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**REBUTTAL TESTIMONY OF DALE G. LOCK, CCP
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
ON BEHALF OF
SOUTHERN STATES UTILITIES, INC.
DOCKET NO. 950495-WS**

1 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

2 A. My name is Dale G. Lock and my business address is

3 1000 Color Place, Apopka, Florida 32703.

4 **Q. ARE YOU THE SAME DALE G. LOCK WHO SUBMITTED PRE-**

5 **FILED DIRECT TESTIMONY IN THIS PROCEEDING?**

6 A. Yes, I am.

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

8 A. The purpose of my testimony is twofold: (1) to

9 rebut the testimony of Office of Public Counsel

10 witness Paul Katz regarding the adequacy and

11 competitiveness of Southern States' compensation

12 program and (2) to rebut the testimony of customers

13 during customer service hearings suggesting that

14 SSU had improperly inflated its projections in the

15 MFRs.

16 **Q. DID YOU READ THE ENTIRETY OF MR. KATZ TESTIMONY**

17 **INCLUDING THE EXHIBITS NO. PAK-1 AND PAK-2?**

18 A. Yes, I studied all of Mr. Katz's testimony and

19 exhibits. According to page 2 of Mr. Katz'

20 testimony, his conclusions were based on a review

21 of only pages 11 through 20 out of the 125 pages of

22 my testimony and exhibits. His failure to be

23 provided with or to review all of my testimony and

24 exhibits may be the explanation for his lack of any

25 mention, critique or analysis of the single most

1 important supporting documentation for SSU's
2 competitive pay increases -- namely, the eighty-one
3 page "Competitive Pay Data and Analysis", Exhibit
4 _____ (DGL-3). Mr. Katz never addresses the study
5 or refers to any of the data or conclusions taken
6 from the study. A brief synopsis of the
7 "Competitive Pay Data and Analysis" begins on page
8 10 of 30 of the testimony, as well as, in Exhibit
9 _____ (DGL-3). This custom market based pay study
10 was conducted for SSU by one of the largest and
11 most renown compensation and benefits consulting
12 firms in the country, Hewitt Associates. Hewitt is
13 an international firm of consultants and actuaries
14 specializing in the design, financing,
15 communication and administration of employee
16 benefits and compensation.

17 **Q. WHAT DO YOU THINK OF MR. KATZ'S CREDENTIALS,**
18 **EMPLOYMENT AND EXPERIENCE OVER THE LAST TEN YEARS**
19 **AS COMPARED TO THE COMBINED EXPERTISE OF HEWITT**
20 **ASSOCIATES?**

21 A. I do not believe that Mr. Katz has recent nor
22 relevant experience to critique today's pay studies
23 in the private sector compensation field. Perhaps
24 his limited experience prevented Mr. Katz from
25 critically analyzing the study performed by Hewitt

1 Associates. Mr. Katz retired 9 years ago from a
2 career exclusively with the federal government.
3 Mr. Katz's resume documents that he has very little
4 experience with the private sector either as an
5 employee or as a consultant. It would be hard to
6 imagine any private sector business which would
7 choose to model itself after the archaic pay
8 practices and costly excesses of the federal
9 government pay system. Since his retirement nine
10 years ago, Mr. Katz's resume indicates that most of
11 his consulting work has been in support of
12 litigation surrounding employment and pay
13 discrimination cases mainly for government workers.
14 Specializing as an expert witness for the
15 plaintiff's bar places him far afield from
16 corporate compensation consulting work. From his
17 resume I do not see examples that Mr. Katz has
18 experience in the modern market based pay programs.
19 He has focused his experience and training in using
20 job evaluation typically know as classification and
21 pay. It would have been more supportable if the
22 Office of Public Counsel had consulted with a
23 professional from one of the large private sector
24 consulting firms such as Hay, Hewitt, Mercer or the
25 like.

1 Q. COULD YOU DESCRIBE THE APPROACH AND CONCLUSIONS OF
2 THE OFFICE OF PUBLIC COUNSEL WITNESS, PAUL KATZ?
3 A. Apparently Mr. Katz conducted a cursory and
4 incomplete review of the testimony provided by SSU.
5 I saw no evidence that he reviewed any
6 interrogatory responses or document requests which
7 were supplied to the OPC dealing with SSU's
8 compensation programs. In fact, Mr. Katz suggested
9 that SSU had no formal incentive pay program and no
10 justification for its current salary levels. His
11 lack of information and relevant facts was apparent
12 throughout his testimony. He completely ignored
13 the empirical quantitative compensation data
14 presented by Hewitt Associates. From Mr. Katz's
15 conclusions, he was able to discern very little
16 about SSU's pay practices, business operations,
17 revenue base or the justification for competitive
18 pay adjustments. He focused on minor supporting
19 statistics. His conclusions demonstrate errors in
20 analysis, interpretation and serious deficiencies
21 of vital numbers and information. I will
22 demonstrate the following points regarding Mr.
23 Katz's testimony:
24 1. A lack of information and understanding by Mr.
25 Katz regarding a) the nature of SSU's water and

1 sewer business, b) no knowledge of SSU's current
2 programs and pay practices; and c) no knowledge of
3 SSU's geographic operating locations. None of the
4 aforementioned were to be found in the testimony
5 Mr. Katz provided.

6 2. Errors in Mr. Katz's comparisons of SSU with
7 the NAWC companies regarding revenue and customers
8 as compared to payroll dollars listed in his
9 Exhibit Nos. PAK-1 and PAK-2.

10 **Q. COULD YOU BEGIN BY EXPLAINING HOW MR. KATZ ERRED IN**
11 **HIS COMPARISONS OF SSU AGAINST THE NAWC SURVEY AND**
12 **TELL US, IS MR. KATZ CORRECT IN HIS COMPARISON OF**
13 **SOUTHERN STATES' PAYROLL TO OTHER NAWC COMPANIES?**

14 A. No, Mr. Katz is not correct. The NAWC survey
15 comparisons were calculated incorrectly by Mr.
16 Katz. In the NAWC survey "Notes to Company
17 Reports" NAWC's footnote reads "Southern States
18 Utilities Incorporated - includes water and
19 wastewater operations. Financial data, other than
20 the information presented, is not available for
21 water operations only." He used only partial SSU
22 revenues and partial customers. Mr. Katz did not
23 include sewer revenue or sewer customers in his
24 comparisons, but did include sewer payroll dollars.
25 When using the true revenue and customer numbers,

1 the ratio of SSU payroll dollars per customer and
2 per revenue dollar are far below average. This
3 supports my testimony which shows that SSU's
4 average payroll cost per employee is far lower than
5 the average company in the NAWC survey. The
6 exhibits prepared by Mr. Katz in his direct
7 testimony, specifically Exhibit No. PAK-1 and
8 Exhibit PAK-2, misrepresent SSU's payroll to the
9 other NAWC companies.

10 The first mistake Mr. Katz makes is in Exhibit
11 No. PAK-1 where he compares only SSU's water
12 revenues to total company payroll. Certainly SSU's
13 dollar amount of revenue per dollar amount of
14 payroll would be extremely low when you only
15 include a portion of revenues in the numerator of
16 the equation but include total company payroll in
17 the denominator. Please refer to Exhibit No. ____
18 (DGL-5) which accurately depicts the dollar of
19 revenue per dollar of payroll. This schedule shows
20 that actual total company water and sewer revenues
21 compared to total company water and sewer payroll
22 yields \$4.20 of revenue to each \$1 of payroll as
23 opposed to Mr. Katz's \$2.57.

24 Mr. Katz concludes from his flawed analysis
25 that SSU "spends relatively more money on pay than

1 do virtually all of SSU's fellow companies".

2 There are other serious problems to Mr. Katz
3 comparison of water only companies to water and
4 sewer companies. I would like to point out that
5 SSU is a water and sewer utility but the survey
6 consists mainly of water companies only. SSU's
7 sewer costs distort any relative payroll comparison
8 because sewer operations are more labor intensive
9 than water operations. One must also ask how
10 appropriate it is for Mr. Katz to compare the
11 company's revenues to payroll when the company
12 revenues are not providing an appropriate level of
13 return.

14 Another significant error occurs in Mr. Katz's
15 Exhibit No. PAK-2 where he compares SSU's water
16 customers only to total company payroll which
17 includes both water and sewer. Once again, SSU
18 payroll dollars to number of customers does not
19 compare favorably to other NAWC companies when one
20 includes only a portion of the company's customers
21 in the denominator and the total amount of payroll
22 in the numerator of the equation. Please refer to
23 Exhibit _____ (DGL-5) which accurately compares
24 SSU's total water and sewer payroll to total water
25 and sewer number of customers.

1 In contrast to Mr. Katz's conclusion, SSU rate
2 payers actually carry a relatively smaller payroll
3 burden than most other rate-payers throughout the
4 country. SSU has a lower than NAWC average labor
5 cost.

6 I would like to discuss the misrepresentation
7 of SSU's rankings in this analysis via the
8 comparison of SSU, a water and sewer utility, to
9 the NAWC companies which are mainly water
10 companies. For instance, in Exhibit No. _____
11 (DGL-5), the ratio of SSU water payroll dollars to
12 the number of customers is at 66. SSU's sewer ratio
13 of payroll dollars to customers has a factor of 99.
14 By combining water and sewer ratios, the combined
15 factor is 77. The labor costs for sewer services
16 are thus about 50% higher than the costs of
17 providing water service alone. That is, 50% more
18 labor is spent per customer on our sewer operations
19 than on water. This demonstrates that sewer
20 operations are much more labor intensive than water
21 alone and bring the average payroll costs up when
22 water and sewer companies like SSU are compared to
23 other water only companies.

