UNITED WATER FLORIDA

DOCKET NO. 960451-WS

ON BEHALF OF THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION
DIVISION OF AUDITING AND FINANCIAL ANALYSIS

FILED: 12/18/96

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FPSC-RECORDS/REPORTING

DIRECT TESTIMONY OF MICHAEL E. BUCKLEY

2 Q. Please state your name and business address.

1

- 3 A. My name is Michael E. Buckley and my business address is 2540 Shumard 4 Oak Blvd, Tallahassee, Florida.
- 5 Q. By whom are you presently employed and in what capacity?
- 6 A. I am employed by the Florida Public Service Commission as a Regulatory
 7 Analyst IV in the Division of Auditing and Financial Analysis.
- 8 Q. How long have you been employed by the Commission?
- 9 A. I have been employed by the Florida Public Service Commission for approximately seven years and nine months.
- 11 Q. Briefly review your educational and professional background.
- A. I have a Bachelor of Business Administration degree with a major in accounting from Oklahoma University. I was hired as a Regulatory Analyst I by the Florida Public Service Commission in July 1989.
- 15 Q. Please describe your current responsibilities.
- A. Currently, I am a Regulatory Analyst IV with the responsibilities of planning and directing the more complicated financial, program, special and investigative audits, including audits of affiliate transactions. I am also responsible for creating audit work programs to meet a specific audit purpose and integrating EDP applications into these programs. I also direct and control assigned staff work as well as participate as a staff auditor and audit manager.
- 23 Q. What is the purpose of your testimony today?
- A. The purpose of my testimony is to sponsor the staff audit report of United Water Florida, Docket No. 960451-WS. The audit report is filed with

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my testimony and is identified as MEB-1

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- Q. Was this audit report prepared by you?
- 3 A. Yes, I was the audit manager in charge of this audit.
 - Q. Please review the audit exceptions in the audit report.
 - A. Audit Exceptions disclose substantial non-compliance with the Uniform System of Accounts, a Commission rule or order. Staff Advisory Bulletins, and formal company policy. Audit Exceptions also disclose company exhibits that do not represent company books and records and company failure to provide underlying records or documentation to support the general ledger or exhibits.

Audit Exception No. 1 discusses the NARUC Uniform System of Accounts. Commission Rule 25-30.115(1), Florida Administrative Code, requires that "Water and wastewater utilities shall, effective January 1, 1986, maintain its accounts and records in conformity with the 1984 NARUC Uniform Systems of Accounts adopted by the National Association of Regulatory Utility Commissioners." The utility uses its own chart of accounts for its record keeping. However, it cross-references these accounts to the NARUC Uniform Systems of Accounts (USOA). Many of these cross-references are incorrect. For instance, in the balance sheet accounts, the utility included Completed Construction Not Classified (USOA account 106). Property Held For Future Use (USOA account 103), and CWIP (USOA account 105) in its account 101. It also incorrectly cross-referenced Accumulated Amortization of Acquisition Adjustments, Other Accounts Receivable (Employees), and Accumulated Provision for Uncollectible Accounts. I believe that these errors in cross-referencing are significant enough to be considered a violation of the rule requiring the USOA.

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Audit Exception No. 2 discusses continuing property records. The 1 utility Policy Number 120 directs that: "each company maintain separate Continuing Property Records (CPR) ...(and) when properly established will provide: a) an inventory 3 of property records which may be readily spot checked for proof 4 of existence. b) the association of costs with such property units 5 to assure accurate accounting of retirements..." 6 The NARUC USOA also requires that "all property shall be considered as 7 consisting of (1) retirement units and (2) minor items of property." The USOA 8 also goes on to require that when retirement units are retired from utility 9 plant in service. the book cost shall be credited to the utility plant 10 account. Without CPR records, this entry cannot be accomplished. 11 Also, as the utility's own policy points out. CPR records also serve 12 as a method of spot checking for proof of existence. A utility should keep 13 track of all the property that is owned and make sure that it continues to be 14 properly recorded and that none of the property has been lost, stolen or 15 16 I recommend that the utility be directed to comply with the NARUC USOA damaged. 17 and its own company policy and maintain continuing property records. 18 Audit Exception No. 3 discusses the Allowance for Funds used During 19 Construction (AFUDC). Commission rule 25-30.116(3), Florida Administrative 20 Code. states "a discounted monthly AFUDC rate. calculated to six decimal 21 places. shall be employed to ensure that the annual AFUDC charged does not exceed authorized levels." Subsection (5) further states that "no utility may 23 charge or change its AFUDC rate without prior Commission approval " 24

- 4 -

6 which deta 7 should also 8 Audit 9 capital struc 10 of United Wat 11 MFR Schedule D 12 Following are t 13 an increase to 1 14 December 1 15 January 199 16 February 199 17 March 1995 18 April 1995 19 August 1995 20 June 1995 21 July 1995 August 1997	ion order 21492, dated June 30. 1989, established an AFUDC rate of or this utility. Beginning January 1. 1995, the utility used an AFUDC reduced by \$94.515 to reflect the discounted rate approved in Order Exhibit MEB-2 attached to my testimony is the set of work papers be reduced consistent with the adjustment for 1995. Exhibit MEB-2 attached to my testimony is the set of work papers be reduced consistent with the adjustment for 1995. Exception No. 4 discusses numerous errors in the MFR pages for the enworks Inc. The first five adjustments are to the capital structure enworks Inc. The first adjustment is to the preferred stock. The thirteen balances from the general ledger. These result in \$824.500 \$820.000 815.700 815.700 815.700 815.700 815.700
21 July 1995	
September 1995	815,700
October 1995	815.700
November 1995	815.700 815.700

December 1995 801.700

The second adjustment is to short-term debt. Schedule D-4 of the MFRs indicates a thirteen-month average for short-term debt. For most of the months, the utility has calculated a daily average for each month in order to accurately calculate effective interest rates. However, three months reflect incorrect daily averages. December 1994 should be changed to \$6,411,290.

