



Public Service Commission

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COMMISSION CLERK

**DATE:** December 1, 2004

**TO:** Sam Merta, Division of Economic Regulation

**FROM:** Denise N. Vandiver, Chief, Bureau of Auditing *DNV*  
Division of Regulatory Compliance and Consumer Assistance

**RE:** **Docket No. 040972-SU ; Company Name:** Ranch Mobile WWTP, Inc. ;  
**Audit Purpose:** File and Suspend Rate Case ;  
**Audit Control No.** 04-287-2-1

Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of the Commission Clerk and Administrative Services. There are no confidential work papers associated with this audit.

DNV/jcp  
Attachment

cc: Division of Regulatory Compliance and Consumer Assistance (Hoppe, District Offices, File Folder)  
Division of the Commission Clerk and Administrative Services (2)  
Division of Competitive Markets and Enforcement (Harvey)  
General Counsel  
Office of Public Counsel

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

Ruden Law Firm  
Kathryn G.W. Cowdery, Esq.  
215 So. Monroe St., Suite 815  
Tallahassee, FL 32301

Charles A. Wilson, C.P.A., P.A.  
2364 Sunset Point Road  
Clearwater, FL 33765

Ralph L. Bircher, Chairman  
Ranch Mobile, WWTP, Inc.  
6800 150<sup>th</sup> Avenue, North  
Clearwater, FL 33764-7709

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**FLORIDA PUBLIC SERVICE COMMISSION**

*DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE  
BUREAU OF AUDITING*

*TAMPA DISTRICT OFFICE*

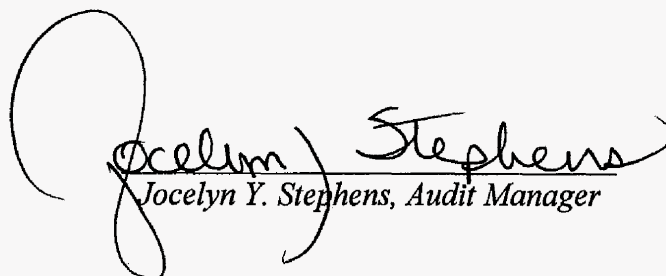
**RANCH MOBILE WWTP, INC**

**FILE AND SUSPEND RATE CASE AUDIT**

**FOR THE HISTORICAL TWELVE MONTHS ENDED DECEMBER 31, 2003  
AND  
PROJECTED TEST YEAR ENDED DECEMBER 31, 2005**

**DOCKET NO. 040972**

**AUDIT CONTROL NO. 04-287-2-1**

  
*Jocelyn Y. Stephens, Audit Manager*

  
*Joseph W. Rohrbacher, Tampa District Supervisor*

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**DIVISION OF REGULATORY COMPLIANCE AND CONSUMER AFFAIRS**

**AUDITOR'S REPORT**

**November 22, 2004**

**TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES**

We have applied the procedures described later in this report to audit the accompanying Schedules of Rate Base, Net Operating Income and Capital Structure for the historical twelve month period ended December 31, 2003 and the projected test year ended December 31, 2005 for Ranch Mobile WWTP, Inc. These schedules were prepared by the Utility as part of its petition for rate relief in Docket No. 040972-SU. There is no confidential information associated with this audit.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except 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.

## **SUMMARY OF SIGNIFICANT FINDINGS**

Adjustments were made to Plant in Service to remove expense items from the rate base calculation. An adjustment was also made to Plant in Service to add a capital item not previously recorded by company in its MFR's. The cost of land was removed from Rate Case consideration because the land is not owned or leased by the utility. Adjustments were made to Operation and Maintenance (O&M) expense to record corrections and/omissions to the utility's calculation of O&M expense. Depreciation expense and accumulated depreciation were recalculated to include staff adjustments to Plant in Service balances.

## **SUMMARY OF SIGNIFICANT PROCEDURES**

Our audit was performed by examining, on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below. The following definitions apply when used in this report:

**Compiled** - The exhibit amounts were reconciled with the general ledger, and accounts were scanned for error or inconsistency.

**Examined** - The exhibit amounts were reconciled with the general ledger. The general ledger account balances were traced to subsidiary ledgers. Selective analytical review procedures were applied, and accounts balances were tested to the extent further described.

**Verify** - The item was tested for accuracy, and substantiating documentation was examined.

**RATE BASE:** Examined Rate Base line items. Reconciled MFR balances to 2003 Annual Report. Traced rate base additions to source documents. Determined adjustments to Plant In Service, Land, Accumulated Depreciation and Working Capital, as necessary.