24 SSU has performed a payroll analysis using
25 water and sewer payroll costs and revenue which

1 more accurately represents its position compared to
2 other NAWC companies. Please refer to Exhibit No.
3 _____ (DGL-6) which compares SSU to the other NAWC
4 companies on the basis of average pay per employee
5 for the years 1993 and 1994. This exhibit shows
6 that in 1993 SSU had an average pay per employee of
7 \$25,216 versus the NAWC average of \$37,876 for all
8 the companies in the survey. The results did not
9 change significantly in 1994 when SSU had an
10 average pay per employee of \$27,269 as compared to
11 an average of \$39,694 for all surveyed NAWC
12 companies. Only 7 companies in 1993 and 8
13 companies in 1994 included in the survey had lower
14 average pay per employee than SSU. These NAWC
15 comparisons of average pay support my earlier
16 testimony and also the Hewitt study results wherein
17 I explained the need for competitive labor
18 adjustments. Even Mr. Katz stated in his testimony
19 he could not believe that the disparity in average
20 pay between SSU and the NAWC surveyed companies was
21 so great.

22 On page 8, line 6 of his testimony, Mr. Katz
23 states that: "SSU ... typically utilizes industry
24 and/or national data and compares it to the whole
25 SSU corporation. This is clearly not a typical or

1 professional personnel practice." This however, is
2 exactly what Mr. Katz did in comparing SSU's whole
3 corporation average payroll, revenues and number of
4 customer ratios to the National Association of
5 Water Companies survey data.

6 **Q. ON PAGE 3 OF MR. KATZ' TESTIMONY HE STATES THAT**
7 **"(A) THE FOUNDATION SALARY SURVEYS USED ARE NON-**
8 **COMPARABLE TO SSU OR IT'S INDIVIDUAL**
9 **ESTABLISHMENTS, AND (B) THE SURVEY DATA ITSELF HAS**
10 **BEEN MISUSED." MR. KATZ ALSO CLAIMS THAT SSU DID**
11 **NOT USE RELEVANT LOCAL GEOGRAPHIC COMPARISONS. DO**
12 **YOU AGREE WITH THESE STATEMENTS?**

13 A. Absolutely not. The salary surveys used by Hewitt
14 Associates were highly relevant and represented the
15 exact jobs which SSU employs, as well as, contained
16 pay data from many of the county and city locales
17 in which SSU does business. Further the statistical
18 analysis and labor market comparison methods used
19 by Hewitt Associates were state of the art. From
20 his testimony, I see no evidence that Mr. Katz
21 reviewed the 81 page Hewitt Associates custom SSU
22 study, which I provided in Exhibit _____ (DGL-3),
23 nor did he see or review any of the published
24 salary surveys used by Hewitt Associates. He
25 criticizes the use of only one survey by name. That

1 is the one which I specifically mentioned in the
2 ten pages of my testimony which he read. And in
3 that instance, he judged the survey, The Florida
4 League of Cities Survey, solely by its name since
5 he apparently had no copy of the survey. This
6 survey was available at SSU for inspection by the
7 OPC, but, they did not avail themselves of the
8 opportunity to review it. Mr. Katz concluded that
9 the jobs and employers contained in the survey were
10 all located in large urban cities. He states on
11 page 9 of his testimony:

12 "That SSU also used a Florida
13 League of Cities survey is still not
14 indicative of the above "local"
15 focus. State-wide (or even local
16 city government) pay data is not the
17 same as, for example, local pay
18 data, especially when an SSU water
19 plant is located in a non-urban area
20 and the city government pay data
21 comes almost exclusively from
22 downtown. It is a well known fact
23 that suburban pay is typically lower
24 than downtown pay."

25 The foregoing conclusions are ludicrous in

1 that the Florida League of Cities Survey contains
2 an exact geographic match of the majority of rural
3 counties and cities in which SSU actually operates
4 water and wastewater plants specifically including
5 the counties of Alachua, Citrus, Hernando,
6 Highlands, Lake, Marion, Martin and Volusia, as
7 well as the small to mid size towns of Altamonte
8 Springs, Deland, Fort Myers, Jacksonville Beach,
9 Kissimmee, New Smyrna, Ocala, Sanford, and
10 Lakeland. Mr. Katz falsely concluded that SSU did
11 not use relevant local geographic comparisons.

12 Another misconception of Mr. Katz is that SSU
13 has no employees in urban areas. SSU operates in
14 and employs personnel listed in the Florida League
15 of Cities Survey from larger counties and cities
16 including Orange, Hillsborough, and Lee Counties.
17 SSU also operates plants in the suburbs of the
18 cities of Orlando, Tampa, and Jacksonville all of
19 which are included in the survey. In fact it would
20 be irresponsible for SSU to ignore the single
21 largest data base of pay rates for licensed Water
22 and Wastewater Plant Operators and maintenance
23 personnel in the State of Florida. We consistently
24 lose trained personnel to these governmental
25 entities who are the largest source of employment

1 for Water and Wastewater Plant Operators. The
2 county and municipal entities are truly our biggest
3 competitors in the labor market. The Florida
4 League of Cities Survey is the best and single
5 largest source of pay data for the very plant
6 operations jobs for which SSU recruits. It
7 contains average pay as well as, minimum and
8 maximum pay range data by job title and description
9 for Water and Wastewater Plant Operators A, B, and
10 C, as well as Meter Reader, Superintendent of Water
11 and Superintendent of Wastewater positions.

12 Mr. Katz' criticism of the use of the survey
13 demonstrates that he did not know what geographic
14 locations were included in the Florida League of
15 Cities Survey (FLCS). He did not know what jobs
16 were contained in the survey. He also did not know
17 in what geographic locations SSU owned and operated
18 its plants. Mr. Katz totally missed the
19 significance and value of the FLCS data. He made no
20 comment on the 18 other surveys used by Hewitt to
21 establish market comparison, such as the Tower
22 Perrin - Florida Benchmark survey or Bureau of
23 Labor Statistics Survey both used to isolate
24 Orlando pay rates.

25 **Q. ON PAGE 11 OF HIS TESTIMONY, MR. KATZ STATES "THE**

1 **NEED TO FOCUS NARROWLY AS IS REASONABLE ON**
2 **COMPARING THE LOCAL ESTABLISHMENT (I.E., THE WATER**
3 **PLANT) TO THE IMMEDIATELY SURROUNDING LOCAL LABOR**
4 **MARKET." HOW HAS SSU DONE THIS IN THE USE OF THE**
5 **HEWITT STUDY "COMPETITIVE PAY DATA AND ANALYSIS FOR**
6 **SELECTED POSITIONS"?**

7 A. As stated earlier, the FLCS survey contained
8 water/wastewater plant operator pay data from the
9 many of the same locations in which SSU operates
10 its plants. By using exclusively the Florida
11 League of Cities - Cooperative Salary Survey for
12 Water and Wastewater plant operators pay
13 comparisons, it was found that the specific SSU
14 cost required to bring Operator I positions to
15 average market level pay rates was 11.4%, Operator
16 II positions was 12.5% and Operator III positions
17 was 22.2%.

18 **Q. MR. KATZ STATES ON PAGE 8 OF HIS TESTIMONY THAT**
19 **"SSU, IN ITS TESTIMONY, TYPICALLY UTILIZES INDUSTRY**
20 **AND/OR NATIONAL DATA AND COMPARES IT TO THE WHOLE**
21 **SSU CORPORATION. THIS IS CLEARLY NOT A TYPICAL OR**
22 **PROFESSIONAL PERSONNEL PRACTICE." IS THIS TRUE?**

23 A. No this is not true. If only Mr. Katz had studied
24 the 81 page, April 1995 Competitive Pay Data and
25 Analysis for Selected Positions he would have seen

1 the job by job detailed custom survey comparisons
2 wherein different geographic area surveys were used
3 for each of the 50 different SSU jobs studied to
4 reflect the labor markets wherein SSU recruits for
5 particular jobs. For example, in pricing the labor
6 rates for the job Secretary, five different survey
7 sources were used. The two highest weighted
8 surveys included only secretarial pay in Orlando.
9 The other two surveys represented statewide general
10 industry secretary pay data. Each survey was
11 assigned a weight by Hewitt to more accurately
12 reflect the relevance of the pay data in deriving
13 the average pay value. This approach correctly
14 reflected that most of SSU's secretary positions
15 are located in Orlando, however each region
16 throughout the state also employs one or more
17 secretaries.

18 **Q. MR. KATZ ON PAGE 4 OF HIS TESTIMONY STATES: "A**
19 **SALARY STRUCTURE HAS LITTLE TO DO WITH ACTUAL PAY."**
20 **HE THEN GOES ON TO SAY: "THE FACT THAT SSU DID NOT**
21 **INCREASE ITS SALARY STRUCTURE HAS NO BEARING**
22 **WHATSOEVER ON (A) ITS ACTUAL RATES, OR (B) ITS**
23 **ABILITY TO FAIRLY COMPETE IN THE LABOR MARKET.**
24 **SSU'S CLAIMS ABOUT SALARY STRUCTURE SHOULD BE**
25 **REJECTED AS IRRELEVANT TO ANY CLAIMS MADE ABOUT THE**

1 **NEED FOR PAY RAISES OR ITS ABILITY TO COMPETE IN**
2 **THE MARKET." DO YOU AGREE WITH THESE STATEMENTS?**

3 A. No. In these comments Mr. Katz engaged in exactly
4 what he referred to as "throwing numbers around".
5 It would be almost impossible to try to dissect or
6 shed reason on his many broad over generalizations
7 and misperceptions based on numbers he has taken
8 out of context. I can demonstrate however, that
9 every other major employer focuses on pay range
10 minimums and maximums, because pay ranges and
11 salary structure data are listed in virtually all
12 commercially published wage and salary surveys.
13 Obviously, Hewitt Associates and the rest of the
14 modern day compensation world finds pay range data
15 to be highly important.