April 1995 should be changed to \$235,000. June 1995 should be changed \$5,870,000. These changes result in a decrease to short-term debt of

The third adjustment is to the long-term debt cost rate. The utility has numerous issues of long-term debt. One coupon rate was entered incorrectly when listing the debt issues and coupon rates in the schedules supporting the MFRs. Account 221-053 should have a coupon rate of 6.35% which results in a new long-term debt rate of 8.18%.

The fourth adjustment is to the short-term debt cost rate. The auditors recalculated the monthly interest expense for short-term debt and found errors in the calculations. The correct monthly balances are listed below. When these interest amounts are compared to the corrected short-term debt balances. the resulting effective interest rate is 6.41%

December 1994	\$35,384
January 1995	43.712
February 1995	2.809
April 1995	1.236
May 1995	11.960
June 1995	30,921

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The fifth adjustment is to the common equity cost rate. After making the previous adjustments to the balances for debt and equity, the cost rate for equity should be adjusted to reflect the revised ratios. This results in a new rate of 11.57%.

The next four adjustments are to the capital structure items from United Water Florida. The first adjustment is to the deferred income tax average. In calculating the thirteen-month average for deferred income taxes, the utility used a December 1995 balance of \$231,044. However, the actual balance was \$917,179. Substituting the correct balance and recalculating the average results in an increase to the average deferred income tax of \$52,779.

The second adjustment is to the average balance for investment tax credits (ITCs). Schedule D-2 Page 2 of 9 reflects the thirteen monthly balances for ITCs. The December 1994 balance is typed incorrectly and should be \$1,281,558. This decreases the average balance by \$853,846.

The third adjustment is to the customer deposit cost rate. The only customer deposits that the utility has collected are from commercial laundry facilities. Commission rule 25-30.311(4)(a), Florida Administrative Code, requires an interest rate of 7 percent on non-residential deposits.

The fourth adjustment is to the ITC cost rate. After making the previous adjustments to the balances for debt and equity, the cost rate for ITCs should be adjusted to reflect the revised ratios. This results in a new rate of 9.69%.

Audit Exception No. 5 addresses the MFR schedules A-1 and A-2 for water and wastewater rate base. Commission rule 25-30.437, Florida Administrative

Code, requires that "each Class A utility applying for a rate increase shall provide the information required by Commission Form PSC/WAW 19 (11/93). entitled "Class A Water and/or Wastewater Utilities Financial. Rate and Engineering Minimum Filing Requirements." This form includes Schedules A-1 and A-2 as rate base schedules and the explanation describes the schedule as an "average rate base for the test year". United Water Florida did not present an average rate base for the test year on these schedules. The rate base presented is a year-end rate base. These schedules should be adjusted to reflect an average rate base, unless the utility demonstrates extraordinary 8 9 growth or investment costs, with no corresponding increase in revenues. 10

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Audit Exception No. 6 discusses plant held for future use reflected on the utility's general ledger. The utility general ledger reflects \$23.776 for plant held for future use but this amount is not reflected in the MFRs. I recommend that the MFRs be reduced by \$23,776 to reflect the balance on the general ledger.

Audit Exception No. 7 discusses accumulated depreciation. Page 12 in the audit report only addresses wastewater. However, our audit also looked at the water account. This exception actually covers four areas for both water and wastewater. First, the MFRs reflect a year-end balance of accumulated depreciation instead of a thirteen-month average. According to the general ledger, the thirteen-month average balance is \$8,020,895 for water and \$16,323,875 for wastewater. This is \$131,055 less than shown in the MFRs for water and \$706.459 less for wastewater. Second, the MFR balances for accumulated depreciation are taken from the utility's subsidiary depreciation schedules. However, these schedules do not reflect the general ledger

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balances. For water, the MFRs are \$120,808 greater than the general ledger. For wastewater, the MFRs are \$120,816 less than the general ledger. The third area concerns the utility's change in 1983 from depreciating total plant to depreciating plant by account. The 1983 depreciation schedules show \$1,389,492 for water and \$3,129,090 for wastewater labeled "Reserve for Depreciation prior to 1982." These amounts were written off by 1985. Therefore, the balance in the accumulated depreciation account is solely the depreciation since 1983. The fourth area discusses the depreciation rates used. In 1986, the utility changed its depreciation rates from those used in the last rate proceeding. The rates the utility changed to are the rates included in the Commission's depreciation rule 25-30.140. Florida Administrative Code. The audit attempted to recalculate accumulated depreciation for wastewater using the rates used in the last order. Without adjustment for the other errors, the audit calculated a balance for wastewater accumulated depreciation of \$17.552,424.

