

OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Aqua)
Ohio, Inc. to Increase Its Rates for Water) Case No. 13-2124-WW-AIR
Service.)

**TESTIMONY IN OPPOSITION TO THE STIPULATION AND
RECOMMENDATION
OF
STEVEN B. HINES**

**On Behalf of
The Office of the Ohio Consumers' Counsel**
*10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485*

August 4, 2014

TABLE OF CONTENTS

	PAGE
I. INTRODUCTION	1
II. EVALUATION OF THE STIPULATION WITH RESPECT TO THE THREE-PRONG TEST USED BY THE PUCO.	2
III. CONCLUSION	17

SCHEDULES

SBH-1	Change in Net Plant Allocation Factor
SBH-2	Rate Base Adjustments related to Change in Net Plant Allocation Factor
SBH-3	Depreciation Expense Adjustment for Change in Net Plant Allocation Factor
SBH-4	Property Tax Expense Adjustment for Change in Net Plant Allocation Factor
SBH-5	Rate Case Expense Adjustment
SBH-6	Signing Bonus Adjustment
SBH-7	FICA Tax Adjustment for Elimination of Signing Bonuses
SBH-8	Account 923-2 Sundry Cost Adjustment
SBH-9	Effect of Switching to Bills-Rendered Billing
SBH-10	Federal Income Tax Adjustment
SBH-11	Supporting Schedule for Federal Income Tax Adjustment
SBH-12	OCC Adjusted Rate Base and Operating Income
SBH-13	OCC Revenue Requirements

ATTACHMENTS

SBH-A	Aqua Response to OCC Interrogatory No. 4
SBH-B	Aqua Application Workpaper WPB-7.1
SBH-C	Staff Workpaper for Staff Schedule C-3.4, Wages Annualized
SBH-D	Aqua Response to OCC Interrogatory No. 8
SBH-E	Aqua Response to OCC Request to Produce No. 18
SBH-F	Aqua Workpaper WPC-2.1b
SBH-G	Aqua Response to OCC Request to Produce No. 31
SBH-H	Aqua Response to Staff Data Request No. 8

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.

A1. My name is Steven B. Hines. My business address is 10 West Broad Street, Suite 1800, Columbus, Ohio 43215-3485. I am employed by the Office of the Ohio Consumers' Counsel ("OCC" or "Consumers' Counsel") as a Principal Regulatory Analyst.

Q2. ARE YOU THE SAME STEVEN HINES WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A2. Yes.

Q3. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A3. My testimony, in addition to other OCC witness testimony, explains the reasons why the Public Utilities Commission of Ohio ("PUCO") should reject the Stipulation and Recommendation ("Stipulation" or "Settlement") filed in this proceeding on July 21, 2014. The proposed Settlement will result in unjust and unreasonable charges collected from the residential customers of Aqua Ohio, Inc. ("Aqua Ohio" or "the Utility"). As a result, the proposed Stipulation does not represent a fair and reasonable compromise, does not benefit the customers, is not in the public interest, and violates important regulatory principles and practices. Therefore, the proposed Stipulation should not be approved.

**II. EVALUATION OF THE STIPULATION WITH RESPECT TO THE
THREE-PRONG TEST USED BY THE PUCO.**

***Q4. WHAT CRITERIA DOES THE PUCO USUALLY RELY UPON FOR
CONSIDERING WHETHER TO ADOPT A STIPULATION?***

A4. It is my understanding that the PUCO will adopt a Stipulation only if it meets all three of the criteria below. The PUCO must analyze the Stipulation and decide the following:

1. Is the settlement a product of serious bargaining among capable, knowledgeable parties representing diverse interests?
2. Does the settlement, as a package, benefit customers and the public interest?
3. Does the settlement package violate any important regulatory principle or practice?

***Q5. DOES THE STIPULATION FILED IN THIS PROCEEDING MEET THOSE
CRITERIA?***

A5. No. The Stipulation fails to meet any of the three criteria considered by the PUCO when evaluating a stipulation, and should therefore be rejected. I address each of the three criteria individually.

1 **Q6. REGARDING THE FIRST CRITERION, IN YOUR OPINION WAS THE**
2 **STIPULATION A PRODUCT OF SERIOUS NEGOTIATION AMONG ALL**
3 **PARTIES REPRESENTING DIVERSE INTERESTS?**

4 **A6.** No. The Stipulation was signed by Aqua, the PUCO Staff and the cities of
5 Marion and Tiffin (collectively referred to as “Signatory Parties”). Although
6 Marion and Tiffin were representing approximately 16,000 and 7,000 residential
7 customers respectively, a large portion of Aqua’s residential customers are not
8 represented by the Signatory Parties to the Stipulation. Specifically, there are
9 approximately 28,500 residential customers in the Lake Division, 1,400
10 residential customers in the Masury Division, and 24,600 residential customers in
11 the former Ohio American Water Division that are not represented by any of the
12 Signatory Parties (See Attachment SBH-A). Thus, about 70% of Aqua’s
13 residential customers’ interests are not represented by the Signatory Parties.¹
14

15 **Q7. REGARDING THE SECOND STIPULATION CRITERION, DOES THE**
16 **SETTLEMENT, AS A PACKAGE, BENEFIT CUSTOMERS AND THE**
17 **PUBLIC INTEREST?**

18 **A7.** No, the Stipulation violates the second criteria in several respects. Below, I will
19 individually set forth each specific reason supporting this answer.

¹ (54,500 + 23,000)/54,500 = 70.32%.

1 ***Q8. WHAT IS THE FIRST ISSUE YOU ADDRESS WITH REGARD TO THE***
2 ***SECOND CRITERIA?***

3 ***A8.*** The first issue I address is the plant allocation factor used to assign Service Center
4 Plant costs to the Aqua Divisions in Ohio.

5
6 ***Q9. WHAT SERVICE CENTER PLANT ALLOCATOR IS USED IN THE***
7 ***STIPULATION?***

8 ***A9.*** The Stipulation is using a plant allocator of 63.00% to allocate Service Center
9 Plant costs at issue in this case among the Aqua Divisions in Ohio.²

10
11 ***Q10. HOW WAS THIS ALLOCATION FACTOR DETERMINED?***

12 ***A10.*** According to Application Workpaper WPB-7.1, the amount of Utility Plant in
13 Service, Depreciation Reserve, Construction Work In Progress, Customers'
14 Advances for Construction, Related Facilities, Contributions in Aid of
15 Construction, and Deferred Accounts for the Total Company and the Rate Area
16 are summed individually and then divided by each other to arrive at the Service
17 Center Plant Allocation Factor.³

² Stipulation and Recommendation, Joint Exhibit 2.0, Schedule B-2.1, pages 13-15 (July 21, 2014).

³ Application, at Workpaper WPB-7.1; See also, Attachment SBH-B.

***Q11. SHOULD THE 63% ALLOCATION FACTOR BE USED TO ALLOCATE
SERVICE CENTER RATE BASE TO THE AQUA DIVISIONS AT ISSUE IN
THIS CASE?***

A11. No. In the calculation of the 63.00% plant allocation factor set forth in Application Workpaper WPB-7.1, the entire amount for the Deferred Accounts in is not included. According to Application Schedule B-6, the total of Deferred Accounts carried forward to Application Schedule B-1 is \$(10,009,497.00) and not \$(7,821,296.42). Recalculating Application Workpaper WPB-7.1 would yield a plant allocation factor 62.04%.⁴

***Q12. WHAT IS THE EFFECT OF THIS CHANGE IN ALLOCATION FACTOR
ON THE PLANT, DEPRECIATION RESERVE, OTHER RATE BASE
ITEMS AND DEPRECIATION EXPENSE PROPOSED IN THE
STIPULATION?***

A12. Using a plant allocation factor of 62.04% would result in the following adjustments: the stipulated Gross Plant would decrease from \$10,766,843 to \$10,587,448; the stipulated Depreciation Reserve would decrease from \$3,871,212 to \$3,799,332; the stipulated Other Rate Base Items would decrease from \$480,184 to \$472,867 (See Schedule SBH-2); and the stipulated Depreciation Expense would decrease from \$969,184 to \$952,555.⁵ I have also made an adjustment to reduce Property Tax Expense by \$6,512.⁶

⁴ See, Schedule SBH-1.

⁵ See, Schedule SBH-3.

⁶ See, Schedule SBH-4.

1 ***Q13. WHY DOES THE PLANT ALLOCATION FACTOR PROPOSED IN THE***
2 ***STIPULATION NOT BENEFIT CUSTOMERS AND IS NOT IN THE***
3 ***PUBLIC INTEREST?***

4 ***A13.*** In calculating the plant allocation factor, the Stipulation neglects to include the
5 amounts in all of the Deferred Accounts. Hence, the 63.00% plant allocation
6 factor used in the Stipulation fails to reduce rate base by an additional \$100,198⁷
7 and fails to reduce expenses by an additional \$23,141.⁸ This error results in
8 higher rates; therefore, it does not benefit customers and is not in the public
9 interest.

10
11 ***Q14. WHAT IS THE SECOND ISSUE YOU ADDRESS WITH REGARD TO THE***
12 ***SECOND CRITERIA?***

13 ***A14.*** The second issue I address is the amount of rate case expense included in
14 Stipulation Joint Exhibit 2.0.

15
16 ***Q15. DOES THE STIPULATION INCLUDE RATE CASE EXPENSE?***

17 ***A15.*** Yes. On Stipulation Schedule C-3.6 there is an estimated current rate case
18 expense of \$350,000. When that amount is amortized over a period of three
19 years, it results in an estimated annual rate case expense of \$116,667.

