

ORIGINAL



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MEMORANDUM

TO: Docket Control

FROM: Steven M. Olea  
Director  
Utilities Division

DATE: February 5, 2013

RE: SURREBUTTAL STAFF REPORT IN RESPONSE TO BEAVER DAM WATER COMPANY, INC.'S APPLICATION FOR A RATE INCREASE.  
(DOCKET NO. W-03067A-12-0232)

On December 12, 2012, Staff filed a Staff Report in the above captioned Beaver Dam Water Company, Inc. rate docket. On January 11, 2013, the Company filed Rebuttal Testimony in response to that Staff Report. Staff hereby submits the attached Surrebuttal Staff Report in response to Beaver Dam's Rebuttal Testimony. Staff recommends approval of the rate application using Staff's recommended rates and charges.

Any party who wishes may file comments to the Supplemental Staff Report with the Commission's Docket Control by 4:00 p.m. on or before February 15, 2013.

SMO:JAC:tdp

Originator: John A. Cassidy

Arizona Corporation Commission  
DOCKETED

FEB 05 2013

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Service List for: Beaver Dam Water Co., Inc.  
Docket No. W-03067A-12-0232

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**SURREBUTTAL STAFF REPORT  
UTILITIES DIVISION  
ARIZONA CORPORATION COMMISSION**

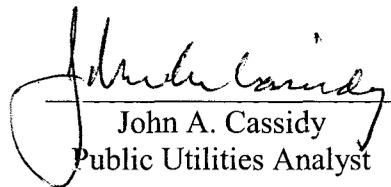
**BEAVER DAM WATER Company, INC.  
DOCKET NO. W-03067A-12-0232**

**APPLICATION FOR A  
PERMANENT RATE INCREASE**

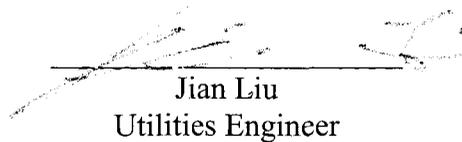
**FEBRUARY 5, 2013**

## STAFF ACKNOWLEDGMENT

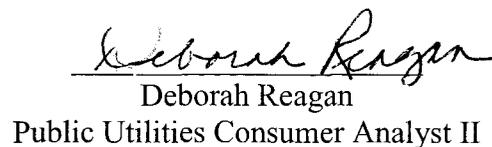
The Surrebuttal Staff Report for Beaver Dam Water Co., Docket No. W-03067A-12-0232, is the responsibility of the Staff members listed below. John A. Cassidy is responsible for the review and analysis of the Company's application, recommended revenue requirement, rate base and rate design. Jian Liu is responsible for the engineering and technical analysis. Deborah Reagan is responsible for reviewing the Commission's records on the Company, determining compliance with Commission policies/rules and reviewing customer complaints filed with the Commission.



John A. Cassidy  
Public Utilities Analyst



Jian Liu  
Utilities Engineer



Deborah Reagan  
Public Utilities Consumer Analyst II

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## SUMMARY OF RATE FILING

On June 8, 2012, the Company filed an application for a permanent rate increase. In its initial application, the Company proposed total operating revenue of \$354,283, an increase of \$46,251, or 15.01 percent, over test year revenue of \$308,032 to provide a \$22,286 operating income and a 6.44 percent rate of return on its proposed \$346,148 fair value rate base ("FVRB") which is also its original cost rate base ("OCRB").

On December 12, 2012, Staff filed its Staff Report in the matter. The Staff Report recommended three rate base adjustments and seven operating income adjustments to test year amounts. The Staff Report recommended total operating revenue of \$354,283, an increase of \$46,645, or 15.16 percent, over the Staff-adjusted test year revenue of \$307,638, to provide a \$31,504 operating income and a 9.63 percent rate of return on the \$327,010 Staff-adjusted FVRB which is also its OCRB.

On January 11, 2013, the Company filed rebuttal testimonies of Thomas J. Bourassa and Bob Frisby. The Company's rebuttal testimony adopted some of Staff adjustments, and after review of the Company's rebuttal testimony Staff has adopted some the Company's positions. The Company and Staff both continue to recommend rates that generate operating revenue of \$354,283.

The Company's rebuttal testimony proposes rates that produce total operating revenue of \$354,283, an increase of \$49,285, or 16.16 percent, over test year revenue of \$304,998 to provide a \$32,190 operating income and a 8.73 percent rate of return on its proposed \$368,943 FVRB.

Staff's surrebuttal recommends rates that produce total operating revenue of \$354,283, an increase of \$49,285, or 16.16 percent, over test year revenue of \$304,998 to provide a \$31,632 operating income and a 8.63 percent rate of return on the Staff-recommended \$366,710 FVRB.

The Company and Staff are in agreement on all material issues relating to rate base and operating income. Staff's rate base of \$366,710 exceeds the Company's rate base of \$368,943 by \$2,233 due to differences in the calculation of cash working capital. Staff's recommended operating income of \$31,632 is \$558 less than the Company's \$32,190 operating income because Staff's depreciation expense of \$19,369 is \$68 less than the Company's depreciation expense of \$19,437, and Staff's income tax expense of \$5,235 is \$626 greater than the Company's income tax expense of \$4,609. Accordingly, the only remaining significant issue is rate design.

The Company proposes a rate structure that includes a monthly minimum charge that increases by meter size, and an inverted three-tier commodity rate for all 5/8 x 3/4-inch and 3/4-inch meters and a two-tier commodity rate for larger meters. The Company proposes to continue using the existing break-over points that increase by meter size. The proposed rates represent increases over present rates to both the monthly minimum charges and the commodity rate for all meter sizes. The Company's proposed rates would increase the typical residential bill

for a 5/8 x 3/4-inch meter, with a median usage of 4,250 gallons, by \$5.98 (16.40 percent) from \$36.43 to \$42.40 (Surrebuttal Schedule JAC-5).

