

RE:	Docket No: 080249-WS;	Company Name: Labrador Utilities, Inc.;
	Audit Purpose: Rate Case;	Company Code: WS851;
	Audit Control No: 08-261-	1-2;

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 a response to the Office of the Commission Clerk. There are no confidential work papers associated with this audit.

DNV/tbm Attachment: Audit Report

 CC: Division of Regulatory Compliance (Salak, Mailhot, Harvey, District Offices, File Folder)
 Office of Commission Clerk (2)
 General Counsel
 Office of Public Counsel

> Mr. Patrick C. Flynn Labrador Utilities, Inc. 200 Weathersfield Avenue Altamonte Springs, FL 32714-4027

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> DOCUMENT NUMBER-DATE 11731 DEC 19 8 FPSC-COMMISSION CLERK

# STATE OF FLORIDA



### FLORIDA PUBLIC SERVICE COMMISSION

#### DIVISION OF REGULATORY COMPLIANCE BUREAU OF AUDITING

**Tallahassee District Office** 

LABRADOR UTILITIES, INC.

FILE AND SUSPEND RATE CASE

**TEST YEAR ENDED DECEMBER 31, 2007** 

DOCKET NO. 080249-WS AUDIT CONTROL NO. 08-261-1-2

~ Ter ntesar Terkawi, Audit Manager

Charleston J. Winston, Audit Staff

Lynn M. Deamer, Audit Supervisor

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#### DIVISION OF REGULATORY COMPLIANCE AUDITOR'S REPORT

#### December 18, 2008

#### **TO: FLORIDA PUBLIC SERVICE COMMISSION**

We have performed the procedures described later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request. We have applied these procedures to the Minimum Filing Requirements (MFRs) prepared by Labrador Utilities, Inc. in support for rate relief in Docket No. 080249-WS for the test period year ending December 31, 2007.

This audit was performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. Our report is based on agreed upon procedures and the report is intended only for internal Commission use.

DOCUMENT NUMBER-DATE

## **OBJECTIVES AND PROCEDURES**

### RATE BASE

- A. Objective Plant in Service: To determine that property exists and is owned by the utility. To determine that additions to Utility Plant In Service (UPIS) are authentic, recorded at original cost, and properly classified in compliance with Commission rules and the NARUC Uniform System of Accounts. To verify that the proper retirements of UPIS were made when a replacement item was put in service.
  - 1. We reconciled the beginning plant in service balance on the MFR schedules to the utility's books and to the prior Commission orders. We traced the filing additions and retirements by year to the utility's annual reports, and general ledgers. Audit Findings numbers 1 through 4 address the Utility Plant in Service balances in the filing.
  - 2. We judgmentally selected a sample of additions and retirements from the general ledger. We tested the sample of plant in service additions for the following: date acquired, original cost, account recorded and appropriate retirements. We tested the sample of retirements for the following: cost retired, account number, date of retirement or disposition, amount of accumulated depreciation retired, amount of proceeds/cost of removal, and amount of gain/loss recorded in utility books after disposal.
- **B.** Objective Land and Land Rights: To determine that utility land is recorded at original cost and is owned or secured under a long-term lease.
  - 1. We verified that there have been no changes to the utility's lease of the water and wastewater site property since its last rate proceeding.
- C. Objective Accumulated Depreciation and Depreciation Expense: To verify that accumulated depreciation and depreciation expense are calculated using the Commission authorized rates and that the calculations are correct.
  - 1. We scheduled accumulated depreciation beginning and ending balances by UPIS sub-account. We reviewed methodology for calculating annual depreciation expense accruals, service lives used to determine the depreciation expense, and methodology for accounting for retirements and adjustments. We calculated current period depreciation expense by sub-account.
  - **2.** We reconciled depreciation expense accruals to the utility's general ledger. Audit Findings I through 4 address the accumulated depreciation balances in the filing.

- **D.** Objective Contribution in Aid of Construction (CIAC): To determine that Utility CIAC balances are properly stated and are reflective of service availability charges authorized in the utility's approved Commission tariff.
  - 1. We reconciled the beginning CIAC balances to the utility's books and prior Commission orders. We read the utility's authorized tariff to determine the type and the amount, if any, of service availability fees for new customer additions, and inquired if the utility had any special agreements, developer agreements, and whether or not it has received donated property of CIAC. Audit Finding No. 5 addresses the CIAC balance in the filing.
- **E.** Objective Accumulated Amortization of CIAC and Amortization Expense: To determine that CIAC accumulated amortization balances are properly stated and that annual accruals are reflective of depreciation rates authorized in the utility's last Commission rate case proceeding.
  - 1. We reconciled beginning balances to the utility's books and the prior Commission Orders. We reconciled accumulated amortization accruals to the utility's general ledger. Audit Finding No. 5 addresses the accumulated amortization of CIAC balances in the filing.
- **F. Objective Working Capital:** To determine that the utility's working capital balance is properly calculated in compliance with Commission rules.
  - 1. We recalculated the utility's working capital balance as of December 31, 2007.
- **G.** Objective Capital Structure: To determine that capital structure represents utility's debt, capital stock, retained earnings, deferred taxes, customer deposits, and other available funds for investment in utility plant, inventory, and operations.
  - 1. We traced the deferred income taxes to the general ledger. We recalculated deferred income taxes. The other components of the capital structure are reviewed and discussed in a separate audit of allocations.