⁷ Schedule SBH-2, \$179,395 - \$71,880 - \$7,317.

⁸ Schedule SBH-3, Depreciation Expense of \$(16,629); Schedule SBH-4, Property Tax of \$(6,512).

1 ***Q16. DO YOU AGREE WITH THIS ADJUSTMENT?***

2 ***A16.*** No. Although I agree with the amortization of the rate case expense over three
3 years, I do not agree with the level of rate case expense that should be amortized.
4 Only half of the rate case expense estimate of \$350,000 should be included
5 because customers should not have to pay for the entire cost of a rate case that
6 disproportionately benefits the Utility and its shareholders over customers billed
7 the increased charges.

8
9 ***Q17. WHAT ADJUSTMENT TO RATE CASE EXPENSE ARE YOU PROPOSING?***

10 ***A17.*** I propose that \$175,000 be excluded from the rate case expense of \$350,000 as it
11 was currently estimated at the time the Stipulation was filed at the PUCO. This
12 would result in an incremental adjustment of \$(58,333) from Stipulation Schedule
13 C-3.6. My adjustment is shown on Schedule SBH-5. If Aqua submits a final rate
14 case expense amount to the PUCO for inclusion in the Revenue Requirement, it
15 too should be accorded the same treatment that I am proposing.

16

17 ***Q18. WHY DOES THE AMOUNT OF RATE CASE EXPENSE PROPOSED IN***
18 ***THE STIPULATION NOT BENEFIT CUSTOMERS AND IS NOT IN THE***
19 ***PUBLIC INTEREST?***

20 ***A18.*** The amount of rate case expense included in the Stipulation does not recognize
21 the fact that the Utility and its shareholders also benefit from this expenditure. It
22 would not benefit customers to pay more than their fair portion of rate case

1 expense. As a reasonable compromise, customers should only pay for half of rate
2 case expense, which would be \$175,000 or \$58,333 amortized over three years.
3

4 ***Q19. WHAT IS THE THIRD ISSUE YOU ADDRESS WITH REGARD TO THE***
5 ***SECOND CRITERIA?***

6 ***A19.*** The third issue I address concerns the signing bonuses that are included in
7 Stipulation Joint Exhibit 2.0.
8

9 ***Q20. DID THE UTILITY INCLUDE SIGNING BONUSES IN ITS CALCULATION***
10 ***OF WAGE ANNUALIZATION ON SCHEDULE C-3.4 OF THE***
11 ***APPLICATION?***

12 ***A20.*** Yes. On Application Schedule WPC-3.4b, Aqua included signing bonuses
13 totaling \$10,500 in the calculation of its Wage Annualization.
14

15 ***Q21. DID THE PUCO STAFF INCLUDE THESE SIGNING BONUSES IN ITS***
16 ***CALCULATION OF WAGES ANNUALIZED ON SCHEDULE C-3.4 OF THE***
17 ***STAFF REPORT?***

18 ***A21.*** In my review of the PUCO Staff Workpapers, the PUCO Staff did include
19 \$10,500 of signing bonuses related to Union Employees.⁹

⁹ Staff Report, Staff Workpapers for Staff Schedule C-3.4, Wages Annualized (See Attachment SBH-C).

1 ***Q22. WAS THERE AN ADJUSTMENT TO REMOVE SIGNING BONUSES FROM***
2 ***THE SCHEDULES FOUND IN STIPULATION JOINT EXHIBIT 2.0?***

3 ***A22.*** No. There was no such adjustment to remove signing bonuses from the
4 calculation of Wages Annualized.
5

6 ***Q23. DO YOU AGREE WITH THE INCLUSION OF THESE SIGNING BONUSES***
7 ***IN THE CALCULATION OF WAGES?***

8 ***A23.*** No. The signing bonus was offered by Aqua in the context of labor negotiations
9 to provide an incentive for acceptance of a negotiated union contract.¹⁰ This
10 bonus has nothing to do with the improvement of customer service or the
11 percentage of the wage increase agreed to in the contract.¹¹ In addition, even if an
12 employee were to do no work during the year, then he/she would still receive the
13 \$500 signing bonus. Hence, these bonuses, which were used as an enticement for
14 employees to agree to a labor contract package, has resulted in no quantifiable
15 increase in labor productivity to the benefit of consumers.
16

17 ***Q24. DID YOU MAKE AN ADJUSTMENT TO EXCLUDE THE SIGNING***
18 ***BONUSES FROM STIPULATION JOINT EXHIBIT 2.0?***

19 ***A24.*** Yes. My adjustment to exclude the signing bonuses of \$10,500 from the
20 calculation of wages is shown on Schedule SBH-6. After the O&M Allocation
21 Percentage of 88.60% is applied, the adjustment would be \$(9,303). I have also

¹⁰ Aqua response to OCC Interrogatory No. 8 (See Attachment SBH-D).

¹¹ Aqua response to OCC Request to Produce No. 18 (See Attachment SBH-E).

1 prepared an adjustment of \$(712) on Schedule SBH-7 that reflects the reduction in
2 FICA Taxes associated with my elimination of the \$9,303 in Signing Bonuses.
3

4 ***Q25. WHY DO THE SIGNING BONUSES INCLUDED IN THE STIPULATION***
5 ***NOT BENEFIT CUSTOMERS AND IS NOT IN THE PUBLIC INTEREST?***

6 ***A25.*** The signing bonuses are not a part of the hourly labor rate in the labor contract
7 and were simply an incentive for the union to agree to sign the contract. Even if
8 there was no work performed during the year, each employee in the union would
9 still get a bonus of \$500. It does not benefit customers to pay for \$10,500 in
10 signing bonuses that could be used toward reducing their rates for water service.
11

12 ***Q26. WHAT IS THE FOURTH ISSUE YOU ADDRESS WITH REGARD TO THE***
13 ***SECOND CRITERIA?***

14 ***A26.*** The fourth issue I address is the inclusion in Stipulation Joint Exhibit 2.0 of
15 certain sundry costs that were incurred by the Corporate Office (or “Service
16 Center”).
17

18 ***Q27. DID AQUA INCLUDE IN ITS APPLICATION ANY SUNDRY COSTS IN***
19 ***ACCOUNT 923-2, MANAGEMENT SUPERVISION FEES AND***
20 ***EXPENSES?***

21 ***A27.*** Yes. As set forth on Workpaper WPC-2.1b, Aqua included these types of costs in
22 the total test year amount of \$4,114,247 in its Application for Corporate Office

(or “Service Center”) Account No. 923-2, Management Supervision Fees and Expenses.¹²

Q28. DID THE PUCO STAFF EXCLUDE ANY SUNDRY COSTS IN ACCOUNT 923-2, MANAGEMENT SUPERVISION FEES AND EXPENSES AT THE SERVICE CENTER LEVEL?

A28. No. It does not appear that the PUCO Staff made any adjustments to Service Center Account No. 923-2 in the Staff Report.

Q29. WAS THERE AN ADJUSTMENT TO REMOVE SUNDRY COSTS INCURRED AT THE SERVICE CENTER FROM THE SCHEDULES FOUND IN STIPULATION JOINT EXHIBIT 2.0?

A29. Yes, in part. On Schedule C-3.20 of the Stipulation, the parties excluded \$1,394 worth of sundry costs addressed in my Direct Testimony filed on June 24, 2014.¹³ These sundry costs related to expensive meals, catering, country clubs, casinos, bar associations, and alumni affairs that were incurred at the Service Center.

¹² See Attachment SBH-F.

¹³ Direct Testimony of Steven B. Hines, pages 14-15 and Schedule SBH-12 (June 24, 2014).

1 ***Q30. SHOULD AN ADDITIONAL ADJUSTMENT BE MADE TO EXCLUDE***
2 ***CERTAIN EXPENSES WITHIN SERVICE CENTER ACCOUNT NO. 923-2?***

3 ***A30.*** Yes. After reviewing the actual sundry costs incurred during April – June 2013 of
4 the test year, I also determined that an adjustment should be made to exclude
5 costs related to Board of Directors (“BOD”) Restricted Stock.¹⁴

6
7 ***Q31. WHY DO YOU RECOMMEND THAT BOARD OF DIRECTORS***
8 ***RESTRICTED STOCK SHOULD BE EXCLUDED FROM THE***
9 ***CALCULATION OF THE RATES THAT AQUA CHARGES ITS***
10 ***CUSTOMERS FOR WATER SERVICE?***

11 ***A31.*** This is an expense being allocated from the Service Center that does not provide a
12 direct and primary benefit to customers of the Utility.

13
14 ***Q32. WHAT DO YOU RECOMMEND WITH REGARD TO THE AMOUNT OF***
15 ***THE EXCLUSION FOR THESE COSTS THAT YOU HAVE IDENTIFIED?***

16 ***A32.*** After allocation to the Divisions at issue in this case,¹⁵ I recommend that \$39,455
17 be excluded from consideration in this case. My adjustment is set forth on
18 Schedule SBH-8.

¹⁴ Aqua response to OCC Request to Produce No. 31 (See Attachment SBH-G).

¹⁵ Aqua response to Staff Data Request No. 8 (See Attachment SBH-H).

1 ***Q33. WHAT IS THE FIFTH ISSUE YOU ADDRESS WITH REGARD TO THE***
2 ***SECOND CRITERIA?***

3 ***A33.*** The fifth issue I address is the application of the rates to be determined in this on
4 a bills-rendered basis instead of a service-rendered basis.

