PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 14, 2011

Draft Resolution W-4883 Agenda ID #10487

TO: All Interested Persons

Enclosed is draft Resolution W-4883 of the Division of Water and Audits regarding Rural Water Company's request for a general rate increase. Draft Resolution W-4883 will be on the Commission's July 14, 2011 agenda. The Commission may act then on this resolution or it may postpone action until later.

When the Commission acts on a draft resolution, the Commission may adopt all or part of the draft resolution, as written, or amend or modify the draft resolution; or the Commission may set the draft resolution aside and prepare a different resolution. Only when the Commission acts does the resolution become binding.

Interested persons may submit comments on draft Resolution W-4883. An original of the comments, with a certificate of service, should be submitted to:

Division of Water and Audits, Third Floor Attention: Albert Schiff California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Interested persons must serve a written or electronic copy of their comments on the utility on the same date that the comments are submitted to the Division of Water and Audits. Interested persons may submit comments on or before July 5, 2011.

Comments should focus on factual, legal, or technical errors or policy issues in the draft resolution.

Persons interested in receiving comments submitted to the Division of Water and Audits may write to Albert Schiff, email him at aas@cpuc.ca.gov, or telephone him at (415) 703-2144.

/s/RAMI S. KAHLON

Rami S. Kahlon, Director Division of Water and Audits

Enclosures: Draft Resolution W-4883

Certificate of Service

Service List

DRAFT

AGENDA ITEM # 10487

DIVISION OF WATER AND AUDITS Water & Sewer Advisory Branch

RESOLUTION NO. W-4883 July 14, 2011

RESOLUTION

(RES. W-4883), RURAL WATER COMPANY (RURAL). ORDER AUTHORIZING A GENERAL RATE INCREASE (GRC) IN ANNUAL REVENUE OF \$190,823 OR 33.5% RELATIVE TO CURRENT APPROVED GROSS REVENUES AND MODIFYING RES. W-4794 SURCREDIT PAYMENT PERIOD.

SUMMARY

Per Advice Letter (AL) 60-W filed on May 10, 2010, Rural requested an increase of \$271,500 or 49% in annual gross revenue for Test Year (TY) 2010 to recover operating expenses and earn an adequate return on its plant improvement.

For TY 2010, this Resolution orders an increase in gross revenues of \$190,823 or 33.5%, over current revenues, which is estimated to provide a Rate of Margin (ROM) of 21.7%.

This Resolution also modifies the period of payment of a surcredit ordered in Res. W-4794 from 12 months to a 36-month period.

BACKGROUND

Rural, a Class C water utility, has requested authority under Section VI of General Order 96-B (G.O. 96-B), Rule 7.6.2 and Water Industry Rule 7.3.3 (5), and Section 454 of the Public Utilities Code to increase its rates by \$271,500 or 49%, for TY 2010, over the current rates. The purpose of the rate increase is to recover increased operating expenses and to provide an adequate rate of return. Rural's request was based on a rate of margin of 15.8%.

In Rural's last general rate increase, which was granted on November 20, 2009, per Res. W-4794, the Commission authorized a decrease in revenues of \$116,871 or -17.4%. In Res. W-4794, the Commission ordered Rural to file an advice letter, within 60 days from the effective date of the resolution, to refund, as a surcredit for a 12-month period,

revenues Rural had over-collected revenues.¹ Also, the Commission ordered Rural to file an advice letter incorporating in its rate schedule the revised rates approved in Res. W-4794.²

Rural's present rates became effective on July 1, 2010, by approval of AL 62, which authorized a Consumer Price Index (CPI) of \$14,978 or 2.7%.

Rural currently serves 877 residential metered customers, 17 commercial customers, 6 industrial customers/schools and 21 irrigation connections (see Appendix D for a breakdown by meter sizes) in San Luis Obispo County. The majority of customers are full-time residents, being a mixture of retired or working individuals.

NOTICE AND PROTESTS

AL 60-W was served on May 10, 2010, as required by G. O. 96-B. A notice regarding the general rate increase was mailed to each customer on May 28, 2010. A Public Meeting was held in Arroyo Grande on July 1, 2010. Over 200 people attended. Numerous complaints about water pressure and mineral deposits were received. The Division of Water and Audits (Division) also received 30 written complaints about the size of the rate increase.