#### **REVENUE AND EXPENSES:**

- A. Objective Revenue: To verify that revenues earned from the utility property during the test year are recorded and included in the filed exhibits, to verify that the utility is billing the approved tariff rates, and that the revenues are classified in compliance with the Commission Rules and Uniform System of Accounts.
  - 1. We tested the reasonableness of the utility revenues by multiplying average consumption times the number of customers for each class of service, and compared it to a schedule of utility revenues by customer class for the historical test year as

shown in the MFR.

- 2. We reconciled revenues reported on the Regulatory Assessment Fee (RAF) filing to the utility's books and records, and recalculated the amount of RAF fees due based on the utility's revenues reported. We agreed revenue balances in the MFR to the utility general ledger.
- **B.** Objective Operation and Maintenance Expenses: To determine that operation and maintenance expenses are classified according to the Commission Rules and Uniform System of Accounts, that expenditures are appropriate for regulatory policy, that the amounts on the invoice agree with the general ledger, and that expenditures are recorded in the proper period.
  - 1. We reconciled the general ledger Operation and Maintenance Expenses to the MFR Operation and Maintenance Expenses Schedules B-5 and B-6. We reviewed the Bench Mark Analysis shown in the MFR, we reviewed the Audit Service Request, we reviewed the previous Audit Report and we reviewed the amounts included in the MFR in determining our sample.
  - 2. All of the expenses included in the MFR were traced to the general ledgers. We sampled the direct expenses for the proper supporting documentation, proper amount, proper period, proper classification, whether non-utility related, nonrecurring, unreasonable and imprudent. We found that an expense item was misclassified to Labrador. More information on this issue can be found in Audit Finding No. 6. We found that rent expense is overstated. More information on this issue can be found in Audit Finding No. 7. We found that rate case expense is overstated. More information on this issue can be found in Audit Finding No. 8.
- C. Objective Taxes other than Income: To determine the appropriate costs for taxes other than income taxes for the test year.
  - 1. We sampled Taxes Other Than Income incurred by the utility for the historical test year for the proper supporting documentation, proper amount, proper period, proper classification, whether non-utility related, nonrecurring, unreasonable and imprudent. We reconciled taxes other than income amounts to the utility's general ledger.

#### SUBJECT: CORRECTIONS TO PRIOR ORDER ADJUSTMENTS

**AUDIT ANALYSIS:** The utility's average water and wastewater rate base balances are overstated by \$23,889 and understated by \$21,030, respectively, as of December 31, 2007.

Order No. PSC-04-1281-PAA-WS, issued December 28, 2004 required specific adjustments to the utility's utility plant in service (UPIS) and accumulated depreciation balances as of December 31, 2003.

Our analysis of the utility's journal entry to record the ordered adjustments indicates that the utility only recorded some of the required adjustments and that the journal entry was not posted until December 2005.

The schedule on page eight of this report shows the adjustments ordered by the Commission in the above order, the utility's journal entry adjustments posted in December 2005 to book the order, and the additional adjustments needed to correct the utility's posted journal entry.

**EFFECT ON GENERAL LEDGER IF THE FINDING IS ACCEPTED:** The following entries are needed to correct the utility's general ledger balances.

Utility	NARUC			
Acct. No	Acct. No.	Account Description	Debit	Credit
1082000	108	Wat & W/Wat Acc/Dep Transportation	\$3,320	
1083021	108	Water Acc/Dep - Structure and Improv.		\$23,518
1083025	108	Water Acc/Dep - Pumping Equip.		\$56
1083043	108	Water Acc/Dep - Tran. And Distr. Mains	\$6,079	
1083094	108	Water Acc/Dep - Tools & Shop		\$2,454
1084003	108	W/Water Acc/Dep - Structure and Improv.	\$3,016	
1084005	108	W/Water Acc/Dep - Sewer Treatment Plant	\$10,472	
2151000	215	Retained Earnings	\$2,575	
3043021	304	Water Structure and Improv.	\$2,703	
3315043	331	Water Tran. And Distr. Mains		\$5,567
3547003	354	W/Water Structure and Improv.		\$18,591
3804005	380	W/Water Sewer Treatment Plant	\$21,455	
4032021	403	Water Dep. Exp Structure and Improv.	\$85	
4032043	403	Water Dep. Exp Tran. And Distr. Mains		\$130
4033003	403	W/Water Dep. Exp Structure and Improv.		\$582
4033005	403	W/Water Dep. Exp Sewer Treatment Plant	\$1,193	