**NET OPERATING INCOME:** Examined Net Operating Income line items. Verified billing rates agreed to FPSC approved tariff rates. Determined adjustments to Operation and Maintenance expense, Depreciation Expense and Taxes Other Than Income, as necessary.

**CAPITAL STRUCTURE:** Complied components of capital structure for utility and parent company, Ranch Mobile, Inc. Agreed MFR balance to Consolidated Balance Sheet at 12/31/03.

**OTHER:** Analyzed monthly working trial balance for the period January - September 2004, and traced applicable items to Rate Base and Net Operating Income schedules. Read and summarized minutes of the utility's Board of Director's meeting. Read outside auditor's 2003 financial report and analyzed accompanying workpapers.

## **AUDIT DISCLOSURE NO. 1**

### **SUBJECT: EXPENSE ITEMS CHARGED TO PLANT IN SERVICE**

#### **STATEMENT OF FACT:**

In 2003, the utility experienced a break in its sewer lines, evidenced by the sinking of a manhole. Utility obtained the services of Ultra Vision and had the necessary repairs done. Total costs of repairs = \$ 34,506. In 2004, the utility experienced another sewer line break. Total costs of repairs = \$7,555 .

Utility included all the 2003 costs incurred, \$34,506, in CWIP and reclassified these costs to plant in service during 2004. Repair costs incurred in 2004, of \$7,555, were not recorded in the MFR's for either Rate Base or Net Operating Income calculations.

Additionally, the utility incurred legal fees related to contract negotiations between Ranch Mobile WWTP and Down Yonder & Twin Palms mobile home parks. The negotiations were an attempt to persuade Twin Palms and Down Yonder to hook up directly with the City of Largo and thereby close the WWTP utility business. Negotiations were unsuccessful. Ranch Mobile WWTP is currently providing service to both parks without a contract.

Total legal fees incurred in 2003 = \$8,468.

Lastly, at the time of filing, the utility had incurred and recorded Rate Case expense of \$2,500. This amount was recorded in the Rate Base as Amortization.

#### **AUDIT FINDINGS:**

The costs of the 2003 sewer repairs totaling \$34,506, should be removed from the Rate Base calculation as they are a maintenance expense item. The \$34,506 for sewer line repairs should be reclassified to a deferred asset account and amortized to O&M expenses over a period of 5 years in the amount of \$6,901 so as to be recognized but not overly distort expenses for a 12-month period.

Additionally, the 2004 cost of repairs totaling \$7,555 should be recorded as O&M expense.

Because the legal fees of \$8,468 are non-recurring and do not apply to sewer operations, they should be expensed and amortized over a period of 5 years (Rule 25-30.433(8).F.A.C. Annual amortization equals \$1,694.

Lastly, the rate case expense of \$2,500 should be removed from the rate base calculation and expensed over a period of four years.

**AUDIT DISCLOSURE NO. 2**

**SUBJECT: SEWER LINE REHABILITATION COSTS NOT RECORDED IN RATE BASE**

**STATEMENT OF FACT:**

In September 2004, the utility entered into a contract for \$44,800 with Ultra Vision Pipeline Services to:

“Provide equipment, labor and material to install a new manhole to replace the existing manhole A1, and to provide all necessary bypass pumping and MOT signs [Mode of Transportation - i.e. Stop signs, Detour signs, cones, etc] as needed.”

**AUDIT FINDING:**

An analysis of rate base revealed that the utility did not include this cost in its rate base calculation for 2004.

Because the original system was contributed and is fully depreciated, any major improvements are capitalized. Therefore, it is recommended that an adjustment of \$44,800 be made to the rate base to include this cost as part of the rehabilitation of the sewer system.

**AUDIT DISCLOSURE NO. 3**

**SUBJECT: LAND**

**STATEMENT OF FACT:**

Ranch Mobile, Inc (parent company) purchased the WWTP (both equipment and land for lift station) from Midway Service Corporation for \$80,000 on March 31, 1983.

The land description from the closing statement agrees with the land description on the warranty deed :

Section C, Ranch Mobile, Plat Book 44, Pages 51 and 52,  
Public Records of Pinellas County, Florida

The plant was situated on the land that Ranch Mobile, Inc purchased and was conveyed to Ranch Mobile at time of purchase. When the plant was demolished, in 1988, the City of Largo placed its lift station on approximately the same area of land. The land is considered to be a permanent easement for use by the City of Largo. As a result, Ranch Mobile Inc. does not pay real estate tax on this land.