In Rural's last general rate increase, the Commission also addressed concerns with respect to water pressure and mineral deposits. There, the Commission ordered Rural to provide the Division with details of water quality problems so that the Division could make corrective recommendations to the Commission, if needed. (See Resolution 4794, Ordering Paragraph 4.) The Division also forwarded these complaints to the

¹ On July 12, 2007, per Res. W-4654, the Commission granted an interim increase for Rural, which would be adjusted upward or downward back to July 12, 2007, consistent with the final rates the Commission adopted in the general rate case. On November 20, 2009, the Commission adopted Res. W-4794, which authorized the rate decrease and surcredit. Rural did not implement this surcredit due to revenue shortfalls.

² On May 27, 2010, Rural filed Advice Letter 61-W to implement the rate decrease the Commission authorized in Res. W-4794. This advice letter became effective on of June 1, 2010.

California Department of Public Health (DPH), which launched an investigation into these complaints. DPH issued the following statement regarding its investigation:

DPH is definitely concerned about the alleged pressure problems in the upper elevations which we are in the process of investigating. The utility is not in violation of health-related drinking water standards based on the data submitted to our department. It is fairly common for utilities to use sources with elevated secondary constituents (such as iron, manganese, TDS, etc.) which are more aesthetic based, the regulations do contain provisions for waivers from these, if the customers choose to not pay for such treatment. We will give the utility an opportunity to respond to the allegations. If improvements are deemed necessary for the safeguard of public health, we will work a compliance schedule out with the utility based on the severity of the problem.

Subsequently, a program for flushing the lines was instituted by Rural with approval by the DPH. A few customers have had continued complaining about water pressure and mineral deposit matters, even after the institution of the flushing, which appear to be problems in their own pipes. No corrective action is merited at this time. The flushing program is sufficient per DPH standards.

In setting rates in this resolution, we have balanced the financial requirements of Rural with the rate concerns of its customers.

DISCUSSION

Appendix A shows Rural's and the Division's estimated summary of earnings at present, proposed and recommended rates for TY 2010.

The Division reviewed operating revenues and expenses, including purchased power, employee labor, materials, contract work, water testing, transportation expenses, other plant maintenance, office salaries, office supplies and expenses, insurance, general expenses, depreciation, and taxes other than income. The Division verified the operating expenses by reviewing supporting documents for substantiation and accuracy, and included the amounts that were deemed reasonable and prudent.

CONSERVATION

Per the objectives stated in the Commission's Water Action Plan 2010, the Division will strengthen water conservation programs when feasible. Accordingly, a three-tiered rate structure is being proposed to achieve water conservation. This could result in billing of \$75.22 for the peak month of June for the example shown in Appendix C.

SUMMARY OF EARNINGS

Appendix A contains estimates for operating revenues, operating expenses, and rate base at present, proposed, and recommended rates for TY 2010. Appendix B contains the tariff schedules at the recommended rates.

Operating Revenues

Operating revenues are based upon a customer base of 921 connections.

Operating Expense

Staff performed a comprehensive investigation of expenses. The differences between the estimates by the Division and Rural are explained below.

Other Volume Related Expenses

Rural added its volume related expense for Propane, Gas, and Chlorine together with expenses from the Nipomo Mesa Management Area (NMMA). (See the discussion below regarding what the NMMA entails.) Division removed the NMMA related expenses from these other costs since the NMMA expenses are not considered volume related. The remaining volume related expenses were \$9,004. Division recommends \$9,004 for this category. Division addresses the NMMA related expenses below.

NMMA Expenses

The NMMA was formed to regulate groundwater extraction in the local area as a result of a lawsuit stipulated judgment. The NMMA includes Nipomo Community Services District, Woodlands Mutual Water Company, and Golden State Water Company, as well as Rural. All costs with respect to the NMMA and the court order (e.g., technical reports, court reports, construction costs, etc.) are related to the construction of a pipeline, which will interconnect with Rural (in addition to these other entities participating in the NMMA), and ultimately, connection to this pipeline will allow Rural to purchase water from this pipeline in the future.

Rural has already incurred \$49,260 in NMMA related costs for which the utility has requested reimbursement in another advice letter (i.e., AL 68-W). Rural is tracking additional NMMA expenses in the purchased water account.³ Rather than recovering these costs through the purchased water account, Rural requests \$30,244 per year going forward to be included in this GRC to recover in rates these NMAA related costs. Division disallows the request but recommends that Rural be allowed to file a Tier 2 AL once a year for recovering these NMMA costs tracked in the purchased water account.