16 In SSU's compensation policy and practice, all
17 employees are hired at the minimum of the pay range
18 or are paid at no more than 90% of the mid-point of
19 the assigned pay range for their job
20 classification, if they possess experience or
21 training superior to those requirements stated in
22 the job description. SSU's Human Resources staff
23 individually checks and approves every
24 recommendation to hire to ensure conformity with
25 this pay practice. To allow anything other than

1 consistent pay treatment would quickly degenerate
2 morale and result in numerous complaints and
3 demands for pay increases by others not afforded
4 like treatment. The pay range minimums have a
5 dramatic impact on our ability to hire and recruit
6 new employees. This is particularly important in
7 view of the level of turnover we experience.

8 **Q. MR. KATZ STATES ON PAGE 5 OF HIS TESTIMONY THAT SSU**
9 **SHOULD NOT HAVE REFERENCED EXTERNAL COMPANY SALARY**
10 **BUDGET DATA REPORTED IN THE HEWITT ASSOCIATES'**
11 **COMMERCIALY PUBLISHED SURVEY OF THE FLORIDA AND**
12 **SOUTHERN UNITED STATES LABOR MARKETS IN 1993 AND**
13 **1994. MR. KATZ FURTHER CONCLUDED THAT, IN HIS**
14 **OPINION, THIS INFORMATION IS IRRELEVANT AND:**
15 **"THUS, THIS FOUNDATION DATA AND ALL THE ANALYSIS**
16 **AND CONCLUSIONS THAT RELY ON IT SHOULD ALSO BE**
17 **REJECTED." COULD YOU INDICATE WHY THIS DATA WAS**
18 **MENTIONED IN YOUR TESTIMONY?**

19 **A.** Yes. Obviously many companies purchase and rely on
20 this type of published data when planning their
21 salary budgets and use this data to make
22 competitive market pay adjustments. To ignore this
23 information would be foolish. In my testimony, none
24 of the historic 1993 and 1994 salary budget data
25 actually was used to recommend the 1996 pay

1 adjustments. It was only included so that the
2 commission staff could ascertain that historically
3 SSU had not kept pace with the market in budgeting
4 nor awarding actual pay increases. Again, Mr. Katz
5 has focused on the relatively inconsequential while
6 ignoring the 81 page Hewitt SSU custom competitive
7 pay study.

8 **Q. ON PAGE 5 OF MR. KATZ TESTIMONY HE STATES: " FIRST**
9 **SSU CALCULATES (PAGES 12 AND 13) THAT ...AVERAGE**
10 **OVERALL SALARY INCREASE BUDGETS IN FLORIDA OF**
11 **APPROXIMATELY 4% A YEAR FOR EACH OF TWO YEARS**
12 **(1993-94) YIELDS AN ACTUAL TWO YEAR SALARY INCREASE**
13 **OF 8.7%. NO SUCH THING!" MR. KATZ THEN TESTIFIES**
14 **THAT BUDGETS FREQUENTLY DO NOT TRANSLATE INTO**
15 **ACTUAL SPENDING AND THAT THIS INFORMATION SHOULD BE**
16 **REJECTED. CAN YOU TELL US THE POINT OF YOUR**
17 **TESTIMONY CITED BY MR. KATZ?**

18 **A.** Yes. Mr. Katz chose to ignore the actual average
19 salary structure information in my testimony and
20 instead criticized the reference to average
21 budgeted salary increase data. This actual
22 information was also presented on page 12 of my
23 testimony. In paragraph two of page 12, actual data
24 is presented from a published Hewitt national
25 survey, which reports the actual salary structure

1 percentage changes.

2 Q. ON PAGE 3 OF HIS TESTIMONY, MR. KATZ REFERENCES THE
3 "ZERO PERCENT INCREASE IN SALARY STRUCTURE"
4 REPORTED BY SSU. THEN ON PAGE 5, HE STATES:

5 "IN THE SECTION TITLED SALARY
6 BUDGETS SSU CLAIMS A ZERO PERCENT
7 INCREASE. HOWEVER, IN A SEPARATE
8 SECTION TITLED "SALARIES" SSU
9 CLEARLY REPORTS A "SALARY INCREASE
10 BUDGET" (FOR MERIT, EQUITY, AND STEP
11 ADJUSTMENTS) OF 7.2%. WELL WHICH IS
12 IT; ZERO PERCENT OR 7.2%. WHICH IS
13 THE REAL TRUTH? PERHAPS THERE IS NO
14 REAL TRUTH, BECAUSE IN THE ALMOST
15 NEXT SENTENCE (PAGE 13, LINE 6) SSU
16 CLAIMS AVERAGE ACTUAL RAISES OF
17 1.44% PER YEAR. WHAT HAPPENED TO THE
18 PREVIOUS ZERO PERCENT OR 7.2%?
19 THAT'S WHAT ' THROWING FIGURES ABOUT
20 MEANS".

21 COULD YOU PLEASE RESPOND TO MR. KATZ'S PRESUMABLY
22 RHETORICAL QUESTIONS?

23 A. Mr. Katz has confused and misquoted numbers from
24 three different matters: (1) Salary structure -
25 pay grade minimums and maximums, (2) Salary budgets

1 - salary increases budgeted for merit, equity and
2 step adjustments, and (3) Average actual pay -
3 Total payroll divided by the number of employees.
4 Mr. Katz actually has answered part of the question
5 himself. On page 3 of his testimony, he stated
6 that the "Zero Percent" referred to salary
7 structure increases, not to "salary increase
8 budgets". Salary structure, as Mr. Katz knows,
9 refers to the minimum and maximum of pay grades. As
10 stated on page 12 of my testimony no increases have
11 been made to the salary range structure since they
12 were last increased by 2% in 1990.

13 Salary increase budgets refer to merit, equity
14 and step adjustments. And incidentally, there is
15 no section in my testimony titled "Salary Budgets"
16 as suggested by Mr. Katz. Further, nowhere in my
17 testimony does SSU claim a Zero Percent increase in
18 salary budgets as suggested by Mr. Katz. Mr. Katz
19 did correctly quote page 13, line 4 of my testimony
20 when I stated: "SSU's more conservative *salary*
21 *increase budgets* for merit, equity and step
22 adjustments reflected a compound growth rate (from
23 1993 to 1994) of 7.2%." Salary increases are the
24 percentage of pay awarded to individuals. On page
25 13, line 6 of my testimony, I state that: "The

1 actual growth in SSU's actual average pay increased
2 by 1.44% or from \$27,168 in 1993 to \$27,560 in
3 1994." My testimony does not say "average actual
4 raises" as suggested by Mr. Katz. With Mr. Katz's
5 credentials he should know that "actual average
6 pay" is calculated by dividing the total payroll by
7 the total number of employees. I can only conclude
8 that, at best, Mr. Katz paid little attention to
9 the facts when preparing his testimony.

10 SSU's point when reporting these differences
11 in salary increase percentages and changes in
12 average pay was to demonstrate that although SSU
13 has granted merit, step and equity increases, SSU's
14 average pay is not reflective of the same annual
15 percentage of growth. The only explanation for
16 average pay not keeping pace with average pay
17 increases would be turnover, whereby higher paid
18 employees leave and are being replaced by lower
19 paid, less experienced ones. Hence, it appears
20 that at least one of Mr. Katz suggestions is
21 accurate -- that appears on page 6, line 4 of his
22 testimony when he states "It gets worse. ... SSU
23 asserts these facts...are due to filling more lower
24 paid... than higher paid positions."

25 When Mr. Katz purports to misunderstand what

1 he read in my testimony, when he can not
2 differentiate between changes in actual average pay
3 and salary increase budgets, he is falsely claiming
4 that SSU reported inconsistencies. This is not the
5 case. In my testimony on page 9, I clearly state
6 that pay increases for merit are budgeted at 3% for
7 both 1995 and 1996. I also indicated the percentage
8 of SSU's historic actual spending on merit,
9 promotion and license adjustments. He is bold in
10 his broad sweeping generalizations and blanket
11 statements. Yet, he never once addressed any of
12 the competitive pay data from the comprehensive
13 custom study which Hewitt conducted for SSU. This
14 oversight renders his opinions invalid.

15 **Q. MR. KATZ STATES THAT THE COMMISSION SHOULD INSIST**
16 **THAT THE COMPANY PROVIDE A VALID COMPENSATION**
17 **SURVEY THAT IS MARKET BASED, WITH THE SPECIFIC**
18 **MARKET BEING THE VARIOUS LOCALITIES IN WHICH THE**
19 **COMPANY OPERATES. WHAT DOES THIS STATEMENT INDICATE**
20 **TO YOU?**

21 **A.** This demonstrates that Mr. Katz either was unaware
22 or chose to ignore the fact that SSU had completed
23 a competitive pay survey performed by an undisputed
24 expert in the field which formed the basis for
25 SSU's requested labor market adjustments. None of

1 the SSU job specific competitive market data that
2 was the basis for the competitive pay adjustments
3 in the MFRs, as found in Exhibit _____ (DGL-3), was
4 ever analyzed or even mentioned by Mr. Katz. The
5 custom Hewitt Associates study of 42 different SSU
6 benchmark jobs should have been his focus, but
7 instead Mr. Katz was fixated on a grossly flawed
8 analysis of a few minor statistics from national
9 surveys.