5

6 ***Q34. WHAT METHOD OF BILLING RATES DOES THE UTILITY CURRENTLY***
7 ***USE?***

8 ***A34.*** Aqua currently applies its rates on a service-rendered basis, which means that all
9 water delivered to the customer on and after the effective date of the rate change
10 is billed at the new rate. In other words, under a service-rendered billing method,
11 the water rates in effect at the time of service are the rates that are applied to
12 customers' bills.

13

14 ***Q35. WHAT METHOD OF BILLING RATES DOES THE STIPULATION***
15 ***PROPOSE?***

16 ***A35.*** The Stipulation proposes that the tariffed rates will go into effect on a bills-
17 rendered basis immediately after the PUCO approves the Stipulation.¹⁶ In other
18 words, under bills-rendered billing, the water rates in effect at the time the bill is
19 rendered are applied to its customers' bills.

¹⁶ Stipulation and Recommendation, Case No. 13-2124-WW-AIR at 3 (July 21, 2014).

1 **Q36. WHY DOES THE SWITCH FROM SERVICE-RENDERED BILLING TO**
2 **BILLS-RENDERED BILLING NOT BENEFIT CUSTOMERS IN THIS**
3 **CASE?**

4 **A36.** If there is a switch to bills-rendered billing, Aqua will be able to apply
5 retroactively the new rates to customer water usage that occurred at least 15 days
6 before the PUCO approves the Stipulation. This would allow Aqua to collect
7 approximately \$159,000 of the rate increase from customers prematurely.¹⁷
8

9 **Q37. HOW DOES THE STIPULATION ADDRESS THE UTILITY'S FEDERAL**
10 **INCOME TAX EXPENSE?**

11 **A37.** As described in the Testimony of Michael J. Majoros, the Stipulation includes
12 \$4,202,711 of federal income taxes included in the rates that Aqua would be
13 permitted to annually charge customers during the time period that the rates from
14 this case are in effect.¹⁸
15

16 **Q38. DO YOU HAVE A RECOMMENDATION WITH RESPECT TO HOW THE**
17 **FEDERAL INCOME TAX EXPENSE WAS CALCULATED IN THE**
18 **STIPULATION?**

19 **A38.** Yes. I have incorporated into my testimony a schedule containing a Federal
20 Income Tax expense adjustment that is based upon the recommendations made in

¹⁷ See Schedule SBH-9.

¹⁸ See, Stipulation and Recommendation, Schedule C4, page 2 of 2, line 22, Column (F); see also, Testimony of Michael J. Majoros in Opposition to the Stipulation and Recommendation, at p. 3 (August 4, 2014).

1 the testimony of OCC witness Michael J. Majoros. This adjustment is shown on
2 Schedule SBH-10 with Schedule SBH-11 being the supporting schedule.
3

4 ***Q39. DID YOU PREPARE A SCHEDULE THAT SUMMARIZES THE***
5 ***ADJUSTMENTS YOU HAVE MADE TO RATE BASE AND OPERATING***
6 ***INCOME?***

7 ***A39.*** Yes. Schedule SBH- 12 summarizes both my recommended adjustments and the
8 proposed adjustments advocated by OCC witness Michael Majoros to rate base
9 and operating income.
10

11 ***Q40. DID YOU PREPARE A SCHEDULE THAT SHOWS YOUR***
12 ***RECOMMENDED REVENUE REQUIREMENTS WHEN YOUR***
13 ***ADJUSTMENTS ARE CONSIDERED?***

14 ***A40.*** Yes. Taking into consideration the additional adjustments to rate base and
15 operating income over and above what is set forth in the Stipulation (see Exhibit
16 SBH-12), and using the rate of return of 7.20% recommended by OCC witness
17 Daniel Duann and the Federal Income Tax adjustment advocated by OCC witness
18 Michael Majoros, I have developed a revenue requirement of approximately
19 \$58,813,286. The calculation of this revenue requirement is shown on Schedule
20 SBH-13. Based on this analysis I recommend a revenue increase of \$2,163,585 or
21 3.82%. The Stipulation, however, recommends a revenue increase of \$3,820,000
22 or 6.74%. Thus, given the greater amount of the rate increase identified in the
23 Stipulation, it does not benefit customers and is not in the public interest.

1 ***Q41. REGARDING THE THIRD STIPULATION CRITERION, DOES THE***
2 ***SETTLEMENT, AS A PACKAGE, VIOLATE ANY IMPORTANT***
3 ***REGULATORY PRINCIPLE OR PRACTICE?***

4 ***A41.*** Yes, the Stipulation violates the third criteria in several respects. I will elaborate
5 further below.

6
7 ***Q42. CONCERNING YOUR FIRST, SECOND AND THIRD ISSUES SET FORTH***
8 ***ABOVE, HOW DOES THE STIPULATION VIOLATE IMPORTANT***
9 ***REGULATORY PRINCIPLES OR PRACTICES?***

10 ***A42.*** These costs, that are included in the tariffed rates proposed in Stipulation Joint
11 Exhibit 3.0, are not just and reasonable as required by the Ohio Revised Code.¹⁹

12
13 ***Q43. CONCERNING YOUR FOURTH ISSUE SET FORTH ABOVE, HOW DOES***
14 ***THE STIPULATION VIOLATE IMPORTANT REGULATORY PRINCIPLES***
15 ***OR PRACTICES?***

16 ***A43.*** The Corporate Office expense for the Board of Directors restricted stock does not
17 provide a direct and primary benefit to customers.²⁰

¹⁹ R.C. 4905.22.

²⁰ *Cleveland v. Pub. Utilities Comm.*, 63 Ohio St. 2d 62, 406 N.E.2d 1370 (1980); *see also Office of Consumers' Counsel v. Pub. Utilities Comm.*, 67 Ohio St. 2d 153, 423 N.E.2d 820 (1981) (Justice Brown dissenting).

1 ***Q44. CONCERNING YOUR FIFTH ISSUE SET FORTH ABOVE, HOW DOES***
2 ***THE STIPULATION VIOLATE IMPORTANT REGULATORY PRINCIPLES***
3 ***OR PRACTICES?***

4 ***A44.*** The shift from service-rendered billing to bills-rendered billing results in the
5 retroactive billing of rates in this case, which violates the principles set forth in
6 *Lucas County Commissioners v. PUCO*.²¹

7

8 **III. CONCLUSION**

9

10 ***Q45. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?***

11 ***A45.*** Yes.

²¹ *Lucas County Comm'rs v. PUC*, 80 Ohio St. 3d 344, 348, 686 N.E.2d 501, (1997); see also, *Keco Industries, Inc. v. Cincinnati & Suburban Bell Tel. Co.*, 166 Ohio St. 254, 141 N.E.2d 465 (1957).

CERTIFICATE OF SERVICE

I hereby certify that a copy of *Testimony in Opposition to the Stipulation of Steven B. Hines on Behalf of the Office of the Ohio Consumers' Counsel* was provided to the persons listed below via electronic transmission this 4th day of August, 2014.

/s/ Melissa R. Yost
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Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Change in Net Plant Allocation Factor

Schedule SBH-1

	(A)	(B)	
<u>Net Plant</u>	<u>Total Company</u>	<u>Rate Area</u>	
Utility Plant in Service	\$ 463,159,228.34	\$ 255,990,661.51	(a)
Depreciation Reserve	\$ (125,333,580.76)	\$ (72,090,129.80)	(a)
CWIP	\$ 8,226,361.95	\$ 4,514,544.51	(a)
Advances for Construction	\$ (5,923,421.53)	\$ (5,923,421.53)	(a)
Related Facilities	\$ (420.00)	\$ (420.00)	(a)
Contributions in Aid of Construction	\$ (89,813,218.82)	\$ (30,578,946.71)	(a)
Deferred Accounts	\$ (21,596,650.29)	\$ (10,009,497.00)	(b)
Total	\$ 228,718,298.89	\$ 141,902,790.98	

OCC Net Plant Allocation Factor Col. (B) / (A)

62.04%

(a) Application Workpaper WPB-7.1 (See Attachment SBH-B)

(b) Application Schedule B-6, page 2 of 2

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Rate Base Adjustments Related to Change
in Net Plant Allocation Factor

<u>Description</u>	(a)					
	<u>Total</u> <u>Jurisdiction</u>	<u>OCC Net Plant</u> <u>Allocation Factor</u>	<u>OCC Adjusted</u> <u>at 62.04%</u>	<u>Stipulation</u> <u>Adjustments</u>	<u>OCC Adjusted</u> <u>Net of</u> <u>Stipulation</u> <u>Adjustments</u>	<u>Stipulation</u> <u>Adjusted</u> <u>at 63.00%</u>
Service Center Plant (b)	\$ 18,687,019	62.04%	\$ 11,593,427	\$ (1,005,979)	\$ 10,587,448	\$ 10,766,843
						\$ (179,395)
Service Center Depreciation Reserve (c)	\$ 7,487,450	62.04%	\$ 4,645,214	\$ (845,882)	\$ 3,799,332	\$ 3,871,212
						\$ (71,880)
Deferred Income Taxes - Liberalized Depreciation - Service Center (d)	\$ 762,197	62.04%	\$ 472,867	\$ -	\$ 472,867	\$ 480,184
						\$ (7,317)

- (a) Schedule SBH-1
(b) Stipulation Schedule B-2.1, page 15 of 15
(c) Stipulation Schedule B-3, page 15 of 15
(d) Staff Schedule B-6, page 1, line 20

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Depreciation Expense Adjustment for
Change in Net Plant Allocation Factor