Staff recommends a rate structure that includes a monthly minimum charge that increases by meter size and an inverted three-tier commodity rate for all 5/8 x 3/4-inch and 3/4-inch meters and a two-tier commodity rate for larger meters. Staff recommends continuing to use break-over points that increase by meter size and to lower those break-over points. Staff recommends a greater spread among the commodity rates for the tiers than those proposed by the Company. Under Staff's recommended rate design the typical residential bill for a 5/8 x 3/4-inch meter customer with a median use of 4,250 gallons would increase by \$3.14 (8.61 percent), from \$36.43 to \$39.56 (Surrebuttal Schedule JAC-5).

Staff agrees with the Company's revision to change the billing determinants to reflect that there are only 177, and not 185, habitable lots in the Beaver Dam Property Owners Association ("BDPOA") resulting in a \$2,640 decrease in test year metered water revenue.

As shown in Surrebuttal Schedule JAC-1, The Company has requested a rate increase providing for an overall rate of return of 6.44 percent, while Staff's recommended rates provide for a rate of return of 8.63 percent. Thus, in the event customers do conserve, Staff's rates provide a 219 basis point rate of return cushion ( $8.63\% - 6.44\% = 2.19\%$ ) above that requested by the Company.

## **DISPUTED ISSUES**

### **Rate Design**

The Company takes issue with several aspects of Staff's rate design. The Company's objections include Staff's recommendations (1) to place the increase in revenue entirely in the commodity rates and none in the monthly minimum charge; (2) to lower the break-over points; and (3) to place more of the increase in the second and third tier commodity rates. The Company's concern is that Staff's recommended rates will cause customers to reduce consumption reducing its ability to generate the authorized revenue requirement. The Company asserts that Staff's rate design is a "one size fits all" approach that does not reflect the facts. The Company notes that the existing break-over point for 5/8 x 3/4-inch meters of 5,000 gallons is below the average usage, and it has promoted lower consumption.

In response Staff notes that the minimum monthly charge in its recommended rates generates 55.9 percent of the revenue of metered water sales, a significant increase from the normal range of 30 percent to 40 percent used by Staff, thus providing greater than typical revenue stability. While revenue stability is a desirable attribute of rate design, in the long-term having a sustainable balance between water supply and demand is a greater priority. Staff typically uses 3,000 gallons as a break-over point to represent non-discretionary residential use. Since 31.9 percent of 5/8 x 3/4-inch meter billings in the test year were for 3,000 gallons or less, it is clear that 3,000 is sufficient for many customers in the Company's service territory.

Additionally, approximately, 52.4 percent of 5/8 x 3/4-inch meter billings used 5,000 gallons or less. The fact that 5,000 gallons is below the average monthly usage of 6,577 gallons does not justify using 5,000 gallons as a break-over point. Average is less useful than median to represent typical consumption. The median consumption was 4,250 gallons in the test year. The break-over point should be below the median level to represent non-discretionary consumption, not typical consumption. Using lower break-over points also tends to offset any greater variability in revenue due to generating more revenue in the second and third commodity tiers by capturing more billings in those higher rate tiers.

In the event the Commission believes that conservation will prevent the Company from achieving total operating revenues of \$354,283, Staff alternatively recommends that the Company be provided a larger rate of return to allow the Company a 10.00 percent rate of return on its OCLD rate base to address the revenue lost from possible conservation. Staff recommends that this be achieved by increasing the monthly minimum charge for a 5/8" x 3/4" meter from \$27.50 to \$28.00, and that Staff's recommended third tier commodity rate be increased from \$5.75 to \$6.00. These changes will provide the Company an additional \$6,372 in metered water revenues, thus allowing it to achieve a 10.00 percent rate of return. (For details of this alternative, see attached Surrebuttal Schedules JAC-1A, JAC-4A and JAC-5A).

Staff has revised the combined service line and meter installation amount for 6-inch compound meters from \$4,120 to \$5,960 to correct a typographical error in its Staff Report, and thanks the Company for identifying this error. Staff also agrees with the Company's proposal for a \$50.00 Reconnection (Delinquent) service charge.

## **STAFF RECOMMENDATIONS**

### **Staff recommends:**

- Approval of Staff's rates and charges as shown in Surrebuttal Schedule JAC-4. In addition to collection of its regular rate and charges, the Company may collect from its customers a proportionate share of any privilege, sales or use tax, per Arizona Administrative Code ("A.A.C.") Rule 14-2-409(D)(5).
- Directing the Company to docket with the Commission a schedule of its approved rates and charges within 30 days after the date the Decision in this matter is issued.
- Directing the Company, as a compliance item in this case, to notify its customers of the authorized rates and charges approved in this proceeding, and their effective date, in a form acceptable to Staff, by means of an insert in its next regular scheduled billing and to file copies with Docket Control within 10 days of the date notice is sent to customers.

- Authorizing the depreciation rates by individual National Association of Regulatory Utility Commissioners (“NARUC”) category, as delineated in Table B of the Engineering Report.
- That Beaver Dam be required to file with Docket Control, as a compliance item in this docket, within 90 days of the effective date of a Decision in this matter, at least five BMPs in the form of tariffs that substantially conform to the templates created by Staff, available at the Commission’s website, for the Commission’s review and consideration. A maximum of two of these BMPs may come from the “Public Awareness/Public Relations” or “Education and Training” categories of the BMP’s. The Company may request cost recovery of actual costs associated with the BMPs implemented in its next general rate application.