10 **Q. WHAT WERE THE CONCLUSIONS FOUND BY HEWITT IN THEIR**
11 **STUDY OF SSU'S COMPETITIVE PAY POSITION?**

12 A. In the April 1995 Hewitt study, Exhibit _____ (DGL-
13 3), page 11 of 81, under the heading "Indicated
14 Actions and Costing", Hewitt states: "The overall
15 percentage cost to bring the surveyed positions to
16 market is 17.3%; however, this is an average and
17 should be used with caution. ...If the Rate
18 positions were removed from the calculation, SSU
19 would need to adjust the salaries of the remaining
20 jobs by 12.9% to bring them to market averages".

21 **Q. WHAT IS THE PERCENTAGE OF PAYROLL INCREASE THAT SSU**
22 **IS REQUESTING TO MAKE COMPETITIVE PAY LABOR**
23 **ADJUSTMENTS IN THE 1996 MFR'S?**

24 A. In order to soften the effect on customer rates of
25 the pay adjustments indicated as required to make

1 SSU salaries competitive, SSU is requesting only a
2 4.7% adjustment in 1996 to begin to improve its
3 competitive position in the external labor market.

4 **Q. COULD YOU BRIEFLY DESCRIBE THE METHODS USED BY**
5 **HEWITT IN THE SSU COMPETITIVE PAY STUDY?**

6 A. Yes. SSU asked Hewitt Associates to use its
7 recommended methodology to compare SSU's current
8 compensation levels (actual average pay for
9 specific benchmark jobs) and salary structure (the
10 minimum pay rates at which employees are hired into
11 these specific jobs) to targeted pay levels in the
12 market place. The jobs SSU selected for inclusion
13 in the study represented all job families as well
14 as the vast majority of employees. Hewitt used
15 only those benchmark jobs for which it could
16 collect solid data. That is specific jobs whose job
17 descriptions closely matched SSU's jobs in terms of
18 the same skill, effort and responsibilities, and
19 training, experience and educational requirements.
20 Mr. Frank Johnson, a principal with Hewitt
21 Associates explains the process used by Hewitt
22 Associates in his rebuttal testimony.

23 **Q. COULD YOU ADDRESS MR. KATZ' ASSERTION THAT "PAY IS**
24 **RARELY AN IMPORTANT FACTOR IN VOLUNTARY DEPARTURES"**
25 **WHICH STATEMENT APPARENTLY IS PREMISED ON A 1954**

1 **STUDY OF MOTIVATION AND PERSONALITY?**

2 A. I think that using a 1954 study to understand 1990s
3 behavior is most inappropriate. The 1996 work place
4 is a far cry from 1954, which predates the 1964
5 Civil Rights Act, OSHA, ADA and virtually all Fair
6 Employment Practices legislation. In 1954, there
7 was little representation of women and minorities
8 in the workplace and fewer still dual career
9 couples or single working parents. There was no
10 high technology automation, no personal computers,
11 no global competition, not even credit card debt!
12 Most employers offered lifetime employment. There
13 was no displacement of jobs to emerging nations, no
14 downsizing. The reasons workers stayed with their
15 employers in 1954 have little or nothing to do with
16 the mobile workforce of today. Working families
17 are highly motivated by pay. In fact, the economic
18 strains are such that working mothers must
19 frequently leave their newborn infants in daycare
20 just to make ends meet. Mr. Katz apparently would
21 have the Commission ignore four decades of such
22 changes. He also once again ignores the facts.

23 SSU conducts exit interviews to determine the
24 cause of turnover. From our statistics, supplied
25 to the parties in response to FPSC Staff

1 Interrogatory No. 42, the worsening turnover for
2 "better paying jobs" increased from 11.8% of
3 resignations citing better paying jobs in 1992 to
4 40.7% citing the need for better paying jobs in
5 1995. It should be born in mind that many
6 individuals refuse to disclose the reasons for
7 leaving so it is likely that the number is even
8 higher than reported.

9 John D. Crane, Professional Engineer and
10 Editor of the Florida Water Resources Journal, the
11 official publication of the FWPCOA, the FSAWWA and
12 the FWEA, stated to SSU that he "knows there is a
13 shortage [of certified operators], but does not
14 know of any studies or research on the subject."
15 Further attempts were made by SSU to obtain
16 statistics on the number of licensed operators in
17 relation to the number water and wastewater
18 facilities in the State.

19 Elsa Potts and Van Hoofnogle, employees of the
20 Department of Environmental Protection (DEP),
21 provided SSU with reports showing that there are
22 currently 3,097 domestic wastewater facilities and
23 7,201 public water systems in Florida totaling
24 10,298 plants. Compared to the number of licensed
25 operators at 8,261, there appears to be a shortage

1 of qualified individuals to operate those
2 facilities in compliance with the DEP regulations.
3 (See rule 62-699).

4 Several articles in the Florida Water
5 Resources Journal, report possible reasons for the
6 small numbers of certified operators in relation to
7 the current demand. First, in 1993, the
8 certification process was transferred from the
9 Department of Environmental Protection (DEP) to the
10 Department of Business and Professional Regulation
11 (BPR). The greatest impact of this transition was
12 the source of revenue of the two agencies. In
13 contrast to the DEP which receives revenue from a
14 variety of sources, the "BPR is funded solely from
15 revenue generated from each profession's
16 examination applicants and licensees." As a
17 result, examination fees have increased from \$25.00
18 to \$230.00 which many employers may not pay.

19 Another attempt at cutting administrative
20 costs is the consolidation of testing dates and
21 sites. This further reduces the opportunities to
22 become licensed or obtain higher level licensure.
23 Beginning in 1996, examinations are scheduled bi-
24 annually in Orlando as opposed to three items a
25 year in three locations being Orlando, Miami and

1 Tallahassee. This also adds travel expenses to the
2 examination fee. BPR had anticipated a 50%
3 increase in enrollment as a result of this
4 consolidation. However, B.J. Phillips,
5 Certification Specialist at the BPR, stated that
6 the enrollment had only increased 11% for the first
7 test of 1996 administered on February 28th. This
8 indicates a decline in the number of new licenses
9 being issued. It should be noted that the supply
10 of licensed water and wastewater plant operators
11 can be expected to diminish and demand thereby will
12 increase. This factor also puts upward pressure on
13 SSU's labor costs. Without the implementation of
14 competitive market adjustments, SSU will be
15 increasingly unable to retain or attract licensed
16 plant operators.

17 Further, SSU can not be satisfied to have
18 turnover on par or worse than the national average
19 of all types of employers which includes retailers,
20 restaurants and the like. Water and wastewater
21 employees are skilled workers and have higher
22 training and licensing costs which SSU must pay.
23 SSU's turnover rates should be significantly below
24 that of the national average of all employers or we
25 will not be able to provide competitive customer

1 rates. I have attached as Exhibit _____ (DGL-7) a
2 copy of the SSU year end 1995 turnover report,
3 which was not available at the time of my original
4 testimony, which demonstrates that for all
5 turnover, the rate in 1995 was 16.01%. Even
6 factoring out turnover that was not a result of
7 voluntary resignation or for cause, the rate of
8 preventable turnover was 11.8%. According to 1994
9 turnover data reported by the Saratoga Institute,
10 utility company total separations averaged only
11 approximately 7.8%.

12 Utility total separations range from a low (in
13 the 10th percentile) of 3.7% to a high (in the 90th
14 percentile) of 11.6%. This means that SSU's total
15 separations at 16.01% exceed the 90th percentile of
16 all utilities nationally. These facts must be
17 addressed. SSU's proposed salary adjustments are a
18 prudent and reasonable step to addressing them.

19 **Q. ON PAGE 12 OF HIS TESTIMONY, MR. KATZ TESTIFIES**
20 **THAT "THE COMMISSION SHOULD REQUIRE THE COMPANY TO**
21 **DEMONSTRATE THE ADOPTION OF AN EFFECTIVE AND VALID**
22 **INCENTIVE PROGRAM THAT IS TRULY PERFORMANCE BASED.**
23 **SUCH A PROGRAM SHOULD INCLUDE CORRESPONDING**
24 **PENALTIES FOR LOWER PERFORMANCE." HE GOES ON TO**
25 **STATE THAT "SUCH PLANS WOULD NOT REQUIRE FUNDING**

1 FROM RATEPAYERS, SINCE THEY WOULD REWARD EMPLOYEES
2 WITH SOME PORTION OF THE FINANCIAL GAINS THAT
3 ACCRUE TO COMPANY STOCKHOLDERS..." PLEASE RESPOND
4 TO MR. KATZ' TESTIMONY.

5 A. The Company responded to the Office of Public
6 Counsel's Interrogatory No. 43 which response
7 details the SSU Management Incentive Compensation
8 Plan. As stated in our response to Interrogatory
9 No. 43, no amounts were budgeted or reflected in A
10 & G labor accounts of the MFRs to award these
11 incentives. Mr. Katz testimony suggests that Mr.
12 Katz had not reviewed SSU's interrogatory responses
13 and thus did not have adequate information about
14 SSU's pay practices when he prepared his testimony.
15 SSU has a management incentive compensation program
16 which rewards key management employees for
17 attainment of financial goals. In 1996, this
18 program was redesigned by the national human
19 resources consulting firm William M. Mercer for
20 M.P. Electric and all affiliates at no cost to SSU.

