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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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AZ CORP COMMISSION  
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**COMMISSIONERS**

- BOB STUMP- Chairman
- GARY PIERCE
- BRENDA BURNS
- BOB BURNS
- SUSAN BITTER-SMITH

IN THE MATTER OF THE APPLICATION OF ARIZONA WATER COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR ADJUSTMENTS TO ITS RATES AND CHARGES FOR UTILITY SERVICE FURNISHED BY ITS EASTERN GROUP AND FOR CERTAIN RELATED APPROVALS.

DOCKET NO. W-01445A-11-0310

**NOTICE OF MODIFICATION OF THE SYSTEM IMPROVEMENT BENEFITS MECHANISM PLAN OF ADMINISTRATION ATTACHED TO THE PROPOSED ORDER**

The Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") hereby files a substitute Plan of Administration ("POA") for the POA attached to the Memorandum and Proposed Order ("Memo and Order") that Staff docketed on July 29, 2014. Subsequent to filing the Memo and Order, Staff and Arizona Water Company ("AWC") made several modifications to the POA relating to the notice requirements set forth in Section VII on page 10. More specifically, the notice provision has been modified to allow AWC to have more time have its Notice reviewed by Staff and more time to provide notice to its customers prior to the Commission's consideration of AWC's future SIB Surcharge requests. In addition, Staff made minor modifications to the "Example Schedules" attached as Exhibits 5 through 6 to the POA. Staff and AWC are in agreement with these modifications to the POA. Attached hereto is a replacement POA with the modified language incorporated that should replace the POA attached to the Memo and Order.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of August, 2014.

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1 Original and thirteen (13) copies  
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3 11<sup>th</sup> day of August, 2014 with:

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8 Copies of the foregoing were emailed/and/or mailed  
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# **Attachment A**

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## I. GENERAL DESCRIPTION

This document is the Plan of Administration ("POA") for the System Improvement Benefits ("SIB") mechanism approved for Arizona Water Company ("Company") by the Arizona Corporation Commission ("Commission") in Decision No. 73938 (June 27, 2013), as affirmed in Decision No. 74463 (April 22, 2014). The SIB mechanism provides for the timely recovery of the capital costs (pre-tax return on investment and depreciation expense, net of associated retirements) associated with distribution system improvement projects that: (1) have not been included in rate base for recovery in Decision No. 73736 (February 20, 2013); (2) are listed in the latest Commission approved SIB Plant Table I; (3) have been verified to be completed<sup>1</sup>; and (4) have been placed in service per SIB Plant Table II. Any expenditures offset by contributions in aid of construction or advances in aid of construction are not eligible for inclusion in the SIB mechanism.

## II. DEFINITIONS

- A. NARUC – National Association of Regulatory Utility Commissioners
- B. SIB – System Improvement Benefits mechanism, to be implemented between rate proceedings to support investment in utility plant recorded in SIB Eligible NARUC accounts.
- C. SIB Eligible Plant – Investments in plant recorded in the SIB Eligible NARUC accounts.
- D. SIB Eligible NARUC accounts:
  - 1. NARUC Account No. 309 – Supply Mains
  - 2. NARUC Account No. 343 – Transmission and distribution mains
  - 3. NARUC Account No. 345 – Services
  - 4. NARUC Account No. 346 – Meters (including meter installations)
  - 5. NARUC Account No. 348 – Hydrants
- E. SIB Plant Table I (an excerpt is attached to this POA as Exhibit 1) – The schedule of planned SIB Eligible Plant projects that is either approved in the Company's most recent rate case or updated by a subsequent Commission decision. As used herein, this term refers to the latest Commission approved SIB Plant Table I available unless reference is made to a particular Commission decision. As of the date of this POA,

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<sup>1</sup> Acceptable forms of verification may include the Arizona Department of Environmental Quality Approval of Construction or signed Construction Placed in Service Notice signed by Professional Engineer where Approval of Construction is not applicable.

the latest Commission approved SIB Plant Table I is attached to Decision No. 73938 as Attachment A, Exhibit A.