Q. Please review the audit disclosures in the audit report.

A. Audit Disclosures disclose material facts that are outside the definition of an Audit Exception.

Audit Disclosure No. 1 discusses several expense items that are included in the MFRs that are normally excluded for rate proceedings. The first item recommends that \$9,603 be disallowed for items which are normally disallowed for rate determinations. These items generally include charitable contributions, association dues, and golf cart fees. A full listing is included in Exhibit MEB-3 attached to my testimony. The second item is for life insurance for officers and employees. The utility paid \$17,788 for life

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insurance for officers and employees. The third item states that the utility misclassified a \$10.580 expense as Water insurance when it should have been classified as travel expense. The last item relates to the allocation of rent 2 expense. The utility allocated approximately 93% of the rent expense to the 3 water systems. I believe that the rent should be reduced to 70% for water and 4 the remainder should be allocated to wastewater. This 70/30 split matches the 5 utility's other allocations. This adjustment results in a reduction of 7 \$51.330 to water and an increase of \$51.330 to wastewater. Audit Disclosure No. 2 discusses \$78.112 included in expenses in the 8 MFRs for "investor relations." Previous commission orders have disallowed 9 these types of cost in whole and in part. Commission Order No. 11307, issued 10 November 10, 1982, in a Petition of Tampa Electric Company, states 11 "Stockholder relations expenses are incurred for activities 12 related to image building and goodwill. This type of expense is 13 not normally allowed by this Commission if incurred by a utility." 14 Commission Order No. PSC-96-1320-FOF-WS, issued October 30. 1996. for a 15 16 Petition of Southern States Utilities, Inc., states "However, through the ROE leverage formula, we have allowed 17 recovery of costs associated with being a publicly traded utility. 18 Specifically, in the calculation of the appropriate cost of 19 equity, we recognized an additional 25 basis points to the 20 otherwise determined cost of equity to provide for these costs. 21 To ask SSU's ratepayers to pay 25 basis points on ROE in addition 22 to the amount requested by SSU would be duplicative. We also 23 question whether the benefits SSU receives from MP&L are worth 24 25

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\$208.776 to the ratepayers in Florida. Consequently, we shall 1 | disallow all of the utility's requested shareholder services 2 expenses of \$208,776." 3 Commission Order No. PSC-94-0119-FOF-TL, issued February 1, 1994, in a 4 Petition of Quincy Telephone Company states 5 "Intrastate expense should be reduced by \$6.514 to remove half of 6 the costs for activities related to maintenance of an active 7 investor relations program, since these activities benefit both 8 the stockholders and the ratepayers." 9 The amount included in the MFRs is approximately 7% of the total spent 10 by the parent company and consists of: 11 "Annual Report" \$8.765 12 "Quarterly Reporting" \$7.097 13 "Annual Meeting" \$18.278 14 "Transfer Agent" \$26,133 15 "Other" \$17,839 16 I am merely disclosing these amounts for the Commission to determine the 17 appropriate treatment. 18 Does this conclude your testimony? 0. 19 Yes, it does. A. 20 21 22 23 24 25

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PLORIDA PUBLIC SERVICE COMMISSION

AUDIT REPORT

RATE AUDIT

YEAR ENDED DECEMBER 31, 1995

Field Work Completed

November 19, 1996

UNITED WATER FLORIDA INC.

Jacksonville, Plorida

Duval County

DOCKET NO. 960451-WS

Audit Control Number 96-214-1-2

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FPSC-RECORDS/REPORTING

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I. EXECUTIVE SUMMARY:

AUDIT PURPOSE: We have applied the procedures described in Section II of this Report to audit the schedules of Rate Base, Net Operating Income, and Capital Structure for the test period ending December 31, 1995, prepared by United Water Florida Inc., for their Petition for rate relief, FPSC Docket information.

DISCLAIM PUBLIC USE: This is an internal accounting report prepared after performing a limited scope audit. Accordingly, to assist the Commission Staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

OPINION: The audited MFR's of Rate Base, Net Operating Income, and Capital Structure for the test period ending December 31, 1995 represent United Water Florida Inc. books and records which have not been maintained in substantial compliance with Commission directives as expressed in the following exceptions and disclosure. The expressed opinions extend only to the scope of the work described in Section II

II. AUDIT SCOPE:

The opinions contained in this report are based on the audit work described below. When used in this report, the following definitions shall apply.

COMPILED - The audit staff reconciled exhibit amounts with the general ledger, visually scanned accounts for error or inconsistency, disclosed any unresolved error, irregularity, or inconsistency, and except as noted, performed no other audit work.

RATE BASE: Compiled Plant-in-Service; tested selected additions and retirements for the year ended December 31, 1995; recomputed Construction Work in Progress; selected Work Order amounts and traced journal entries to accounts payable ledgers and vendor invoices; recomputed accumulated depreciation balances; recomputed working capital including interest bearing amounts, unfunded reserves, and non-utility transactions; traced CIAC total balances to the general ledger for the year ended December 31, 1995. Traced ended December 31, 1995.

NET OPERATING INCOME: Compiled the Operation and Maintenance Expenses for the year ending December 31, 1995; matched company's O&M accounting structure (non-USOA format) to the rate filing format (USOA), and traced data from the general ledger to the company's rate filing schedules; performed a selective analysis of the following accounts: Purchased Water; Purchased Power; Chemicals; Materials and Supplies; Contractual Services Other; Rental; Transportation; Insurance vehicle; Insurance general Purchased Sewage Treatment; Sludge Removal expense. Reviewed selected invoices and selected checks, equipment, and automobile Reviewed the allocation of corporate management costs and other overhead charges flowing down to the books of United Water Florida Clearing account of United Water Florida).

CAPITAL STRUCTURE: Recomputed 13 month averages for each General Ledger account in capital; recomputed cost rates for all General Ledger accounts; reconciled all General Ledger balances of the parent's (United Waterworks, Inc.) capital; obtained copies of all long term debt agreements; recomputed short term debt daily average; recomputed Deferred Income Taxes; recomputed parent company's cost of capital for use in allocating Florida's Equity; recomputed United Water Florida's Weighted Cost.

OTHER: Read the Board of Directors Minutes for 1991 to 1995; obtained federal and state income tax returns; obtained gross receipts tax returns and ad valorem tax returns; obtained internal audit reports for 1994 and 1995.