Account Number	Service Center Account Description	(a) Total Jurisdiction	(b) OCC Net Plant Allocation Factor	OCC Adjusted at 62.04%	(a) Stipulation Adjustments	OCC Adjusted Net of Stipulation Adjustments	(c) Depreciation Accrual Rates	OCC Calculated Depreciation Expense	(d) Stipulation Depreciation Expense
303	Miscellaneous Intangible Plant (e)	\$ 14,504,886	62.04%	\$ 8,998,831	\$ (1,007,381)	\$ 7,991,450	10.79%	\$ 862,277	\$ 877,498
390	Structures & Improvements	\$ 1,021,017	62.04%	\$ 633,439	-	\$ 633,439	2.10%	\$ 13,302	\$ 13,508
390-1	Structures & Improvements - Leasehold Improvements (f)	\$ 1,025,947	62.04%	\$ 636,498	-	\$ 636,498	0.22%	\$ 1,400	\$ 1,436
391-1	Office Furniture and Equipment	\$ 195,796	62.04%	\$ 121,472	-	\$ 121,472	3.59%	\$ 4,361	\$ 4,428
391-2	Office Furniture and Equipment - Data Processing	\$ 739,676	62.04%	\$ 458,895	\$ 1,402	\$ 460,297	9.12%	\$ 41,979	\$ 42,627
391-3	Office Furniture and Equipment - Computers	\$ 297,895	62.04%	\$ 184,814	-	\$ 184,814	12.10%	\$ 22,363	\$ 22,708
394	Tools, Shop and Garage Equipment	\$ 60,598	62.04%	\$ 37,595	-	\$ 37,595	3.85%	\$ 1,447	\$ 1,470
397	Communication Equipment	\$ 108,746	62.04%	\$ 67,466	-	\$ 67,466	6.15%	\$ 4,149	\$ 4,213
398	Miscellaneous Equipment	\$ 38,663	62.04%	\$ 23,987	-	\$ 23,987	5.32%	\$ 1,276	\$ 1,296
	Total Service Center	\$ 17,993,224		\$		\$		\$ 952,555	\$ 969,184

OCC Reduction in Depreciation Expense related to
Change in Net Plant Allocation Factor

\$ (16,629)

- (a) Stipulation Schedule B-3, pages 13-15
(b) See Schedule SBH-1
(c) Stipulation Schedule B-3, pages 13-15
(d) Stipulation Schedule B-3.2, pages 13-16
(e) Stipulation Schedule B-3.2, page 13. Depreciation Accrual rate
calculated as $877,498 / 8,130,697 = 10.79\%$
(f) Stipulation Schedule B-3.2, page 14. Depreciation Accrual rate
calculated as $1,436 / 646,347 = 0.22\%$

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Property Tax Expense Adjustment for
Change in Net Plant Allocation Factor

Schedule SBH - 4

<u>Description</u>	<u>Amount</u>	
1.) OCC Adjustment related to change in Plant Allocation Factor	\$ (179,395)	(a)
2.) Assessment Valuation Percentage	<u>42.73%</u>	(b)
3.) Valuation at 3/31/14 for OCC Adjustment (1) x (2)	\$ (76,655)	
4.) Average Property Tax Rate	<u>\$ 0.08495</u>	(c)
5.) OCC Recommended Adjustment to Property Tax (3) x (4)	\$ (6,512)	

(a) See Exhibit SBH - 2

(b) Stipulation Schedule C-3.23a, line 11

(c) Stipulation Schedule C-3.23a, line 23 (84.95 / 1,000)

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Rate Case Expense Adjustment

	<u>Water A</u>	
1.) Total Estimated Rate Case Expense (a)	\$ 350,000	
2.) Company/Customer Sharing	<u>50%</u>	
3.) Customer Responsibility (1) x (2)	\$ 175,000	
4.) Three-Year Amortization (a)	<u>3</u>	
5.) Annual Rate Case Expense (3) / (4)	\$ 58,333	
6.) Test Year Amount (a)	<u>\$ 356,031</u>	
7.) OCC Adjustment to Test Year Amount (5) - (6)	\$ (297,698)	
8.) Stipulation Adjustment to Test Year Amount (a)	\$ (239,364)	
9.) OCC Incremental Adjustment (7) - (8)	\$ (58,334)	

(a) Stipulation Schedule C-3.6

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Signing Bonus Adjustment

Schedule SBH - 6

	<u>Description</u>	<u>Amount</u>	
1.)	Signing Bonus included in Wage Annualization	\$ (10,500)	(a)
2.)	O&M Allocation Percentage	<u>88.60%</u>	(b)
3.)	OCC Adjustment to exclude Signing Bonus	\$ (9,303)	

(a) Staff Workpapers (See Attachment SBH-C)

(b) Staff Schedule C-3.4

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
FICA Tax Adjustment for
Elimination of Signing Bonuses

Schedule SBH - 7

<u>Description</u>	<u>Service Center</u> <u>Account 391-2</u>	
1.) OCC Adjustment to exclude Signing Bonus	\$ (9,303)	(a)
2.) OASDI Tax at .062	\$ (577)	(b)
3.) Health Insurance at .0145	<u>\$ (135)</u>	(b)
4.) Total OCC Adjustment to FICA Tax (2) + (3)	<u><u>\$ (712)</u></u>	

(a) See Schedule SBH - 6

(b) Aqua Schedule WPC-3.18, Lines 7 and 9

Schedule SBH - 8

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Account 923-2 Sundry Cost Adjustment

<u>Description</u>	(a)	(b)	<u>Divisional Cost</u>
	<u>Total Ohio Cost</u>	<u>Allocation Factor</u>	
Account 923-2 Sundry Expenses - BOD Restricted Stock	\$ (64,144.83)	61.51%	\$ (39,455.48)
OCC Incremental Adjustment to Sundry Expenses			\$ (39,455)
Stipulation Adjusted Budget Expense (c)			\$ 3,931,120
Stipulation Adjusted Budget Expense net of OCC Adjustment			\$ 3,891,665
Test Year Budget Expense (c)			\$ 4,281,749
Budget Expense Adjustment with OCC Incremental Adjustment			\$ (390,084)

- (a) Response to OCC Request to Produce No. 31 (See Attachment SBH-G)
(b) Response to Staff Data Request No. 8 (See Attachment SBH-H)
(c) Stipulation Schedule C-3.20

Aqua Ohio, Inc.
Case No. 13-2124-WW-AIR
Effect of Switching to
Bills-Rendered Billing

1.)	Stipulation Revenue Increase Recommended (a)	
2.)	Number of Months in the Year	\$ 3,820,000
		<u>12</u>
3.)	Stipulated Rate Increase per Month (1) / (2)	\$ 318,333
4.)	Number of Days in a Month	<u>30</u>
5.)	Stipulated Rate Increase per Day (3) / (4)	\$ 10,611
6.)	Number of Revenue Lead Days	<u>15</u>
7.)	Benefit to Aqua of Switch to Bills-Rendered Billing (5) x (6)	\$ 159,167

(a) Stipulation Joint Exhibit 2.0, Schedule A-1, line 17

AQUA OHIO, INC.
CASE NO. 13-2124 WW-AIR
TEST YEAR ENDING MARCH 31, 2014

Schedule SBH-10

FEDERAL INCOME TAX EXPENSE - DEFERRED PORTION ONLY / CURRENT SET AT \$0

	OCC Adjusted with FIT	Adjustments	Reference	Adjusted Revenue Requirement Increase	Reference
Rate Base	\$ 150,126,988	\$ -		\$ 150,126,988	Schedule SBH-13- Line 1
Total Operating Revenues (Adjusted Current)	\$ 56,649,701	\$ -		\$ 56,649,701	Schedule SBH-13 - Line 9
Operating Expenses Before FIT	\$ 44,656,453	\$ -		\$ 44,656,453	Schedule SBH-12
Federal Income Taxes (Schedule SBH-12)	\$ 2,946,180	\$ 269,064	B13 + C13	\$ 3,215,244	Schedule SBH-11
Total Operating Expenses (Schedule SBH-12)	\$ 47,602,633	\$ 269,064		\$ 47,871,697	
Required Operating Income (Schedule SBH-13)	\$ 10,809,143	\$ -		\$ 10,809,143	Line G8*7.20%
Current Operating Income (Schedule SBH-12)	\$ 9,047,068	\$ (269,064)	B18-C18	\$ 8,778,004	E11-E15
Income Deficiency (Schedule SBH-13)	\$ 1,762,075	\$ 269,064		\$ 2,031,139	E17-E18
Gross Revenue Conversion (Schedule SBH-13)	\$ 1,63878			\$ 1,06521	(1) PUCO Staff Report Schedule A-2
Revenue Increase Required (Schedule SBH-13)	\$ 2,887,653	\$ (724,068)		\$ 2,163,585	Line G20 * Line G19