Office Salaries

The requested amount is \$8,000. This account includes the salaries of all employees whose time is utilized in billing, collecting, record keeping, or general office work. This work has been outsourced to Multi-Task Business Services, Inc. and allocated by the company under Office Supplies and Expenses Account No. 681. Therefore the funds allocated to this account are \$0.

Management Salaries

Rural requested \$60,000 for management. The owner has become more involved in the day-to-day operations since the last GRC. The Division reviewed the work log and recommends \$40,000.

Employee Pension and Benefits

The requested amount for this category is \$27,901. The Division had considered this personal in nature since it pertains only to the shareholders and should not be allocated to the ratepayers on the basis that they do not benefit from them. The Division recommends the amount allocated to be zero.

Office Services and Rentals

The Division reviewed the invoices for office services and rentals of \$16,630 for 2009. Division agrees with Rural's request for TY 2010 and recommends \$17,079 after adjustment of 2.7% for inflation.

Office Supplies and Expenses

The Division reviewed the invoices for office supplies and expenses of \$9,750 for 2009. Division agrees with Rural's request for TY 2010 and recommends the requested amount of \$10,686 after adjustment of 2.7% for inflation.

³ Rural established the purchased water account on August 20, 2010. All NMMA costs Rural has incurred subsequent to the initial \$49,260, which are being addressed in AL 68-W, were incurred after this account was created.

Professional Services

Professional Services costs have been rapidly rising. Rural's GRC request shows \$74,411 for 2008, \$83,535 for 2009 and \$104,560 for 2010. This is due to increasing interaction with customers and the Commission. The average is \$87,502 which is what the Division recommends.

Regulatory Commission Expense

These costs are for DPH health services charges and Regional Water Quality Control Board groundwater monitoring. The Division reviewed the invoices for 2009 expenses and recommends \$6,893 for TY 2010.

The Division's recommended revenue requirement is shown in Appendix A, and the Division's recommended rates are shown in Appendix B. The Division recommends that the Commission approve the rate increases and resulting rates shown in Appendix B.

Two methods are available for the Division to utilize in the rate-making process: (1) Rate of Return (ROR), and (2) Rate of Margin (ROM). Per Decision 92-03-093, dated March 31, 1992, the Division must recommend the method that produces the higher revenues.

ROM produces the higher revenues of \$760,546 compared with ROR revenue of \$45,471. Therefore, the Division recommends the 21.7% ROM for Class C water utility for TY 2010. The increase in revenue will be \$190,823 or 33.5%.

Rural's current rate structure consists of two schedules: Nos. 1, Metered Service and 2R, Residential Flat Rate Service.

Water consumption has started to decrease from 2008 levels of 346,542 Ccf (one Ccf is equal to one hundred cubic feet). Total consumption for 2009 was 329,688 Ccf as indicated in the 2009 Annual Report. The consumption for 2010 was reported as 289,686 Ccf.

At the Division's recommended rates shown in Appendix B, the monthly bill in the peak month of June for most metered residential customers could increase from \$68.42 to \$105.58 if consumption rates measured in 2010 continue to be the same. (See conservation discussion above.) A comparison of customer bills for presently adopted and recommended rates for this GRC is shown in Appendix C. The projections and tax calculations are shown in Appendix D.

COMPLIANCE

There are no outstanding Commission orders requiring system improvements. The utility has been filing annual reports as required.

As discussed above, Res. W-4794 ordered a rate decrease and ordered Rural to refund over-collected revenues, from July 12, 2007 until November 20, 2009, of \$116,871 as a surcredit to be repaid over a 12-month period. Rural did not implement this surcredit because it had revenue shortfalls. Rural implemented the rate decrease authorized in Res. W-4794 on July 1, 2010. Thus, until that date, Rural continued to collect more revenues than it was authorized by the Commission. The Division has calculated the total revenues Rural has over-collected, and needs to refund to customers, to be \$350,613 ($$116,871 \times 3 = $350,613$).

At present rates, Rural is operating at a loss. In order to lessen the impact on Rural's revenue, the Division recommends that Rural implement a surcredit, to be refunded over a 36-month period beginning on September 1, 2011. For the purpose of refunding the over-collected revenues totaling \$350,613, the Division recommends that Rural prorate the surcredit by meter size per Appendix B for each of Rural's ratepayers and that Rural track the refund in a balancing account.