III. AUDIT EXCEPTIONS:

AUDIT EXCEPTION NO. 1

SUBJECT: UNIFORM SYSTEM OF ACCOUNTS FOR WATER AND WASTEWATER

STATEMENT OF FACT: Rule 25-30.115 F.A.C. (1) states "Water and wastewater utilities shall, effective January 1, 1986, maintain its accounts and records in conformity with the 1984 NARUC Uniform System of Accounts (USOA) adopted by the National Association of Regulatory Utility Commissioners."

AUDIT OPINION: The Company General Ledger does not follow the USOA. The table provided by the Company to cross-reference the General Ledger accounts to the USOA also does not fully comply with the USOA.

SUBJECT: CONTINUING PROPERTY RECORDS

STATEMENT OF FACT: Instruction 2.A., General - Records, states "Each utility shall keep NARUC, Class A, Water Utility, Accounting its books of accounts, and all other books, records, and memoranda which support the entries in such books of account so as to furnish readily full information as to any item included in any account."

Company Policy Number 120, Page 1 of 1, adopted by United Water Florida

"1.1 It is the policy of GWC, where directed by the Regulatory Commission, that each company maintain separate Continuing Property Records (CPR) of the original book costs of all water and sewer plant located within each city, town, village or borough of the

"The CPR when properly established will provide:

a) An inventory of property records which may be readily spot checked for proof of existence.

b) The association of costs with such property units to assure

c) The dates of installation and removal of property units to provide age-life data for use in depreciation studies."

AUDIT OPINION: The Company records do not comply with NARUC Uniform Systems of Accounts Class A Water and Wastewater instructions 2.A. The Company also does not follow its own policy for Continuing Property Records. The Company should be directed to comply with NARUC Accounting

SUBJECT: ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION

STATEMENT OF FACT: Rule 25-30.116 (3) F.A.C. states "Discounted monthly AFUDC rate. A discounted monthly AFUDC rate, calculated to six charged does not exceed authorized levels."

Rule 25-30.116 (3)(b) states "The monthly AFUDC rate, carried out to six decimal places, shall be applied to the average monthly balance of eligible CWIP that is not included in rate base."

Rule 25-30.116 (5) states "No utility may charge or change its AFUDC rate without prior Commission approval."

FPSC Order 21492 dated June 30, 1989, states "Ordered by Florida Public Service Commission that the application of Jacksonville Suburban Utilities Corporation for establishment of an 11.12% AFUDC rate is approved."

The company does not use a monthly discounted rate to calculate monthly AFUDC charges. Instead the company divided the AFUDC rate by 12 and calculates monthly charges.

The company did not use the approved AFUDC rate of 11.12% as of January 1, 1995, but used an AFUDC rate of 14.83%.

If the company had used the approved AFUDC rate and monthly discounted rate for the year 1995, the AFUDC charges would have been \$94,515.00 less then what was booked in 1995.

Total AFUDC Booked by Company in 1995:

330,619.00

Total AFUDC Estimated Per FPSC Order Rate:

236,104.00

Amount Difference from Ordered Rate

\$94,515.00

An AFUDC rate of 14.83% is still being used in 1996.

OPINION: The 1995 rate base should be reduced by \$94,515.00. The projected 1996 and 1997, rate bases should also be adjusted.

SUBJECT: CAPITAL STRUCTURE

STATEMENT OF FACT: Numerous errors were made in the MFRs for Capital Structure:

United Waterworks Inc.

- 1. Preferred Stock Calculation Error (13 Month General Ledger Average understated \$4,631).
- 2. Short Term Debt 13 Month Average Calculation overstated \$655,595. (Misstatement of average amount outstanding for December 1994, April and June 1995)
- 3. Long Term Debt Cost Rate should be 8.18%. (Fallout calculation).
- 4. Short Term Debt Cost Rate recalculation should be 6.41%.
- (Fallout calculation). 5. Common Equity Cost Rate should be 11.57%. (Fallout calculation).

United Water Florida

- 1. Deferred Income Tax 13 Month Average understated \$52,779 (Misstatement of December 1995 Total calculation).
- 2. Investment Tax 13 Month Average overstated \$853,846 (Misstatement of December 1994 Month Amount).
- 3. Customer Deposits Cost Rate should be 7.00% when a utility elects not to refund a deposit after 23 Months (F.A.C. Rule 25-30.311(4)(a). Laundries are the only customer deposits held.
- 4. Investment Tax Cost Rate should be 9.69%. (Fallout Calculation)

AUDIT OPINION: The auditor's recalculated 13 Month average capital structure follows.

United Water Florida, Inc. Capital Structure 13-MONTH AVERAGE Rate Base Audit Test year ended: 12/31/95

STAFF CALCULATED

Capital Components	UWF Per Book	Equity Allocation based on Parents Capital Structure	Test Year Adjusted	Ratio	Cost Rate	Weighte
Long-Term Debt Short-Term Debt Preferred Stock Common Equity Customer Deposits Investment Tax Acc. Deferred Income Tax	59,382,462 9,133 1,264,038 980,755 61,636,388	32,268,508 291,049 121,588 26,701,317	32,268,508 291,049 121,588 26,701,317 9.133 1,264,038 980,755 61,636,388	52.35% 0.47% 0.20% 43.32% 0.01% 2.05% 1.59%	8.18% 6.41% 5.00% 11.57% 7.00% 9.69% 0.00%	Cost 4 28% 0 03% 0 01% 5 01% 0 00% 0 20% 0 00% 9 53%