Ranch Mobile WWTP does not own the land for the lift station nor is there a lease agreement between Ranch Mobile Inc. and Ranch Mobile WWTP, Inc. for use of the land.

**AUDIT FINDINGS:**

Staff could not determine how a value of \$1,000 was applied to the land and recorded on the books of Ranch Mobile WWTP Inc. Utility personnel also does not understand how this transaction occurred. However, since the land is not owned or used by the utility, we recommend it be removed from the rate base calculation.



## **AUDIT DISCLOSURE NO. 4**

### **SUBJECT: OPERATION AND MAINTENANCE (O&M) EXPENSE**

#### **STATEMENT OF FACT:**

Because of the utility's hook-up to the sewer system of the City of Largo, O&M expenses are limited. O&M expenses incurred by the utility are limited to Purchased Sewer Treatment, permits and fees and routine recurring sewer line repairs. The utility accumulates and classifies its costs in compliance with the Commission Rules and the Uniform System of Accounts

Total O&M costs recorded by utility for 2003, 2004 and 2005 are \$175,554, \$177,854 and \$184,755 respectively.

In addition to the O&M costs recorded by the utility, staff also noted documentation of Rate Case Expense totaling \$5,672, as of October 2004.

Also in O&M expenses, staff noted a related party transaction. The transaction consisted of an annual fee of \$2,000, from Ranch Mobile Inc., which comprises: allocated salary expense of office manager (approximately two hours per week); allocated office space, use of office equipment, electric, telephone and postage. The two hours per week is based upon an analysis performed for a six-month period during 1998.

#### **AUDITOR CONCLUSION:**

As discussed in Audit Disclosure No. 1, audit staff made an adjustment to reclassify an expenditure initially capitalized by the utility in 2003. Owing to the age and deterioration of the existing sewer lines, staff considers it a likely possibility that this type of repair may again be necessary over the projected ten-year period that utility requires to completely rehab its sewer lines. Audit staff considers this type repair to be recurring, but not on an annual basis. Therefore, audit staff amortized this reclassification over a five-year period so as not to overly distort a 12-month operating period. Annual amortization is \$6,901.

Also, staff increased O&M expense for an expenditure for repairs which was not recorded by the utility. The repair cost of the sewer line break, during 2004, was \$7,555.

The administrative fee charged by Ranch Mobile Inc. to Ranch Mobile WWTP, Inc. is based upon 1998 costs and has not increased since that time. Based upon the current salary level of the office manager and the inflationary increases in other operating costs, an increase in this expense could be justified. However, in an attempt to keep costs at a minimum for the utility, Ranch Mobile Inc. has not requested an increase nor has audit staff proposed an increase.

The legal fees of \$8,468 are non-recurring and do not apply to sewer operations. They should be expensed and amortized over a period of 5 years (Rule 25-30.433(8).F.A.C. Annual amortization equals \$1,694.

Lastly, audit staff amortized current rate case expense over a four year period. The annual charge to expense was calculated to be \$1,418.

Based upon adjustments by staff, O&M expenses are calculated to be \$184,148, \$195,421 and \$194,768, respectively.

**AUDIT DISCLOSURE NO. 5**

**SUBJECT: ACCUMULATED DEPRECIATION**

**STATEMENT OF FACT:**

Utility calculated Depreciation Expense and Accumulated Depreciation based upon its computation of Plant In Service.

The depreciation expense and accumulated depreciation as recorded in the MFR's are as follows:

|                               |           |
|-------------------------------|-----------|
| Depreciation Expense - 2003 = | \$ -0-    |
| Depreciation Expense - 2004 = | \$ 4,622  |
| Depreciation Expense - 2005 = | \$ 10,694 |
|                               | -----     |
| Accumulated Depreciation      | \$ 15,316 |
|                               | =====     |

**AUDITOR FINDING:**

In the analysis of plant in service, audit staff noted costs, included in plant in service, that should be expensed. These costs were for (1) non-recurring legal fees totaling \$8,468; (2) O&M expenses totaling \$34,506; and (3) Rate Case expense totaling \$2,500.

Also, the utility did not include capitalizable cost of \$44,800 in its plant in service or accumulated depreciation calculations.

