         Laborat           48         344.50         Laborat         48         344.50         Laborat	istribution Reservoirs and Standpipes	21,603,063	508,329			22,111,392
36         334.40         Meters a           37         335.40         Hydrant           38         336.40         Backflo           39         339.40         Other P           40         Total         Total           41         45         GENEH           42         303.50         Land an           43         304.50         Structure           43         340.50         Office F           43         340.50         Office F           43         344.50         Storestr           47         343.50         Tools, S           48         344.45         Laborat	ransmission and Distribution Mains	181,464,844	7,829,851	121,524		189,173,171
37         335.40         Hydrant           38         336.40         Backho           39         339.40         Other P           40         Total           41         .5         GENEI           42         303.50         Land an           43         304.50         Structure           44         340.50         Office F           45         341.50         Transpo           46         342.50         Storestr           47         343.50         Tools, S           48         344.50         Laborat	ervices	43,307,594	2,687,502	428,801		45,566,295
38         336.40         Backflo           39         339.40         Other PI           40         Total         41 <b>5</b> 41 <b>5 GENEJ</b> 42         303.50         Land an           43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Storest E           47         343.50         Tools, S           48         344.50         Laborat	leters and Meter Installations	19,104,296	888,969	581,050		19,412,215
39         339.40         Other P           40         Total           41         .5         GENER           42         303.50         Land an           43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores E           47         343.50         Tools, S           48         344.50         Laborat	ydrants	7,994,958	430,516	42,290		8,383,184
40         Total           41         .5         GENEI           42         303.50         Land an           43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores E           47         343.50         Tools, S           48         344.50         Laborat	ackflow Prevention Devices	454,711	42,045	2,016		494,740
41         .5         GENEI           42         303.50         Land an           43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores E           47         343.50         Tools, S           48         344.50         Laborate	ther Plant and Miscellaneous Equipment					
42         303.50         Land an           43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores F           47         343.50         Tools, S           48         344.50         Laborate	Total Transmission and Distribution Plant	274,675,568	12,593,925	1,175,681		286,093,812
43         304.50         Structur           44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores F           47         343.50         Tools, S           48         344.50         Laborate	ENERAL PLANT	XXX	XXX	XXX	XXX	XXX
44         340.50         Office F           45         341.50         Transpo           46         342.50         Stores F           47         343.50         Tools, S           48         344.50         Laborate	and and Land Rights	250,868				250,868
45         341.50         Transpo           46         342.50         Stores E           47         343.50         Tools, S           48         344.50         Laborate	tructures and Improvements	4,499,749	183,616	24,593		4,658,772
46         342.50         Stores E           47         343.50         Tools, S           48         344.50         Laborate	ffice Furniture and Equipment	9,170,373	458,313	26,431		9,602,255
47 343.50 Tools, S 48 344.50 Laborate	ransportation Equipment	1,459,423	268,279	138,491		1,589,211
48 344.50 Laborate		109,224				109,224
	ools, Shop and Garage Equipment	753,054	29,325	9,244		773,135
	aboratory Furniture & Equipment	60,150	4,297	1,555		62,892
49 345.50 Power (	ower Operated Equipment	131,283				131,283
50 346.50 Commu	ommunication Equipment	2,130,965	316,234			2,447,199
51 347.50 Miscella	liscellaneous Equipment	328,286	74,689			402,975
52 348.50 Other T	ther Tangible Plant					
53 Total	Total General Plant	18,893,375	1,334,753	200,314		20,027,814
54 TOTAI	OTAL WATER PLANT-IN-SERVICE	349,669,833	23,756,902	1,547,396		371,879,339

## 2.4 Plant materials and supplies

#### 214. PLANT MATERIALS AND SUPPLIES - Account No. 151.0

ummarize below by character (such as chemicals, fuel oil, valves, pipe, etc.) of materials and supplies, the balance Account No. 151.0 at the beginning and end of the year.

Important inventory adjustments during the year of materials and supplies account shall be explained, showing the class of
materials affected and the various classes of accounts (operating expenses, clearing accounts, plant accounts) debited or credited.

Line No.	Classification of Materials And Supplies (a)	Balance Beginning of Year (b)	Balance End of Year (c)	Increase (Decrease) (d)
1	Chemicals & Fuel Oil	92,834	92,308	(526)
2	Service Line Fittings	81,956	87,688	5,732
3	Mains & Accessories	211,134	255,409	44,275
4	Main Fittings & Meter Sets	228,477	152,251	(76,226)
5	Meter Boxes, Parts, & Pig Lead	81,938	77,283	(4,655)
6	Special Inventory	26,587	29,771	3,184
7	Fire Hydrants & Parts	173,728	163,840	(9,888)
8	Gasoline	8,967	17,019	8,052
9				
10				
11			2	
12				
13				
14		·····		
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26			-	
27				
28				
29				
30	Total	905,621	875,569	(30,052)

## 2.5 Contributed capital (CIAC)

#### Utility capital projects

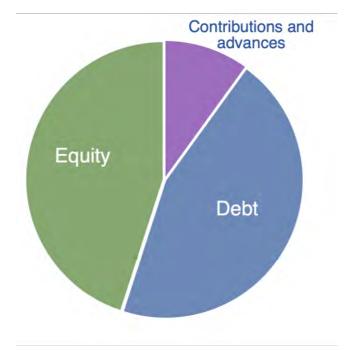
- Financed by investors and funded by ratepayers
- Utilities typically "own it" (equity) or "owe it" (debt)
- Capital for plant investment might also be supplied by others who are not investors
- May include contributions from customers or others including government grants
- Contributed capital is reported on the balance sheet, with differences between water and energy
- Assets financed by contributed capital may be depreciated, but recovery of this expense in rates is typically not allowed, which affects cash flow

## Contributions in aid of construction (CIAC)

- Non-refundable amounts provided to a utility to help finance construction of utility plant
- Come from developers or homeowners in the form of impact fees (see Part 5) but also government grants
- Unless exempt, taxes on CIAC are paid either by developers (with "gross-up") or ratepayers ("socialized")
- Water and energy differences in accounting

### Advances for construction are repayable

A form of interest-free financing



## 2.5 System development, capacity, or impact fees

- Development, capacity, or impact fees are used to support system-wide needs
  - Funding (revenues) that offset need for investor-financed capital (debt or equity)
  - Based on the concept that "growth should pay for growth" to protect existing ratepayers
  - More likely used by publicly than privately owned systems cause of rate disparity
  - May depend on economic development policies
- Regulated private utilities
  - Treated as a "contribution in aid of construction" and excluded from rate base
- Accounting rules and practices vary
  - Electric/Gas/Telephone deducted directly from plant book costs
  - ▶ Water/Wastewater a separate account deducted from the rate base (see Part 3)
- Non-private utilities
  - Might make certain capital expenditures (adding to assets) from current revenues, as recorded on the cash flow statement (see Part 4) – e.g., meters, service lines

### Q. How do private and non-private utilities differ in terms of contributed capital?

# 2.5 Contributed capital (i)

### 271. Contributions in Aid of Construction (USoA, 1996)

- A. This account shall include:
- I. Any amount or item of money, services or property received by a utility, from any person or governmental agency, any portion of which is provided at no cost to the utility, which represents an addition or transfer to the capital of the utility, and which is utilized to offset the acquisition, improvement or construction costs of the utility's property, facilities, or equipment used to provide utility services to the public.
- Amounts transferred from account 252 Advances for Construction, representing unrefunded balances of expired contracts or discounts resulting from termination of contracts in accordance with the Commission's rules and regulations.
- 3. Compensation received from governmental agencies and others for relocation of water mains or other plants.
- Any amount of money received by a utility, any portion of which is provided at no cost to the utility, which represents an addition or transfer to the capital of the utility and which is utilized to offset the federal, state or local income tax effect of taxable contributions in aid of construction, taxable amounts transferred from Account 252 - Advances for Construction, and taxable compensation received from governmental agencies and others for relocation of water mains or other plants shall be reflected in a sub-account of this account.

# 2.5 Ratemaking treatment of taxes on contributions

- ISSUE ¶40. Ratemaking treatment of income taxes on contributions in aid of construction (CIAC)
  - York maintained that it was permitted by the PUC to include taxes associated with CIAC and CAC [customer advances for construction] in rate base. If staff position is adopted, the reduction should be adjusted by net income taxes on CIAC and CAC (\$113,257).
  - Staff recommended that York use a gross-up method, under which it would charge all taxes associated with the contributions to the contributors, resulting in a reduction of \$240,768 to the rate base claim.
  - Under the terms of the settlement, within 30 days of a final disposition of the tariff supplement filing of PA-American Water, York shall file a tariff supplement consistent with the resolution in that proceeding of prospective cost responsibility for, and prospective ratemaking treatment of, income taxation of CIAC.
  - ▶ Update: Following appeal to PUC for reconsideration, gross-up is allowed.
  - The 2021 Infrastructure Investment and Jobs Act, restored the exemption from taxation of CIAC for water and wastewater although CIAC is still taxable for energy companies.