- F. SIB Plant Table II (an excerpt is attached to this POA as Exhibit 2) – The schedule of completed and verified SIB Eligible Plant projects from the latest Commission approved SIB Plant Table I, including the associated plant retirements.
- G. Total Revenue Requirement – The revenue requirement approved in Decision No. 73736, plus the SIB Authorized Revenue.
- H. SIB Revenue Requirement – The revenue requirement equal to the pre-tax return on investment and depreciation expense associated with SIB-eligible projects that have been completed and placed into service, per SIB Plant Table II. net of associated retirements.
- I. SIB Revenue Requirement Efficiency Credit – An amount equal to five percent (5%) of the SIB Revenue Requirement.
- J. SIB Authorized Revenue – Amount equal to the SIB Revenue Requirement less the SIB Revenue Requirement Efficiency Credit, plus or minus any SIB True-up Adjustment.
- K. Gross SIB Surcharge – Amount to be shown on customers' bills, based on meter size, without consideration of the SIB Surcharge Efficiency Credit.
- L. SIB Surcharge Efficiency Credit – An amount equal to five percent (5%) of the Gross SIB Surcharge, to be shown on customers' bills.
- M. SIB Surcharge – The amount equal to the Gross SIB Surcharge less the SIB Surcharge Efficiency Credit to be charged, based on meter size, calculated to recover the SIB Authorized Revenue. The SIB Surcharge is to be shown as a separate line item on customer bills.
- N. SIB True-up Adjustment – The reconciliation of over- or under-collection of the SIB Authorized Revenue, as compared with the total SIB Surcharges collected for the preceding 12-month period. Each SIB True-up Adjustment shall also analyze the cumulative over- or under-collections to include a comparison of all past SIB Authorized Revenues, total SIB Surcharge collections, and prior SIB True-up Adjustments to be used in calculating the individual SIB True-up Adjustment by meter size.

### III. SIB RELATED FILINGS

- A. Progress Reports – The Company must file with Docket Control semi-annual status reports delineating the status of all SIB Eligible Plant projects, as listed in the latest Commission approved SIB Plant Table I. The initial semi-annual status report shall include only those projects from the initial SIB Plant Table I which the Company has designated as most likely to be completed and placed in service during the first 12 months.
- B. Reconciliation and True-up – Once a SIB Surcharge is implemented, the Company must file annually to true-up its SIB Surcharge collections over the preceding 12 months with the SIB Authorized Revenue for that period, and establish a surcharge or credit to true-up any over- or under-collections, regardless of whether it seeks a new surcharge. The filing dates for these annual true-ups shall be established in the Commission's Decision approving the SIB Surcharge.
- C. SIB Surcharge Requests – The Company must file the following with each SIB Surcharge request:
1. SIB Plant Table II (with supporting information and documentation), listing the SIB Eligible Plant projects that have been completed and placed in service, for which the Company seeks cost recovery. Such SIB Eligible Plant must:
    - a. Be projects listed in the latest Commission approved SIB Plant Table I;
    - b. Have been completed and placed in service by the Company;
    - c. Have been verified (see footnote 1); and
    - d. Actually be serving customers.
  2. A summary of the Commission approved SIB-Eligible Plant projects (shown on SIB Plant Table I approved in Decision No. 73938) the Company expects to complete and place in service during the next 12 months for inclusion in the next SIB Surcharge, to enable the Commission to establish the latest SIB Plant Table I.<sup>2</sup>
  3. SIB Schedule A (an example is attached to this POA as Exhibit 3), showing a calculation of the SIB Revenue Requirement, SIB Revenue Requirement

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<sup>2</sup> Beginning with its SIB Surcharge request for the second 12-month surcharge period, the Company may request a change from the estimated Cost/Unit (shown on the SIB Plant Table I approved in Decision No. 73938) due to inflation using the latest calendar year Consumer Price Index. This may be done only if the original SIB Plant Table I Cost/Unit did not account for inflation.

Efficiency Credit, SIB Authorized Revenue, Gross SIB Surcharge, SIB Surcharge Efficiency Credit and the SIB Surcharge. Schedule A shall be supported by using the revenue requirement model relied upon to generate the revenue requirement approved in Decision No. 73736, and the total revenue requirement will be determined by including the effects of the SIB Eligible Plan as pro-forma adjustments to this model.

4. SIB Schedule B (an example is attached to this POA as Exhibit 4) showing the SIB True-up Adjustment calculation for the prior 12-month SIB Surcharge period, as well as the individual SIB True-up Adjustment by meter size.
  5. SIB Schedule C (an example is attached to this POA as Exhibit 5) showing the effect of the SIB Surcharge on a typical residential customer's monthly bill for both median and average usage.
  6. SIB Schedule D (an example is attached to this POA as Exhibit 6) which shall include an analysis of the impact of completed SIB Eligible Plant projects on the fair value rate base, revenue, and the fair value rate of return. The Company shall also include the following as part of SIB Schedule D:
    - a. The most current balance sheet at the time of the filing;
    - b. The most current income statement;
    - c. An earnings test schedule;
    - d. A rate review schedule (including the incremental and pro forma effect of the proposed increase);
    - e. An adjusted rate base schedule; and,
    - f. A construction work in progress ("CWIP") ledger for each project showing the accumulation of charges by month and paid contractor invoices., including a summary page showing the calculation of the SIB eligible rate base and depreciation expense net of associated retirements.
- D. The Company will maintain and provide to the Commission's Utilities Division ("Staff") and the Residential Utility Consumer Office ("RUCO") schedules in Microsoft Excel format (with all formulae intact) supporting the revenue requirement approved in Decision No. 73736, and the effects of completed SIB Eligible Plant for the current SIB Surcharge request and any previously approved SIB Surcharge and SIB True-up Adjustment requests.