**SUMMARY OF FILING**

	-- Present Rates --		-- Proposed Rates --	
	Company as Filed	Staff as Adjusted	Company as Filed	Staff as Adjusted
Revenues:				
Metered Water Revenue	\$307,492	\$304,458	\$353,743	\$353,743
Unmetered Water Revenue	0	0	0	0
Other Water Revenues	540	540	540	540
<b>Total Operating Revenue</b>	<b>\$308,032</b>	<b>\$304,998</b>	<b>\$354,283</b>	<b>\$354,283</b>
Operating Expenses:				
Operation and Maintenance	\$279,253	\$268,601	\$279,253	\$268,601
Depreciation	20,992	19,369	20,992	19,369
Property & Other Taxes	29,520	29,446	29,520	29,446
Income Tax	2,232	50	2,232	5,235
<b>Total Operating Expense</b>	<b>\$331,997</b>	<b>\$317,466</b>	<b>\$331,997</b>	<b>\$322,651</b>
<b>Operating Income/(Loss)</b>	<b>(\$23,965)</b>	<b>(\$12,468)</b>	<b>\$22,286</b>	<b>\$31,632</b>
Rate Base O.C.L.D.	\$346,148	\$366,710	\$346,148	\$366,710
Rate of Return - O.C.L.D.	N/M	N/M	6.44%	8.63%
Times Interest Earned Ratio (Pre-Tax)	N/M	N/M	1.77	3.11
Debt Service Coverage Ratio (Pre-Tax)	N/M	0.31	1.02	2.48
Operating Margin	N/M	N/M	6.29%	8.93%

- NOTES:
1. The times interest earned ratio (TIER) represents the ability of the Company to pay interest expenses before taxes.
  2. Operating Margin represents the proportion of funds available to pay interest and other below the line or non-ratemaking expenses.

**RATE BASE**

	----- Original Cost -----			Staff
	Company	Adjustment		
Plant in Service	\$1,476,056	\$2,800	A	\$1,478,856
Less:				
Accum. Depreciation	432,777	14,281	B	447,058
<b>Net Plant</b>	<b>\$1,043,279</b>	<b>(\$11,481)</b>		<b>\$1,031,798</b>
Less:				
Plant Advances	\$81,205	\$0		\$81,205
Customer Security Deposits	0	0		0
<b>Total Advances</b>	<b>\$81,205</b>	<b>\$0</b>		<b>\$81,205</b>
Contributions Gross	\$677,631	\$0		\$677,631
Less:				
Amortization of CIAC	61,705	0		61,705
<b>Net CIAC</b>	<b>\$615,926</b>	<b>\$0</b>		<b>\$615,926</b>
<b>Total Deductions</b>	<b>\$697,131</b>	<b>\$0</b>		<b>\$697,131</b>
Plus:				
1/24 Power	\$0	\$766	C	\$766
1/8 Operation & Maint.	0	31,277	C	31,277
Inventory	0	0		0
Prepayments	0	0		0
<b>Total Additions</b>	<b>\$0</b>	<b>\$32,043</b>		<b>\$32,043</b>
<b>Rate Base</b>	<b>\$346,148</b>	<b>\$20,562</b>		<b>\$366,710</b>

*Explanation of Adjustment:*

- A See Schedule JAC-2, Page 2.
- B See Schedule JAC-2, Page 3.
- C The Company did not request a cash working capital allowance. Staff calculated a cash working capital allowance using the formula method and Staff-adjusted operating expenses.

**PLANT ADJUSTMENT**

	Company Exhibit	Adjustment	Staff Adjusted
301 Organization	\$20,335	\$0	\$20,335
302 Franchises	0	0	0
303 Land & Land Rights	35,596	32,396 b	67,992
304 Structures & Improvements	6,000	0	6,000
307 Wells & Springs	159,275	0	159,275
310 Power Generated Equipment	\$0	0	0
311 Pumping Equipment	68,959	2,800 a	71,759
320.1 Water Treatment Equipment	0	0	0
320.2 Solution Chemical Feeders	0	0	0
330.1 Storage Tanks	273,381	0	273,381
330.2 Pressure Tanks	0	0	0
331 Transmission & Distribution Mains	823,464	0	823,464
333 Services	0	0	0
334 Meters & Meter Installations	22,090	0	22,090
335 Hydrants	827	0	827
336 Backflow Prevention Devices	0	0	0
339 Other Plant and Misc. Equipment	0	0	0
340 Office Furniture & Equipment	6,500	0	6,500
340.1 Computers & Software	6,886	0	6,886
341 Transportation Equipment	16,100	0	16,100
343 Tools Shop & Garage Equipment	4,247	0	4,247
344 Laboratory Equipment	0	0	0
345 Power Operated Equipment	0	0	0
346 Communication Equipment	0	0	0
347 Miscellaneous Equipment	0	0	0
348 Other Tangible Plant	32,396	(32,396) b	0
	0	0	0
<b>TOTALS</b>	<b>\$1,476,056</b>	<b>\$2,800</b>	<b>\$1,478,856</b>

*Explanation of Adjustment:*

- a To capitalize \$2,800 of 2011 plant additions to Pumping Equipment (Acct. No. 311) previously expensed as Outside Services (Acct. No. 630).
- b To reclassify \$32,396 of 2009 plant additions form Other Tangible Plant (Acct. No. 348) to Land and Land Rights (Acct. No. 303).

(Note: No adjustment was made to remove the not used and useful plant identified in the Engineering Report, as the Company had not included this plant in its plant schedules)

**ACCUMULATED DEPRECIATION ADJUSTMENT**

	<u>Amount</u>
Accumulated Depreciation - Per Company	\$432,777
Accumulated Depreciation - Per Staff	<u>447,058</u>
<b>Total Adjustment</b>	<b><u><u>\$14,281</u></u></b>

<u>Accumulated Depreciation Balances</u>	Per Company	Adjustment	Per Staff
304 Structures & Improvements	6,000	-	6,000
307 Wells & Springs	45,137	4,349	49,486
310 Power Generated Equipment	-	-	-
311 Pumping Equipment	29,770	18,396	48,166
320.1 Water Treatment Equipment	-	-	-
320.2 Solution Chemical Feeders	-	-	-
330.1 Storage Tanks	127,617	524	128,141
330.2 Pressure Tanks	-	-	-
331 Transmission & Distribution Mains	180,321	(10,885)	169,436
333 Services	-	-	-
334 Meters & Meter Installations	10,145	3,755	13,900
335 Hydrants	87	(12)	75
336 Backflow Prevention Devices	-	-	-
339 Other Plant and Misc. Equipment	-	-	-
340 Office Furniture & Equipment	6,500	-	6,500
340.1 Computers & Software	6,886	(0)	6,886
341 Transportation Equipment	16,100	-	16,100
343 Tools Shop & Garage Equipment	2,156	213	2,369
344 Laboratory Equipment	-	-	-
345 Power Operated Equipment	-	-	-
346 Communication Equipment	-	-	-
347 Miscellaneous Equipment	-	-	-
348 Other Tangible Plant	2,058	(2,058)	-
<b>Total Accumulated Depreciation</b>	<u><u>432,777</u></u>	<u><u>14,281</u></u>	<u><u>447,058</u></u>