# 2.6 Funds for construction (AFUDC, CWIP)

- Two options for long-term (>1 year) plant construction one or the other
  - Allowance for funds used during construction (AFUDC)
  - Construction work in progress (CWIP) in the rate base
- Allowance for funds used during construction (AFUDC)
  - An amount added to construction work in progress (CWIP) to compensate the utility for the use of its funds (borrowed and equity) during the construction period for major capital projects and prior to their completion and inclusion of the assets in the rate base
  - Not used if construction work in progress is included in the rate base
- Construction work in progress (CWIP) in the rate base
  - Plant under construction but not yet completed and placed in service
  - ▶ Not considered used and useful but with exceptions.
  - Ratemaking treatment is determined by each jurisdiction
  - Historically is typically not included in the rate base
  - Recently, movement of including in rate base as incentive to invest

# 2.6 Funds for construction (USoA, 1996) (i)

- 105. Construction Work in Progress (CWIP) USoA, 1996)
  - A. This account shall include the total of balances of work orders for utility plant in process of construction but not ready for service at the date of the balance sheet.
  - B. Work orders shall be cleared from this account as soon as practicable after completion of the job. Further, if a project, such as pumping station or treatment plant, is designed to consist of two or more units which may be placed in service at different dates, any expenditures which are common to and which will be used in the operation of the project as a whole shall be included in utility plant in service upon the completion and the readiness for service of the first unit. Any expenditures which are identified exclusively with units of property not yet in service shall be included in this account.
  - C. Expenditures on research and development projects for construction of utility facilities are to be included in a separate subdivision in this account. Records must be maintained to show separately each project along with complete detail of the nature and purpose of the research and development project together with the related costs.

### • 420. Allowance for Funds Used During Construction (AFUDC) (USoA, 1996)

This account shall include concurrent credits for allowance for funds used during construction based upon the net cost of funds. used for construction purposes and a reasonable rate upon other funds when so used. Appropriate regulatory approval shall be obtained for "a reasonable rate" (See Accounting Instruction No. 19).

# 2.6 Allowance for funds used during construction (AFUDC)

- AFUDC is added to the amount of plant that is being capitalize
  - Includes the cost of funds used in the period of construction of utility plant
  - Non-private entities only consider interest cost

### Regulatory policy

- Regulators may require capital funding in the form of both short-term and long-term debt and also shareholder equity
- Capitalized amount is reflected in financial statements as other income, a reduction to interest expense, or both

## AFUDC determination

- Balances and debt rates are determined annually
- Return on equity is based on most current regulatory proceeding
- Many states follow the FERC formula for AFUDC
  - ▶ Electricity: Title 18 CFR Part 101, Electric Plant Instructions, § 3.17
  - Natural gas: Title 18 CFR Part 201, Natural Gas Instructions, § 3.17
  - Used for power plants and other long-term projects

## 2.6 Impact of AFUDC vs. CWIP (simplified)

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
AFUDC (no CWIP in rate base)										
Capitalized cost (cumulative)	\$1,000	\$2,070	\$3,215							
AFUDC (7%)	\$70	\$145	\$225							
Total CWIP	\$1,070	\$2,215	\$3,440							
Plant in service				\$3,440	\$3,440	\$3,440	\$3,440	\$3,440	\$3,440	
Accumulated depreciation				\$573	\$1,147	\$1,720	\$2,293	\$2,867	\$3,440	
Rate base				\$2,867	\$2,293	\$1,720	\$1,147	\$573	\$0	
ROR (7%)				\$201	\$161	\$120	\$80	\$40	\$0	
Depreciation expense				\$573	\$573	\$573	\$573	\$573	\$573	
Rate impact				\$774	\$734	\$694	\$654	\$613	\$573	\$4,042
CWIP in rate base										
Total CWIP	\$1,000	\$2,000	\$3,000							
Plant in service	\$1,000	\$2,000	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000	
Accumulated depreciation	\$0	\$0	\$0	\$500	\$1,000	\$1,500	\$2,000	\$2,500	\$3,000	
Rate base	\$1,000	\$2,000	\$3,000	\$2,500	\$2,000	\$1,500	\$1,000	\$500	\$0	
ROR (7%)	\$70	\$140	\$210	\$175	\$140	\$105	\$70	\$35	\$0	
Depreciation expense	\$0	\$0	\$0	\$500	\$500	\$500	\$500	\$500	\$500	
Rate impact of CWIP in RB	\$70	\$140	\$210	\$675	\$640	\$605	\$570	\$535	\$500	\$3,945

## 2.6 Construction work in progress (CWIP)

#### 204. CONSTRUCTION WORK IN PROGRESS - Account No. 105.0

1. Describe the particulars concerning utility plant in process of construction but not ready for service at end of Calendar Year.

2. Describe separately each work order that exceeds an estimated expenditure of \$250,000 or 1%, whichever is lessor, of the

book cost of utility plant at the beginning of the year. All other work orders may be grouped by nature of project.

			Estimate	Projected
	Description of Work	Balance	Total Cost of	In-Service
Line		End of Year	Construction	Date
No.	(a)	(b)	(c)	(d)
1	304 Building Structures	747,562	1,132,227	by 06/20
2	310 Power Generation	4,192	4,192	by 06/19
3	311 Pumping Equipment	141,206	634,116	by 06/20
4	320 Purification Equipment	169,882	490,150	by 12/19
5	330 Distribution Reservoirs and Standpipes	7,742	30,000	by 06/19
6	331 Mains and Accessories	2,200,304	6,859,000	by 12/19
7	333 Services	341,431	1,638,000	by 11/19
8	334 Meters	47,516	657,333	by 12/19
9	335 Fire Hydrants	95,063	345,000	by 12/19
10	340 Office Furniture & Equipment	11,872	244,000	by 12/19
11	341 Transportation Equipment	87,252	87,773	by 03/19
12	346 SCADA & Communication Equipment	24,681	45,000	by 06/19
13	347 Miscellaneous Equipment	11,636	20,000	by 06/19
14				
15	305 Work Order A10-050 - Lake Williams RCC Dam Armoring	389,219	5,000,000	by 12/21
16	305 Work Order A18-390 - Lake Williams Spillway Replacement	21,257	2,000,000	by 2/20
17				
18	311 Work Order A18-041 - Brillhart Pumping Station Pump Replacements	68,267	3,000,000	by 06/20
19				
20	330 Work Order A18-011 - Almoney Rd. Standpipe Replacement	4,320	900,000	by 2/20
21				
22	10520000 Retirement Work in Progress	239,162		
23				
24	TOTALS	\$4,612,564	\$23,086,791	

## 2.7 Asset valuation methods

#### Original cost less depreciation (observable)

- Regulatory standard of law and practice
- Plant in service is valued at its cost at the time that it was first placed into service and dedicated to public service
- Recording of original cost remains throughout the plant's life
- When plant is purchased from another utility, original cost remains the recorded value

### Reproduction cost (new) or replacement cost (practical)

- ▶ Reproduction cost assumes the same plant and equipment adjusted for inflation
- Replacement cost assumes updated or alternative plant and equipment
- Handy-Witman index of utility construction costs is used to trend historical costs to current reproduction cost
  - Result is adjusted to reflect percentage depreciated
  - Reproduction cost new less depreciation (RCND)
- Market value (theoretical)
  - Referred to as "present value" or "fair market value"
  - Based on a "market" appraisal which assumes a functional market

#### Q. How should the value of an asset transferred between utilities be recorded?

# 2.7 Original cost for determining the rate base

### Rate base Items – general principles (NRCAM, 2003)

- Many jurisdictions have adopted the concept of using the original cost of the plant or equipment to determine the value for the purposes of computing rate base.
- Under the original cost concept, the cost of the item at the time that it was first put into utility service is the cost that remains with that item throughout its life. If the asset is purchased during its life from another utility, the original cost carries with it, and any difference between it and the purchased price is booked as an acquisition adjustment (known as goodwill in non-utility industries).
- However, some jurisdictions have adopted other valuation methods, such as fair value, reconstruction costs, or replacement costs.
- The audit guidelines presume the use of original cost and do not specifically address auditing based on other valuation methods

#### Notable exceptions

- Arizona averages original cost and reproduction cost and lowers the authorized return
- Indiana can adjust either rate base or returns but outcomes vary, and appraised or fair value is being used for water acquisitions

**IPUMSU** 

## 2.7 Fair market value acquisitions

#### "Fair market value" defined

- As allowed by law and policy, the price paid by IOUs for publicly owned utility assets following appraisal and negotiation processes, which may diverge from book value – original cost of the assets net of depreciation
- Successfully challenged in Pennsylvania in 2023 (ongoing)
- Purchase prices above "value"
  - Historically, above-value "goodwill" (under GAAP) was used to address special circumstances
  - "Acquisition adjustments" above book have been allowed at the discretion of the regulator for private-to-private acquisitions considered in the public interest and benefitting ratepayers
  - "Fair market value" inflates asset value and the cost of service both buyer (IOU) and seller (city) want a higher sale price that will be paid by utility ratepayers



Source: Walden.