(1) As Adjusted to reflect \$0 for FIT - Current Gross Up

AQUA OHIO, INC.
CASE NO. 13-2124 WW-AIR
TEST YEAR ENDING MARCH 31, 2014

Schedule SBH-11

FEDERAL INCOME TAX SUMMARY

Current FIT	Un-Adjusted Company Present	Adjustments	Adjusted Stip Present	Stipulation Adjustments	Stipulation Proposed Rates	Adjustments	OCC	References
Operating Income Before FIT	\$ 11,584,029	\$ 349,048	\$ 11,933,077	\$ 3,586,198	\$ 15,519,275	\$	\$ -	
Interest Charges	\$ (2,895,688)	\$ (770,446)	\$ (3,666,134)	\$ -	\$ (3,666,134)		\$ (3,633,073)	Schedule SBH-13 Line 1 * 2.42%
Tax Accelerated Depreciation	\$ (7,149,064)	\$ (5,819,701)	\$ (12,968,765)	\$ -	\$ (12,968,765)	\$	\$ (12,968,765)	
Book Depreciation	\$ 6,304,699	\$ 464,646	\$ 6,769,345	\$ -	\$ 6,769,345	\$	\$ 6,769,345	
Excess Tax over Book	\$ (844,365)	\$ (5,355,055)	\$ (6,199,420)	\$ -	\$ (6,199,420)	\$	\$ (6,199,420)	
Repair Tax Deduction	\$ -	\$ (2,832,391)	\$ (2,832,391)	\$ -	\$ (2,832,391)	\$	\$ (2,832,391)	
Misc. Deferred Items	\$ (6,752)	\$ 6,752	\$ -	\$ -	\$ -			
Subtotal	\$ (3,746,805)	\$ (8,951,140)	\$ (12,697,945)	\$ -	\$ (12,697,945)	\$	\$ (12,664,884)	
Taxable Income	\$ 7,837,224	\$ (8,602,092)	\$ (764,868)	\$ 3,586,198	\$ 2,821,330	\$	\$ -	
FIT at 35%	\$ 2,743,028	\$ (3,010,732)	\$ (267,704)	\$ 1,255,169	\$ 987,466	\$	\$ -	
Investment Tax Credits	\$ -	\$	\$ -	\$	\$ -			
FIT - Current	\$ 2,743,028	\$ (3,010,732)	\$ (267,704)	\$ 1,255,169	\$ 987,466	\$	\$ -	
Deferred FIT								
Tax Accelerated Depreciation	\$ 7,149,064	\$ 5,819,701	\$ 12,968,765	\$	\$ (12,968,765)	\$	\$ (12,968,765)	
Tax Straight Line Depreciation	\$ 6,304,699	\$ 254,464	\$ 6,559,163	\$	\$ 6,559,163	\$	\$ 6,559,163	
Excess of Accelerated over S/L	\$ 844,365	\$ 5,565,237	\$ 6,409,602	\$	\$ (6,409,602)	\$	\$ (6,409,602)	
Deferred Income Tax at 35%	\$ 295,528	\$ 1,947,833	\$ 2,243,361	\$	\$ 2,243,361	\$	\$ 2,243,361	
Deferred Income Tax at 35% RTA	\$ -	\$ 991,337	\$ 991,337	\$	\$ 991,337	\$	\$ 991,337	
Amortization of Prior Year ITC	\$ (4,230)	\$ (15,224)	\$ (19,454)	\$	\$ (19,454)	\$	\$ (19,454)	
ITC - Net	\$ (4,230)	\$ 976,113	\$ 971,883	\$	\$ 971,883	\$	\$ 971,883	
Total Deferred Taxes	\$ 291,298	\$ 2,923,946	\$ 3,215,244	\$	\$ 3,215,244	\$	\$ 3,215,244	
Total Federal Income Taxes	\$ 3,034,326	\$ (86,786)	\$ 2,947,540	\$ 1,255,169	\$ 4,202,709	\$	\$ 3,215,244	To Schedule SBH-10 Line 13

Aqua Ohio, Inc.
Case No. 13-2124-WW -AIR
OCC Adjusted Rate Base and Operating Income

	Staff Adjusted (a)	OCC Adjustments (b)	OCC Adjusted (c)
Rate Base	150,227,186	(100,198)	\$ 150,126,988
Total Operating Revenues	56,649,701	-	56,649,701
Operating Expense before FIT	44,787,364	(130,911)	44,656,453
Federal Income Taxes	2,899,512	46,668	2,946,180
Total Operating Expenses	47,686,876	(84,243)	47,602,633
Net Operating Income	8,962,825	84,243	\$ 9,047,068

(a) Staff Report Schedules B-1 and C-2

(b) OCC Operating Revenue Schedules:

Total OCC Revenue Adjustments

SBH O&M Expense Exhibits and FIT impact at 35% rate:

SBH-4 Property Tax Expense related to Change in Net Plant Allocation Factor

SBH-3 Depreciation Expense related to Change in Net Plant Allocation Factor

SBH-6 Signing Bonuses

SBH-5 Rate Case Expense

SBH-8 Sundry Cost - Service Center Account 923-2

SBH-7 FICA Tax assoc. with Signing Bonuses

Total OCC Expense Adjustments

OCC FIT Expense Adjustment

SBH Rate Base Exhibits and FIT impact at 35% rate:

SBH-7 Change in Plant related to Net Plant Allocation Factor

SBH-7 Change in Depreciation Reserve related to Net Plant Allocation Factor

SBH-7 Change in Other Rate Base Items related to Net Plant Allocation Factor

DM-1 Regulatory Asset - Deferred Depreciation

OCC Decrease to Staff Rate Base

x Weighted cost of debt (Staff Schedule C-4)

Decrease to Interest Charges

x FIT tax rate

OCC Increase to FIT Expense

(c) Stipulation +/- OCC Adjustments

Aqua Ohio, Inc.
Case No. 13-2124-WW -AIR
OCC Revenue Requirements

	Applicant (a)	Stipulation Lower Bound (a)	Stipulation Upper Bound (a)	OCC Adjusted (b)
1.) Rate Base	152,450,469	151,493,153	151,493,153	\$ 150,126,988
2.) Net Operating Income	7,720,595	8,985,537	8,985,537	9,047,068
3.) Rate of Return Earned	5.06%	5.93%	5.93%	6.03%
4.) Rate of Return Recommended (c)	7.73%	7.47%	7.47%	7.20%
5.) Required Operating Income	11,784,421	11,316,539	11,316,539	10,809,143
6.) Income Deficiency	4,063,826	2,331,002	2,331,002	1,762,075
7.) Gross Revenue Conversion Factor	1.638780	1.638780	1.638780	1.638780
8.) Revenue Increase Required before FIT Adjustment	6,659,718	3,820,000	3,820,000	2,887,653
9.) Adjusted Operating Revenue				56,649,701
10.) Revenue Requirements before FIT Adjustment				59,537,354
11.) FIT Adjustment (d)				(724,068)
12.) Revenue Increase Required after FIT Adjustment				2,163,585
13.) Revenue Increase Recommended	6,659,718	3,820,000	3,820,000	2,163,585
14.) Adjusted Operating Revenue	56,649,701	56,649,701	56,649,701	56,649,701
15.) Revenue Requirements after FIT Adjustment	63,309,420	60,469,701	60,469,701	58,813,286
16.) Increase over Current Revenue	11.76%	6.74%	6.74%	3.82%

(a) Stipulation Schedule A-1

(b) Schedule SBH-12

(c) OCC Rate of Return - Testimony of OCC Witness Duann

(d) Schedule SBH-10

Inter. No. 4: Please provide the most current numbers of residential customers served in each respective service territory listed in Exhibit 1 of Schedule S-4.1 filed with the Application.

RESPONSE: See attached “Inter. No. 4” (Att. at p. 2–3).

Inter. No. 4: Please provide the most current numbers of residential customers served in each respective service territory listed in Exhibit 1 of Schedule S-4.1 filed with the Application.

RESPONSE: See attached “Inter. No. 4” (Att. at p. 2–3).

**AQUA OHIO, INC.
NUMBER OF RESIDENTIAL CUSTOMERS
AS OF JUNE 30, 2013**

LAKE ERIE	28,449
STARK REGIONAL	33,361
STRUTHERS	17,497
MASURY	1,390
ASHTABULA	11,443
MARION	16,045
TIFFIN	6,910
FRANKLIN COUNTY WATER	7,802
FRANKLIN COUNTY SEWER	6,407
MANSFIELD	1,356
PORTAGE COUNTY	853
LAWRENCE COUNTY (includes LAKE WHITE)	<u>3,190</u>
TOTAL	<u><u>134,703</u></u>

TCR
10/4/13
WPB - 7.1

Aqua Ohio, Inc.
Lake / Masury / Prior American Properties
13-2124-WW-AIR
Allocation Factors

Net Plant	Water	Total Company	Rate Area
UPIS		463,159,228.34	255,990,661.51
Depreciation Reserve		(125,333,580.76)	(72,090,129.80)
CWIP		8,226,361.95	4,514,544.51
Advances		(5,923,421.53)	(5,923,421.53)
Related Facilities		(420.00)	(420.00)
Contributions		(89,813,218.82)	(30,578,946.71)
Deferred Accounts		(21,596,650.29)	(7,821,296.42)
		<u>228,718,298.89</u>	<u>144,090,991.56</u>
			<u>63.00%</u>
Net Plant	Sewer		
UPIS		463,159,228.34	17,528,809.24
Depreciation Reserve		(125,333,580.76)	(2,802,492.19)
CWIP		8,226,361.95	144,960.02
Advances		(5,923,421.53)	0.00
Related Facilities		(420.00)	0.00
Contributions		(89,813,218.82)	(4,778,491.00)
Deferred Accounts		(21,596,650.29)	(248,274.00)
		<u>228,718,298.89</u>	<u>9,844,512.07</u>
			<u>4.30%</u>

					Status
51058	150	4/14/13 Bonus	500.00	0.00	Other
51056	150	4/14/13 Bonus	500.00	0.00	Other
51059	150	4/14/13 Bonus	500.00	0.00	Other
51060	150	4/14/13 Bonus	500.00	0.00	Other
51062	150	4/14/13 Bonus	500.00	0.00	Other
51067	150	4/14/13 Bonus	500.00	0.00	Other
51069	150	4/14/13 Bonus	500.00	0.00	Other
51070	150	4/14/13 Bonus	500.00	0.00	Other
51072	150	4/14/13 Bonus	500.00	0.00	Other
51073	150	4/14/13 Bonus	500.00	0.00	Other
51074	150	4/14/13 Bonus	500.00	0.00	Other
51075	150	4/14/13 Bonus	500.00	0.00	Other
51076	150	4/14/13 Bonus	500.00	0.00	Other
51105	150	4/14/13 Bonus	500.00	0.00	Other
52414	150	4/14/13 Bonus	500.00	0.00	Other
52599	150	4/14/13 Bonus	500.00	0.00	Other
80170	150	4/14/13 Bonus	500.00	0.00	Other
80295	150	4/14/13 Bonus	500.00	0.00	Other
80433	150	4/14/13 Bonus	500.00	0.00	Other
80442	150	4/14/13 Bonus	500.00	0.00	Other
80733	150	4/14/13 Bonus	500.00	0.00	Other
Total			10,500.00	0.00	

\$17,600 2011 Award
 \$ 10,500 2012 Bonus
 \$ 10,500 2013 Bonus

Inter. No. 8: Referring to Page 2 of WPC-3.4b, what is a “signing bonus”?