*Explanation of Adjustment:*

- B - Removed amounts attributable to Other Tangible Plant to reflect Staff's reclassification of these amounts to Land and Land Rights, a non-depreciable account, and to reflect recalculation of amounts in the intervening years since the test year in the prior rate case.

**STATEMENT OF OPERATING INCOME**

	Company Exhibit	Staff Adjustments		Staff Adjusted
Revenues:				
461 Metered Water Revenue	\$307,492	(\$3,034) D		\$304,458
460 Unmetered Water Revenue	0	0		0
474 Other Water Revenues	540	0		540
<b>Total Operating Revenue</b>	<b>\$308,032</b>	<b>(\$3,034)</b>		<b>\$304,998</b>
Operating Expenses:				
601 Salaries and Wages	\$121,950	\$0		\$121,950
610 Purchased Water	\$0	0		0
615 Purchased Power	19,653	(1,272) E		18,382
618 Chemicals	1,445	0		1,445
620 Repairs and Maintenance	15,297	0		15,297
621 Office Supplies & Expense	4,989	0		4,989
630 Outside Services	21,545	(11,028) F		10,517
635 Water Testing	3,672	105 G		3,777
641 Rents	46,999	0		46,999
650 Transportation Expenses	7,967	0		7,967
657 Insurance - General Liability	9,192	0		9,192
659 Insurance - Health and Life	13,644	1,542 H		15,186
666 Regulatory Commission Expense - Rate Case	5,000	0		5,000
675 Miscellaneous Expense	7,900	0		7,900
403 Depreciation Expense	20,992	(1,623) I		19,369
408 Taxes Other Than Income	17,861	0		17,861
408.11 Property Taxes	11,659	(74)		11,585
409 Income Tax	2,232	(2,182) J		50
<b>Total Operating Expenses</b>	<b>\$331,997</b>	<b>(\$14,531)</b>		<b>\$317,466</b>
<b>OPERATING INCOME/(LOSS)</b>	<b>(\$23,965)</b>	<b>\$11,497</b>		<b>(\$12,468)</b>
Other Income/(Expense):				
419 Interest and Dividend Income	\$0	\$0		\$0
421 Non-Utility Income	0	0		0
427 Interest Expense	13,852	(2,004) K		11,848
426 Miscellaneous Non-Utility Expense	0	0		0
<b>Total Other Income/(Expense)</b>	<b>(\$13,852)</b>	<b>\$2,004</b>		<b>(\$11,848)</b>
<b>NET INCOME/(LOSS)</b>	<b>(\$37,817)</b>	<b>\$13,501</b>		<b>(\$24,316)</b>

**STAFF ADJUSTMENTS**

D	- METERED WATER REVENUE - Per Company Per Staff	\$307,492 304,458	<u><u>(\$3,034)</u></u>
	To remove the Company's proposed annualization adjustment other than for conversion from master meter to individual meter billing for the HOA.		
E	- PURCHASED POWER - Per Company Per Staff	\$19,653 18,382	<u><u>(\$1,272)</u></u>
	To remove out of-test-year expense.		
F	- OUTSIDE SERVICES - Per Company Per Staff	\$21,545 10,517	<u><u>(\$11,028)</u></u>
	To reclassify \$2,800 of costs from expense to Pumping Equipment (Acct. No. 311); to disallow \$4,810 of rate case expense; to disallow \$2,255 of out of test year expenses; to disallow \$713 of wastewater accounting expense; and to disallow \$450 of meter reading expense representing a thirteenth month.		
G	- WATER TESTING - Per Company Per Staff	\$3,672 3,777	<u><u>\$105</u></u>
	To recognize the average on-going water testing expenses.		
H	- INSURANCE - HEALTH AND LIFE - Per Company Per Staff	\$13,644 15,186	<u><u>\$1,542</u></u>
	To recognize known and measurable change as per documentation provided.		

**STAFF ADJUSTMENTS (Cont.)**

I	-	DEPRECIATION EXPENSE - Per Company	\$20,992	
		Per Staff	<u>19,369</u>	<u>(\$1,623)</u>
		To reflect application of Staff's depreciation rates to Staff's depreciable plant balances, by account offset by amortization of CIAC. (See Schedule JAC-3, p. 4.)		
J	-	INCOME TAX - Per Company	\$2,232	
		Per Staff	<u>50</u>	<u>(\$2,182)</u>
		To reflect application of statutory tax rates to taxable income.		
K	-	INTEREST EXPENSE - Per Company	\$13,852	
		Per Staff	<u>11,848</u>	<u>(\$2,004)</u>
		To recognize test year interest expense on long term debt outstanding.		