# 2.8 Acquisition adjustments (USoA, 1996)

## 114. Utility Plant Acquisition Adjustments

- A. This account shall include the difference between (a) the cost to the accounting utility of utility plant acquired as an operating unit or system by purchase, merger, consolidation, liquidation, or otherwise, and (b) the original cost, estimated, if not known, of such property, less the amount or amounts credited by the accounting utility at the time of acquisition to accumulated depreciation, accumulated amortization and contributions in aid of construction with respect to such property.
- B. This account shall be subdivided so as to show the amounts included herein for each property acquisition and the amounts applicable to each utility department and to utility plant in service and utility plant leased to others (See Accounting Instruction 21).
- C. The amounts recorded in this account with respect to each property acquisition shall be amortized, or otherwise disposed of, as the Commission may approve or direct.

# 2.8 Acquisition adjustments (NRCAM, 2003) (i)

- "Under the concept of booking all plant-in-service at original cost, any difference between the price paid for the utility plant and the original cost of that plant is booked as an acquisition adjustment.
- It is at the discretion of each jurisdiction as to whether or not the acquisition adjustment is included in the rate base, and often, that decision is made by the jurisdiction on a case-by-case basis.
- The auditor should look at each acquisition adjustment transaction and determine the circumstances for its existence.
  - Why did the utility pay above book for the property, and is there some benefit to ratepayers as a result of that transaction?
  - Will customers have better service as a result of the purchase by the utility, even if the utility did pay above book value for the property?
- As another option, some jurisdictions have allowed the amortization of the acquisition adjustment above the line, but have not allowed the unamortized balance to be included in rate base – thus splitting the risk of that transaction between ratepayers and the utility's shareholders"

## 2.8 York: acquisitions over time (1978-2018)

THE YORK WATER COMPANY AMORTIZATION OF ACQUISITION ADJUSTMENTS

Account 406

Company Acquired	Year Acquired	Acquisition Adjustment	Remaining Life of Assets When Acquired	2017 Annual Amortization	Unamortized Balance 12/31/17	2018 Annual Amortization	Unamortized Balance 12/31/18	2019 Annual Amortization	Unamortized Balarice 12/31/19	
Borough of Loganville										
Water Works	1978			-2,016.24	-14,476.64	-2,016.25	-12,460.39	-2,016.24	-10,444.15	
Lehr Water Company	1981			-192,95	-2,701.29		-2,508.34	-192.95	-2,315.39	
Pervale Water Company	1982	and the second	4.121	132.95	1,994.25			132.95	1,728.35	
Gleneagles Water Company	1983			-1.500.66	-16,282.16		-14,781.50	-1,500.66	-13,280.84	
Borough of New Salam	1.904			-12,093,77	-201,119.47	-12,093.77		-12,093,77	-176,931.93	
Hepplewhite Water Company	1985			222,08	3,997.44	222.08	3,775.36	222.08	3,553.28	
Heliam Borough Water Works	1985			-5,596,68		-5,596.68		-5,596.68	-154,356.31	
Mt View Walar Company	1986			-215,75	-4,099,33	-215.75		-215.75	-3,667.83	
Raintree Water Company	1986	-5,261.65	50.00	-138,46	-2,630.83	-138.46	-2,492.37	-138.47	-2,353.90	
Mid-Penn Water Works. Inc	1966	-30,102.99	41.45	-957.17	-11.916.76	-957.17	-10,959.59	-957.17	-10.002.42	
Briar Water Company	1990	-7,364.53	50.00	-176.35	-4,032.96	-175.35	-3,857,61	-175.35	-3,682.26	
Seven Valleys Borough Water Works	1994	-30,076,12	29.77	-1,166.92	-7,904.70	-1,166.92	-6,737.78	-1,166,92	-5,570.86	
Springfield Township Water Authority	1994	-69,956.61	45.07	-1.703,47	-37,590.72	-1,703.47	-35,887.25	-1,703.47	-34,183.78	
Thomas E. Starnick I/a Saginaw Water	1.994	19,701.53	33.22	674.29	6,890.00	674.29	6,215.71	674.29	5,541.42	
Nashville Water Company	1995	9,398.84	43.50	232,06	4,989.77	232.06	4,757.71	232.06	4,525.65	
East Prospect Borough Water Works	1995	-98,300.20	72.52	-1,414,07	-71,432.88	-1,414.07	-70,018.81	-1,414.07	-68,604.74	
Jefferson Borough Water Works	1996	-619,485,17	71.77	-6,878,34	-450,796.77	-8,878.34	-441,918.43	-8,878,34	-433,040.09	
Railroad Borough Water Works	1999	83,715.46	69.59	1,202,98	62,061.80	1,202.98	60,858.82	1,202.98	59,655.84	
Spring Grove Borough	2005	-513,621.35	k.	-9,369,23	-407,827.09	-9,369.23	-398,457,86	-9,369.23	-389,088.63	
Spring Grove Water Co.	2005	714,907.89	6- I.	17,390,12	518,544.44	17,390.12	501,154.32	17,390.12	483,764.20	
Abbottstown Borough Water	2007	+130,858,57		-2.029,78	-106,531.22	-2,029.76	-106,501.46	-2,029.76	-104,471.70	
Asbury Pointe	2008	-185,298.60	i.	-2,502.01	-162,780.54	-2,502.01	-160,278.53	-2,502.01	-157,776.52	
West Manheim Borough	2009	-1,440,361.44	ei.	-19,406,65	-1,265,701.60	-19,406.65	-1,246,294.95	-19,406.65	-1,226,888.30	
Beaver Creek Village	2009	-25,831.26	È.	-723,97	-19,979.17	-723.97	-19,255.20	-723.97	-18,531.23	
York Starview, LP	2012	35,897.34	r -	1.021.84	32,320.89	1,021.84	31,299.05	1,021,84	30,277.21	
Section A Water Corporation	2012	34,728.82	1	1,183.26	30,587-39	1,183.26	29,404.13	1,183.26	28,220.87	
Windy Brae Mobile Home Park	2013	-45,332,19		0.00	-45,332.19	0.00	-45,332.19	-381.39	-44,950.80	
Forest Lakes Water Assoc.	2014	-7,338.90	к. –	0,00	-7,338.90	0.00	-7,338.90	-72.72	-7,266.18	
Lincoln Estates MHP	2015	-77.185.59	i I	0.00	-77,185.59	0.00	-77,185.59	-776,83	-76,408.76	
The Meadows	2015	-158,817.90	i.	0,00	-158,817.90	0.00	-158,817.90	-934.66	-157,883.24	
Paradise Momes	2015	-27,866.11		0.00	-27,866.11	0.00	-27,866.11	-258.02	-27,608.09	
Newberry Farms MHP	2016	-57.32		0.00	-57.32	0.00	-57.32	-57.32	0.00	
Margaretta MHP	2016	55,508.BE	F	0,00	55,508.85	0.00	55,508.85	495.39	55,013.46	
CrestMew MHP	2016	19,100.12	1	0.00	19,100.12	0.00	19,100,12	184.45	18,915.67	
Westwood MHP	2018	-75,474.07	e	0,00	-75,474 07	0.00	-75,474.07	-633-85	-74,840.22	
Stockham's Village MHP	2017			0,00	17,369.38	0.00	17,369.38	224.16	17.145.22	
Wrightsville Borough Municipal Authority	2018	67,886.41				0.00	67,886.41		67,886.41	
		-3,292,572.33		-48.021.86	-2,594,061.55	-48,021.88	-2,478,153.26	-50,232,68	-2,427,920.58	

# 2.8 Acquisition adjustments in the rate case

- In total, the case resolved fourteen (14) acquisition adjustments
  - Five negative adjustments were excluded; three negative adjustments were included; three positive adjustments were excluded; three positive adjustments were included.
- ISSUE ¶30. Amortization of acquisition adjustments and costs related to lead service lines
  - The following amortizations of positive acquisition adjustments are specifically approved and are reflected in the Settlement's base rate allowance: York Starview (\$3,590 annual); Section A (\$3,473 annual); and Margaretta MHP. The amortization period is 10 years.
  - The following amortizations are specifically approved and are reflected in the Settlement's base rate allowance: legal and communication fees associated with lead testing and renewal (\$22,281 annual). The amortization period is 4 years.
  - The following amortizations are specifically approved and are reflected in the Settlement's base rate allowance: customer-owned lead service line replacement (\$67,174 annual for costs totaling \$244,695 incurred through August 2018). The amortization period is 4 years.