The Division reviewed water sampling tests conducted by the local DPH which found the contaminant manganese at one well. This well had not been in use for some time and the elevated manganese level was 9 times the maximum level allowed. After two sampling periods indicating normal levels, DPH believes that the over-limit test was an anomaly. In addition, Rural had not adhered to the required quarterly testing schedule.

A later water quality incident occurred at Rural in January 2011. At this time, test showed that Rural had exceeded nitrate levels of 45 mg by 1 mg.

The Division has confirmed that DPH reports the utility is now conforming to the required testing schedule and that water quality presently meets standards.

COMMENTS

Public Utilities Code Section 311 (g) (1) generally requires that resolutions must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Accordingly, this draft resolution was mailed to the utility

and the protestants, including the people who complained at the public meeting, or by letter or email, and was made available for public comment on June 14, 2011.

FINDINGS

- 1. Rural Water Company (Rural) has requested authority to increase its rates by \$271,500 or 49%, for TY 2010.
- 2. Rural provides water service to 877 residential metered customers, 17 commercial customers, 6 industrial customers/schools and 21 irrigation connections in San Luis Obispo County.
- 3. Advice Letter 60-W was served as required by General Order 96-B on May 10, 2010. A notice regarding the general rate increase was mailed to each customer on May 28, 2010. A Public Meeting was held in Arroyo Grande on July 1, 2010. Over 200 people attended. Numerous complaints were received at and after the public meeting.
- 4. The last general rate increase for Rural was on November 20, 2009, by Res. W-4794, which authorized a rate reduction of \$116,871 or 17.4%.
- 5. Rate of Margin produces the higher revenues of \$760,546 compared with Rate of Return revenue of \$45,471. Therefore, the Division of Water and Audits (Division) recommends the 21.7% Rate of Margin for Class C water utility for TY 2010. The increase in revenue will be \$190,823 or 33.5%.
- 6. Rural should be allowed to submit a Tier 2 advice letter once a year for recovering Nipomo Mesa Management Area costs tracked in its purchased water account.
- 7. Resolution W-4794 ordered a rate decrease and ordered Rural to refund over-collected revenues, from July 12, 2007 until November 20, 2009, of \$116,871 as a surcredit to be repaid over a 12-month period. Rural did not implement this surcredit because it had revenue shortfalls. Rural implemented the rate decrease authorized in Resolution W-4794 on July 1, 2010.
- 8. Until July 1, 2010, Rural continued to collect more revenues than it was authorized by the Commission. The Division has calculated the total revenues Rural has over-collected, and needs to refund to customers, to be \$350,613 ($$116,871 \times 3 = $350,613$).
- 9. Rural is presently operating at a loss. In order to lessen the impact on Rural's revenue the Division recommends that Rural implement a surcredit, to be refunded over a 36-month period beginning on September 1, 2011.

- 10. For the purpose of refunding the over-collected revenues totaling \$350,613, the Division recommends that Rural prorate the surcredit by meter size per Appendix B for each of Rural's ratepayers and that Rural track the refund in a balancing account.
- 11. Water consumption has started to decrease from 2008 levels of 346,542 Ccf. Total consumption for 2009 was 329,688 Ccf as indicated in the Rural 2009 Annual Report. The consumption for 2010 was reported as 289,686 Ccf. This value was used in calculating rates.
- 12. A water sampling test found a contaminant, manganese, which was 9 times the maximum level at one well. This well had not been in use for some time. After two sampling periods indicating normal levels, the Department of Public Health (DPH) concluded that the over-limit was an anomaly.
- 13. A later water sampling test in January 2011 showed that Rural exceeded the maximum nitrate level of 45 mg by 1 mg. In addition, Rural had not adhered to the required testing schedule.
- 14. The Division has confirmed that DPH reports the utility is now conforming to the required testing schedule and that water quality presently meets standards.
- 15. The Division's recommended earnings (Appendix A) are reasonable and should be adopted.
- 16. The rates recommended by the Division (Appendix B) are reasonable and should be adopted.
- 17. The quantities (Appendix D) used to develop the Division's recommendations are reasonable and should be adopted.