RESPONSE: A signing bonus was offered by Aqua Ohio in the context of labor negotiations to provide an incentive for acceptance of a negotiated union contract.

RFP No. 18: Referring to OCC Interrogatory No. 8, please provide the labor contract and/or contract amendment that contains a provision providing for a “signing bonus.”

RESPONSE: See “Response to RFP No. 18,” attached.

Company Proposal and Counters to Union Offers

March 21, 2011

1500 hours

4 YEAR AGREEMENT

T/A #3

Company Proposals

Proposal #4, Article XII, Section 1- Holidays – Withdrawn

Proposal #5, Article XIII, Pension - In the event of pension freeze, company guarantees white star 401k adjustment to a level no less than a company match of 50% of the employee's first 6% contribution plus any discretionary profit sharing contributions. In the event of a pension freeze, any future adjustments made to enhance the existing Blue Star 401k will be realized by the union. No change to existing pension earlier than 12/31/14.

Proposal #6, Article XV, Section 1, Medical Insurance – Full flexibility for union healthcare at 7/1/11. For employees enrolled within the Aqua Ohio Health Plan, company will contribute to an FSA at \$250 for individuals, \$500 for family the first year (Individuals must complete required health risk assessment). If an HRA or HSA is established in future years, the union will be eligible for the same benefits offered to all non union employees within the Aqua Ohio Health Plan.

Proposal #7, Article XV, Section 5, Payment of Premiums - Non union and union the same contribution level (for 2011: 20% for base wage > \$45,000, 15% for base wage < \$45,000); union contribution not to exceed 20% during term of agreement

Union Proposals

Proposal #1 – Withdrawn

Proposal #2 – Withdrawn

Proposal #3, Article VII, Section 1, Hours of Work – Company will enter into an informal agreement for 2011 only; during June, July, and August, distribution technicians scheduled to work within the distribution department shall be scheduled Monday-Friday 7:00 a.m. – 3:30 pm. Company will meet with union at conclusion of informal agreement to evaluate viability for remaining years.

✓ Proposal #5, Article X, Section 1, Wages – Four year agreement, 3.5% for year 1. (Year 1 effective upon union ratification), an \$800 signing bonus in Year 1. Years 2-4, 3.0%, \$500 signing bonus per employee.

Proposal #6, Article X, Section 6, License and Premiums - \$.05 increase in license premiums upon healthcare enrollment.

Proposal #8, Article XIV, Group Life Insurance – Accept GL change to 1.5 times increase, improve retiree benefit to \$7500 for retirees after 4/1/11.

Proposal #9 – Withdrawn

Proposal #10 – Withdrawn

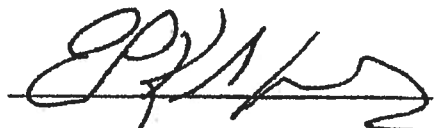
Proposal #11, Article XV111, Conclusion – 4 year agreement

Proposal #12, Savings Plan (401k) – No interest, See Company Proposal #5

Proposal #13, White Star, Blue Star descriptions included as exhibits within contract – Agreed

 3/21/11

Donald P. Opatka, Region III Director, UWUA



Edmund P. Kolodziej, President, Aqua Ohio

INITIALS	RAH
DATE	6/30/2013
	WPC-2.1b

Data: (3) Months Actual & (9) Months Estimated

LINE NO.	ACCOUNT NO.	DESCRIPTION	APR 2013	MAY 2013	JUN 2013	JUL 2013	AUG 2013	SEP 2013	OCT 2013	NOV 2013	DEC 2013	JAN 2014	FEB 2014	MAR 2014	TOTAL
1	920-1	ADMIN. & GENERAL SALARIES	187,902	175,745	152,590	171,748	165,223	158,231	171,748	158,231	165,223	166,391	145,702	155,204	1,953,938
2	921-2	EXP. OF EMPLOYEES IN AC 920													0
3	921-3	TELEPHONE	1,294	910	1,105	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	16,810
4	921-4	MEMBERSHIP FEES AND DUES	5,289	6,548	6,363	4,633	4,183	4,183	4,183	4,183	4,183	4,183	4,183	7,183	59,296
5	921-5	PRINTING & POSTAGE	184	181	551	500	500	500	500	500	500	500	500	500	5,416
6	921-6	UTILITIES	337	4,319	2,421	2,425	2,425	2,450	2,600	2,675	3,350	3,350	3,200	2,975	32,527
7	921-7	MISC. SUPPLIES & EXPENSES	13,404	6,782	6,015	7,243	7,243	7,243	7,243	7,243	7,243	7,243	7,243	7,243	91,387
8	923-2	MGT. SUPV. FEES & EXPENSES	366,400	322,315	489,784	290,032	305,704	423,607	287,553	290,505	333,935	301,706	347,983	354,713	4,114,247
9	923-3	ACCOUNTING SERVICES	18,021	18,021	18,021	18,021	18,021	18,021	18,021	18,021	18,021	18,021	18,021	18,021	216,252
10	923-4	LEGAL SERVICES	19,396	1,017	14,242	16,667	16,667	16,667	16,667	16,667	16,667	16,667	16,667	16,667	184,658
11	923-5	MISC. SERVICES	20,456	21,894	26,164	24,435	27,235	23,935	25,135	23,935	24,235	26,685	24,085	24,085	292,279
12	924	PROPERTY INSURANCE	260	260	260	260	260	260	260	260	260	260	260	260	3,120
13	925-2	LIABILITY INSURANCE	280	280	4,775	0	0	0	0	0	0	0	0	0	5,335
14	925-3	WORKER'S COMPENSATION	2,920	2,920	71	2,920	2,920	2,920	2,920	2,920	2,920	2,920	2,920	2,920	32,191
15	926-2	EMPLOYEES WELFARE EXPENSE	33,985	3,908	2,931	4,855	4,855	4,855	4,855	4,855	4,855	4,855	4,855	4,855	86,516
16	926-3	EMPLOYEE INSURANCE BENEFITS	21,982	19,483	21,682	21,990	21,990	21,990	21,990	21,990	21,990	21,990	21,990	21,990	260,956
17	926-4	EMPLOYEE PENSIONS	47,790	47,790	47,790	51,900	51,900	51,900	51,900	51,900	51,900	51,900	51,900	51,900	610,470
18	926-5	EMPLOYEE POST RETIREMENT BEN	(60)	(60)	(60)	(50)	(50)	(50)	(50)	(50)	(50)	(50)	(50)	(50)	(630)
19	926-6	EMPLOYEE CONTRIBUTION THRIFT PL	3,582	3,405	3,583	3,180	2,640	2,370	2,370	2,370	2,370	5,600	5,330	5,060	41,860
20	930-10	ADVERTISING				(112,932)	(108,737)	(103,217)	(111,042)	(105,343)	(112,093)	(113,430)	(98,009)	(101,791)	(1,211,409)
21	930-20	MISC. GENERAL EXPENSES	(62,485)	(88,988)	(93,342)	0	0	6,740	10,000	0	6,740	4,200	0	6,740	36,160
22	930-21	TRUSTEE & DIRECTOR FEES	1,740	0	0	0	0	0	0	0	0	0	0	0	0
23	931	RENTS													0
24	426-02	CHARITABLE CONTRIBUTIONS													0
25	426.03	SERVICE CLUB DUES													0
26															
27	922	SUBTOTAL CORPORATE OFFICE	662,578	546,726	704,955	509,327	524,479	644,105	518,353	502,362	555,749	524,491	558,280	579,975	6,831,379
28		CONSTRUCTION OVERHEADS	0	0	0	0	0	0	0	0	0	0	0	0	0
29															
30		CORPORATE OFFICE OPERATIONS	662,578	546,726	704,955	509,327	524,479	644,105	518,353	502,362	555,749	524,491	558,280	579,975	6,831,379
31															

RFP No. 31: Referring to WPC-2.1b, for April through June 2013, please provide accounting records and other documents that detail the costs recorded in Account 923-2, "MGT. SUPV. FEES & EXPENSES".

RESPONSE: See "RFP No. 31.pdf," attached.