#### ISSUE ¶31. Negative acquisition adjustments

The Joint Petitioners agree that they will not propose, in this or any future proceeding, to amortize or otherwise pass through to ratepayers the difference between depreciated original cost and acquisition cost ("negative acquisition adjustment") with respect to five water and wastewater system acquisitions. The Joint Petitioners agree... that matters of "substantial public interest" exist with respect to such acquisitions, which justify this ratemaking treatment. The Joint Petitioners agree that agreement to these specific acquisitions cannot be construed as precedent.

## 2.8 Exercise: acquisition adjustments (n=14)

Treatment of York's recent acquisitions	Better for investors?	Better for ratepayers?
A. Three <i>positive</i> acquisition adjustments were <i>included</i> - York Starview (\$3,590) - Section A (\$3,473) - Margaretta Mobile Home Park		
B. Three <i>negative</i> acquisitions were <i>included</i> - Lincoln Estates (\$7,719) - The Meadows (\$15,882) - Westwood Mobile Home Park (\$7,547)		
C. Three <i>positive</i> adjustments were <i>excluded</i> - Crestview Mobile Home Park - Stockham's Village Mobile Home Park - West York Borough		
<ul> <li>D. Five negative acquisition adjustments were excluded</li> <li>Windy Brae Mobile Home Park</li> <li>Forest Lakes Water Association</li> <li>Paradise Homes Mobile Home Park</li> <li>Newberry Farms Mobile Home Park</li> <li>East Prospect Borough Authority (wastewater)</li> </ul>		

## 2.8 Exercise: acquisition adjustments (n=14)

Treatment of York's recent acquisitions	Better for investors?	Better for ratepayers?
A. Three <i>positive</i> acquisition adjustments were <i>included</i> - York Starview (\$3,590) - Section A (\$3,473) - Margaretta Mobile Home Park	Х	
B. Three <i>negative</i> acquisitions were <i>included</i> - Lincoln Estates (\$7,719) - The Meadows (\$15,882) - Westwood Mobile Home Park (\$7,547)		Х
C. Three <i>positive</i> adjustments were <i>excluded</i> - Crestview Mobile Home Park - Stockham's Village Mobile Home Park - West York Borough		Х
<ul> <li>D. Five negative acquisition adjustments were excluded</li> <li>Windy Brae Mobile Home Park</li> <li>Forest Lakes Water Association</li> <li>Paradise Homes Mobile Home Park</li> <li>Newberry Farms Mobile Home Park</li> <li>East Prospect Borough Authority (wastewater)</li> </ul>	Х	

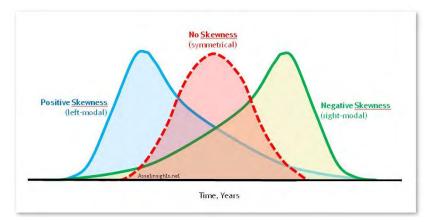
## 2.9 Plant service lives and depreciation

#### Service lives of plant assets

- The time between the date utility plant is placed in service, and the date of its retirement. If depreciation is accounted for on a production basis rather than on a time basis, then service life should be measured in terms of the appropriate unit of production
- Actual life will be affected by materials and geography-based environmental conditions
- Service value reflects difference between original cost and net salvage value of plant
- Obsolescence raises policy issues related to prudence, risk, and cost recovery

#### Analytical accounting tools

- Survivor curves (or "lowa curves") are used to model asset deterioration for remaining-life analysis to synchronize asset life with cost recovery,
- Mass asset grouping like water mains or power poles are depreciated using a group-life or vintage approach instead of by individual asset or component



## 2.9 Plant service lives

## 7-Utility plant service lives

Line no.	Item	End of 2018	End of 2017	End of 2016	Remaining recovery periods
1	Mains and accessories	190,679	182,927	176,068	11 to 86 years
2	Services, meters, and hydrants	74,178	71,183	68,510	18 to 52 years
3	Operations: structures, reservoirs, and water tank	61,868	53,610	46,494	9 to 59 years
4	Pumping and treatment equipment	32,575	29,814	29,459	8 to 31 years
5	Office, transportation, and operating equipment	13,531	12,787	12,360	3 to 24 years
6	Land and other non-depreciable assets	3,202	3,196	3,172	na
7	>Utility plant in service	376,033	353,517	336,063	
8	It four section and the sector of the				
9	Construction work in progress (CWIP)	4,751	12,250	7,349	
10			1		
11	>Total utility plant	380,784	365,767	343,412	

#### IPUMSU

## 2.9 Guidelines on useful life assets (USEPA, Watertrust)

		Component www.watertrust.org	<b>Useful Life</b>
<u>Ta</u> Years	<u>able 2-1 - Useful Life Matrix</u> Component	Wells and Springs	25 years 35 years
80 - 100 50 15 - 25 25 50 15 90 - 100	<u>Clean Water</u> Collections Treatment Plants - Concrete Structures Treatment Plants - Mechanical & Electrical Force Mains Pumping Stations - Concrete Structures Pumping Stations - Mechanical & Electrical Interceptors	Pumping Equipment         Disinfection Equipment         Hydropneumatic Tanks         Concrete and Metal Storage Tanks         Transmission Structures (Pipes)         Valves         Mechanical Valves         Computer Equipment/Software	5 years 10 years 30 years 35 years 35 years 15 years
50 - 80 60 - 70 15 -25 65 - 95 60 - 70 25 65 - 95	Drinking Water Reservoirs & Dams Treatment Plants - Concrete Structures Treatment Plants - Mechanical & Electrical Trunk Mains Pumping Stations - Concrete Structures Pumping Stations - Mechanical & Electrical Distribution	Transformers/Switchgears/Wiring         Motor Controls/Variable Frequency Drives         Sensors         Buildings         Service Lines         Hydrants         Chlorination Equipment         Transmission Mains         Lab/Monitoring Equipment	20 years 10 years 7 years 30 years 30 years 40 years 10 years 35 years
		Tools and Shop Equipment	15 years

Note: These expected useful lives are drawn from a variety of sources. The estimates assume that assets have been properly maintained.

Transportation Equipment 10 Years



## 2.9 Plant service lives and depreciation

## Depreciation (FERC USoA)

- Depreciation, as applied to depreciable service company property, means the loss in service value not restored by current maintenance. Among the causes to be used as consideration for causes of loss in service value are wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand and requirements of public authorities."
- Depreciation rates may be used to match cost recovery to useful service life
  - ▶ Depreciation is a means of temporal cost allocation not asset valuation
  - Utilities use depreciation studies to establish asset-specific rates smaller utilities may require standardized guidance and simplified methods
  - Composite depreciation rates reflect the weighted average service life of a single plant account, several plant account, or all depreciable plant of the utility
- Fully depreciated assets do not contribute to the rate base for ratemaking
  - For smaller utilities, return may instead be applied to O&M expenses (operating ratio)
- Depreciation expense provides cash flow for discretionary reinvestment
  - Municipal utilities can depreciate or implement asset management (GASB 34)

#### Q. Under what circumstances might an asset be retired earlier than its useful life?

# 2.9 Utility plant retirements (end of life)

## Abandonments (Deloitte, 2012)

- In the case of abandonment, regulators might permit recovery of all or partial costs as well as a return on investment
- Assets abandoned during a construction project must be removed from CWIP
- Recoverable cost of the abandoned asset must be recorded as a new regulatory asset
- A loss is calculated as the difference between net carrying value and the present value of the revenue stream provided for cost recovery and must be adjusted for tax effects

## Accounting for Asset Retirement Obligations

- Consistent with Accounting Standards Code 410-20 (FAS 143 issued June 2001), the FERC's rules requires that a jurisdictional entity recognize a liability for the fair value of an asset retirement obligation (calculated on a net present value basis) at the time the asset is constructed, acquired, or when a change in a law creates a legal obligation to perform the retirement activities
- Upon initial recognition of that liability, the business entity is to increase the cost of the asset that must be retired by the amount of the recognized retirement liability
- These capitalized asset retirement costs are then depreciated over the life of the asset. The Commission noted that the accounting called for in the rule produces the same results as the application of ASC 410-20

# 2.10 Accumulated depreciation

- Depreciation recognizes costs over the useful life of tangible (plant) assets
  - May correlate with changing value but is a method of cost recovery not valuation
  - Two methods: straight-line (same amount each period) or accelerated
  - Amortization is comparable but applies to intangible (non-plant) assets
- Accumulated depreciation is recorded on the balance sheet (account 108)
  - Annual depreciation expense is included in revenue requirements (see Part 3)
  - Sum of all past years' depreciation expense for a depreciable asset
  - May include estimated amounts for salvage or cost of removal
  - Reflected in the value of net plant on the balance sheet ("book value")

## Regulatory policy

- Regulatory and tax policy differences affect accounting and ratemaking
- Regulators may seek to allocate depreciation as equitably as possible over the period during which services are obtained from the asset's use (intergenerational equity)
- Shareholders are not allowed recovery of plant financed with contributed capital (CIAC) the depreciation expense is offset by amortization of the CIAC (water and wastewater utilities only)

# 2.10 Accumulated depreciation accounts (j)

- 108. Accumulated Depreciation (USoA, 1996)
  - A. This account shall reflect the depreciation accumulated on plant used in water utility service.
  - B. The utility shall maintain separate subaccounts corresponding with the depreciable plant accounts, in which the accumulated depreciation total is segregated.
- 110. Accumulated Amortization (USoA, 1996)
  - A. This account shall reflect the amortization accumulated on plant used in water utility service.
  - B. The utility shall maintain separate subaccounts corresponding with the amortizable plant accounts, in which the accumulated amortization total is segregated.