THEREFORE IT IS ORDERED THAT:

- 1. Rural Water Company is authorized to file a supplemental advice letter incorporating the revised rate schedule attached to this resolution as Appendix B, and concurrently cancel its presently effective Schedule No. 1, Metered Service. The effective date of the revised schedule shall be five days after the date of filing.
- 2. The quantities used to develop the Division of Water and Audits' recommendations (Appendix D) are adopted.
- 3. Rural Water Company shall refund over collected revenues of \$350,613 providing a prorated surcredit to each customer per Appendix B over a period of 36 months beginning on September 1, 2011. Rural Water Company shall provide this surcredit concurrently with the general rate increase authorized here.

- 4. Rural Water Company is authorized to submit a Tier 2 advice letter once a year to recover costs related to the Nipomo Mesa Management Area tracked in the purchased water account and incurred after the establishment of this account. These advice letters shall become effective upon approval by the Division of Water and Audits.
- 5. This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on July 14, 2011; the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

APPENDIX A Rural Water Company SUMMARY OF EARNINGS Test Year 2010

	Utility Estimated		Division Estimated		<u>Division</u>
	Present	Requested	Present	Proposed	Recommended
Item	Rates	<u>Rates</u>	Rates	<u>Rates</u>	ROM Rates
					
Operating Revenue					
Water Sales	\$554,745	\$826,245	\$554,745	\$826,245	\$760,546
Operating Expenses	# 000 101	# 000 101	#	# 000 404	# 000 404
Purchased Power	\$208,404	\$208,404	\$208,404	\$208,404	\$208,404
Other Volume Related Expenses	\$39,249	\$39,249	\$9,004	\$9,004	\$9,004
Contract Work	\$96,058	\$96,058	\$96,058	\$96,058	\$96,058
Transportation Expenses	\$5,167	\$5,167	\$1,839	\$1,839	\$1,839
Other Plant Maintenance	\$66,752	\$66,752	\$66,752	\$66,752	\$66,752
Office Salaries	\$8,000	\$8,000	\$0	\$0	\$0
Management Salaries	\$60,000	\$60,000	\$40,000	\$40,000	\$40,000
Employee Pension & Benefits	\$27,901	\$27,901	\$0	\$0	\$0
Office Services & Rentals	\$17,079	\$17,079	\$17,079	\$17,079	\$17,079
Office Supplies & Expenses	\$10,686	\$10,686	\$10,686	\$10,686	\$10,686
Professional Services	\$104,560	\$104,560	\$87,502	\$87,502	\$87,502
Insurance	\$4,776	\$4,776	\$4,776	\$4,776	\$4,776
Regulatory Commission Expense	\$6,893	\$6,893	\$6,893	\$6,893	\$6,893
General Expenses	\$1,463	\$1,463	\$1,425	\$1,425	\$1,425
Total Operating expenses	\$656,988	\$656,988	\$550,418	\$550,418	\$550,418
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Depreciation Expense	\$14,356	\$14,356	\$14,356	\$14,356	\$14,356
Taxes other than Income	\$5,500	\$5,500	\$5,500	\$5,500	\$5,500
CA Franchise Tax	\$800	\$12,007	\$800	\$22,628	\$16,820
Federal Income Taxes	\$0	\$31,539	\$0	\$74,254	\$50,896
Interest Expense					
Total Deductions	\$677,644	\$720,390	\$571,074	\$667,156	\$637,990
Net Revenue	(\$122,899)	\$105,855	(\$16,329)	\$159,089	\$122,556
Rate Base					
Average Plant	\$4,435,351	\$4,505,351	\$4,505,351	\$4,505,351	\$4,505,351
Ave. Accumulated Depreciation	(\$1,846,389)	(\$1,846,389)	(\$1,846,389)	(\$1,846,389)	(\$1,846,389)
Net Plant	\$6,281,740	\$6,351,740	\$6,351,740	\$6,351,740	\$6,351,740
<u>Less</u> CIAC	(\$2,318,369)	(\$2,318,369)	(\$2,318,369)	(\$2,318,369)	(\$2,318,369)
Plus Materials & Supplies	\$0	\$0	\$0	\$0	\$0
Working Cash	\$59,781	\$52,689	\$52,689	\$52,689	\$52,689
Rate Base:	\$8,659,890	\$8,722,798	\$8,722,798	\$8,722,798	\$8,722,798
Rate of Return					
Rate of Margin	Negative	15.8%	Negative	28%	21.7%

(END OF APPENDIX A)

DRAFT

Resolution W-4883 RURAL/DRAFT AL/RSK/PTL/AAS/jlj July 14 2011

APPENDIX B Rural Water Company Test Year 2010 Schedule No. 1 GENERAL METERED SERVICE

APPLICABILITY

Applicable to all metered service.