Adjustments to plant in service for the above items resulted in adjustments to depreciation expense and accumulated depreciation. Per staff computation, depreciation expense should be as follows:

|                               |           |
|-------------------------------|-----------|
| Depreciation Expense - 2003 = | \$ -0-    |
| Depreciation Expense - 2004 = | \$ 4,333  |
| Depreciation Expense - 2005 = | \$ 10,114 |
|                               | -----     |
| Accumulated Depreciation      | \$ 14,447 |
|                               | =====     |

**AUDIT DISCLOSURE NO. 6**

**SUBJECT: REGULATORY ASSESSMENT FEE**

**STATEMENT OF FACT:**

In each of the Net Operating Income Schedules, for the 12-month periods ending December 31, 2003, 2004 and 2005, the company included Regulatory Assessment Fee expense in the amount of \$8,346. This amount was determined by multiplying the utility calculated 2003 wastewater operating revenues of \$185,468 by the regulatory assessment fee of .045%.

**AUDITOR FINDINGS:**

Staff calculated wastewater operating revenues for 2004 and 2005 based upon the FPSC currently approved tariff rates for the periods January 2003 - September 2004 and October 2004 - December 2005.

Based upon staff calculations, revenues and the applicable regulatory assessment fee are shown below:

|                               | <u>2004</u> | <u>2005</u> |
|-------------------------------|-------------|-------------|
| Wastewater Operating Revenues | \$187,356   | \$197,836   |
| Regulatory Assessment Fee     | 8,431       | 8,903       |

Schedule of Sewer Rate Base

Florida Public Service Commission

Company: *FLORIDA POWER & LIGHT CO.*  
 Docket No.: *10000*  
 Schedule Year Ended: *1964*  
 Interim [ ] Final [ ]  
 Historical  Projected [ ]

Schedule: A-2  
 Page 1 of 1  
 Preparer: *W. J. ...*

Explanation: Provide the calculation of average rate base for the test year, showing all adjustments. All non-used and useful items should be reported as Plant Held For Future Use. If method other than formula approach (1/8 O&M) is used to determine working capital, provide additional schedule showing detail calculation.

| Line No. | (1)<br>Description                | (2)<br>Balance<br>Per<br>Books | (3)<br>Utility<br>Adjustments | (4)<br>Adjusted<br>Utility<br>Balance | (5)<br>Supporting<br>Schedule(s) |
|----------|-----------------------------------|--------------------------------|-------------------------------|---------------------------------------|----------------------------------|
| 1        | Utility Plant in Service          |                                |                               |                                       | A-6                              |
| 2        | Utility Land & Land Rights        | 100.00                         |                               |                                       | A-6                              |
| 3        | Less: Non-Used & Useful Plant     |                                |                               |                                       | A-7                              |
| 4        | Construction Work in Progress     | 42974                          |                               |                                       | -                                |
| 5        | Less: Accumulated Depreciation    | 0                              |                               |                                       | A-10                             |
| 6        | Less: CIAC                        |                                |                               |                                       | A-11                             |
| 7        | Accumulated Amortization of CIAC  |                                |                               |                                       | A-12                             |
| 8        | Acquisition Adjustments           |                                |                               |                                       | -                                |
| 9        | Accum. Amort. of Acq. Adjustments |                                |                               |                                       | -                                |
| 10       | Advances For Construction         |                                |                               |                                       | A-14                             |
| 11       | Working Capital Allowance         |                                |                               |                                       | A-15                             |
| 12       | Total Rate Base                   | 43974                          |                               |                                       |                                  |

Schedule of Sewer Net Operating Income

Florida Public Service Commission

Company: WWT P  
 Schedule Year Ended: 2003  
 Interim [ ] Final [ ]  
 Historic  or Projected [ ]

Schedule: B-2  
 Page    of     
 Docket No.:  
 Preparer: [Signature]

Explanation: Provide the calculation of net operating income for the test year. If amortization (Line 4) is related to any amount other than an acquisition adjustment, submit an additional schedule showing a description and calculation of charge.