OPERATING INCOME ADJUSTMENT D - DEPRECIATION EXPENSE

LINE NO.	DESCRIPTION	[A] COMPANY PROPOSED	[B] STAFF ADJUSTMENTS	[C] STAFF RECOMMENDED	[D]	[E]	[F]
1	Depreciation Expense	\$ 20,992	\$ (1,623)	\$ 19,369			
Line No.	ACCT NO. DESCRIPTION	Company Proposed PLANT IN SERVICE BALANCE	STAFF PLANT BALANCE	Fully Depreciated Plant	STAFF DEPR. PLANT BALANCE	STAFF RECOMMENDED RATE	STAFF RECOMMENDED EXPENSE
2	Plant In Service						
2	301 Organization	\$ 20,335	20,335	\$ -	\$ 20,335	0.00%	\$ -
3	302 Franchises	-	-	-	-	0.00%	-
4	303 Land & Land Rights	35,596	67,992	-	67,992	0.00%	-
5	304 Structures & Improvements	6,000	6,000	6,000	-	3.33%	-
6	307 Wells & Springs	159,275	159,275	-	159,275	3.33%	5,304
7	310 Power Generating Equipment	-	-	-	-	5.00%	-
8	311 Pumping Equipment	68,959	71,759	-	71,759	12.50%	8,970
9	320.1 Water Treatment Plants	-	-	-	-	3.33%	-
10	320.2 Solution Chemical Feeders	-	-	-	-	20.00%	-
11	330.1 Storage Tanks	273,381	273,381	-	273,381	2.22%	6,069
12	330.2 Pressure Tanks	-	-	-	-	5.00%	-
13	331 Transmission & Distribution Mains	823,464	823,464	-	823,464	2.00%	16,469
14	333 Services	-	-	-	-	3.33%	-
15	334 Meters & Meter Installations	22,090	22,090	-	22,090	8.33%	1,840
16	335 Hydrants	827	827	-	827	2.00%	17
17	336 Backflow Prevention Devices	-	-	-	-	6.67%	-
18	339 Other Plant and Misc. Equipment	-	-	-	-	6.67%	-
19	340 Office Furniture & Equipment	6,500	6,500	6,500	-	6.67%	-
	340.1 Computers and Software	6,886	6,886	6,140	746	20.00%	-
20	341 Transportation Equipment	16,100	16,100	16,100	-	20.00%	-
21	343 Tools Shop & Garage Equipment	4,247	4,247	2,000	2,247	5.00%	112
22	344 Laboratory Equipment	-	-	-	-	10.00%	-
23	345 Power Operated Equipment	-	-	-	-	5.00%	-
24	346 Communication Equipment	-	-	-	-	10.00%	-
25	347 Miscellaneous Equipment	-	-	-	-	10.00%	-
26	348 Other Tangible Plant	32,396	-	-	-	5.00%	-
27		-	-	-	-	-	-
28							
29	Subtotal General	\$ 1,476,056	\$ 1,478,856	\$ 36,740	\$ 1,442,116		\$ 38,781
30	Less: Non-depreciable Account(s)	55,931			88,327		
31	Depreciable Plant (L29-L30)	\$ 1,420,125			\$ 1,353,789		
32							
33	Contributions-in-Aid-of-Construction (CIAC)					\$ 677,631	
34	Weighted Average Depreciation/Amortization Rate					2.8646%	
35	Less: Amortization of CIAC (L32 x L33)						\$ 19,412
36	<b>Depreciation Expense - STAFF</b>						<b>\$ 19,369</b>
37							
38	<b>Pro Forma Depreciation Expense Calculation</b>						
39							
40	Plant in Service	\$ 1,478,856					
41	Less: Non-depreciable plant	88,327					
42	Fully depreciated plant	36,740					
43	Depreciable Plant	\$ 1,353,789					
44	Times: Staff weighted average depreciation rate	2.8646%					
45	Depreciation expense before amortization of CIAC	38,781					
46	Less: Amortization of CIAC	19,412					
47	<b>Test Year Depreciation - Staff</b>	<b>19,369</b>					
48	Depreciation expense - Company	20,992					
49	<b>Staff recommended adjustment</b>	<b>\$ (1,623)</b>					

**RATE DESIGN**

Monthly Usage Charge	Present	-Proposed Rates-	
	Rates	Company	Staff
<u>5/8" x 3/4" Meter</u>	\$27.50	\$31.52	\$27.50
3/4" Meter	41.25	47.28	41.25
1" Meter	68.75	78.80	68.75
1 1/2" Meter	137.50	157.60	137.50
2" Meter	220.00	252.16	220.00
3" Meter	440.00	504.32	440.00
4" Meter	687.50	788.00	687.50
6" Meter	1,375.00	1,576.00	1,375.00
8" Meter	2,200.00	2,521.60	2,200.00
10" Meter	3,162.00	3,624.80	3,162.50
12" Meter	5,912.00	6,776.80	5,912.50
Gallons Included in Minimum	0	0	0
<u>Commodity Rate Charge</u>			
<u>5/8" x 3/4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 5,000 gallons	2.10	2.56
Tier 2	From 5,001 to 12,000 gallons	3.15	3.46
Tier 3	Over 12,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 3,000 gallons		2.25
Tier 2	From 3,001 to 7,000 gallons		4.25
Tier 3	Over 7,000 gallons		5.75
<u>3/4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 5,000 gallons	2.10	2.56
Tier 2	From 5,001 to 12,000 gallons	3.15	3.46
Tier 3	Over 12,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 3,000 gallons		2.25
Tier 2	From 3,001 to 7,000 gallons		4.25
Tier 3	Over 7,000 gallons		5.75
<u>1" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 30,000 gallons	3.15	3.46
Tier 2	Over 30,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 15,000 gallons		4.25
Tier 2	Over 15,000 gallons		5.75
<u>1 1/2" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 60,000 gallons	3.15	3.46
Tier 2	Over 60,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 35,000 gallons		4.25
Tier 2	Over 35,000 gallons		5.75
<u>2" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 96,000 gallons	3.15	3.46
Tier 2	Over 96,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 60,000 gallons		4.25
Tier 2	Over 60,000 gallons		5.75
<u>3" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 192,000 gallons	3.15	3.46
Tier 2	Over 192,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 125,000 gallons		4.25
Tier 2	Over 125,000 gallons		5.75
<u>4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 300,000 gallons	3.15	3.46
Tier 2	Over 300,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 200,000 gallons		4.25
Tier 2	Over 200,000 gallons		5.75
<u>6" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 600,000 gallons	3.15	3.46
Tier 2	Over 600,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 400,000 gallons		4.25
Tier 2	Over 400,000 gallons		5.75