TERRITORY

The unincorporated area known as Tract 151 and vicinity, located approximately 2 miles southeast of the community of Oceano, San Luis Obispo County.

RATES

Quantity Rates (per month):

First 18 hundred cubic feet (Ccf)	\$1.97 per Ccf	(I)
Water in excess of 18 Ccf up to 28 Ccf	\$2.36 per Ccf	
Water in excess of 28 Ccf	\$2.76 per Ccf	(I)

Service Charge:

		Per Meter Per Month		
For	5/8 x 3/4-inch meters	\$10.77	(I)	
For	3/4 –inch meters	\$16.16		
For	1-inch meters	\$26.93		
For	1-1/2 inch meters	\$53.85		
For	2-inch meters	\$86.16	(I)	

The Service Charge is a readiness-to-serve charge, which is applicable to all metered service and to which is added the charge for water used computed at the Quantity Rates.

SPECIAL CONDITIONS

- 1. All bills are subject to the Reimbursement fee set forth in Schedule No. UF. (L)
- 2. Surcredit for a period of 36 months beginning on September 1, 2011 per the following formula: (C)

		rer Meter rer Mont	<u>u</u>
For	5/8 x 3/4-inch meters	\$ 6.62	(N)
For	3/4–inch meters	\$ 9.93	
For	1-inch meters	\$16.55	
For	1-1/2-inch meters	\$33.10	
For	2-inch meters	\$52.74	(N)

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(END OF APPENDIX B)

APPENDIX C Rural Water Company Comparison of Rates for Test Year 2010

709 of the 921 connections are for 3/4 inch meters

For these customers in the month of June using 39 Ccf , the comparison for a typical usage would be:

Present Svc Charge	Present Nom Qty	Excess Qty	Present Total
\$11.30	\$1.38 x 33 Ccf = \$45.54	\$1.93 x 6 Ccf = \$11.58	\$ 68.42
New Svc Charge	New Nom Qty	Excess Qty	New Total
\$16.16	\$1.97 x 18 Ccf = \$35.46	\$2.36 x 10 Ccf = \$23.60 \$2.76 x 11 Ccf = \$30.36	\$105.58

The expectation for instituting the third tier is to achieve a reduction in water usage. For the example shown above, this could reduce consumption to only the first and second tiers and result in a water bill of \$75.22 instead of the present \$68.42.

(END OF APPENDIX C)

APPENDIX D Rural Water Company Adopted Quantities - Test Year 2010

Purchased Power

Pacific Gas & Electric Schedule No. A-1, Small General Service

Cypress Ridge Sewer and Rural Water		
power charges are split on PG&E	Total kWh	Total Cost
Account #4715993741	291,516	\$ 49,347
For Account # 2074690830	892,167	\$ 143,722
For Account # 4674994412	87,086	\$ 15,335
		\$ 208,404
Service Connections		

Ser vice connections	
5/8"	169
3/4 "	709
1"	19
2"	<u>24</u>
	921

Consumption (2010) 289,686 Ccf

Tax Calculations

Federal Tax Rate:	15% for first \$50,000
	25% for next \$25,000
	34% for next \$25,000
	39% for over \$100,000

CCFT: 8.84%

Item	State Tax	Federal Tax
Operating Revenue	\$760,546	
O&M Expense	\$550,418	
Taxes Other Than Income	\$ 5,500	
Depreciation	\$ 14,356	
Interest	\$ 0	
Taxable Income for CCFT CCFT	\$190,272 \$ 16,820	
Taxable Income for FIT		\$ 173,452
FIT		\$ 50,896
Total Income Tax		\$ 67,716

(END OF APPENDIX D)

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of draft Resolution W-4883 on all parties in these filings or their attorneys as shown on the attached list.

Dated June 14, 2011, at San Francisco, California.

/s/ JOSIE L. JONES
Josie L. Jones

Parties should notify the Division of Water and Audits, Public Utilities Commission, 505 Van Ness Avenue, Room 3106, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the Resolution number of the service list on which your name appears.

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