21 SSU is requesting competitive labor adjustment
22 to minimally reach pay levels consistent with
23 other competing employers. It would be highly
24 unlikely that any company could attract and retain
25 hourly workers by paying non-competitive pay rates

1 and compounding this problem by placing portions of
2 their pay at risk based on company financial
3 performance. Unless hourly employees were paid at
4 market levels "gain sharing" programs would be a
5 huge disincentive. Companies using "gain sharing"
6 do so primarily for salaried employees and do so
7 with hourly employees only upon first establishing
8 competitive labor rates.

9 **Q. DID YOU REVIEW THE DIRECT TESTIMONY OF OPC**
10 **WITNESSES HUGH LARKIN, JR. AND DONNA DERONNE?**

11 A. Yes, I did.

12 **Q. DO YOU AGREE WITH THE PROPOSED ADJUSTMENTS TO**
13 **OPERATING INCOME PERTAINING TO SALARY & WAGE**
14 **EXPENSE APPEARING ON SCHEDULES 19 AND 20?**

15 A. No I do not. These adjustments are not justified.
16 Mr. Larkin and Ms. DeRonne state that Mr. Katz
17 sponsors "the theory behind the disallowance," but
18 Mr. Katz does not identify with specificity any
19 rationale for recommending that all of SSU's
20 projected wage increases for the future test year
21 be disallowed in their entirety. As explained
22 throughout my testimony and the testimony of Mr.
23 Frank Johnson, Mr. Katz had no justification for
24 recommending the removal of SSU's proposed pay
25 adjustment, based on the Hewitt Study, much less

1 the 1996 projected payroll adjustments for merit
2 pay, license attainment pay, promotions, and step
3 increases. The Commission should also note that
4 these increases, amounting to 5.87%, do not
5 represent an "attrition" increase, as incorrectly
6 suggested in Schedule 20 of Exhibit _____ (HL-1).
7 Rather, the 5.87% adjustment represents the
8 aggregate of the total payroll impact of the
9 components I mentioned and is an amount which is
10 virtually equal to that spent for 1995. Neither
11 the testimony of Mr. Larkin/Ms. DeRonne nor Mr.
12 Katz indicate that they reviewed SSU's response to
13 OPC Interrogatory No. 44 which documented, by
14 component, the types of pay increases SSU granted
15 historically in 1992, 1993 and 1994, budgeted for
16 1995 and projected for 1996. The Company's
17 response to OPC Interrogatory No. 44 is provided in
18 Exhibit _____ (DGL-8).

19 Moreover, the increases clearly represented in
20 Interrogatory Appendix 44-1, page 1 of 1 are
21 prudent and reasonable. At SSU, for example, merit
22 increases at 3% of payroll were paid in 1993, 1994
23 and 3% was the 1995 actual amount of merit increase
24 which is consistent with the MFR projection. In
25 1996, a 3% increase again is budgeted for merit

1 increases.

2 According to the Hewitt Associates 1994 and
3 1995 Salary Increase Survey Report - 18th Annual
4 Survey Findings, for the 1,941 participating
5 organizations, the average 1994 merit increases
6 actually earned for salaried exempt, salaried non-
7 exempt, non-union hourly and union employees
8 averaged 4.3%, 4.1%, 3.8% and 3.3% respectively.
9 SSU at 3% is clearly below average overall in
10 granting merit increases. In looking at utility
11 data, specifically, for 1994 actual earned merit
12 increases for salaried exempt, salaried non-exempt
13 and non-union hourly employees, respectively, were
14 3.9%, 3.8% and 3.4%. Again, SSU's increases are
15 below the average. I also should clarify that the
16 Survey Findings are the result of a generic study
17 performed by Hewitt as opposed to the customized
18 study Hewitt performed for SSU which is the basis
19 for our proposed adjustments.

20 Additionally, promotional increases of 1% are
21 budgeted for 1996 and were based on actual historic
22 budgeted and spending documented in 1993, 1994 and
23 1995. In budgeting the amounts to be paid for
24 promotions, SSU has exercised unusual diligence in
25 restricting even promotional increases within the

1 Company.

2 To follow the recommendations and
3 disallowances of Mr. Katz, as applied by Mr. Larkin
4 /Ms. DeRonne, would seriously harm SSU in its
5 ability to recruit and retain employees, as do
6 other Florida businesses, by compensating our
7 employees fairly and at competitive market rates.

8 **Q. HAS SSU MADE THE EQUITY ADJUSTMENTS WHICH YOU**
9 **INDICATED IN YOUR DIRECT TESTIMONY?**

10 A. In part. As of December, 1995, SSU provided 5.08%
11 in competitive market based equity adjustments to
12 the salaries of customer service employees as the
13 first step in obtaining salary equity as indicated
14 in the Hewitt study which I provided as Exhibit
15 _____ (DGL-3).

16 **Q. COULD YOU NOW PLEASE PROVIDE YOUR REBUTTAL OF THE**
17 **CUSTOMER TESTIMONY DURING THE CUSTOMER SERVICE**
18 **HEARINGS SUGGESTING THAT SSU HAD IMPROPERLY**
19 **INFLATED ITS MFR PROJECTIONS?**

20 A. We believe the information provided by numerous SSU
21 witnesses regarding the minimal deviations between
22 actual 1995 experience and MFR 1995 projections
23 refutes allegations that SSU improperly inflated
24 our MFR projections. A specific example of how SSU
25 was conservative in its projections was the

1 projection of 1995 FAS 106 expenses. As I
2 indicated in my direct testimony, SSU could not
3 provide the actual 1995 FAS 106 costs at the time
4 the MFRs were submitted. Since that time, we have
5 received the 1995 actuarial report from Godwins
6 Boone and Dickenson, which we provided to the
7 parties as a late filed deposition exhibit. A copy
8 of the report is contained in Exhibit _____ (BSB-2)
9 which is being sponsored by Mr. Brian S. Broverman,
10 the actuary.

11 We have asked Mr. Broverman to provide the
12 Commission with actual 1995 FAS 106 expenses to
13 demonstrate that the allegations and concerns
14 expressed by customers and their counsel were
15 unfounded since SSU actually was conservative in
16 several areas of expenses, such as FAS 106
17 projections.

18 As indicated at page 1 of the report, SSU's
19 1995 FAS 106 expense is \$948,957. This exceeds the
20 1995 projected OPEB costs of \$787,150 contained in
21 the MFRs by \$161,807. SSU requests that this
22 revised 1995 OPEB cost be approved by the
23 Commission. As the Commission may recall, I
24 indicated in my prefiled direct testimony that we
25 would make this request.

1 Also, the report provides an updated
2 projection of 1996 OPEB costs. The updated
3 actuarials projection on page 2 of the report is
4 \$994,000. The amount projected for 1996 OPEB costs
5 in the MFRs was \$850,122.

6 SSU requests that the additional \$161,807 of
7 actual FAS 106 expense for 1995 be considered by
8 the Commission as a set-off against any other
9 revenue requirement reductions which might result
10 after Commission consideration of the issues in
11 this proceeding. The increased FAS 106 costs,
12 representing the actual FAS 106 costs of \$948,957
13 for 1995 then would be escalated by the 2.49%
14 Commission ordered attrition factor, discussed by
15 SSU witness Kimball, to arrive at the proper 1996
16 cost.

17 **Q. DO YOU AGREE WITH MS. KIM DISMUKES' RECOMMENDATIONS**
18 **THAT THE TOTAL 1996 PROJECTED SALARY AND OVERHEAD**
19 **EXPENSES OF SOUTHERN STATES' MANAGER OF**
20 **COMMUNICATIONS AND GOVERNMENT RELATIONS SHOULD BE**
21 **REMOVED FOR THE 1996 TEST YEAR?**

22 A. No. I do not agree with the disallowance of 100%
23 of Mr. Smith's salary and overhead expenses. It is
24 my opinion that since 30% of the job functions are
25 expended on lobbying efforts, and another 20% on

1 public relations advertising and company image
2 enhancement that the salary and expenses be divided
3 in a similar fashion for the test year. At least
4 50% of Mr. Smith's efforts are internal
5 communication management responsibilities
6 (including media liaison) and external customer
7 water supply, and conservation education.

8 Mr. Smith was hired as Manager of
9 Communications and Governmental Relations in
10 November 1994. The duties of the job, as outlined
11 in the job description contained in Exhibit ____
12 (DGL-9) indicate that the primary function of the
13 position relates to external and internal
14 communications. In fact, of the 13 duties and
15 responsibilities listed, only three items relate to
16 lobbying activities. They are:

- 17 1. Formulates long-range strategies and plans for
18 company in areas of government and press relations,
19 as well as employee and customer communications.
- 20 2. Maintains constant contact with governing
21 bodies who have jurisdiction over company water or
22 wastewater systems, Florida and federal legislators
23 and other governmental bodies which set and enforce
24 water and wastewater policies or which administrate
25 State or federal environmental laws impacting water

1 and wastewater facilities.

2 3. Performs other duties or special projects as
3 requested related to the area of responsibility.

4 Additionally, during 1995, Mr. Smith managed
5 and was chiefly responsible for all internal
6 communication to SSU employees, advertising
7 development and placement, media relations and
8 response to media inquiry. Likewise, communication
9 efforts, by and large, are designed to educate and
10 keep employees and customers informed on issues
11 critical to the operation of the utility and
12 service provided to customers.

13 **Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?**

14 **A.** Yes, it does.