**RATE DESIGN**

		Present	-Proposed Rates-	
		Rates	Company	Staff
<b>8" Meter</b>				
<i>Company</i>				
Tier 1	From 0 to 960,000 gallons	3.15	3.46	
Tier 2	Over 960,000 gallons	3.75	4.26	
<i>Staff</i>				
Tier 1	From 0 to 675,000 gallons			4.25
Tier 2	Over 675,000 gallons			5.75
<b>10" Meter</b>				
<i>Company</i>				
Tier 1	From 0 to 1,380,000 gallons	3.15	3.46	
Tier 2	Over 1,380,000 gallons	3.75	4.26	
<i>Staff</i>				
Tier 1	From 0 to 900,000 gallons			4.25
Tier 2	Over 900,000 gallons			5.75
<b>12" Meter</b>				
<i>Company</i>				
Tier 1	From 0 to 2,580,000 gallons	3.15	3.46	
Tier 2	Over 2,580,000 gallons	3.75	4.26	
<i>Staff</i>				
Tier 1	From 0 to 1,750,000 gallons			4.25
Tier 2	Over 1,750,000 gallons			5.75

Service Line and Meter Installation Charges

			Service Line	Meter Installation	Total
5/8" x 3/4" Meter	\$580.00	\$580.00	\$ 425.00	\$ 155.00	\$ 580.00
3/4" Meter	700.00	\$700.00	445.00	255.00	700.00
1" Meter	700.00	\$700.00	445.00	255.00	700.00
1½" Meter	880.00	\$880.00	460.00	420.00	880.00
2" Meter (Turbine)	1,380.00	\$1,380.00	615.00	765.00	1,380.00
2" Meter (Compound)	1,460.00	\$1,460.00	615.00	845.00	1,460.00
3" Meter (Turbine)	1,930.00	\$1,930.00	745.00	1,185.00	1,930.00
3" Meter (Compound)	2,010.00	\$2,010.00	745.00	1,265.00	2,010.00
4" Meter (Turbine)	2,935.00	\$2,935.00	1,050.00	1,885.00	2,935.00
4" Meter (Compound)	3,020.00	\$3,020.00	1,050.00	1,970.00	3,020.00
6" Meter (Turbine)	4,120.00	\$4,120.00	1,250.00	2,870.00	4,120.00
6" Meter (Compound)	5,960.00	\$5,960.00	1,250.00	4,710.00	5,960.00
8" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost
10" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost
12" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost

Service Charges

Establishment	\$35.00	\$35.00	\$35.00
Establishment (After Hours)	\$45.00	\$45.00	NT
Reconnection (Delinquent)	\$50.00	\$50.00	\$50.00
Reconnection (Delinquent) After Hours	\$65.00	\$65.00	NT
Meter Test (If Correct)	\$25.00	\$25.00	\$30.00
Deposit	*	*	*
Deposit Interest	*	*	*
Re-Establishment (Within 12 Months)	**	**	**
Re-Establishment (Within 12 Months) After Hours	**	**	NT
NSF Check	\$25.00	\$25.00	\$20.00
Deferred Payment (per Month)	***	***	***
Meter Re-Read (If Correct)	\$15.00	\$15.00	\$15.00
Late Fee (per Month)	***	***	***
Moving Customer Meter (Customer Request)	****	****	****
After Hours Service Charge (Customer Request)	N/A	N/A	\$35.00

NT = No Tariff

Monthly Service Charge for Fire Sprinkler

4" or Smaller	\$0.00	\$0.00	*****
6"	0.00	0.00	*****
8"	0.00	0.00	*****
10"	0.00	0.00	*****
Larger than 10"	0.00	0.00	*****

- \* Per Commission Rules (R14-2-403.B)
- \*\* Months off system times the minimum (R14-2-403.D)
- \*\*\* 1.5% on the unpaid balance per month
- \*\*\*\* Per Commission Rules (R14-2-405.B)
- \*\*\*\*\* 2.00% of Monthly Minimum for a Comparable Sized Meter Connection, but no less than \$10.00 per month. The Service Charge for Fire Sprinklers is only applicable for service lines separate and distinct from the primary water service line.

**Typical Bill Analysis**  
General Service 5/8 x 3/4-Inch Meter

Company Proposed	Gallons	Present Rates	Proposed Rates	Dollar Increase	Percent Increase
Average Usage	6,577	\$ 42.97	\$ 49.78	\$ 6.81	15.85%
Median Usage	4,250	36.43	42.40	\$ 5.98	16.40%
<b>Staff Recommended</b>					
Average Usage	6,577	\$ 42.97	\$ 49.45	\$ 6.48	15.09%
Median Usage	4,250	36.43	39.56	\$ 3.14	8.61%

**Present & Proposed Rates (Without Taxes)**  
General Service 5/8 x 3/4-Inch Meter

Gallons Consumption	Present Rates	Company Proposed Rates	% Increase	Staff Recommended Rates	% Increase
-	\$ 27.50	\$ 31.52	14.62%	\$ 27.50	0.00%
1,000	29.60	34.08	15.14%	29.75	0.51%
2,000	31.70	36.64	15.58%	32.00	0.95%
3,000	33.80	39.20	15.98%	34.25	1.33%
4,000	35.90	41.76	16.32%	38.50	7.24%
5,000	38.00	44.32	16.63%	42.75	12.50%
6,000	41.15	47.78	16.11%	47.00	14.22%
7,000	44.30	51.24	15.67%	51.25	15.69%
8,000	47.45	54.70	15.28%	57.00	20.13%
9,000	50.60	58.16	14.94%	62.75	24.01%
10,000	53.75	61.62	14.64%	68.50	27.44%
11,000	56.90	65.08	14.38%	74.25	30.49%
12,000	60.05	68.54	14.14%	80.00	33.22%
13,000	63.80	72.80	14.11%	85.75	34.40%
14,000	67.55	77.06	14.08%	91.50	35.46%
15,000	71.30	81.32	14.05%	97.25	36.40%
16,000	75.05	85.58	14.03%	103.00	37.24%
17,000	78.80	89.84	14.01%	108.75	38.01%
18,000	82.55	94.10	13.99%	114.50	38.70%
19,000	86.30	98.36	13.97%	120.25	39.34%
20,000	90.05	102.62	13.96%	126.00	39.92%
25,000	108.80	123.92	13.90%	154.75	42.23%
30,000	127.55	145.22	13.85%	183.50	43.87%
35,000	146.30	166.52	13.82%	212.25	45.08%
40,000	165.05	187.82	13.80%	241.00	46.02%
45,000	183.80	209.12	13.78%	269.75	46.76%
50,000	202.55	230.42	13.76%	298.50	47.37%
75,000	296.30	336.92	13.71%	442.25	49.26%
100,000	390.05	443.42	13.68%	586.00	50.24%