## 2.10 Exercise: accumulated depreciation

		Gross plant balance	Annual depreciation expense (straight)	Accumulated depreciation (balance sheet)	Net plant balance
1	Day one	\$100,000	\$0	\$0	\$100,000
2	End of year one	\$100,000	\$20,000	\$20,000	\$80,000
3	End of year two	\$100,000	\$20,000	\$40,000	\$60,000
4	End of year three	\$100,000	\$20,000	\$60,000	\$40,000
5	End of year four	\$100,000	\$20,000	\$80,000	?
6	End of year five	\$100,000	\$20,000	\$100,000	?

## 2.10 Exercise: accumulated depreciation

		Gross plant balance	Annual depreciation expense (straight)	Accumulated depreciation (balance sheet)	Net plant balance
1	Day one	\$100,000	\$0	\$0	\$100,000
2	End of year one	\$100,000	\$20,000	\$20,000	\$80,000
3	End of year two	\$100,000	\$20,000	\$40,000	\$60,000
4	End of year three	\$100,000	\$20,000	\$60,000	\$40,000
5	End of year four	\$100,000	\$20,000	\$80,000	? \$20,000
6	End of year five	\$100,000	\$20,000	\$100,000	? \$0

## 2.10 Accumulated depreciation

#### 205. ACCUMULATED DEPRECIATION OF UTILITY PLANT -Account Nos. 180.1, 180.2, 180.3 and 117.0

Report below an analysis of the changes in accumulated depreciation during the year and the amounts applicable to prescribed functional classifications.
 Explain and give particulars of important adjustments during the year.

		Account No.	108.1	108.2	108.3	117.0
			Utility	Utility Plant	Property Held	Operating Plant
			Plant In	Leased to	for	Pending
Line	Item	Total	Service	Others	Future Use	Reclassification
No.	(a)	(b)	(c)	(d)	(e)	(f)
1	Balance Beginning of Year	72,240,231	72,240,231			
2	Credits During Year	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
3	Depreciation Provisions charged to:	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
4	403. Depreciation	7,222,503	7,222,503			
5	413. Income from Utility Plant Leased to Others					
6						
7						
8						
9						
10	Total Depreciation Provisions	7,222,503	7,222,503			
11	Recoveries from Insurance					
12	Salvage Realized from Retirements	47,007	47,007			
13	Other Credits (Describe)					
14						
15	FAS 143	851,159	851,159			
16	Acquisition Accumulated Depreciation	63,265	63,265			
17						
18	Total Credits During Year	961,431	961,431			
19	Total Credits	8,183,934	8,183,934			
20	Debits During Year	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
21	Retirement of Utility Plant	1,526,945	1,526,945			
22	Cost of Removal	1,976,807	1,976,807			
23	Other Debits (Describe)					
24						
25						
26						
27						
28	Total Debits During Year	3,503,752	3,503,752			
29	Balance at End of Year	76,920,413	76,920,413			

Describe the basis upon which depreciation provisions for the year were determined and attach worksheets showing the computations made in arriving at the annual provisions.

# 2.11 Accumulated deferred income taxes

#### Accumulated deferred income taxes

- The portion of income taxes collected in rates but not yet payable to the IRS until a future date – recorded on the balance sheet as a liability
- Annual tax expenses are "normalized" & included in revenue requirement (see Part 3)

## Ratemaking issues

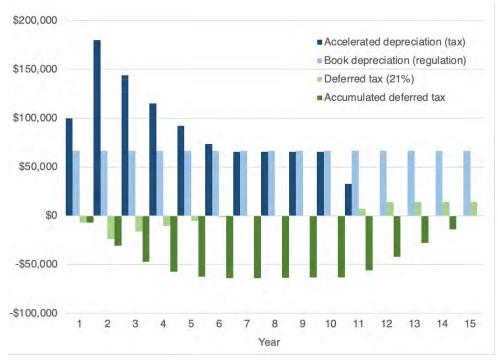
- Balance of the deferred income taxes are deducted from the rate base, under the theory that these funds were not provided by investors and thus ineligible to earn a return
- Balance of the deferred income taxes are treated as a cost-free (0.0% rate) element of the capital structure under the theory that these funds are available for the utility's use, without compensation to shareholders or bondholders
- Depreciation policies (including accelerated or bonus depreciation as well as the "repairs" deduction) are the biggest factors in deferrals
- Accelerated depreciation affects income taxes paid and changes to accumulated deferred income taxes

## 2.11 Accumulated deferred income taxes

Year	Accelerated depreciation (tax)	Book depreciation (regulation)	Timing difference	Deferred tax 21%	Accumulated deferred tax
1	100,000	66,667	(33,333)	(7,000)	(7,000)
2	180,000	66,667	(113,333)	(23,800)	(30,800)
3	144,000	66,667	(77,333)	(16,240)	(47,040)
4	115,200	66,667	(48,533)	(10,192)	(57,232)
5	92,160	66,667	(25,493)	(5,354)	(62,586)
6	73,728	66,667	(7,061)	(1,483)	(64,068)
7	65,536	66,667	1,131	237	(63,831)
8	65,536	66,667	1,131	237	(63,594)
9	65,536	66,667	1,131	237	(63,356)
10	65,536	66,667	1,131	237	(63,119)
11	32,768	66,667	33,899	7,119	(56,000)
12	0	66,667	66,667	14,000	(42,000)
13	0	66,667	66,667	14,000	(28,000)
14	0	66,667	66,667	14,000	(14,000)
15	0	66,667	66,667	14,000	0
	1,000,000	1,000,000			

# 2.11 Accumulated deferred income taxes

- Causes of timing differences in accounting (asynchronicity)
  - Depreciation life differences
    - IRS-specified life versus physical or technological life
    - Basis differences
      - Differences in what is recognized as a deferred cost or expense
    - Depreciation method differences
      - Straight line vs. accelerated (a tax incentive to provide a source of financial capital)
      - Results eventually reconcile



## 2.11 Exercise: deferred income taxes

#### Assumptions

- \$4,500 asset with straight-line depreciation
- Tax life = 3 years (\$1,500 per year depreciation expense)
- Book life = 5 years (\$900 per year depreciation expense)
- Tax rate = 21%

	IRS taxes	Book taxes for ratemaking	Current year deferred income taxes	Deferred income taxes balance
1	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$126
2	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$126 + \$126 = \$252
3	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$252 + \$126 = \$378
4	\$ 0 * 21% = \$ 0	\$900 * 21% = \$189	\$0 - \$189 = (\$189)	?
5	\$ 0 * 21% = \$ 0	\$900 * 21% = \$189	\$0 - \$189 = (\$189)	?