Equity Percentage (0.01131/0.4496)+(0.0905)=0.1157

Allocation based on United Waterworks, Inc. 13 Month Average Capital Structure

Long-Term Debt	13-Month Average (216,462,668)	Ratio	Cost Rate	Weighted Cost
Short-Term Debt Preferred Stock Common Equity	(1,952,405) (815,631) (179,117,000) (398,347,704)	54.34% 0.49% 0.20% 44.96% 100.00%	8.18% 6.41% 5.00% 11.57%	4 45% 0.03% 0.01% 5.20% 9.69%

WP 31

SUBJECT: MFR SCHEDULE A-1 & A-2 RATE BASE: WATER & SEWER

STATEMENT OF FACT: The Company has filed these Schedules entitled 13-month average rate base on a year-end basis instead of the required calculation based on a 13 month average. This results in an overstatement of Water Rate Base of \$1,754,670 and an overstatement of Sewer Rate Base of \$3,487,740.

AUDIT OPINION: The Company should file this Schedule on a 13-month

SUBJECT: PROPERTY FOR FUTURE USE

STATEMENT OF FACT: The Company General Ledger reflects \$23,776 in Property for future use. It has been included in Utility Plant in Plant on MFR A-1. The Company shows a \$0 amount for Nonused

AUDIT OPINION: \$23,776 should be removed from Rate Base for property

SUBJECT: ACCUMULATED DEPRECIATION

STATEMENT OF FACT: SAB 17 issued February 13, 1990 requires "If a company has previously appeared before this Commission (example would be a revenue rate case) and (1) has received an order to use a certain depreciation rate or set of rates, or (2) a depreciation rate or rates were used to calculate expenses allowed in calculating allowed tariffs, those explicit or implicit depreciation rates from the latest Commission action are in effect until the first Commission action under the new (effective 3-22-84) depreciation rule."

AUDIT OPINION AND CONCLUSION: The Company changed depreciation rates in 1986 from the rates used in the Company's last rate case in 1980.

This change of rates caused the Company to under depreciate sewer plant. The proper balance in year-end accumulated depreciation is \$17,552,424. This balance represents recomputing depreciation from 1981 through 1995 at the same rates in effect in 1980.

The filed 12/31/95 year-end "per books" accumulated depreciation of sewer \$16,909,582 is understated by \$642,842.

The 12/31/95 general ledger balance for accumulated depreciation of sewer \$17,030,424 is understated by \$522,091.

In 1981 and 1982, the Company combined accumulated depreciation for most plant accounts into one amount. In 1983, the Company began to show accumulated depreciation by each plant account.

The 1983 depreciation schedule shows \$3,129,090 labelled "Reserve for Depreciation prior to 1982" separately. Prior accumulated depreciation was not allocated to the plant accounts.

The beginning balance for accumulated depreciation by account equals

The \$3,129,090 was written off by 1985.

RECOMMENDATIONS: The Company should adjust the general ledger and filed amounts for the understatement in sewer depreciation.

AUDIT DISCLOSURE NUMBER 1

SUBJECT: 0 & M EXPENSES

STATEMENT OF FACT: The O & M Water expense accounts contained items which normally are excluded for rate determination (Charity contributions, Rotary dues, etc.).

#675 Miscellaneous Expenses - Water #604 Life Insurance for Officers and Employees - Water	
and Employees	(\$3,662)
The Own Sewar and Mater	(\$5,336)

The O&M Sewer expense accounts contained items which normally are excluded for rate determination (Charity contributions, Rotary dues, etc.).

#775 Miscellaneous Expenses - Sewer #704 Life Insurance for Officers and Employees - Sewer	
insurance for Officers and Employees	(\$5,941)
In another install	(\$12.451)

In another instance, the O & M expense account was mistitled; (Insurance - Water should have been Travel - Water)

#656 Insurance - Water #675 Travel - Water	water)	
mater		(\$10,580) \$10,580

Rent also was not allocated to sewer. The following entry should be made:

#641 Rent - Sewer #741 Rent - Water	26
water	\$51,330 (\$51,330)

AUDIT DISCLOSURE NUMBER 2

SUBJECT: INVESTOR RELATIONS

STATEMENT OF FACT: \$78,112 was allocated to United Water Florida for United Water Annual Report, Quarterly Reporting, Annual Meeting, Transfer Agent and other. Order Number 11307 and Order Number PSC-96-0119-FOF-TL disallowed all of these expenses. Order Number PSC-94-

All of the Investor Relations Expenses were charged to Water.

EXHIBIT MEB - 1 (PAGE 15 OF 19)

Schodule of Water Rate Seco Company: United Water Florida Docket No.: 989461-199 Test Year Ended: 12/21/87 Historic [x] or Projected [x]

Ploride Public Bervice Commission Schedule: A-1 Page 1 of 1 Propose: FMcGuire

Explanation: Provide the celculation of 13-month average rate been for the test year, showing all adjustments. All non-used and useful items should be reported as Plant Hald for Future Use. Use the Balance Shoat Mathod approach to determine working capital.