**SUMMARY OF FILING - ALTERNATIVE**

	-- Present Rates --		-- Proposed Rates --	
	Company as Filed	Staff as Adjusted	Company as Filed	Staff as Adjusted
Revenues:				
Metered Water Revenue	\$307,492	\$304,458	\$353,743	\$360,115
Unmetered Water Revenue	0	0	0	0
Other Water Revenues	540	540	540	540
<b>Total Operating Revenue</b>	<b>\$308,032</b>	<b>\$304,998</b>	<b>\$354,283</b>	<b>\$360,655</b>
Operating Expenses:				
Operation and Maintenance	\$279,253	\$268,601	\$279,253	\$268,601
Depreciation	20,992	19,369	20,992	19,369
Property & Other Taxes	29,520	29,446	29,520	29,446
Income Tax	2,232	50	2,232	6,568
<b>Total Operating Expense</b>	<b>\$331,997</b>	<b>\$317,466</b>	<b>\$331,997</b>	<b>\$323,984</b>
Operating Income/(Loss)	(\$23,965)	<b>(\$12,468)</b>	\$22,286	<b>\$36,671</b>
Rate Base O.C.L.D.	\$346,148	\$366,710	\$346,148	\$366,710
Rate of Return - O.C.L.D.	N/M	N/M	6.44%	10.00%
Times Interest Earned Ratio (Pre-Tax)	N/M	N/M	1.77	3.11
Debt Service Coverage Ratio (Pre-Tax)	N/M	0.31	1.02	2.48
Operating Margin	N/M	N/M	6.29%	10.17%

- NOTES:
1. The times interest earned ratio (TIER) represents the ability of the Company to pay interest expenses before taxes.
  2. Operating Margin represents the proportion of funds available to pay interest and other below the line or non-ratemaking expenses.

**RATE DESIGN - ALTERNATIVE**

Monthly Usage Charge	Present	-Proposed Rates-	
	Rates	Company	Staff
<u>5/8" x 3/4" Meter</u>	\$27.50	\$31.52	\$28.00
3/4" Meter	41.25	47.28	42.00
1" Meter	68.75	78.80	70.00
1½" Meter	137.50	157.60	140.00
2" Meter	220.00	252.16	224.00
3" Meter	440.00	504.32	448.00
4" Meter	687.50	788.00	700.00
6" Meter	1,375.00	1,576.00	1,400.00
8" Meter	2,200.00	2,521.60	2,240.00
10" Meter	3,162.00	3,624.80	3,220.00
12" Meter	5,912.00	6,776.80	6,020.00
Gallons Included in Minimum	0	0	0
<u>Commodity Rate Charge</u>			
<u>5/8" x 3/4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 5,000 gallons	2.10	2.56
Tier 2	From 5,001 to 12,000 gallons	3.15	3.46
Tier 3	Over 12,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 3,000 gallons		2.25
Tier 2	From 3,001 to 7,000 gallons		4.25
Tier 3	Over 7,000 gallons		6.00
<u>3/4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 5,000 gallons	2.10	2.56
Tier 2	From 5,001 to 12,000 gallons	3.15	3.46
Tier 3	Over 12,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 3,000 gallons		2.25
Tier 2	From 3,001 to 7,000 gallons		4.25
Tier 3	Over 7,000 gallons		6.00
<u>1" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 30,000 gallons	3.15	3.46
Tier 2	Over 30,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 15,000 gallons		4.25
Tier 2	Over 15,000 gallons		6.00
<u>1½" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 60,000 gallons	3.15	3.46
Tier 2	Over 60,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 35,000 gallons		4.25
Tier 2	Over 35,000 gallons		6.00
<u>2" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 96,000 gallons	3.15	3.46
Tier 2	Over 96,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 60,000 gallons		4.25
Tier 2	Over 60,000 gallons		6.00
<u>3" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 192,000 gallons	3.15	3.46
Tier 2	Over 192,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 125,000 gallons		4.25
Tier 2	Over 125,000 gallons		6.00
<u>4" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 300,000 gallons	3.15	3.46
Tier 2	Over 300,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 200,000 gallons		4.25
Tier 2	Over 200,000 gallons		6.00
<u>6" Meter</u>			
<i>Company</i>			
Tier 1	From 0 to 600,000 gallons	3.15	3.46
Tier 2	Over 600,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 400,000 gallons		4.25
Tier 2	Over 400,000 gallons		6.00

**RATE DESIGN - ALTERNATIVE**

		Present Rates	-Proposed Rates- Company Staff
<b>8" Meter</b>			
<i>Company</i>			
Tier 1	From 0 to 960,000 gallons	3.15	3.46
Tier 2	Over 960,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 675,000 gallons		4.25
Tier 2	Over 675,000 gallons		6.00
<b>10" Meter</b>			
<i>Company</i>			
Tier 1	From 0 to 1,380,000 gallons	3.15	3.46
Tier 2	Over 1,380,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 900,000 gallons		4.25
Tier 2	Over 900,000 gallons		6.00
<b>12" Meter</b>			
<i>Company</i>			
Tier 1	From 0 to 2,580,000 gallons	3.15	3.46
Tier 2	Over 2,580,000 gallons	3.75	4.26
<i>Staff</i>			
Tier 1	From 0 to 1,750,000 gallons		4.25
Tier 2	Over 1,750,000 gallons		6.00