**EFFECT ON THE FILING IF THE FINDING IS ACCEPTED**: The utility's average water and wastewater rate base balance should be decreased by 23,889 (21,025 + 2,864) and increased by 21,030 (2,864 + 18,166), respectively as of December 31, 2007. The utility's water and wastewater year end balances should be decreased by 23,866 (21,002 + 2,864) and increased by 20,725 (17,861 + 2,864). The utility's water and wastewater depreciation expense balances should be decreased by 45 and increased by 611, respectively, for the 12month period ended December 31, 2007.

See the audit staff's calculations on the following pages.

#### **General Ledger and Filing Adjustments**

Acct. No.	Acct. No.	Acct. Descrip	Adjustment	Adjustment	Adjustment	<u>Adjustment</u>	<u>Adjustment</u>
3043021	304	Structures an	\$2,703	\$0	\$0	\$2,703	\$2,703
3315043	331	T&D Mains	(5,567)	<u>0</u>	<u>0</u>	<u>(5,567)</u>	(5,567)
Total Water U	PIS Adjustr	nent	<u>(\$2,864)</u>	<u>\$Q</u>	<u>\$0</u>	<u>(\$2,864)</u>	<u>(\$2,864)</u>
3547003	354	Structures an	(\$18,591)	\$0	\$0	(\$18,591)	(\$18,591)
3804005	380	Sewer Treatn	<u>21,455</u>	<u>0</u>	<u>0</u>	<u>21,455</u>	21,455
Total Wastewa	ater UPIS A	djustment	<u>\$2,864</u>	<u>\$0</u>	<u>\$0</u>	<u>\$2,864</u>	<u>\$2,864</u>

<u>Adjustment t</u>	to Acc/Dep:	Debit_(Credit)					
			Dec-04	Dec-05	Dec-06	Dec-07	Average
Utility	NARUC		Acc/Dep	Accrual	Accrual	Acc/Dep	Acc/Dep
Acct. No.	Acct. No.	Acct. Description	Adjustment	Adjustment	Adjustment	Adjustment	Adjustment
1082000	108	Transportation - Order	(\$1,053)	\$0	\$0	(\$1,053)	(\$1,053)
1083021	108	Struc. & Improv Order	(\$23,136)	\$0	\$0	(\$23,136)	(\$23,136)
1083021	108	Struc. & Improv Cumulative	<u>(127)</u>	<u>(85)</u>	<u>(85)</u>	<u>(382)</u>	<u>(340)</u>
			(\$23,263)	(\$85)	(\$85)	(\$23,518)	(\$23,476)
1083025	108	Pumping Equip.	(\$56)	(\$56)	(\$56)	(\$56)	(\$56)
1083043	108	T&D Mains - Order	\$5,494	<b>\$</b> 0	\$0	\$5,494	\$5,494
1083043	108	T&D Mains - Cumulative	<u>195</u>	130	<u>130</u>	<u>585</u>	520
			\$5,689	\$130	\$130	\$6,079	\$6,014
1083094	108	Tools & Shop - Order	(\$2,454)	\$0	\$0	(\$2,454)	(\$2,454)
Total Water A	.cc/Dep Adju	stment	<u>(\$21.137)</u>	<u>(\$11)</u>	<u>(\$11)</u>	(\$21.002)	(\$21,025)
			Dec-04	Dec-05	Dœ-06	Dec-07	Average
Utility	NARUC		Acc/Dep	Accrual	Accrual	Acc/Dep	Acc/Dep
Aca. No.	Acct. No.	Acct. Description	Adjustment	Adjustment	Adjustment	Adjustment	Adjustment
1082000	108	Transportation - Order	\$4,373	\$0	\$0	\$4,373	\$4,373
1084003	108	Struc. & Improv Order	\$397	\$0	\$0	\$397	\$397
1084003	108	Struc. & Improv Cumulative	<u>873</u>	<u>582</u>	<u>582</u>	<u>2,619</u>	<u>2,328</u>
			\$1,270	\$582	\$582	\$3,016	\$2,725
					• •	<b></b>	<b>01 5 0 40</b>
1084005	108	Sewer Treatment Plant - Order	\$15,840	\$0	\$0	\$15,840	\$15,840
1084005 1084005	108 108	Sewer Treatment Plant - Order Sewer Treatment Plant - Cumulativ	\$15,840 (1,789)	\$0 (1,193)	\$0 (1,193)	\$15,840 (5,368)	\$15,840 (4,772)