		Transmitte training training capital.					
(Ap.	Description	Balanco Por Baulo 12/31/95	Adjustments	Projected Belance 12/31/96	1007 Adbretments	Projected Belance 12/31/97	Deporting Schoolston
•	Utility Plant in Barvios	46,337,300	0,767,326	52,104,634	0,000,005	60,004,310	A-6
2	Utility Land & Land Plighto	602,700		802,700		802,708	A-4
3	Total Utility Plant in Sec.	46,830,076	6,174,660	82,104,634	7,292,451	00,307,005	
•	Loor: Non-Used & Veeled Plant						
•	Construction Work in Progress	2,700,000	(2,700,000)				
•	Less Accuss. Depreclation	(0,272,707)	(1,202,402)	(0,636,220)	(1,600,700)		A-0
,	Lovo CIAC	(21,843,810)	(2,034,100)	(23,877,910)	(004,400)		A-12
•	Accumulated Ameritz, of CIAC	4,824,971	623,600	5,348,570	648,107	6,000,077	A-14
•	Acquisition Adjustments	894,320		804,320		604,320	0-00
10	Anoum, Amort, of Acq. Adjustments				(22,207)	(22,267)	
**	Loss Advances for Construction	(162,370)		(162,370)		(152,370)	A-10
13	Working Capital Allowance	322,467	13,375	335,842		335,842	A-17
14	[freed	24,193,102	624,071	24,818,103	5,225 001	30,043,254	

Schodule of Sever Rate Seve Company, United Water Florida Docket No.: 980481-1978 Tool Year Ended: 13/31/87 Historic [s] or Projected [s]

Florida Public Borvice Commission

Rehadule: A-2 Page 1 of 1 Preparer: F McGulre

160	Description	Bolonco Per Busha 12/31/95	Affaratments	Projected Belance	1999 Adjustments	Projected Between	Schodules
•	Utility Plant in Service	73,884,369	18,583,097	90,447,490	13,040,040	12/31/07]
2	Utility Land & Land Rights	1,010,304		1,010,304	13,040,040	104,003,544	A-0
3	Total Utility Plant in Sve.	74,882,763	10,503,007	91,405,000		1,018,394	A-0
•	Lose: Non-Used & Useful Plant			***********	13,040,048	105,111,848	A-0
	Constr. Work In Progress	1,700,000	(1,700,000)				
•	Luce Acasm. Depractation	(10,000,562)	(1,334,078)		(3,871,620)	•	
7	Lose CIAC	(32,462,129)	(2,107,000)	(34,660,120)	(1,440,100)		A-10
•	Accumulated Amerite, of CIAC	9,872,000	741,477	10,014,105	700,007	(38,007,220)	. W-45
•	Acquisition Adjoutments	887,888		867,000	•	11,400,972	A-14
10	Accum, Amert, of Aeq. Adhestments					867,000	
11			•		(32,640)	(32,640)	
	Loss Advances for Construction						
12	Working Capitel Allowance	025,005	25,004	951,029		051,020	
13	Total	30,055,031	12,141,400	50,797.001			A-17
			The residence of the second		9,200,666	00,077,777	

Schedule of Water Not Operating Income Water Company: United Water Florida Schedule Year Ended Interior: 1886 Florida Public Berrico Commission Bahac:-le: 8-1 Page 6 of 6 Dooket No: 880451-WS

Suplementon: Provide the extendence of not operating become for the text year. If assertinates (Line 4) is related to any asserts other than no empirical effections, exhault on additional extended showing a description and extended on dange.

Line No.	Description	Balanco Par Books	Utility Yout Year Adjustments	Requested Revenue Requirement @ Present	Requested Annual Adjustment	Requested Revenue Requirement	Supporting Schodule
- 1	OPERATING REVENUES	86,862,515		86,652,815	81,148,996	88,001,481	8-4
2	Operation and Maintanance	3,486,048		3,488,046	7,301	3,466,348	8-4
	Depreciation, Not of CMC Amert.	817,783		817,733		817,733	8-14
	Ameritasion of Aequalition Adjustment	18,762		12,782		12,752	
	Taxon Other Than PTT	761 334		761,334	81,703	812,008	8-16
	OPERATING EXPENSES	84,779,886		84,779,866	889,006	84,838,870	
	Operating Income Betere FIT	82,072,648		82,072,848	\$1,080,881	83,162,611	
7	Provocion for Income Taxes	460,126	(100,376)	360,752	410,182	769,804	C-2
	NET INCOME	81,012,821		81,712,800	8679,809	82.302,707	
•	Rate Base			824,183,192		824.183,192	
10	Rate of Return on Rate Base			7.08%		9.80% *	

"Commission Order No. 16531, Dealest No. 516571 – WS(CE) contributed for the rate of scenarios to tend in the interior rate proceeding from 13.40% to 15.25%. Essenter United Water Plantide walves that right and opic to use that rate of return developed on Schodule D.- L.

Schoolule of Water Not Operating Income Wasterwater Company: United Water Plantsia Schodule Year Ended Interim: 1806

Plorido Public Bervino Commission Behadulo: 8-2 Pago 3 et 3 Deaket No: 980451-WS Proparor: Jest

September: Provide the exhaultains of not operating income for the test pass. If contribution (Line 4) is subsent to any content other than no computation edjustement, exhault no colditional exhaults charried absorber and exhaultains of charge.

	a constitution and enhancement of charge.								
No.	Description OPERATING REVENUES	Par Par Books	Voter Ad Les Smarts	Requirement	Requested	many party			
2		813,630,706		813,636,705	Ad he bront	Requirement	Buppersng		
	Depresident, Net of CIAC Amers.	6,917,130			81,073,960	814,713,665	Bchedule B-4		
4	Amorkanian of Angulation Adjustment	1,860,648		1,000,048	0,825	C98, C54,#	8-4		
	Texas Other Then FTT	13,408		13,406		1,080,640	8-14		
	OPERATING EXPENSES	1,000,525		1,000 525	48 320	13,408			
•	Operating Income Before PTT	80,817,717		89.617,717		1,714,853	8-15		
7	Provision for Income Taxos	4,021,984		4,021,866	886,182	80,672,860			
	MET PICOME	791,979	42,394		1,018,797	8,040,786			
	Rate Base	83,230,012		834,370	363,373	1,217,743	C-2		
10	Rate of Roturn on Rate Base			836.855.831	8635,424	83.823.042			
	*Commission Code	71- 5000				9.86% -			
	to be used in the interior rose presenting from 15 Phorido values that right and own to	Less to 13,250 to	inheed for the rate	of many					

*Commission Order No. 18555, Deather No. 610871—978(CB) combilished for the rate of meters to be used in the interior rate presenting from 12.699 to 15.239. Benover Daired Water Phorido walour that right and open to use that rate of nature developed on Subadule D-1.