- E. The Company may file its initial SIB Surcharge request with Docket Control no earlier than 12 months after the entry of Decision No. 73736.
- F. The Company may make no more than one SIB Surcharge request every 12 months with no more than five (5) SIB Surcharge requests between rate case decisions. A SIB True-up Adjustment must be filed with each SIB Surcharge request, except the first SIB Surcharge request.
- G. Unless otherwise authorized by the Commission, the Company is required to file its next general rate case for its Eastern Group no later than August 31, 2016, with a test year ending no later than December 31, 2015.
- H. Any SIB Surcharges that are in effect shall be reset to zero upon the date new rates become effective in the Company's next general rate case.

#### IV. SIB SURCHARGE CALCULATIONS

- A. Calculation of Amounts to Be Collected By the SIB Surcharge
  - 1. The amount to be collected by the SIB Authorized Revenue shall be equal to the SIB Revenue Requirement minus the SIB Revenue Requirement Efficiency Credit, plus any SIB True-up Adjustment. For purposes of calculating the SIB Revenue Requirement:
    - a. The required rate of return is equal to the overall rate of return authorized in Decision No. 73736;
    - b. The gross revenue conversion factor/tax multiplier is equal to the gross revenue conversion factor/tax multiplier approved in Decision No. 73736; and
    - c. The applicable depreciation rate(s) is equal to the depreciation rate(s) approved in Decision No. 73736.
  - 2. The SIB plant unit cost to be used in calculating the SIB Revenue Requirement shall be the lesser of the installed SIB plant unit cost listed in SIB Plant Table II, or 110 percent (110%) of the SIB plant estimated unit cost listed in the latest Commission approved SIB Plant Table I (See Exhibit 2).
  - 3. The amount to be collected by each SIB Surcharge shall be capped annually at five percent (5%) of the revenue requirement authorized in Decision No. 73736.

B. Reconciliation and True-Ups

1. The revenue collected pursuant to the SIB Surcharge over the preceding 12 months shall be trued-up and reconciled with the SIB Authorized Revenue for that period.
2. A new SIB Surcharge shall be combined with an existing SIB Surcharge such that a single SIB surcharge and a single SIB Efficiency Credit are shown on a customer's bill.
3. For each 12 month period that a SIB Surcharge is in effect, the Company shall reconcile the amounts collected by the SIB Surcharge with the SIB Authorized Revenue, for that 12 month period, consistent with Schedule B.
4. Any under- or over-collected SIB Authorized Revenues shall be recovered or refunded, without interest, over a 12-month period by means of a SIB True-up Adjustment.
5. Starting with the second annual SIB Surcharge, where there are over- or under-collected balances, such over- or under-collected balances shall be carried over to the next year, and considered in the calculation of the new SIB True-up Adjustment. If, at the time new rates go into effect in the Company's next rate case, there remains an over- or under-collected balance, such balance shall be reset to zero, and addressed in the next rate case.

C. Earnings Test

1. Once a SIB Surcharge is in effect, the Company is required to perform an annual earnings test calculation for each SIB Surcharge request to determine whether the actual rate of return reflected by the operating income for the affected system or division for the relevant 12-month period exceeded the most recently authorized fair value rate of return for the affected system or division.
2. The earnings test shall be:
  - a. Based on the most recent available operating income;
  - b. Adjusted for any operating revenue and expense adjustments adopted in the most recent general rate case; and
  - c. Based on the rate base adopted in the most recent general rate case, updated to recognize changes in plant, accumulated depreciation, contributions in aid of construction, advances in aid of construction,

and accumulated deferred income taxes through the most recent available financial statement (quarterly or longer).