SOUTHERN STATES UTILITIES, INC.
1993 COMPARISON OF REVENUE TO PAYROLL AND PAYROLL TO CUSTOMERS
DOCKET NO. 950495-WS

Line No.	Description	1993 ACTUAL \$ OF REVENUE PER \$ OF PAYROLL		
		water	sewer	total
1	REVENUES	31,277,321	19,409,594	50,686,915
2	PAYROLL	7,222,849	4,835,658	12,058,507 (1)
3	\$ OF REVENUE PER \$ OF PAYROLL	4.33	4.01	4.20

Line No.	Description	1993 ACTUAL PAYROLL \$ PER # OF CUSTOMER		
		water	sewer	total
1	PAYROLL	7,222,849	4,835,658	12,058,507 (1)
2	NUMBER OF CUSTOMERS	108,501	48,683	157,184
3	PAYROLL \$ PER # OF CUSTOMER	66.57	99.33	76.72

Note: (1) Gas allocated payroll has been excluded from this analysis.

SOUTHERN STATES UTILITIES, INC.
 1993 COMPARISON BY COMPANY - AVERAGE PAYROLL PER EMPLOYEE
 DOCKET NO. 950495-W5

Rank	Company Name	Payroll	# of Employees	Avg. Payroll Per Employee	% of Companies Surveyed With Lower Avg. Pay Per Employee
1	Rotunda West	221,339	13	17,026	0.00%
2	Adelphia	141,743	7	20,249	1.02%
3	Avon Water Co., Inc.	314,999	15	21,000	2.04%
4	Maine Water Com.	191,672	9	21,297	3.06%
5	Hampton Water Works Com.	462,771	20	23,139	4.08%
6	Wanakah Water	511,610	21	24,362	5.10%
7	Florida Cities Water Com.	3,180,563	128	24,848	6.12%
8	Southern States Utilities, Inc.	12,153,925	482	25,216	7.14%
9	Tidewater	465,874	18	25,882	8.16%
10	General Water - PA	264,840	10	26,484	9.18%
11	West Lafayette Water Com.	446,031	16	27,877	10.20%
12	General Water - Pine Bluff	1,301,503	46	28,294	11.22%
13	Pennsylvania Gas & Water Com.	28,506,000	975	29,237	12.24%
14	Bloomsburg Water Com.	498,559	17	29,327	13.27%
15	Paradise Valley Water Com.	360,367	12	30,031	14.29%
16	Consolidated Water Service	480,974	16	30,061	15.31%
17	Hydraulics	395,163	13	30,397	16.33%
18	Inter-State Water Com.	1,169,504	38	30,776	17.35%
19	Capital City Water Com.	831,927	27	30,812	18.37%
20	Indiana-American Water Com.	6,642,384	215	30,895	19.39%
21	Palm Coast Utility Corp.	2,357,510	76	31,020	20.41%
22	Wakefield Water Com.	311,176	10	31,118	21.43%
23	Beckley Water Com.	1,405,477	45	31,233	22.45%
24	Camden & Rockland Water Com.	977,597	31	31,535	23.47%
25	Hoosier Water Co., Inc.	632,044	20	31,602	24.49%
26	New Mexico-American Water Com.	887,297	28	31,689	25.51%
27	Del Este Water Com.	922,235	29	31,801	26.53%
28	Baton Rouge Water Works Com.	6,618,937	204	32,446	27.55%
29	South Gate Water and Sewer Com.	129,927	4	32,482	28.57%
30	Plainville	325,541	10	32,554	29.59%
31	Connecticut-American Water Com.	3,430,375	105	32,670	30.61%
32	Missouri-American Water Com.	3,307,186	100	33,072	31.63%
33	York Water Com. (Note 3)	2,982,008	90	33,133	32.65%
34	Northern Illinois Water Corp.	4,663,180	140	33,308	33.67%
35	Pennsylvania Water Com.	400,510	12	33,376	34.69%
36	Ohio-American Water Com.	3,542,410	106	33,419	35.71%
37	General Water - CT	368,134	11	33,467	36.73%
38	Shorelands Water, Inc.	977,145	29	33,695	37.76%
39	Citizens Utilities - Cal.	2,264,957	67	33,805	38.78%
40	Maryland-American Water Com.	478,614	14	34,187	39.80%
41	Artesian Water Co., Inc.	4,454,254	130	34,263	40.82%
42	Gary-Hobart Water Corp.	5,839,495	170	34,350	41.84%
43	Newtown Artesian Water Com.	619,560	18	34,420	42.86%
44	Iowa-American Water Com.	2,983,684	86	34,694	43.88%
45	San Gabriel Valley Water Com.	6,750,516	191	35,343	44.90%
46	Jacksonville Suburban Utilities	3,336,073	94	35,490	45.92%
47	Roaring Creek Water Com.	1,420,777	40	35,519	46.94%
48	Toms River Water Com.	1,741,985	49	35,551	47.96%
49	Illinois-American Water Com.	13,940,592	390	35,745	48.98%
50	Consumers Illinois Water Com.	2,762,703	77	35,879	50.00%
51	Dauphin Consolidated Water Supply	2,119,111	59	35,917	51.02%
52	Wilmington Suburban Water Com.	2,310,004	64	36,094	52.04%
53	Indiana Cities Water Corp.	2,964,002	82	36,146	53.06%
54	Boise Water Corp.	2,857,256	79	36,168	54.08%
55	West Virginia-American Water Com.	12,767,922	353	36,170	55.10%
56	Virginia-American Water Com.	3,331,451	92	36,211	56.12%
57	Mountain Water Com.	1,378,047	38	36,264	57.14%

SOUTHERN STATES UTILITIES, INC.
 1993 COMPARISON BY COMPANY - AVERAGE PAYROLL PER EMPLOYEE
 DOCKET NO. 950495-WS

Rank	Company Name	Payroll	# of Employees	Avg. Payroll Per Employee	% of Companies Surveyed With Lower Avg. Pay Per Employee
58	Tennessee-American Water Com.	5,995,479	165	36,336	58.16%
59	Ohio Suburban Water Com.	624,133	17	36,714	58.18%
60	Mechanicsburg Water Com.	625,327	17	36,784	60.20%
61	Pennichuck Water Works	2,177,652	59	36,909	61.22%
62	Lincoln Water Corp.	444,930	12	37,078	62.24%
63	Louisville Water Com.	15,450,987	411	37,594	63.27%
64	Mass American	1,505,381	40	37,635	64.29%
65	Pennsylvania-American Water Com.	33,705,623	888	37,957	65.31%
66	Birmingham	722,000	19	38,000	66.33%
67	Connecticut Water Service	6,534,793	168	38,898	67.35%
68	St. Louis County Water Com.	21,673,089	557	38,910	68.37%
69	California-American Water Com.	7,487,829	191	39,203	69.39%
70	Shenango Valley Water Com.	1,911,243	48	39,818	70.41%
71	Garden state Water Com.	2,135,064	53	40,284	71.43%
72	Mount Holly Water Com.	564,322	14	40,309	72.45%
73	Stamford Water Com.	1,601,669	39	41,068	73.47%
74	Southern California Water Com.	20,036,152	486	41,227	74.49%
75	Suburban Water Systems	4,085,363	99	41,266	75.51%
76	Middlesex Water Com.	5,575,134	135	41,297	76.53%
77	Southern New Hampshire Water Co., Inc.	1,074,976	26	41,345	77.55%
78	Bridgeport Hydraulic Corp.	10,391,742	251	41,401	78.57%
79	Ohio Water Service Com.	6,086,224	147	41,403	79.59%
80	Elizabethtown Water Com.	15,950,204	381	41,864	80.61%
81	Torrington	505,245	12	42,104	81.63%
82	Philadelphia Suburban Water Com.	21,590,000	511	42,250	82.65%
83	Indianapolis Water Com.	15,747,810	370	42,561	83.67%
84	Dominguez Water Corp.	3,213,483	75	42,846	84.69%
85	New Mexico Utilities	430,190	10	43,019	85.71%
86	New Jersey-American Water Com.	27,622,092	642	43,025	86.73%
87	New Rochelle Water Com.	2,997,765	69	43,446	87.76%
88	Long Island Water Corp.	6,521,169	149	43,766	88.78%
89	California Water Service Com.	26,976,222	614	43,935	89.80%
90	Rio Rancho	1,281,871	29	44,202	90.82%
91	San Jose Water Com.	12,283,000	277	44,343	91.84%
92	Jamaica Water Supply Com.	12,732,303	287	44,363	92.86%
93	Park Water Com.	3,781,603	84	45,019	93.88%
94	Spring Valley Water Com.	4,099,466	87	47,120	94.90%
95	New York Water Service Com.	3,525,185	74	47,638	95.92%
96	College Utilities Corp.	490,097	10	49,010	96.94%
97	Citizens Utilities - Home	453,305	9	50,367	97.96%
98	Hackensack Water Com.	24,067,718	475	50,669	98.98%
	Total	501,779,080	13,248	37,876	
	Southern States Utilities, Inc.			25,216	
	DIFFERENCE			(12,660)	
	DEVIATION FROM AVERAGE			-33.43%	