Aqua Ohio,inc
 Lake / Masury / Prior American Properties
 Case 13-2124-WW-AIR

OCC 4th Set
 RPD-31

	April 2013	May 2013	June 2013
Service Billing	\$196,220.00	\$231,684.45	\$318,651.04
Sundry Billing	\$187,439.98	\$106,028.34	\$195,436.28
Transfer Service Billing to CWIP	(\$17,259.52)	(\$15,398.28)	(\$24,293.32)
Total #923-2			
Mgmt. Supv. Fees & Expenses	\$366,400.46	\$322,314.51	\$489,794.00

INDEX PAGE

OHIO
SUNDY EXPENSES
June 2013

Last Name/Vendor	Invoice Number	Date	Subsidiary	Amount	Acct Unit	Account	OHIO
Depreciation Accrual	3	6/30/2013	PSC ALL UTIL	6,074.00	421	403010	970.62
BOD Restricted Stock	6	6/30/2013	PSC ALL UTIL	401,408.00	411	603841	64,144.83
ER Contribution Thrift Pl	100014	6/30/2013	PSC ALL UTIL	809.44	410	604837	97.36
Unum CWC Referees	100012	6/30/2013	PSC ALL CWC	30.88	410	604840	14.58
Business & Legal Resource	2	6/30/2013	PSC ALL UTIL	308.85	410	604845	40.37
Complianceonline	2	6/30/2013	PSC ALL UTIL	349.00	410	604846	55.77
ifesp	2	6/30/2013	PSC ALL UTIL	980.00	410	604845	156.60
Okm 000000610astax	2	6/30/2013	PSC ALL UTIL	3,235.50	421	604845	517.03
Choice Strategies	100003	6/30/2013	PSC ALL UTIL	45.00	410	604850	7.19
Choice Strategies	100003	6/30/2013	PSC ALL UTIL	45.00	410	604850	7.19
Aqua Services Ameritflex	6	6/30/2013	PSC ALL UTIL	920.40	410	604850	147.08
Choice Strategies	100001	6/30/2013	PSC ALL UTIL	928.20	410	604850	148.33
Employment Background Inv	2	6/30/2013	PSC OHIO	108.00	410	604852	108.00
Comprehensive Screening S	2	6/30/2013	PSC OHIO	117.45	410	604852	117.45
Comprehensive Screening S	6	6/30/2013	PSC OHIO	121.20	410	604852	121.20
Comprehensive Screening S	2	6/30/2013	PSC OHIO	286.19	410	604852	286.19
Employment Background Inv	2	6/30/2013	PSC OHIO	470.00	410	604852	470.00
tu Health Occ Serv Munice	2	6/30/2013	PSC ALL UTIL	25.00	410	604854	3.98
Employment Background Inv	2	6/30/2013	PSC OHIO	135.00	410	604854	136.00
American Waterworks	2	6/30/2013	PSC ALL UTIL	249.00	410	604856	39.79
12828SALUDOS HISPANOS,INC.	265433	6/30/2013	PSC ALL UTIL	595.00	410	604856	95.08
42113DIVERSITYPENNSYLVANIA	109652	6/30/2013	PSC ALL UTIL	2,782.50	410	604856	444.64
Www.Linkedin.Com	2	6/30/2013	PSC ALL UTIL	3,632.00	410	604856	580.39
Careerbuilder	2	6/30/2013	PSC ALL UTIL	3,740.00	410	604850	597.65
13089BLACK EOE JOURNAL	783	6/30/2013	PSC ALL UTIL	4,000.00	410	604856	639.20
Flowerbuds	2	6/30/2013	PSC ALL UTIL	90.95	200	604857	14.63
Fruit Flowers Broomall	2	6/30/2013	PSC ALL UTIL	72.00	300	604857	11.51
Fruit Flowers Broomall	2	6/30/2013	PSC ALL UTIL	89.50	300	604857	14.30
TOWERS PERRIN	100003	6/30/2013	PSC ALL CWC	14,500.91	410	604864	8,869.73
40705EPICOR SOFTWARE CORPO	CIV0256592	6/30/2013	PSC ALL UTIL	100.00	410	604864	15.98
Cardian Corp	2	6/30/2013	PSC ALL UTIL	103.75	410	604864	16.58
40705EPICOR SOFTWARE CORPO	CIV0257808	6/30/2013	PSC ALL UTIL	550.00	410	604864	87.89
40705EPICOR SOFTWARE CORPO	CIV0258745	6/30/2013	PSC ALL UTIL	1,350.00	410	604864	216.73
42201JOAN WILLIAMS	61013EXP	6/30/2013	PSC ALL UTIL	1,586.04	410	604864	253.45
40914EQUILIBRIA LEADERSHIP	82113	6/30/2013	PSC ALL UTIL	1,647.48	410	604864	263.27
TOWERS PERRIN	100003	6/30/2013	PSC ALL UTIL	3,000.63	410	604864	479.50
4272KELLY DAY	60513SERVICE	6/30/2013	PSC ALL UTIL	7,785.30	410	604864	1,244.04
TOWERS PERRIN	100003	6/30/2013	PSC ALL UTIL	13,009.95	410	604864	2,078.98
39234BUCK CONSULTANTS, LLC	2135863	6/30/2013	PSC ALL UTIL	14,825.00	410	604864	2,389.03
TOWERS PERRIN	100003	6/30/2013	PSC ALL UTIL	15,532.56	410	604864	2,482.10
39234BUCK CONSULTANTS, LLC	2139849	6/30/2013	PSC ALL UTIL	41,350.00	410	604864	6,507.71
TOWERS PERRIN	100003	6/30/2013	PSC ALL UTIL	51,831.58	410	604864	8,262.66
40671FROSCH REWARDS & INCE	7872	6/30/2013	ACCO ALLOCATE	1,001.35	410	604866	162.52
40671FROSCH REWARDS & INCE	7872	6/30/2013	PSC ALL UTIL	3,162.95	410	604868	505.44
40671FROSCH REWARDS & INCE	7872	6/30/2013	PSC OHIO	5,993.78	410	604868	5,993.79
Wellness Programs	100015	6/30/2013	PSC ALL UTIL	(51,408.40)	410	604869	(8,215.04)
Bed Bath & Beyond #161	2	6/30/2013	PSC ALL UTIL	3.37	410	604869	0.54
Homegoods #294	2	6/30/2013	PSC ALL UTIL	15.88	410	604869	2.64
Staples 00117481	2	6/30/2013	PSC ALL UTIL	21.77	410	604869	3.48
Superfresh #70189	2	6/30/2013	PSC ALL UTIL	23.06	410	604869	3.68
Paypal	2	6/30/2013	PSC ALL UTIL	26.14	410	604869	4.18
Party City	2	6/30/2013	PSC ALL UTIL	26.42	410	604869	4.22
Amz*webstaurantstore C	2	6/30/2013	PSC ALL UTIL	28.04	410	604869	4.48
Bj Wholesale #0110	2	6/30/2013	PSC ALL UTIL	29.22	410	604869	4.67
Giant 6464	2	6/30/2013	PSC ALL UTIL	32.93	410	604869	5.26
42677SARA C APPLEBY	52513EXP	6/30/2013	PSC ALL UTIL	41.02	410	604869	6.55
Whole Foods Pm 10249	2	6/30/2013	PSC ALL UTIL	65.16	410	604869	10.41
Tuesday Morning # 1047	2	6/30/2013	PSC ALL UTIL	65.67	410	604869	10.49
Amazon.Com	2	6/30/2013	PSC ALL UTIL	70.22	410	604869	11.22
Amazon.Com	2	6/30/2013	PSC ALL UTIL	70.23	410	604869	11.22
Paperstyle Com	2	6/30/2013	PSC ALL UTIL	116.10	410	604869	18.55
Chick-Fil-A #01218	2	6/30/2013	PSC ALL UTIL	119.93	410	604869	18.16
Amazon.Com	2	6/30/2013	PSC ALL UTIL	130.68	410	604869	20.88
Knobels Park Office	2	6/30/2013	PSC ALL UTIL	150.00	410	604869	23.97
Sephora Com	2	6/30/2013	PSC ALL UTIL	159.00	410	604869	25.41
Sephora Com	2	6/30/2013	PSC ALL UTIL	159.00	410	604869	25.41
Harleysville Rentac*inc.	2	6/30/2013	PSC ALL UTIL	184.30	410	604869	28.26
Chick-Fil-A #01218	2	6/30/2013	PSC ALL UTIL	199.34	410	604869	31.85
42328SAFEGUARD BUSINESS GY	24654	6/30/2013	PSC ALL UTIL	249.92	410	604869	39.04
42328SAFEGUARD BUSINESS GY	28931540RPRNT	6/30/2013	PSC ALL UTIL	300.72	410	604869	48.06
Dream Essentials 00 Of 00	2	6/30/2013	PSC ALL UTIL	310.00	410	604869	50.60
Courtyard By Marriott-Rai	2	6/30/2013	PSC ALL UTIL	387.00	410	604869	61.84
42328SAFEGUARD BUSINESS GY	28931538RPRNT	6/30/2013	PSC ALL UTIL	428.03	410	604869	68.40
42328SAFEGUARD BUSINESS GY	24653	6/30/2013	PSC ALL UTIL	452.86	410	604869	72.33
41185FIT ESSENTIALS INC	0870	6/30/2013	PSC ALL UTIL	465.00	410	604869	74.31
42328SAFEGUARD BUSINESS GY	28931544RPRNT	6/30/2013	PSC ALL UTIL	512.97	410	604869	81.97
41185FIT ESSENTIALS INC	8873	6/30/2013	PSC ALL UTIL	610.00	410	604869	97.48
41321ALERE WELBEING INC	33483	6/30/2013	PSC ALL UTIL	750.00	410	604869	119.85
42328SAFEGUARD BUSINESS GY	28931539RPRNT	6/30/2013	PSC ALL UTIL	1,109.90	410	604869	177.36
41185FIT ESSENTIALS INC	8869	6/30/2013	PSC ALL UTIL	3,800.00	410	604869	575.28
40516RR DONNELLEY	1253840400	6/30/2013	PSC ALL UTIL	277.00	320	632800	44.26
39949MARTIN P GERSHOFMAN /	6713	6/30/2013	PSC ALL UTIL	501.66	330	632800	80.16

Hines, Steven

From: Saluga, Stephen J. <SJSaluga@aquaamerica.com>
Sent: Friday, January 17, 2014 4:38 PM
To: Willis, William
Cc: Drumm, Jane; 'Andrew Campbell'; Hines, Steven
Subject: FW: Allocation Factors DR #8 Due 1/15/14 Case 13-2124-WW-AIR
Attachments: Response to DR #8.pdf

[PUCO DR#8](#)

Please provide the Staff with a detailed supporting schedule showing allocation factors used and the methodology to allocate corporate office expenses, customer accounting expenses, and any other common administrative and general expenses to the jurisdictional test year. Thank you.