Service Line and Meter Installation Charges			Service Line	Meter Installation	Total
5/8" x 3/4" Meter	\$580.00	\$580.00	\$ 425.00	\$ 155.00	\$ 580.00
3/4" Meter	700.00	\$700.00	445.00	255.00	700.00
1" Meter	700.00	\$700.00	445.00	255.00	700.00
1½" Meter	880.00	\$880.00	460.00	420.00	880.00
2" Meter (Turbine)	1,380.00	\$1,380.00	615.00	765.00	1,380.00
2" Meter (Compound)	1,460.00	\$1,460.00	615.00	845.00	1,460.00
3" Meter (Turbine)	1,930.00	\$1,930.00	745.00	1,185.00	1,930.00
3" Meter (Compound)	2,010.00	\$2,010.00	745.00	1,265.00	2,010.00
4" Meter (Turbine)	2,935.00	\$2,935.00	1,050.00	1,885.00	2,935.00
4" Meter (Compound)	3,020.00	\$3,020.00	1,050.00	1,970.00	3,020.00
6" Meter (Turbine)	4,120.00	\$4,120.00	1,250.00	2,870.00	4,120.00
6" Meter (Compound)	5,960.00	\$5,960.00	1,250.00	4,710.00	5,960.00
8" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost
10" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost
12" Meter (Turbine)	Cost	Cost	Cost	Cost	Cost

<u>Service Charges</u>			
Establishment	\$35.00	\$35.00	\$35.00
Establishment (After Hours)	\$45.00	\$45.00	NT
Reconnection (Delinquent)	\$50.00	\$50.00	\$50.00
Reconnection (Delinquent) After Hours	\$65.00	\$65.00	NT
Meter Test (If Correct)	\$25.00	\$25.00	\$30.00
Deposit	*	*	*
Deposit Interest	*	*	*
Re-Establishment (Within 12 Months)	**	**	**
Re-Establishment (Within 12 Months) After Hours	**	**	NT
NSF Check	\$25.00	\$25.00	\$20.00
Deferred Payment (per Month)	***	***	***
Meter Re-Read (If Correct)	\$15.00	\$15.00	\$15.00
Late Fee (per Month)	***	***	***
Moving Customer Meter (Customer Request)	****	****	****
After Hours Service Charge (Customer Request)	N/A	N/A	\$35.00

NT = No Tariff

<u>Monthly Service Charge for Fire Sprinkler</u>			
4" or Smaller	\$0.00	\$0.00	*****
6"	0.00	0.00	*****
8"	0.00	0.00	*****
10"	0.00	0.00	*****
Larger than 10"	0.00	0.00	*****

- \* Per Commission Rules (R14-2-403.B)
- \*\* Months off system times the minimum (R14-2-403.D)
- \*\*\* 1.5% on the unpaid balance per month
- \*\*\*\* Per Commission Rules (R14-2-405.B)
- \*\*\*\*\* 2.00% of Monthly Minimum for a Comparable Sized Meter Connection, but no less than \$10.00 per month. The Service Charge for Fire Sprinklers is only applicable for service lines separate and distinct from the primary water service line.

Typical Bill Analysis - Alternative  
General Service 5/8 x 3/4-Inch Meter

Company Proposed	Gallons	Present Rates	Proposed Rates	Dollar Increase	Percent Increase
Average Usage	6,577	\$ 42.97	\$ 49.78	\$ 6.81	15.85%
Median Usage	4,250	36.43	42.40	\$ 5.98	16.40%
<b>Staff Recommended</b>					
Average Usage	6,577	\$ 42.97	\$ 49.95	\$ 6.98	16.26%
Median Usage	4,250	36.43	40.06	\$ 3.64	9.99%

Present & Proposed Rates (Without Taxes)  
General Service 5/8 x 3/4-Inch Meter

Gallons Consumption	Present Rates	Company Proposed Rates	% Increase	Staff Recommended Rates	% Increase
-	\$ 27.50	\$ 31.52	14.62%	\$ 28.00	1.82%
1,000	29.60	34.08	15.14%	30.25	2.20%
2,000	31.70	36.64	15.58%	32.50	2.52%
3,000	33.80	39.20	15.98%	34.75	2.81%
4,000	35.90	41.76	16.32%	39.00	8.64%
5,000	38.00	44.32	16.63%	43.25	13.82%
6,000	41.15	47.78	16.11%	47.50	15.43%
7,000	44.30	51.24	15.67%	51.75	16.82%
8,000	47.45	54.70	15.28%	57.75	21.71%
9,000	50.60	58.16	14.94%	63.75	25.99%
10,000	53.75	61.62	14.64%	69.75	29.77%
11,000	56.90	65.08	14.38%	75.75	33.13%
12,000	60.05	68.54	14.14%	81.75	36.14%
13,000	63.80	72.80	14.11%	87.75	37.54%
14,000	67.55	77.06	14.08%	93.75	38.79%
15,000	71.30	81.32	14.05%	99.75	39.90%
16,000	75.05	85.58	14.03%	105.75	40.91%
17,000	78.80	89.84	14.01%	111.75	41.81%
18,000	82.55	94.10	13.99%	117.75	42.64%
19,000	86.30	98.36	13.97%	123.75	43.40%
20,000	90.05	102.62	13.96%	129.75	44.09%
25,000	108.80	123.92	13.90%	159.75	46.83%
30,000	127.55	145.22	13.85%	189.75	48.77%
35,000	146.30	166.52	13.82%	219.75	50.21%
40,000	165.05	187.82	13.80%	249.75	51.32%
45,000	183.80	209.12	13.78%	279.75	52.20%
50,000	202.55	230.42	13.76%	309.75	52.93%
75,000	296.30	336.92	13.71%	459.75	55.16%
100,000	390.05	443.42	13.68%	609.75	56.33%