**V. ADDING PROJECTS TO SIB PLANT TABLE I UNDER EMERGENCY CIRCUMSTANCES**

- A. The Company may seek Commission approval to add projects to SIB Plant Table I under emergency circumstances. No changes may be made to SIB Plant Table I without Commission approval.
- B. Any addition to SIB Plant Table I must be plant investment that maintains or improves existing customer service, system reliability, integrity and safety. Eligible plant additions are limited to plant replacement projects. The costs of extending facilities or capacity to serve new customers are not recoverable through the SIB mechanism.
- C. To be eligible for SIB treatment, a project must be SIB Eligible Plant.
- D. SIB Eligible Plant must satisfy at least one of the following criteria:
  - 1. Water loss for the system exceeds ten percent (10%), as calculated by the following formula:  $((\text{volume of water produced and/or purchased}) - (\text{volume of water sold} + \text{volume of water put to beneficial use}))$  divided by  $(\text{volume of water produced and/or purchased})$ . If the volume of water put to beneficial use is not metered, it shall be established in a reliable, verifiable manner.
  - 2. Plant assets that have remained in service beyond their useful service lives (based on the Company's authorized utility plant depreciation rates) and are in need of replacement due to being worn out or in a deteriorating condition through no fault of the Company;
  - 3. Any other engineering, operational or financial justification supporting the need for a plant asset replacement, other than the Company's negligence or improper maintenance, including, but not limited to:
    - a. A documented increasing level of repairs to, or failures of, a plant asset justifying its replacement prior to reaching the end of its useful service life (e.g. black poly pipe);
    - b. Assets that are required to be moved, replaced or abandoned by a governmental agency or political subdivision, if the Company can show that it has made a good faith effort to seek reimbursement for all or part of the costs incurred.

## VI. SIB SURCHARGE RATE DESIGN

- A. The SIB Surcharge rate design shall be as follows:
1. The SIB Surcharge shall be a fixed monthly surcharge containing a Gross SIB Surcharge and the SIB Surcharge Efficiency Credit as its two components.
  2. The SIB Surcharge shall be calculated by dividing the SIB Authorized Revenue by the number of active equivalent 5/8 x 3/4-inch meters at the end of the most recent 12-month period, and shall increase with meter size based on the following meter capacity multipliers:

5/8-inch x 3/4-inch	1.0 times
1-inch	2.5 times
1-1/2-inch	5 times
2-inch	8 times
3-inch	16 times
4-inch	25 times
6-inch	50 times
8-inch	80 times
10-inch & above	115 times
- B. The SIB Surcharge shall apply to all of the Company's metered customers, including private fire service customers.

## VII. SIB SURCHARGE NOTICE REQUIREMENTS

- A. Thirty days prior to filing each application to implement a SIB Surcharge, the Company shall file a proposed form of notice to Staff for review, and a Summary of what the Company will be requesting in the application. Once the notice is approved by Staff, the Company shall provide a copy of the approved notice to its customers via newsletter or bill insert. After providing notice, the Company shall file a copy of the notice and a description of when and how it provided notice with each application to implement a SIB surcharge. The Summary and Notice shall include at least the following information:
1. The individual Gross SIB Surcharge, by meter size;
  2. The individual SIB Surcharge Efficiency Credit, by meter size;
  3. The SIB Surcharge, by meter size; and

4. Directions to where the customer may obtain a summary of the projects included in the current SIB Surcharge request, including a description of each project and its cost.
- B. A SIB Surcharge shall not become effective until approved by the Commission.
  - C. The Company shall provide a proposed order for the Commission's consideration.
  - D. The Company shall notice its customers of the SIB Surcharge approved herein as soon as possible in a form acceptable to Staff and consistent with the notice requirements of Decision No. 73938.
  - E. The Company shall not implement the SIB Surcharge until 30 days after having filed documentation in Docket Control providing the date when all customers in Arizona Water Company's Cochise Division have been notified of the Commission approved SIB Surcharge.

# **EXHIBIT 1**



# **EXHIBIT 2**























# **EXHIBIT 3**

Company name  
 Water System Name and PWS ID No.  
 Decision No .XXX  
 Effective Date XXX

**EXAMPLE**

Check if  
 Consolidated

LINE NO. CALCULATION OF OVERALL SIB REVENUE REQUIREMENT AND EFFICIENCY CREDIT

1	Total Authorized Revenue Requirement , Per Decision xxxxx, See Attached Schedules	TBD	
2	SIB Revenue Cap percentage	5% Per Year	
3	SIB Revenue Cap	TBD	
4	SIB Allowed Cost (Per SIB Table II, Summary page, Column 2)	TBD	
5	Total Revenue Requirement, (with pro forma SIB investments). See attached revenue requirements schedules as provided by Company.	TBD	
6	SIB Revenue Requirement (line 5 minus line 1)	TBD	
7	SIB Revenue Requirement Efficiency Credit	5%	
8	SIB True-Up Adjustment (from SIB Schedule B)	TBD	
9	SIB Authorized Revenue (line 6 plus line 7 plus line 8)	TBD	