F YCASESUANO_1_PG_2.WILL Percentification of Capital Structure to Plaq seeled Rale See 13-blonth overage Company: United Water Pleride Decket No.: 000451-WS Test Year anded: 13/31/06 Historia (n) or Projected ()

Florido Publio Barvico Commissio

S-C eluberial Page 1 of 9 Proporer: McGube

Explanation: Provide a reconciliation of the 13-blanth Average capital structure to requested rate base. Explain all adjustments made. Submit an additional schedule if a year-and basis is used.

Ling No.	Class of Capital Test Year anded 12731785	Personalised to To Requested Rate Base	Equity Affectation based on Parent Cap. Struct. See D-2, Page 3	Tost Year Adjusted	Date	
•	Long-Toom Dabit					
2	Short-Yourn Dobt		32,215,817	32,215,817	51.00%	
3	Preferred Stock		388,148	368,146	0.02%	
4	Common Equity***	00,302,402	120,700	120,700	0.10%	
5	Cashemas Deposits	0,133	28,657,799	26,657,700	42 70%	
7	Yex Credit-said cost	2,117,884		9,133	0.01%	
	Accum. Delerred Inc. Test			2,117,884	3.30%	
	Total	927,976		927,976	1.49%	
		82,437,455	59,382,462	62,437,455	100.00%	
	*** Affocation based as United Waterworks (noo D-2, Pg. 3)	n United Weterwurks (i 13-Month Average Co	spital Structure		See Schedule D	-2, Page 3,
10	Ohort-1	Toron Dobt	(Thousands of S)			
11	Long-1	area Dobl			0.05%	
12		od Stock	216,462		54.25%	
13	Commo	m Equity	011		0.20%	
14			170,117		44 80%	
			\$398,998		100 00%	

EXHIBIT MEB - 2 (PAGE 1 OF 5) M aliete mB 10/22/96 UNITED WATER FLORIDA RATE CASE AUDIT CALCULATION OF APUDC PERIOD 1995 TEST YEAR SUBJECT: UNITED WATER FLORIDA INC., RATE CASE AUDIT COMPONENTS: 1995 ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION WORK SUMMARY: The auditor examined AFUDC for 1995 by selecting one month and recalculating AFUDC capitalized interest charge using the FPSC authorized rate of 11.12% (Order 21492). The auditor found a discrepancy in interest rate used, and recalculated the 1995 year . The company monthly booking of AFUDC charges were divided by the monthly rate used by the company, as determined by examining the separate work-order booking sheets. This process provided a estimated amount of CWIP eligible for AFUDC interest capitalization. The estimated CWIP for august was compared with the actually eligible CWIP to determine accuracy. The difference between the amounts was less the one ten of one percent. The monthly estimated eligible CWIP was then multiplied by the correct monthly discounted rate of .882543% per order 21492. The years 1996, 1994, 1993, and 1992 were review-to determine that the correct rate and CONCLUSION: For 1995 and 1996, the company was using a AFUDC rate of 14.83%, and dividing it by 12 to arrive at a monthly rate. For the years 1994 to 1992, the company used the FPSC ordered rate of 11.12%, but did not used the authorized monthly discounted rate of .882543%. The difference between per company AFUDC amount and per audit amount is \$94,515.00. For 199 5 No. AFUDCLED DOC

16W-12

D 10/12/24 MB 10/20/96

COMPANY: UNITED WATER FLORIDA SCHEDULE: CALCULATION OF APUDC 1996 AUDITOR: DAVID J. DRAPER

DOCKET: 980481-W8 CONTROL NO.: 98-214-1-2 PLENAME: APUDC.WK.4

Monthly Roles Charged: Aut 12.3	PILENAME: APUDC.WK4
Per FPSC And Scripping = 0.434167% +	0.8016674, # 414.83%
M = Monthly Rate Per PPSC Order 21899 =	5.91% (can /bw15.4)

Acc	(a)	0 455	Co. in 19	0 432.70	Total AFUDC	Auditor Est. Amt	
JAN PEB. MAPR APR MAY JUN. JUL. AUG. SEP.* OCT. NOV. DEC	0 0 0 0 0 (18,518) (3,786) (4,285) (4,727) (4,882)	(6,836) (7,921) (8,740) (9,023) (66,964)	(8,609) (11,044) (9,405) (22,799) (78,810)	(d) 0 (4.157) (2.152) (2.152) (2.160)	Booked by Co. (e) 0 (7,843) (4,081) (4,081) (4,075) (4,075) (79,842) (28,724) (38,193) (43,064) (40,259) (78,822)	63. (a) day, by (14.83%/12) (7), e13.157 0 (634,833) (328,804) (328,804) (328,737) (6.480,580) (2.324,262) (2.847,714) (3.653,163) (3.267,840) (6.378,046)	Col. (f) must. b FPBC disc. res (g) 0 (5.601) (2.900) (2.910) (2.910) (57.017) (20.513) (28,132) (31,182) (28,750) (56,289)

(a) thru (d) AFUDC amounts booked by company account numbers.