| Line No. | (1)<br>Description               | (2)<br>Balance Per Books | (3)<br>Utility Test Year Adjustments | (4)<br>Utility Adjusted Test Year | (5)<br>Requested Revenue Adjustment | (6)<br>Requested Annual Revenues | (7)<br>Supporting Schedule(s) |
|----------|----------------------------------|--------------------------|--------------------------------------|-----------------------------------|-------------------------------------|----------------------------------|-------------------------------|
| 1        | OPERATING REVENUES               | 185,468                  |                                      |                                   |                                     |                                  | --                            |
| 2        | Operation & Maintenance          | 175,554                  |                                      |                                   |                                     |                                  | B-5                           |
| 3        | Depreciation, net of CIAC Amort. |                          |                                      |                                   |                                     |                                  | B-11                          |
| 4        | Amortization                     |                          |                                      |                                   |                                     |                                  |                               |
| 5        | Taxes Other Than Income          | 8,346                    |                                      |                                   |                                     |                                  | B-12                          |
| 6        | Provision for Income Taxes       |                          |                                      |                                   |                                     |                                  | C-1                           |
| 7        | OPERATING EXPENSES               | 183,900                  |                                      |                                   |                                     |                                  |                               |
| 8        | NET OPERATING INCOME             | 15,68                    |                                      |                                   |                                     |                                  |                               |
| 9        | RATE BASE                        | 43,724                   |                                      |                                   |                                     |                                  |                               |
| 10       | RATE OF RETURN                   | 36%                      |                                      |                                   |                                     |                                  |                               |

Schedule of Requested Cost of Capital  
Beginning and End of Year Average

Florida Public Service Commission

Company: *WINT P*  
Docket No.:  
Test Year Ended: *2007*  
Schedule Year Ended:  
Historic [] or Projected [ ]  
Subsidiary [ ] or Consolidated [ ]

Schedule: D-1  
Page    of     
Preparer: *ewh/bs*

Explanation: Provide a schedule which calculates the requested Cost of Capital on a beginning and end of year average basis. If a year-end basis is used, submit an additional schedule reflecting year-end calculations.

| Line No. | Class of Capital             | (1)<br>Reconciled<br>To Requested<br>Rate Base | (2)<br>Ratio   | (3)<br>Cost<br>Rate | (4)<br>Weighted<br>Cost |
|----------|------------------------------|--|----------------|---------------------|-------------------------|
| 1        | Long-Term Debt               |  |                |                     |                         |
| 2        | Short-Term Debt              |  |                |                     |                         |
| 3        | Preferred Stock              |  |                |                     |                         |
| 4        | Customer Deposits            |  |                |                     |                         |
| 5        | Common Equity                | <i>1,780,876</i>                               | <i>100%</i>    | <i>9.10</i>         | <i>9.10</i>             |
| 6        | Tax Credits - Zero Cost      |  |                |                     |                         |
| 7        | Tax Credits - Wtd. Cost      |  |                |                     |                         |
| 8        | Accum. Deferred Income Taxes |  |                |                     |                         |
| 9        | Other (Explain)              |  |                |                     |                         |
| 10       | Total                        | <i>1,780,876</i>                               | <i>100.00%</i> |                     | <i>9.10</i>             |

Supporting Schedules: D-2  
Recap Schedules: A-1,A-2

*Randville Parent*

Schedule of Sewer Rate Base

Florida Public Service Commission

Company: *W. W. P.*  
 Docket No.:  
 Schedule Year Ended: *2005*  
 Interim [ ] Final [ ]  
 Historical [ ] Projected [*X*]

Schedule: A-2  
 Page 1 of 1  
 Preparer: *Carlson*

Explanation: Provide the calculation of average rate base for the test year, showing all adjustments. All non-used and useful items should be reported as Plant Held For Future Use. If method other than formula approach (1/8 O&M) is used to determine working capital, provide additional schedule showing detail calculation.

| Line No. | (1)<br>Description                | (2)<br>Balance<br>Per<br>Books | (3)<br>Utility<br>Adjustments | (4)<br>Adjusted<br>Utility<br>Balance | (5)<br>Supporting<br>Schedule(s) |
|----------|-----------------------------------|--------------------------------|-------------------------------|---------------------------------------|----------------------------------|
| 1        | Utility Plant in Service          | 463192                         |                               |                                       | A-6                              |
| 2        | Utility Land & Land Rights        | 1000                           |                               |                                       | A-6                              |
| 3        | Less: Non-Used & Useful Plant     |                                |                               |                                       | A-7                              |
| 4        | Construction Work in Progress     |                                |                               |                                       |                                  |
| 5        | Less: Accumulated Depreciation    | 15317                          |                               |                                       | A-10                             |
| 6        | Less: CIAC                        |                                |                               |                                       | A-11                             |
| 7        | Accumulated Amortization of CIAC  |                                |                               |                                       | A-12                             |
| 8        | Acquisition Adjustments           |                                |                               |                                       | -                                |
| 9        | Accum. Amort. of Acq. Adjustments |                                |                               |                                       | -                                |
| 10       | Advances For Construction         |                                |                               |                                       | A-14                             |
| 11       | Working Capital Allowance         |                                |                               |                                       | A-15                             |
| 12       | Total Rate Base                   | 448875                         |                               |                                       |                                  |