## 2.11 Exercise: deferred income taxes

#### Assumptions

- \$4,500 asset with straight-line depreciation
- Tax life = 3 years (\$1,500 per year depreciation expense)
- Book life = 5 years (\$900 per year depreciation expense)
- Tax rate = 21%

	IRS taxes	Book taxes for ratemaking	Current year deferred income taxes	Deferred income taxes balance
1	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$126
2	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$126 + \$126 = \$252
3	\$1,500 * 21% = \$315	\$900 * 21% = \$189	\$315 - \$189 = \$126	\$252 + \$126 = \$378
4	\$ 0 * 21% = \$ 0	\$900 * 21% = \$189	\$0 - \$189 = (\$189)	? \$378 + (\$189) = \$189
5	\$ 0 * 21% = \$ 0	\$900 * 21% = \$189	\$0 - \$189 = (\$189)	? \$189 + (\$189) = \$ 0

# 2.11 Investment tax credits (NRCAM, 2003) (i)

- Congress enacted the investment tax credit (ITC) for the first time in 1962 to encourage Investment in infrastructure
  - Inflation Reduction Act (2022) significantly expanded the Investment Tax Credit (Sec 48) for a broad range of renewable energy resources, including expanding the eligibility for the full ITC to certain projects such as energy storage
- ITCs were generally required to be amortized in equal increments over the economic life of assets
  - Some of the assets constructed during that period are still in service, and thus, the current revenue requirement may reflect a remaining balance related to earlier ITCs
- Utilities were generally required to select one of two options for regulatory treatment of ITCs
  - Option One: For ratemaking purposes, the rate base may be reduced by the unamortized ITC, but the net operating income may not be increased by the amortization of the ITC
  - Option Two: For ratemaking purposes, the net operating income may reflect the amortization of the ITC, but the rate base may not be reduced by any portion of the unamortized ITC (typical)
  - Option Three (expired in 1980): Allowed for the flow through of credits immediately as a reduction of current tax expense

# 2.12 Working capital

- Enterprises must spend money before they can make money
- Working capital ("circulating capital" Adam Smith)
  - Various rate base funding requirements other than the utility plant in service, such as inventories, prepayments, and cash working capital; investor-supplied funds are allowed in the rate base (Deloitte, 2012)
  - The measure of investor funding of daily expenditures and a variety of non-plant investments that are necessary to sustain ongoing operations of the utility until those expenditures can be recovered through revenues (NRCAM, 2003)
- Cash working capital is a subset of working capital
  - Funds needed to finance operations (Deloitte, 2012)
  - Can be positive (bank balance) or negative (bank line of credit)
  - May be investor or ratepayer-funded
- Different methods of measurement are used by utilities and regulators

Q. How do utilities utilize cash working capital?

## 2.12 Leading and lagging (asynchronous timing)

T1	Т2	тз	Т4	Т5	т6	Т6
Provide service	Provide service	Provide service	Provide service	Provide service	Provide service	Provide service
ightarrow $ ightarrow$ $ ightarrow$ $ ightarrow$ $ ightarrow$ $ ightarrow$	ightarrow $ ightarrow$ $ ightarrow$ $ ightarrow$ $ ightarrow$	Bill customers	Customer receipts	ightarrow $ ightarrow$ $ ightarrow$ $ ightarrow$ $ ightarrow$ $ ightarrow$	$\rightarrow$ $\rightarrow$ $\rightarrow$ $\rightarrow$	Bill customers
Pay wages	Pay wages	Pay wages	Pay wages	Pay wages	Pay wages	Pay wages
Pay for energy	Pay for energy	Pay for energy	Pay for energy	Pay for energy	Pay for energy	Pay for energy
Purchase chemicals	Pay for chemicals	$\rightarrow$				
$\rightarrow \rightarrow \rightarrow$	Purchase water	Pay for water	$\rightarrow$ $\rightarrow$ $\rightarrow$	Purchase water	Pay for water	$\rightarrow$ $\rightarrow$ $\rightarrow$

# 2.12 Cash working capital (NRCAM, 2003)

- Lead-lag study method expensive and time consuming but most common
  - Attempt to measure the actual time between a utility's out-of-pocket payment of expenses to provide service and the collection of revenues for service (cash flow).
  - The weighted average of the net lag days times the average daily expense yields a positive or negative cash working capital requirement.
- Formula (1/8<sup>th</sup>) method simple (smaller systems) but may lack accuracy
  - Assumes 45-day lag in revenues
  - ▶ 45/365 = 1/8th or 12.33% of O&M expenses excluding depreciation, taxes, and fuel
  - Complicated by the use of cost trackers

#### Balance-sheet method – based on standard accounting but complicated

- Net current asset method current assets less (-) current liabilities
  - Average current and accrued assets are compared to the current and accrued interest free liabilities. Used in traditional accounting circles and looks at the fact that all current assets must be financed, regardless of the financing method used.
- Overall balance-sheet method long-term liabilities less (-) long-term equity
  - Premise is that utility's return should be equal to the carrying cost of outstanding securities including common equity (noting and removing disallowed investments and non-utility ventures). If the rate base exceeds the return bearing capital, the difference between the two quantities is cost free capital. If the capitalization exceeds the rate base, the difference is the required cash working capital.

# 2.13 Operating reserve accounts

- Publicly owned and not-for-profit utilities operating as enterprises
  - Are required to maintain adequate financial reserves
  - Cooperatives may create capital credits to be returned to customers over time
  - Rate stabilization funds are a form of reserve to mitigate fluctuating sales
  - Reserves should be "ring-fenced" to prevent diverting funds to another purpose
- Operating reserves usually are not maintained for privately owned utilities
  - Comparable to customer advances and excluded from the rate base (Deloitte, 2012)
  - Investor-owned utilities may have retained earnings
- Operating reserves (Deloitte, 2012)
  - Represent advance provisions for the cost of service in the event of unanticipated future losses
  - When a reserve provision is allowed as part of cost of service, rates produce funds in advance of need
  - Since these cost-free funds may be used in supporting the rate base investment, they
    are frequently deducted from the rate base, although in rare cases the reserves are
    segregated and not deducted

## Q. What were York's operating reserves in 2018?

# 2.13 Factors affecting reserve practices (AWWA, 2018)

- Bond requirements for restricted debt-service or operating reserves
- Credit rating objectives related to unrestricted reserves
- Insurance requirements for reserves
- Budget contingencies or conservative budgets
- Rate structures, usage variability, and cash-flow seasonality
- Availability of multiple reserve accounts
- Availability and access to nonutility resources (e.g., general funds)

# 2.13 Cash-reserve policy guidelines (AWWA, 2018)

- Adequate operating reserves give utilities the ability to
  - Manage potential risks
  - Manage fluctuations in revenue
  - Meet working capital needs
  - Address unforeseen fiscal emergencies

## Types of reserves

- Operating reserves
- Capital reserves
- Equipment replacement
- Debt service
- Rate stabilization
- Special purpose
- Emergencies
- Reserve policies should be reviewed every three to five years

# 2.13 Some reserve level recommendations (AWWA, 2018) (i)

- Water Environment Federation (WEF)
  - One to three months of operating costs
  - Depending on the instability or unpredictability of revenues and expenses
- International City/County Management Association (ICMA)
  - One to two months of expenses
  - Depending on the utility's size, the challenges it faces, and the availability of special reserves for rate stabilization or emergency purposes

### Government Finance Officers Association (GFOA)

- No less than 45 days of expenses
- Recommends using annual operating expenses, including depreciation expenses
- If, however, annual depreciation expenses are significantly more or less than the anticipated capital outlays of the next period to be paid from working capital, consideration should be given to adjusting the benchmark
- An appropriate adjusted benchmark may be annual operating expenses, annual depreciation expense plus capital outlays of the next period paid from working capital

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# 2.13 Coverage-ratio methods for reserves

- Coverage ratios
  - Applied by lenders (such as RUS and CoBank) and credit rating agencies
  - Coverage amount is retained in fund balance and cannot be spent or transferred
- Debt-service coverage ratio (DSCR or DCR)
  - Net operating income (NOI) divided by debt service (principal plus interest expense)
  - A multiple of debt service (principal plus interest) (e.g., x = 1.25)
- Times-interest-earned ratio (TIER or TIE) method
  - Net operating income (NOI) divided by interest expense
  - A multiple of interest expense (e.g., x = 2.00)
- For the use of coverage in setting the utility's revenue requirements, see Part 4

## 2.13 Exercise: coverage (reserves) for non-private utilities

	Debt service coverage ratio (DSCR) method to determine revenues and reserves	Example	
1	Principal payments	\$1,762,829	
2	+ Interest expense	\$8,814,144	
3	= Debt service amount (DS) (line 1 + line 2)	?	
4	* Debt service coverage ratio ( <i>x</i> )	1.25	
5	= Coverage required from income = 1.25 * DS	?	
6	Income excess (+) or deficiency (-) due to changing expenses	(\$2,302,961)	
7	Coverage net of income excess or deficiency (line 5 + line 6)	?	
8	Coverage ratio (before any rate change) (line 7/line 3)	?	