\* Number of Equivalent Meters, below  
 \* Charge per 5/8" meter

	No. of Customers at SIB Cycle Year End	Multipliers	5/8 x 3/4-inch Equivalent Meters	Fixed Surcharge	Annual Rev by Meter Size
5/8 x 3/4-inch	TBD	1	TBD	TBD	TBD
3/4-inch	TBD	1.5	TBD	TBD	TBD
1-inch	TBD	2.5	TBD	TBD	TBD
1 1/2-inch	TBD	5	TBD	TBD	TBD
2-inch	TBD	8	TBD	TBD	TBD
3-inch	TBD	16	TBD	TBD	TBD
4-inch	TBD	25	TBD	TBD	TBD
6 -inch	TBD	50	TBD	TBD	TBD
8 -inch	TBD	80	TBD	TBD	TBD
10-inch	TBD	115	TBD	TBD	TBD
Totals	TBD		TBD		TBD

# **EXHIBIT 4**

Company name  
 Water System Name and PWS ID No.  
 Decision No .XXX  
 Effective Date XXX

CALCULATION OF SIB TRUE-UP REVENUE REQUIREMENTS ADJUSTMENT	SIB Filing Sequence				
	SIB year 1*	SIB year 2	SIB year 3	SIB year 4	SIB year 5
SIB Authorized Revenue , Per SIB Schedule A	TBD	TBD	TBD	TBD	TBD
Total SIB Surcharges collections for Period	TBD	TBD	TBD	TBD	TBD
SIB True-Up Adjustment	TBD	TBD	TBD	TBD	TBD

Note: The Company shall also provide an analysis of cumulative over or under collections and a net amount to be included in the SIB True-up Adjustment

\*SIB year 1 is one year after effective date

EXAMPLE

# **EXHIBIT 5**

TYPICAL BILL IMPACTS  
5/8 -inch Customers

Company name  
Water System Name and PWS ID No.  
Decision No. XXX  
Effective Date XXX

Per Dec. No. XXXXX(no SIB Surcharges)	Step 1			Step 2			Step 3			Step 4			Step 5		
	Total Bill w/ SIB Year.1 *	SIB Inc.	Cumulative % Increase	Total Bill w/ SIB Year. 2 *	SIB Inc.	Cumulative % Increase	Total Bill w/ SIB Year.3 *	SIB Inc.	Cumulative % Increase	Total Bill w/ SIB Year. 4 *	SIB Inc.	Cumulative % Increase	Total Bill w/ SIB Year.5 *	SIB Inc.	Cumulative % Increase
0	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
1000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
2000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
3000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
4000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
5000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
6000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
7000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
8000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
9000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
10000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
11000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
12000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
13000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
14000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
15000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
20000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
25000	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Median (Cite Usage)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Mean (Cite Usage)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

\*: Bills in Years 1 -5 are net of  
Efficiency Credit

EXAMPLE

# **EXHIBIT 6**

SIB Schedule D  
and Sub-Schedule List

Schedule D

Fair Value Rate Base, Revenue & Rate of Return  
Rate Review  
Balance Sheet  
Income Statement  
Earnings Test  
Rate Base  
Construction Work in Progress (CWIP) Ledger  
Calculation of Corporate Allocation Factor

**EXAMPLE**

EXAMPLE

SIB Schedule D

Fair Value Rate Base, Revenue & Rate of Return - Decision No. \_\_\_\_\_

Company name \_\_\_\_\_  
 Water System Name and PWS ID No. \_\_\_\_\_  
 Decision No. .XXX \_\_\_\_\_  
 Effective Date XXX \_\_\_\_\_

Per Dec. No XXXXXX	SIB Step 1	SIB Step 2	SIB Step 3	SIB Step 4	SIB Step 5	Total Pro- forma with SIB
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD
TBD	TBD	TBD	TBD	TBD	TBD	TBD

Total Operating Revenue \*

Operating Expenses  
 Operations & Maintenance  
 Depreciation & Amortization  
 Taxes Other than Income  
 Income Taxes  
 Total Operating Expenses

Operating Income

Rate Base  
 Rate of Return on Rate Base  
 Authorized Rate of Return on Rate Base

\*: SIB Revenues in Years 1-5 are net of 5% Efficiency Credit