[Aqua Ohio Response](#)

Attached is the Aqua Ohio response to PUCO DR #8- Allocation Factors.

From: Hideg, Richard A.
Sent: Thursday, January 02, 2014 1:39 PM
To: Saluga, Stephen J.
Cc: Martin, Elaine J.
Subject: FW: Allocation Factors DR #8 Due 1/15/14

From: Willis, Ross [<mailto:Ross.Willis@puc.state.oh.us>]
Sent: Thursday, January 02, 2014 1:23 PM
To: Hideg, Richard A.; Kopas, Robert A.
Cc: PUCO Aqua Ohio 13-2124-WW-AIR
Subject: Allocation Factors DR #8 Due 1/15/14

Please provide the Staff with a detailed supporting schedule showing allocation factors used and the methodology to allocate corporate office expenses, customer accounting expenses, and any other common administrative and general expenses to the jurisdictional test year. Thank you.

Wm. Ross Willis

*Public Utilities Commission of Ohio
Chief, Rates Division
Utilities Department
(614) 466-8040
PUCO.ohio.gov*

Saluga, Stephen J.

Subject: FW: Allocation Factors DR #8 Due 1/15/14

From: Hideg, Richard A.
Sent: Thursday, January 02, 2014 1:39 PM
To: Saluga, Stephen J.
Cc: Martin, Elaine J.
Subject: FW: Allocation Factors DR #8 Due 1/15/14

From: Willis, Ross [<mailto:Ross.Willis@puc.state.oh.us>]
Sent: Thursday, January 02, 2014 1:23 PM
To: Hideg, Richard A.; Kopas, Robert A.
Cc: PUCO Aqua Ohio 13-2124-WW-AIR
Subject: Allocation Factors DR #8 Due 1/15/14

Please provide the Staff with a detailed supporting schedule showing allocation factors used and the methodology to allocate corporate office expenses, customer accounting expenses, and any other common administrative and general expenses to the jurisdictional test year. Thank you.

Wm. Ross Willis

Public Utilities Commission of Ohio

Chief, Rates Division

Utilities Department

(614) 466-8040

PUCO.ohio.gov



The major allocation for TV service center allocation and customer accounting expenses are attached.

Any additional support for other allocations in the case will be provided as needed.

AQUA OHIO, INC
ADMINISTRATIVE & GENERAL EXPENSES ALLOCATION
2013 ALLOCATION %'s
BASED ON DATA as of 12/31/12 - Use to Allocate Service Center for '13

DISTRICT	PLANT & CWP AMOUNT	EMPLOYEES (WEIGHTED 50%) NUMBER %	GROSS PAYROLL (WEIGHTED 50%) NUMBER %	WATER TREATED (WEIGHTED 50%) MG %	CUSTOMERS (WEIGHTED 50%) NUMBER %	TOTAL REVENUE (WEIGHTED 50%) AMOUNT %	TOTAL %s	ALLOCATION PERCENT
STARK	119,352,031.02	28 8.64%	1,705,876 8.59%	3,476.00 12.95%	35,592 12.08%	20,266,703 10.85%	79.78%	22.794%
STRUTHERS	52,816,560.96	21 6.48%	1,301,403 6.55%	1,578.60 5.88%	19,204 6.52%	12,113,726 6.48%	43.72%	12.491%
FRANKLIN - Sewer	17,709,640.25	4 1.23%	326,359 1.64%	0.00%	6,573 2.23%	3,988,286 2.13%	11.20%	3.200%
Allocation percent to divisions other than in the rate case								
LAKE SHORE - LAKE (Includes Sub, Norlick, Seneca, Auburn, Ashtabula)	100,354,704.10	27 8.33%	1,685,927 8.49%	2,890.10 10.77%	32,230 10.94%	17,443,345 9.34%	70.29%	20.083%
MASURY	3,561,522.44	- 0.00%	- 0.00%	- 0.00%	1,491 0.51%	842,734 0.45%	1.75%	0.501%
ASHTABULA	39,806,541.90	23 7.10%	1,471,934 7.41%	1,950.00 7.27%	12,809 4.35%	10,184,559 5.45%	40.47%	11.563%
MARION	59,538,172.02	25 7.72%	1,508,190 7.59%	2,274.90 8.48%	17,404 5.91%	14,337,022 7.67%	50.67%	14.478%
TIFFIN	22,290,774.67	15 4.63%	852,644 4.29%	602.80 2.25%	7,856 2.67%	5,195,347 2.78%	21.60%	6.171%
FRANKLIN - Water	18,748,454.95	14 4.32%	753,241 3.79%	571.60 2.13%	8,003 2.72%	5,418,512 2.90%	20.05%	5.728%
MANSFIELD	3,817,361.74	2 0.62%	136,646 0.69%	71.70 0.27%	1,368 0.46%	779,028 0.42%	3.31%	0.945%
PORTAGE	1,482,894.52	- 0.00%	13,290 0.07%	- 0.00%	905 0.31%	547,341 0.29%	1.00%	0.285%
LAKE WHITE	1,217,966.73	- 0.00%	- 0.00%	- 0.00%	422 0.14%	250,844 0.13%	0.55%	0.157%
LAWRENCE COUNTY	6,919,649.55	3 0.93%	173,428 0.87%	- 0.00%	3,448 1.17%	2,052,528 1.10%	5.61%	1.604%
Allocation percent to divisions in the rate case								
TOTAL	447,616,274.85	162 50.00%	9,928,938 50.00%	13,415.70 50.00%	147,305 50.00%	93,419,975 50.00%	350.00%	100.000%
								61.514%
								100.000%

Allocation percent to divisions in the rate case

61.514%

TOTAL

100.000%

AQUA OHIO, INC.
CUSTOMER ACCOUNTING EXPENSE ALLOCATION
2013 ALLOCATION %'s
BASED ON DATA as of 12/31/12 - Use to Allocate '13

<u>USED FOR CALL CENTER COSTS</u>		<u>CUSTOMERS</u>	
<u>DISTRICT</u>		<u>NUMBER</u>	<u>%</u>
STARK		35,592	24.16%
STRUTHERS	Water only	19,204	13.04%
FRANKLIN - Sewer		6,573	4.462%
Allocation to divisions not in the rate case			41.66%
LAKE SHORE - LAKE		32,230	21.88%
(Includes Sub, Norlick, Seneca, Auburn, Ashtabula)			
MASURY		1,491	1.012%
ASHTABULA		12,809	8.70%
MARION		17,404	11.81%
TIFFIN		7,856	5.33%
FRANKLIN - Water		8,003	5.43%
MANSFIELD		1,368	0.93%
PORTAGE		905	0.61%
LAKE WHITE		422	0.29%
LAWRENCE COUNTY		3,448	2.34%
Allocation to divisions in the rate case			58.34%
TOTAL		<u>147,305</u>	<u>100.00%</u>

AQUA OHIO, INC.
CUSTOMER ACCOUNTING EXPENSE ALLOCATION
2013 ALLOCATION %'s
BASED ON DATA as of 12/31/12 - Use to Allocate '13

<u>USED FOR BILLING PROCESSING</u>		CUSTOMERS	
DISTRICT		NUMBER	%
	Includes Firestone Trace & Sites Lake	35,823	24.25%
STARK			
STRUTHERS	Includes water & Sewer	38,408	26.00%
FRANKLIN - Sewer		6,573	4.45%
	Allocation to divisions not in the rate case		54.71%
LAKE SHORE - LAKE (Includes Sub, Norlick, Seneca, Auburn, Ashtabula)		32,230	21.82%
MASURY		1,491	1.01%
ASHTABULA	*half since bi-monthly	6,405	4.34%
MARION	*half since bi-monthly	8,702	5.89%
TIFFIN	*half since bi-monthly	3,928	2.66%
FRANKLIN - Water		8,003	5.42%
MANSFIELD		1,368	0.93%
PORTAGE		905	0.61%
LAKE WHITE		422	0.29%
LAWRENCE COUNTY		3,448	2.33%
	Allocation to divisions in the rate case		45.29%
TOTAL		147,706	100.00%
			100.00%

*The allocation for the billing process is calculated based on a bi-monthly billing cycle for the divisions of Ashtabula, Marion, and Tiffin in the Prior American Properties. Effective December 2013 all of these divisions were on a monthly billing cycle.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/4/2014 4:30:25 PM

in

Case No(s). 13-2124-WW-AIR

Summary: Testimony Testimony of Steven B. Hines in Opposition to the Stipulation and Recommendation on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Yost, Melissa R. Ms.