## 2.13 Exercise: coverage (reserves) for non-private utilities

	Debt service coverage ratio (DSCR) method to determine revenues and reserves		Example
1	Principal payments		\$1,762,829
2	+ Interest expense		\$8,814,144
3	= Debt service amount (DS) (line 1 + line 2)	?	\$10,586,973
4	* Debt service coverage ratio ( <i>x</i> )		1.25
5	= Coverage required from income = 1.25 * DS	?	\$13,233,716
6	Income excess (+) or deficiency (-) due to changing expenses		(\$2,302,961)
7	Coverage net of income excess or deficiency (line 5 + line 6)	?	\$10,930,755
8	Coverage ratio (before any rate change) (line 7/line 3)	?	1.03



# 2.14 Regulatory assets and liabilities

- Regulatory assets and regulatory liabilities and the rate base
  - Allowed pursuant to applicable accounting standards and regulatory policies
  - International financial reporting standards (IFRS) in this area are evolving
  - Regulatory assets are often deferred expenditures may or may not be included in rate base

#### Regulatory assets

- May be "recovery of" or "recovery of and on" based on policy ("contingent")
- Recorded on utility's financial statements based on either a commitment by the regulator or reasonable expectation that the cost will be recovered in rates, such as (Deloitte, 2012)
  - Uninsured storm losses
  - Losses from early retirement of major plant assets not provided for in depreciation
  - Expenses of rate case (typically recoverable and may be included in the rate base)
  - Costs of an abandoned construction project
  - Infrequent maintenance expenditures
  - Environmental clean-up costs

#### Regulatory liabilities

- Recorded on utility's financial statements based on the actions of the regulator requiring amounts be paid or refunded by the utility, such as (Deloitte, 2012)
  - Overcharges refunded to customers
  - Insurance recoveries
  - · Gains on sale of utility plant
  - Fuel-cost adjustments (asset or liability)

# 2.14 Regulatory assets in the COVID-19 context

- Pennsylvania PUC Secretarial Letter on COVID-19 Cost Tracking (May 13, 2020)
- I. COVID-19 Expense Tracking/Loan and Grant Tracking
  - The Commission hereby directs all jurisdictional electric, natural gas, water, wastewater, steam and telecommunications utilities to track extraordinary, nonrecurring incremental COVID-19 related expenses and to maintain detailed accounting records of such expenses.
  - Utilities must maintain detailed records of the incremental expenses incurred for the provisioning of utility services used to maintain the health, safety and welfare of Pennsylvania customers during the COVID-19 pandemic.
  - With the exception of the separate regulatory authorization afforded uncollectible expenses below, this Secretarial Letter does not grant authorization for utilities to defer any other potential COVID-19 related expenses.
  - Utilities shall also track any loans, grants, assistance or benefit they receive in connection with COVID-19, regardless of form or source, that would offset any COVID-19-related expenses.
- II. Regulatory Asset for COVID-19 Uncollectible Expenses Resulting from Compliance with the Emergency Order
  - The Commission recognizes that compliance with its Emergency Order may increase uncollectible expenses for utilities.
  - Consequently, the Commission authorizes [regulated] utilities to create a regulatory asset for any incremental uncollectible expenses incurred above those embedded in rates since the issuance of the Emergency Order.
  - In order to be eligible for inclusion in a utility's COVID-19 designated regulatory asset, the utility must maintain detailed records of the incremental extraordinary, nonrecurring expenses incurred as a result of compliance with the Emergency Order, as outlined in Part I of this Secretarial Letter.

## 2.14 Regulatory assets and liabilities $({\rm i})$

 ASC 980. Rate actions of a regulator can provide reasonable assurance of the existence of an asset

- An enterprise shall capitalize all or part of an incurred cost that would otherwise be charged to expense if both of the following criteria are met:
  - It is probable that future revenue in an amount at least equal to the capitalized cost will result from inclusion of that cost in allowable costs for ratemaking purposes
  - Based on available evidence, the future revenue will be provided to permit recovery of the
    previously incurred cost rather than to provide for expected levels of similar future costs. If
    the revenue will be provided through an automatic rate adjustment clause, this criterion
    requires that the regulator's intent clearly be to permit recovery of the previously incurred
    cost.

### NARUC Uniform System of Accounts (USoA)

- Regulatory assets and liabilities arise from specific revenues, expenses, gains or losses that would have been included in determination of net income in one period under the general requirements of the [USoA] but for it being probable that;:
  - Such items will be included in a different period(s) for purposes of developing the rates the utility is authorized to charge for its utility services; or
  - In the case of regulatory liabilities, that refunds to customers, not provided for in other accounts, will be required. Regulatory assets and liabilities can also be created in reconciling differences between the requirements of generally accepted accounting principles, regulatory practice and tax laws.

# 2.14 Regulatory assets and liabilities (i)

### 186.3 Regulatory Assets (USoA, 1996)

- A. This account shall include the amounts of regulatory-created assets, not included in other accounts, resulting from the ratemaking actions of regulatory agencies. (See Definition 27.)
- B. The amounts included in this account are to be established by those charges which would have been included in net income determination in the current period under the general requirements of the Uniform System of Accounts but for it being probable that such items will be included in a different period(s) for purposes of developing the rates that the utility is authorized to charge for its utility services. When specific identification of the particular source of a regulatory asset cannot be made, such as in plant phase-ins, rate moderation plans or rate levelization plans, Account 407.5 Amortization of Regulatory Liabilities shall be credited. The amounts recorded in this account are generally to be charged, concurrently with the recording of the amount in rates, to the same account that would have been charged if included in income when incurred, except all regulatory assets established through the use of Account 407.5 shall be charged to Account 407.4 Amortization of Regulatory Assets, concurrent with the recovery of the amounts in rates.
- C. If rate recovery of all or part of an amount included in this account is disallowed, the disallowed amount shall be charged to Account 426 - Miscellaneous Nonutility Expenses, or Account 434 - Extraordinary Deductions, in the year of the disallowance.

# 2.14 Regulatory assets and liabilities (i)

### 253.1 Regulatory Liabilities (USoA, 1996)

- A. This account shall include the amounts of regulatory liabilities, not included in other accounts, imposed on the utility by the ratemaking actions of regulatory agencies. (See Definition 27) The amounts to be included in this account are to be established by those credits which would have been included in net income determinations in the current period under the general requirements of the Uniform System of Accounts but for it being probable that: 1) such items will be included in a different period(s) for purposes of developing rates that the utility is authorized to charge for its utility services; or 2) refunds to customers, not provided for in other accounts, will be required.
- When specific identification of the particular source of the regulatory liability cannot be made or when the liability arises from revenues collected pursuant to tariffs on file with a regulatory agency, account 407.4 - Amortization of Regulatory Assets, shall be debited.
- The amounts recorded in this account generally are to be credited to the same account that would have been credited if included in income when earned except: 1) all regulatory liabilities established through the use of account 407.4 shall be credited to account 407.5 -Amortization of Regulatory Liabilities; and 2) in the case of refunds, a cash account or other appropriate account should be credited when the obligation is satisfied.
- B. If it is later determined that the amounts recorded in this account will not be returned to customers through rates or refunds, such amounts shall be credited to Account 421 -Nonutility Income, in the year such determination is made.
- C. The records supporting the entries to this account shall be so kept that the utility can furnish full information as to the nature and amount of each regulatory liability included in this account, including justification for inclusion of such amounts in this account.

### 2.15 Deriving the rate base

#### Rate base is a regulatory construct

 "Determination of the rate base, the value of a utility's property used and useful in the public service minus accrued deprecation, is one of the most important and most difficult problems confronting both the commissions and the utilities" (*The Regulation of Public Utilities,* Charles Phillips, Jr.)

#### Defining and deriving the rate base

- The total of the investor funded or supplied plant, facilities, and other investments used by the utility in providing services to its customers – it is the investment base to which a fair rate of return is applied to arrive at the net operating income requirement (i.e., amount of authorized return) (NRCAM, 2003)
- Rate base is also known as the "regulatory asset base"
- Investors expect to receive
  - A "return of" their investment (rate base) in the form of depreciation expense (see Part 3)
  - A "return on" the invested rate base (see Part 4)

# 2.15 Deriving the rate base

- Balance sheet data inform the derivation of the rate base
  - Balance sheet account data inform the determination of the rate base
  - Some items may not be directly reflected in the rate base but instead included in working capital (and eligible for returns)
- Investment is funded by shareholders or debt holders
  - Are entitled to earn returns (of and on) only on investor-supplied funds
- Rate base represents investments that are eligible for cost recovery
  - Necessary for the provision of service (used and useful to ratepayers) and prudent
  - Without regulatory oversight, investor-owned utilities may be prone to overinvestment
- What is included in the rate base is a matter of regulatory policy and discretion
  - Commissions may allow return of regulatory assets as well as a return on assets
- Note on York
  - York was the only Pennsylvania utility not seeking to include lead service line replacements in their rate base

# 2.15 Rate base issues

- Assets normally are valued at original cost less depreciation vs. fair market value
  - Plant financed using contributed capital is typically excluded from the rate base
  - Contributed capital is excluded
- Plant held for future use
  - Plant owned and held for a future purpose but not (yet) used and useful