SOURCE: 1993 NAWC ECONOMIC RESEARCH PROGRAM SURVEY

SOUTHERN STATES UTILITIES, INC.
 1994 COMPARISON BY COMPANY - AVERAGE PAYROLL PER EMPLOYEE
 DOCKET NO. 950495-WS

Rank	Company Name	Payroll	# of Employees	Avg. Payroll Per Employee	% of Companies Surveyed With Lower Avg. Pay Per Employee
1	Gulf Utility	420,022	26	16,155	0.00%
2	Ranier View	444,289	20	22,214	1.10%
3	Adelphia	156,180	7	22,311	2.20%
4	Hampton Water Works Com.	428,184	19	22,536	3.30%
5	Avon Water Co., Inc.	339,860	14	24,276	4.40%
6	Heater Utilities	2,148,293	85	25,274	5.49%
7	Columbia Water Com.	424,037	16	26,502	6.59%
8	United W. Lafayette	537,457	20	26,873	7.69%
9	Southern States Utilities, Inc.	13,688,882	502	27,269	8.79%
10	Florida Cities Water Com.	3,596,284	130	27,664	9.89%
11	Consumers - Maine	1,770,630	64	27,666	10.99%
12	United New Mexico	765,576	27	28,355	12.09%
13	Tidewater	490,066	17	28,827	13.19%
14	Paradise Valley Water Com.	378,413	13	29,109	14.29%
15	Ohio Suburban Water Com.	496,774	17	29,222	15.38%
16	Northern Michigan	205,408	7	29,344	16.48%
17	United Arkansas	1,373,831	46	29,866	17.58%
18	Vallencia Water Com.	819,000	27	30,333	18.68%
19	United Missouri	821,828	27	30,438	19.78%
20	Pennsylvania Gas & Water Com.	29,773,000	965	30,853	20.88%
21	Inter-State Water Com.	1,112,893	36	30,914	21.98%
22	Consolidated Water Service	501,798	16	31,362	23.08%
23	United South Gate	129,193	4	32,298	24.18%
24	New Mexico-American Water Com.	917,549	28	32,770	25.27%
25	Missouri-American Water Com.	3,279,570	100	32,796	26.37%
26	Palm Coast Utility Corp.	2,400,543	73	32,884	27.47%
27	York Water Com. (Note 3)	3,021,117	91	33,199	28.57%
28	Baton Rouge Water Works Com.	6,806,138	204	33,363	29.67%
29	United Connecticut	402,894	12	33,575	30.77%
30	Consumers - Pa-Roar. Ck	1,433,420	42	34,129	31.87%
31	Hydraulics	450,038	13	34,618	32.97%
32	Ohio-American Water Com.	3,707,503	107	34,650	34.07%
33	Northwest Indiana	6,163,081	177	34,820	35.16%
34	Missouri Cities Water Com.	1,463,256	42	34,839	36.26%
35	Shorelands Water, Inc.	1,048,345	30	34,945	37.36%
36	Iowa-American Water Com.	3,019,195	86	35,107	38.46%
37	Northern Illinois Water Corp.	4,888,386	139	35,168	39.56%
38	Consumers - Pa-Susque.	422,952	12	35,246	40.66%
39	United Rhode Island	354,612	10	35,461	41.76%
40	United Pennsylvania	3,797,487	106	35,825	42.86%
41	Indiana-American Water Com.	10,074,903	281	35,854	43.96%
42	Illinois-American Water Com.	13,974,627	388	36,017	45.05%
43	Artesian Water Co., Inc.	4,892,587	130	36,097	46.15%
44	Newtown Artesian Water Com.	652,999	18	36,278	47.25%
45	Kentucky-American Water Com.	5,152,326	141	36,541	48.35%
46	New Mexico Utilities	477,511	13	36,732	49.45%
47	Consumers Illinois Water Com.	2,833,639	77	36,801	50.55%
48	United Toms River	1,822,225	49	37,188	51.65%
49	United Idaho	3,467,387	93	37,284	52.75%
50	United Florida	3,547,347	94	37,738	53.85%
51	Pennichuck Water Works	2,241,499	59	37,992	54.95%
52	Maryland-American Water Com.	494,132	13	38,010	56.04%
53	Tennessee-American Water Com.	6,222,850	163	38,177	57.14%
54	Mass American	1,567,086	41	38,222	58.24%
55	Citizens Utilities - Cal.	2,599,631	68	38,230	59.34%
56	Connecticut-American Water Com.	3,670,602	96	38,235	60.44%
57	Virginia-American Water Com.	3,413,306	89	38,352	61.54%

SOUTHERN STATES UTILITIES, INC.
 1994 COMPARISON BY COMPANY - AVERAGE PAYROLL PER EMPLOYEE
 DOCKET NO. 950495-WS

Rank	Company Name	Payroll	# of Employees	Avg. Payroll Per Employee	% of Companies Surveyed With Lower Avg. Pay Per Employee
58	West Virginia-American Water Com.	13,949,699	363	38,429	62.64%
59	Torrington	501,329	13	38,564	63.74%
60	California-American Water Com.	7,648,641	196	39,024	64.84%
61	United Delaware	2,504,086	64	39,126	65.93%
62	United Illinois	481,227	12	40,102	67.03%
63	St. Louis County Water Com.	22,224,362	553	40,189	68.13%
64	Connecticut Water Service	6,654,538	164	40,576	69.23%
65	Suburban Water Systems	4,016,900	98	40,989	70.33%
66	Pennsylvania-American Water Com.	35,114,385	853	41,166	71.43%
67	Stamford Water Com.	1,615,800	39	41,431	72.53%
68	Consumers - New Jersey	2,256,411	54	41,785	73.63%
69	Consumers - Ohio	6,035,203	143	42,204	74.73%
70	Louisville Water Com.	18,580,182	431	43,063	75.82%
71	Middlesex Water Com.	5,815,596	135	43,078	76.92%
72	Dominguez Water Corp.	3,316,219	76	43,634	78.02%
73	New Jersey-American Water Com.	27,768,023	628	44,217	79.12%
74	Long Island Water Corp.	6,724,587	152	44,241	80.22%
75	Consumers - Pa-Shenango	1,975,045	44	44,887	81.32%
76	United New Roch.	3,101,894	69	44,955	82.42%
77	Philadelphia Suburban Water Com.	23,071,000	513	44,973	83.52%
78	California Water Service Com.	28,146,615	624	45,107	84.62%
79	Southern California Water Com.	21,129,436	467	45,245	85.71%
80	Indianapolis Water Com.	16,643,675	367	45,351	86.81%
81	Mount Holly Water Com.	647,010	14	46,215	87.91%
82	Elizabethtown Water Com.	17,714,127	383	46,251	89.01%
83	Bridgeport Hydraulic Corp.	10,823,904	234	46,256	90.11%
84	San Jose Water Com.	13,015,129	281	46,317	91.21%
85	United New York	4,358,622	92	47,376	92.31%
86	Jamaica Water Supply Com.	12,081,381	254	47,564	93.41%
87	New York Water Service Com.	3,603,962	74	48,702	94.51%
88	Citizens Utilities - Home	489,276	10	48,928	95.60%
89	College Utilities Corp.	490,883	10	49,088	96.70%
90	Southern New Hampshire Water Co., Inc.	992,107	19	52,216	97.80%
91	United New Jersey	24,939,450	474	52,615	98.90%
Total		519,713,335	13,093	39,694	
Southern States Utilities, Inc.				27,269	
DIFFERENCE				(12,425)	
DEVIATION FROM AVERAGE				-31.30%	

SOURCE: 1994 NAWC ECONOMIC RESEARCH PROGRAM SURVEY
 Southern States Payroll was not included in 1994 NAWC Survey but was from SSU payroll department for this exhibit.

SOUTHERN STATES UTILITIES, INC						
1995 Employee Turnover Analysis						
Active: 506.00	Status Group Sel:					
Terminated: 81.00	Turnover % . . .	16.01				
Employee No.	Hire Date	Job Title	Status	Terminated	Reason	
71	12/28/89	AREA MANAGER	FULL	7/11/95	DIS	
10269	3/30/95	MAINTENANCE TECH. I	FULL	6/28/95	VOL	
9975	3/16/89	MAINTENANCE TECH. II	FULL	6/23/95	RET	
5015	12/8/71	LEAD MAINTENANCE TECH	FULL	7/17/95	LTD	
5028	8/14/67	DISABLED	FULL	6/28/95	DEATH	
333	9/25/91	OPERATOR III	FULL	8/17/95	LTD	
5056	3/7/83	LEAD MAINTENANCE TECH	FULL	9/14/95	VOL	
305	1/8/79	NORTH REGION MANAGER	FULL	12/1/95	DIS	
10273	4/19/95	MAINTENANCE TECH. I	FULL	4/20/95	VOL	
10042	6/1/92	MAINTENANCE TECH. I	FULL	1/17/95	DIS	
9944	12/7/88	SENIOR MAINTENANCE TECH.	FULL	8/17/95	VOL	
10192	3/28/94	SECRETARY II	PART	9/8/95	LAY	
10226	8/23/94	OPERATOR II	FULL	9/22/95	VOL	
88	3/12/90	SENIOR MAINTENANCE TECH.	FULL	7/18/95	LTD	
5245	8/18/86	LEAD OPERATOR III - MARCO	FULL	7/25/95	VOL	
10236	10/18/94	OPERATOR II - MARCO	FULL	5/25/95	VOL	
844	12/12/91	OPERATOR I	FULL	1/25/95	DEATH	
10091	1/28/93	OPERATOR III	FULL	3/2/95	VOL	
826	11/2/76	MAINTENANCE TECH. I	FULL	7/5/95	RET	
10300	9/1/95	MAINTENANCE TECH. I	FULL	10/15/95	VOL	
9815	6/21/88	OPERATOR III	FULL	6/9/95	RET	
10258	1/31/95	MAINTENANCE TECH. I	FULL	3/15/95	DIS	
10261	2/13/95	LEAD OPERATOR I	FULL	6/19/95	VOL	
5177	11/3/86	CHIEF OPERATOR	FULL	3/21/95	VOL	
5409	7/15/85	AREA SUPERVISOR I	FULL	10/20/95	VOL	
5093	1/17/72	SECRETARY II	FULL	6/30/95	RET	
10225	8/18/94	MAINTENANCE HELPER	FULL	10/30/95	VOL	
5033	1/19/87	DEVELOPMENT ASSISTANT	FULL	1/11/95	VOL	
10138	8/23/93	PARALEGAL	FULL	6/8/95	VOL	