Total AFUDC booked by Company in 1995.

Total Company CWIP subject to AFUDC calculations determined by dividing 'Column (e) by the monthly rate used by the Company (14.83% /12).

Total Company CWIP subject to AFUDC calculations multiplied by FPSC approved monthly discounted

Total amount of CWIP applicable to AFUDC for Sept. per Company:

RW-12 2 (2,847,870)

(2.847.714)

Total estimated amount of CWIP applicable to AFUDC for Sept. per Audit

(156)

The difference in the two amounts is small - sucit estimates are acceptable by $d_{\rm red,\,loc}$.

432-00 Debt Water 432-20 Equity Water 432-50 Debt Sewer 432-70 Equity Sewer	(36,166) 3 (66,964) 3 (79,810) 3
Total AFUDC Booked by Co. for 1996	(147,867) >
Total AFUDC Per FPSC Order for 1986	(330,619)
Amt. to be Removed From Rate Base	(238,104)
CONCLUSION: The company is not	BAR18 70 14W-12.

CONCLUSION: The company is not using the ordered annual AFUDC rate set forth in FPSC order 21599. Source: FPSC Order 21599 & 21492, FPSC rules & regulations Chapter 25-30 116 3(a), and Document Request 8 36

AFUDC WK4

COMPANY: UNITED WATER PLORIDA INC. SCHEDULE: UNF AFUDC for August² AUDITOR: DAVID J. DRAPER DOCKET: SEBASI-NIS CONTROL NO.: 85-216-1-2 PRENAME: CIAC_LINE MICA

(n)	1800	Aught to	HO (0) Abolised Col. (c) PUDC most. to dennet (14.85%/ Company Par. And	12) PPEC refe	All Company CANP amounts that
10 10 11 12 13 14 14 15 16 17 18 18 18 18 18 18 18 18 18 18 18 19 19 19 19 19 19 19 19 19 19 19 19 19	93013 0.01 0.02 0.03 0.04 0.05 0.06 0.07 0.08 0.07 0.08 0.07 0.08 0.03 0.03 0.04 0.05 0.05 0.07 0.08 0.09 0.09 0.09 0.09 0.09 0.09	128,750 54,855 0 0 138,121 120,122 0 0 4 0 71,175 2 28,358 5 71,423 12 0 0 0 11 71,423	189 1 1,722 1,7 23 98 2 801 807 0 770 471 1,266 1, 0 0 1,316 1, 0 0 2,447 2	80	were applied to APUDC calculations were commend up in uniterm (a). All contributed interest oftenges booked by the company are summed up in calcute (d). Calcute (a) to calcute (d). Calcute (a) to calcute (a) multiplied by 14.8916/12. Calcute (a) and calcute the care rate amounts, shouling the same rate of 14.8916/12 were used in that calcute (b) in the total manifely CNVP a calcute (b) multiplied by PPSC orders manifoly discounted rate of 56254396.
62 63 Company's Al 64 65 Column (4) N 66 67 Column (4) N	and for APUDC Colors PUDC Intersected Che subspilled by Compan subspilled by FPSC Or sols Scotland in State	agent for Ang." ton APUIC Rate of (stored Discounted R	CELUS COLUMN AND AND AND AND AND AND AND AND AND AN	26.595	20.130
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77 Seath	At The company is a conductive strengths prescribes	6.193 ()	month bug-p-	a south in FPSC and AFUDC rate of all AFV ar	order 21500 The cross of the Sapel.

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Conduct 96 D431-14	Rate Case Audit FPSC ORDER 21492 AFUDE Rates	DO calcolore
	only preind modes on Ensemble 11, 1960, the AFGE officerium for alighte projects as of January 1. To decorate the later projects as of January 1. The foreign make the project for the day of the foreign make the approximation that the province make the approximation that the modes are the province of the growing that the province of the growing to the foreign that is made the province of the growing to the foreign that the province of the growing to the foreign that the province of the growing to the foreign to the foreign provided to the 19-12 lt. The foreign that the province of the growing to the foreign to the foreign of the growing to the foreign that the foreign of the foreign to the foreign that the foreign that the foreign that the foreign that the growing of the standard of the the remain that this foreign the standard of the the remain that this foreign the standard of the the remain that this foreign the growing the growing that the growing the growing the growing that the growing the growing the growing the growing that the growing the growing the growing the growing that the growing the growing the growing that the growing the	
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		-68.80	-137.20
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	-230.00	-89.00	-63.00
	-90.00		-135.80
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	-45.00		-115.50
	-165.00		-130.20
	-186.00		-755.14
	-1078.77		-2240.00
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857.553			
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	PY: TH Company Clearing ACCOUNT NUMBER 921.32 921.33 921.33	TH Company Clearing ACCOUNT NUMBER 921.32 921.33	Clearing ACCOUNT NUMBER TOTAL 1.00 921.32 921.32 921.32 921.32 921.32 921.32 -31.90 -960.00 921.32 -1078.77 -323.63 921.32 -185.00 -48.50 -48.50 -185.00 -48.50 -185.00 -13.50 921.32 -186.00 -13.50 921.32 -450.00 -135.00 -521.32 -200.50 -61.95 921.32 -194.00 -58.20 -921.32 -194.00 -58.20 -921.32 -196.00 -58.20 -921.32 -196.00 -58.80 921.32 -196.00 -58.80 921.32 -196.00 -58.80 921.32 -196.00 -58.80 921.33 -75.00 -22.50 930.15 -1116.00 -1116.00 -30.00 930.33 930.33 -100.00 -30.00

TOTAL MISC. EXPENSE REMOVALS:			
	-9603.15	-3662.15	-5941.01