### Construction costs

- Allowance for funds used during construction (AFUDC)
- Construction work in progress (CWIP) in rate base
- Negative rate base
  - Results from allowing a depreciation expense in rates for contributed capital without an offsetting credit and an investor-funded rate base (see Part 3)

imated Rate Base*	
12/	As of 31/2023
Net Utility Plant	\$25.3
Less	
Advances for Construction	\$0.3
CIAC – Contributions in Aid of Construction	\$1.5
Net Deferred Income Taxes	\$3.8
	\$5.6
Total Estimated Rate Base	\$19.7

# 2.15 Standards applied to rate-base investments

#### Used and useful

 Rate base investments must be currently functioning, providing service, necessary, beneficial to ratepayers, and not excessive

#### Prudent

- Along with usefulness, addresses the propensity of utilities toward rate base investment and even treatment of operating expenditures
- Prudence is sound decision-making, judged in the context of known information and without micromanagement by the regulator or hindsight
- Plant in service may be used and useful but not prudent (e.g., placing in service a technology that will soon be obsolete)

#### Economical (efficient)

- Operational economies should be relatively comparable to competitive entities, taking service obligations and standards into account
- Not excessive in terms of size or capacity, taking scale economies of construction into account with the context of a long-term capital plan
- No "gold plating" or extravagant facilities or inefficient choice of capital over labor (known as the Averch-Johnson or AJ effect)

#### Fairly determined

- Cost results from a fair and arms-length transaction
- No inappropriate transactions with affiliated companies

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# 2.15 Generally included/allowed in the rate base (additions)

- Assets not yet depreciated or amortized
- Construction work in progress (CWIP)
- Plant held for future use
- Plant in service but not yet classified
- Miscellaneous deferred assets (debits)
- Acquisition adjustments ("goodwill")
- Prepayments (may be averaged)
- Fuel stock inventory
- Materials and supplies inventory (may be averaged)
- Unamortized rate case expense
- Pending collections from cost trackers
- Investor-funded (cash) working capital
- Regulatory assets (e.g., deferred disaster expenses)

### 2.15 Generally excluded/disallowed from the rate base (deductions)

- Plant that is deemed unnecessary or imprudent (including excess capacity)
- Assets already depreciated or amortized (accumulated amounts)
- Accumulated deferred income taxes
- Plant that is unrelated to regulated services
- Governmental grants for capital projects
- Customer contributions (non-investor supplied capital)
- Unamortized income tax credits
- Pending refunds from cost trackers
- Customer deposits and customer advances
- Ratepayer-funded (cash) working capital
- Regulatory liabilities (e.g., refund of unapproved rates or charges)

#### Q. Why should government grants be excluded from the rate base?



## 2.15 Poll: included in the rate base

- Which of the following is *not* included in the rate base?
  - A. Contributions in aid of construction (CIAC)
  - B. Materials and supplies
  - c. Cash working capital
  - D. Regulatory assets

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## 2.15 Illustration of rate base adjustments (NRCAM, 2003)

#### **Example Computation of Rate Base**

	Company Books	Company Adjustments	Company As Adjusted	Staff Adjustments	Staff As Adjusted
Plant in Service	\$1,018,148,893	\$178,432,801	\$1,196,581,694	(\$7,163,680)	\$1,189,418,014
Plant Held for Future Use	930,274	0	930,274	(678,985)	251,289
Misc. Deferred Debits	13,770,053	142,108	13,912,161	(8,014,433)	5,897,728
Acquisition Adjustment	23,758,411	0	23,758,411	0	23,758,411
Prepayments	4,717,479	0	4,717,479	(874,544)	3,842,935
Fuel Stock	6,838,332	879,042	7,717,374	0	7,717,374
Materials and Supplies	14,772,467	0	14,772,467	270,502	15,042,969
Working Capital	2,909,838	578,401	3,488,239	(230,872)	3,257,367
Rate Base Additions	\$1,085,845,751	\$180,032,352	\$1,265,878,103	(\$16,692,012)	\$1,249,186,091
Accumul. Depreciation	379,123,702	\$1,764,842	380,888,544	(175,566)	380,712,978
Accumul. Amortization	12,311,595	0	12,311,595	0	1,2311,595
Accumulated DIT	67,390,960	678,421	68,069,381	(66,469)	68,002,912
Unamortized ITC	5,896,865	0	5,896,865	0	5,896,865
Customer Advances	6,176,892	0	6,176,892	0	6,176,892
Customer Deposits	0	0	0	818,502	818,502
Rate Base Deductions	\$470,900,014	\$2,443,263	\$473,343,277	\$576,467	\$473,919,744
TOTAL RATE BASE	\$614,945,737	\$177,589,089	\$792,534,826	(\$17,268,479)	\$775,266,347

### 2.15 Exercise: deriving the rate base

	Item	Amount
1	Plant in service	\$371,879,339
2	Accumulated depreciation	(\$76,920,413)
3	Utility plant acquisition adjustment	(\$3,292,572)
4	Accumulated amortization of acquisition adjustment	\$814,419
5	Net plant (rate base before additions & deductions)	?
6	Total additions to rate base (included)	\$35,980,533
7	Total deductions from rate base (excluded)	(\$116,770,558)
8	rate base	?

### 2.15 Exercise: deriving the rate base

	Item	Amount
1	Plant in service	\$371,879,339
2	Accumulated depreciation	(\$76,920,413)
3	Utility plant acquisition adjustment	(\$3,292,572)
4	Accumulated amortization of acquisition adjustment	\$814,419
5	Net plant (rate base before additions & deductions)	\$292,480,773
6	Total additions to rate base (included)	\$35,980,533
7	Total deductions from rate base (excluded)	(\$116,770,558)
8	rate base	\$211,690,748

### 2.15 Deriving the rate base (detail)

#### 14-Rate base (hypothetical)

Line no.	Sched.	Acct.	Item	2018	2017	Average
1	200	101.0	TOTAL PLANT IN SERVICE         371,879,339         348,669,833		360,274,586	
2						
3	205	108.1	Accumulated Depreciation	(76,920,413)	(72,240,231)	(74,580,322)
4			>Plant in Service Net of Accumulated Depreciation	294,958,926	276,429,602	285,694,264
5						
6			Adjustments for Rate Base			
7	200	114.0	Utility Plant Acquisition Adjustment	(3,292,572)	(3,360,459)	(3,326,516)
8	200	115.0	Accumulated Amortization of Acquisition Adjustment	814,419	766,397	790,408
9			>Plant in Service Net of Depreciation and Adjustments	292,480,773	273,835,540	283,158,157
10						
11			Calculating the Rate Base: Additions (Included)			
12	203	103.0	Plant Held for Future Use	0	0	0
13	215	162.0	Prepayments (insurance, property tax, other)	926,656	700,578	813,617
14	214	151.0	Materials and Supplies	875,569	905,621	890,595
15	200	131.2	Cash Working Capital (1/8 O&M method)	2,184,881	2,098,657	2,141,769
16	200	186.3	Regulatory Assets (deferred)	31,993,427	30,292,810	31,143,119
17			>Total Additions	35,980,533	33,997,666	34,989,099
18						
19			Calculating the Rate Base: Deductions (Excluded)			
20	200	281-282	Accumulated Deferred Income Taxes	(50,449,379)	(48,371,145)	(49,410,262)
21	200	255.1	Accumulated Deferred ITC			
22	200	271.1-2	Contributions in Aid of Construction (CIAC, net)	(39,692,068)	(38,629,881)	(39,160,975)
23	200	252.0	Advances for Construction	(6,849,139)	(6,323,876)	(6,586,508)
24			Customer Deposits	0	0	0
25	230	253.0	Regulatory Liabilities (deferred)	(10,509,060)	(4,432,332)	(7,470,696)
26			Other Deferred Credits	(9,270,912)	(14,844,024)	(12,057,468)
27			>Total Deductions	(116,770,558)	(112,601,258)	(114,685,908)
28						
29			RATE BASE	211,690,748	195,231,948	203,461,348

# 2.16 Ratemaking scenarios

- 1. A utility owned a vacant lot in a high-growth area, but it was never included in rate base. The utility sells it for a very large profit one year before it files a rate case.
- 2. A utility's new water treatment plant becomes useful in the 11<sup>th</sup> month of the test year for establishing rates. The regulator typically uses a 13-month average to derive the rate base.
- 3. A utility decides to install smart meters to help control losses and encourage enduse efficiency. Their existing meter stock has five years of useful life remaining.
- A utility needs to add distribution system storage due to growth in housing developments in the service territory and proposes a system-wide surcharge to pay for it.
- 5. A utility asserts that a water treatment plant should be upsized due to economies in construction and in anticipation of customer growth due to acquisitions.
- 6. A utility claims it needs a "return" on the expense of migrating from in-house servers to cloud computing as an incentive. The decision is considered prudent and in the interest of customers.