Schedule of Sewer Net Operating Income

Florida Public Service Commission

Company: WWTB  
 Schedule Year Ended: 2005  
 Interim [ ] Final [ ]  
 Historic [ ] or Projected

Schedule: B-2  
 Page    of     
 Docket No.:  
 Preparer: C. Wilson

Explanation: Provide the calculation of net operating income for the test year. If amortization (Line 4) is related to any amount other than an acquisition adjustment, submit an additional schedule showing a description and calculation of charge.

| Line No. | (1) Description                  | (2) Balance Per Books<br><i>Historical</i> | (3) Utility Test Year Adjustments | (4) Utility Adjusted Test Year<br><i>2005</i> | (5) Requested Revenue Adjustment | (6) Requested Annual Revenues<br><i>2005</i> | (7) Supporting Schedule(s) |
|----------|----------------------------------|--|-----------------------------------|---|----------------------------------|--|----------------------------|
| 1        | OPERATING REVENUES               | 185,468                                    |                                   | 185,468                                       | 35.85%<br>66,489                 | Rev 23<br>251,957                            | --                         |
| 2        | Operation & Maintenance          | 175,554                                    |                                   | 184,755                                       | Amort                            | 184,755                                      | B-5                        |
| 3        | Depreciation, net of CIAC Amort. |  |                                   | 14379   |                                  | 14379  | B-11                       |
| 4        | Amortization                     |  |                                   | 625   |                                  | 625  |                            |
| 5        | Taxes Other Than Income          | 8346                                       |                                   | 8346  | 3004                             | 11350  | B-12                       |
| 6        | Provision for Income Taxes       |  |                                   |   |                                  |  | C-1                        |
| 7        | OPERATING EXPENSES               | 183900                                     |                                   | 208105  | 3004                             | 211109                                       |                            |
| 8        | NET OPERATING INCOME             | 1568                                       |                                   | (22637)                                       | 63485                            | 40849  |                            |
| 9        | RATE BASE                        | 43974                                      |                                   | 448875  |                                  | 448875                                       |                            |
| 10       | RATE OF RETURN                   | 3.6%                                       |                                   |   |                                  | 9.1  |                            |

Schedule of Requested Cost of Capital  
Beginning and End of Year Average

Florida Public Service Commission

Company: *WMP*  
 Docket No.:  
 Test Year Ended: *2005*  
 Schedule Year Ended:  
 Historic [ ] or Projected   
 Subsidiary [ ] or Consolidated

Schedule: D-1  
 Page    of     
 Preparer: *amb*

*Parent/Child Consolidated*

Explanation: Provide a schedule which calculates the requested Cost of Capital on a beginning and end of year average basis. If a year-end basis is used, submit an additional schedule reflecting year-end calculations.

| Line No. | Class of Capital             | (1)<br>Reconciled<br>To Requested<br>Rate Base | (2)<br>Ratio   | (3)<br>Cost<br>Rate | (4)<br>Weighted<br>Cost |
|----------|------------------------------|--|----------------|---------------------|-------------------------|
| 1        | Long-Term Debt               |  |                |                     |                         |
| 2        | Short-Term Debt              |  |                |                     |                         |
| 3        | Preferred Stock              |  |                |                     |                         |
| 4        | Customer Deposits            |  |                |                     |                         |
| 5        | Common Equity                | <i>1,780,873</i>                               |                | <i>9.10</i>         | <i>9.10</i>             |
| 6        | Tax Credits - Zero Cost      |  |                |                     |                         |
| 7        | Tax Credits - Wtd. Cost      |  |                |                     |                         |
| 8        | Accum. Deferred Income Taxes |  |                |                     |                         |
| 9        | Other (Explain)              |  |                |                     |                         |
| 10       | Total                        | <u><i>1,780,873</i></u>                        | <u>100.00%</u> |                     | <u><i>9.10</i></u>      |

Supporting Schedules: D-2  
 Recap Schedules: A-1,A-2