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74	1/4/90	TRAINING & DEVELOP. ADMINISTRATOR	FULL	6/30/95	LAY
9990	5/1/89	HUMAN RESOURCES ADMINISTRATOR	FULL	6/30/95	LAY
10228	9/8/94	TEMP. COMMUNICATIONS ADMINISTRATOR	TEMP	6/29/95	VOL
10049	7/9/92	ASSISTANT ENGINEER II	FULL	7/24/95	VOL
10159	10/27/93	DRAFTER I	TEMP	10/20/95	VOL
10295	8/21/95	DRAFTER II	TEMP	9/6/95	VOL
70	12/26/89	DRAFTER II	FULL	4/7/95	VOL
10286	6/9/95	ASSISTANT ENGINEER I	TEMP	12/29/95	LAY
216	7/13/89	CONSTRUCTION INSPECTOR	FULL	1/27/95	VOL
10308	10/16/95	SECRETARY II	FULL	11/8/95	LAY
10280	5/18/95	LAB TECHNICIAN	TEMP	8/2/95	VOL
10242	11/10/94	LAB ANALYST II	FULL	10/2/95	DIS
10284	6/1/95	LAB ANALYST II	FULL	12/15/95	VOL
10243	11/10/94	LAB ANALYST II	FULL	4/7/95	VOL
9949	12/31/88	MGR., FINANCIAL PLANNING	FULL	6/30/95	LAY
10175	1/27/94	ACCOUNTING CLERK I	FULL	6/21/95	VOL
10014	3/2/92	ACCOUNTING CLERK I	FULL	7/14/95	VOL
10293	8/1/95	ACCOUNTING CLERK I	FULL	12/15/95	DIS
10005	1/13/92	ACCOUNTING CLERK I	FULL	8/10/95	VOL
9982	4/6/89	MGR. ADMIN. SERVICES	FULL	6/30/95	LAY
10264	2/28/95	RECORDS TECHNICIAN	FULL	3/1/95	VOL
10149	9/30/93	RECORDS TECHNICIAN	FULL	1/24/95	VOL
10256	1/9/95	SECRETARY II	TEMP	8/31/95	LAY
10247	11/28/94	RATE ANALYST I	FULL	6/30/95	VOL
10223	8/15/94	SENIOR RATE ANALYST	FULL	6/23/95	VOL
64	12/11/89	SENIOR ACCOUNTING CLERK	FULL	11/2/95	VOL
26	8/24/89	SENIOR ACCOUNTING CLERK	FULL	4/10/95	DIS
10172	12/15/93	METER READER I	FULL	9/15/95	VOL
10312	10/26/95	METER READER II	FULL	11/2/95	VOL
10140	8/30/93	METER READER I	FULL	12/21/95	LTD
10232	9/20/94	CUSTOMER SERVICE FIELD TECH. I	FULL	6/28/95	VOL
10294	8/7/95	CUSTOMER SERVICE FIELD TECH. I	FULL	8/15/95	VOL
10108	4/28/93	CUSTOMER SERVICE REP. I	FULL	2/10/95	DOWNNS
5029	1/19/87	METER READER II	FULL	11/10/95	LTD

30 / 3049
 (10-1-95)
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SOUTHERN STATES UTILITIES, INC.
DOCKET NO.: 950495-WS
RESPONSE TO INTERROGATORIES

REQUESTED BY: OPC
SET NO: 1
INTERROGATORY NO: 44
ISSUE DATE: 07/18/95
WITNESS: DALE G. LOCK
RESPONDENT: Dale Lock

INTERROGATORY NO: 44

State the amount, percent increases, and effective dates for general wage increases and, separately, for merit increases granted by the Company during the last five years and as budgeted for the years 1995 and 1996.

RESPONSE: 44

SSU does not grant general pay increases per se. The effective date of the annual Merit increases was the first pay period in January for the years 1992 and 1993. Beginning with 1994 the Merit increases were deferred until the first pay period in March. This deferral allows the Company to account for earnings in the prior year and ascertain the availability of funding for merit increases in the new year. Appendix 44-A is a breakdown of all pay increases granted and budgeted by year.

ATTACHMENT 44
SOUTHERN STATES UTILITIES, INC.
DOCKET NO.: 950495-WS

Southern States Utilities, Inc. Analysis of Pay Increases

1992 through 1996 As a % of 1/1 Payroll	Actual 1992	Actual 1993	Actual 1994	Budget 1995	Projected 1996
Merit - Amount	\$ 516,098	\$ 372,799	\$ 401,788	\$ 410,666	\$ 419,118
Merit - Percent	4.94%	3.06%	3.12%	3.00%	3.00%
License - Amount	\$ 56,655	\$ 16,565	\$ 31,442	\$ 34,222	\$ 34,927
License - Percent	0.54%	0.14%	0.24%	0.25%	0.25%
Promotions - Amount	\$ 145,769	\$ 192,093	\$ 139,797	\$ 136,889	\$ 139,706
Promotions - Percent	1.40%	1.58%	1.08%	1.00%	1.00%
Union Contract -Percent	0.01%	0.02%	0.00%	0.00%	0.00%
Corrections- Amount	\$ 909	\$ -	\$ -	\$ -	\$ -
Corrections- Percent	0.01%	0.00%	0.00%	0.00%	0.00%
Demotion - Amount	\$ (2,045)	\$ (1,215)	\$ (481)	\$ -	\$ -
Demotion -Percent	-0.02%	-0.01%	0.00%	0.00%	0.00%
Equity/Market -Amount	\$ 7,305	\$ 8,396	\$ 27,859	\$ 204,375	\$ 223,750
Equity/Market -Percent	0.07%	0.07%	0.22%	1.49%	1.50%
Disability- Amount	\$ (2,764)	\$ -	\$ -	\$ -	\$ -
Disability-Percent	-0.03%	0.00%	0.00%	0.00%	0.00%
Step- Amount	\$ 67,770	\$ 50,611	\$ 18,503	\$ 9,582	\$ -
Step-Percent	0.65%	0.42%	0.14%	0.07%	0.00%
Total Increases -Amount	\$ 793,241	\$ 644,158	\$ 620,902	\$ 797,730	\$ 819,497
Total Increases -Percent	7.60%	5.29%	4.81%	5.83%	5.87%

SSU JOB DESCRIPTION

JOB TITLE: MANAGER OF COMMUNICATIONS AND GOVERNMENTAL RELATIONS

DEPARTMENT: Communications and Governmental Relations

IMMEDIATE SUPERVISOR: Corporate Services Vice President

ELIGIBLE FOR OVERTIME: No

EEO JOB CODE: 2 - Professionals

GENERAL PURPOSE:

Establishes government relations and communications strategies for company. Performs and manages a variety of governmental liaisons and educational and public relations functions. Position requires a broad-based, industry knowledge, government and communications contacts and the ability to communicate company positions and concerns to the broad spectrum of employees, customers, general public, government personnel and community opinion leaders.

DUTIES

Responsibilities involve the following:

1. Formulates long-range strategies and plans for company in areas of government and press relations, as well as employee and customer communications.
2. Maintains constant contact with governing bodies who have jurisdiction over company water or wastewater systems, Florida and federal legislators and other governmental bodies which set and enforce water and wastewater policies or which administrate State or federal environmental laws impacting water and wastewater facilities.
3. Supervises the research, design, writing and production and distribution of a variety of brochures, bill inserts and other customer communications.
4. Works with appropriate departments and communications administrator to plan certain employee communications such as the company newspaper and bulletins.
5. Assists with responses to inquiries on rate and regulatory compliance filings or statutory notification requirements.

6. Supervises or researches and writes news releases for media; represents the company in local and regional media relations and response to media inquiries for information.
7. Provides editorial assistance to departments and company executives. Prepares correspondence and speeches on a wide variety of issues affecting employees, customers and the general public.
8. Supervises or designs, writes and coordinates production and placement of corporate advertising and special events.
9. Maintains up-to-date knowledge of company operations, policies and issues.
10. Administers and controls capital and operating budgets within area of responsibility.
11. Performs other duties or special projects as requested related to the area of responsibility.
12. Duties performed under normal office conditions. However, considerable travel and off-hour work schedules are often required.
13. Trips and visits to company facilities, county officials, the State Capital, Washington, and outside agencies. Generally requires to work beyond normal working hours and travel in a company car.

CONTACTS

INTERNAL: All level of management and all employees.

EXTERNAL: Community leaders, media representatives, government agencies State and federal lawmakers, customers and general public.

HIRING STANDARDS

EDUCATION: Masters' Degree in Communications, Journalism or related field or equivalent.

EXPERIENCE: Minimum of 10 years experience in development and formulation of government and public relations strategy and hands on professional practice in day-to-day communications, public relations, government relations with highly-developed professional skills in written and interpersonal communications; publication design, layout and production; speech preparation and presentation; media relations and contacts with governmental officials.