Calculations:

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Average Acc/Dep adjustment = (2006 Acc/Dep adjustment + 2007 Acc/Dep adjustment) / 2

# Water and Wastewater Plant in Service Adjustment:

#### Correcting adjustments to the order balance: Debit (Credit)

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Utility	NARUC		Per Order	Correction	Per Utility
Acct. No.	Acct. No.	Acct. Description	<u>Adjustment</u>	Required	Adjustment
3043021	304	Structures and Improv.	\$2,703	\$2,703	\$0
3113028	311	Pumping Equip.	(557)	0	(557)
3315043	331	T&D Mains	(5,567)	(5,567)	0
3917000	341	Transportation Equip.	(12,217)	0	(12,217)
3466094	346	Tools & Shop	<u>(5,873)</u>	Q	(5,873)
Water utility	plant in servi	ice adjustment	(\$21,511)	(\$2,864)	(\$18,647)
Utility	NARUC		Per Order	Correction	Per Utility
Acct. No.	Acct. No.	Acct. Description	Adjustment	Required	Adjustment
3547003	354	Structures and Improv.	(\$18,591)	(\$18,591)	\$0
3804005	380	Sewer Treatment Plant	21,455	21,455	0
3917000	391	Transportation Equip.	<u>(6,836)</u>	<u>0</u>	(6,836)
Wastewater u	itility plant in	service adjustment	(\$3,972)	\$2,864	(\$6,836)

Audit staff's adjustment to UPIS is made as of December 2003.

Therefore the average 2007 ending UPIS adjustment equals the total correction.

### Cumulative effect of posting 2003 adjustments in 2007: Debt (Credit)

Utility <u>Acct. No.</u> 3043021 3315043 Water Acc/Do	NARUC <u>Acct. No.</u> 304 331 ep and Dep.	Acct. Description Structures and Improv. Tran. and Distr. Mains Exp. adjustment	Correction <u>Amount</u> \$2,703 ( <u>5.567</u> ) (\$2,864)	Depreciation Rule Rate 3.13% 2.33%	Acc/Dep <u>Adjustment</u> (\$382) <u>585</u> \$203	Dep. Exp <u>Adjustment</u> \$85 (130) (\$45)
Utility <u>Acct. No.</u> 3547003 3804005 Water Acc/De	NARUC <u>Acct. No.</u> 354 380 ep and Dep. 1	<u>Acct. Description</u> Structures and Improv. Sewer Treatment Plant Exp. adjustment	Correction <u>Amount</u> (\$18,591) <u>21,455</u> \$2,864	Depreciation <u>Rule Rate</u> 3.13% 5.56%	Acc/Dep Adjustment \$2,619 (5,368) (\$2,749)	Dep. Exp <u>Adjustment</u> (\$582) <u>1,193</u> \$611

# Acc/Dep Adjustment to Order

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#### Correcting adjustments to the order balance: Debit (Credit)

Utility	NARUC		Per Order	Correction	Per Utility
Acct. No.	Acct. No.	Acct. Description	<u>Adjustment</u>	Required .	<u>Adjustment</u>
1082000	108	Acc/Dep - Transportation Equipment	\$8,475	(\$1,053)	\$9,528
1083021	108	Acc/Dep - Structure and Improv.	(23,136)	(23,136)	0
1083025	108	Acc/Dep - Pumping Equip.	14	(56)	70
1083043	108	Acc/Dep - Tran. And Distr. Mains	5,494	5,494	0
1083094	108	Acc/Dep - Tools & Shop	2,397	(2,454)	4,851
Water accun	nulated depr	reciation adjustment	(\$6,756)	(\$21,205)	\$14,449
Utility	NARUC		Per Order	Correction	Per Utility
Acct. No.	Acct. No.	Acct. Description	<u>Adjustment</u>	Required A	Adjustment
1082000	108	Acc/Dep - Transportation Equipment	\$4,373	\$4,373	\$0
1084003	108	Acc/Dep - Structure and Improv.	397	397	0
1084005	108	Acc/Dep - Sewer Treatment Plant	15,840	<u>15,840</u>	<u>0</u>
Wastewater	accumulated	d depreciation adjustment	\$20,610	\$20,610	\$0

Audit staff's adjustment to accumulated depreciation is made as of December 2003. Therefore the average 2007 ending accumulated depreciation adjustment equals the total correction.

#### SUBJECT: ADJUSTMENT TO ORGANIZATION COST AND FRANCHISE FEES

**AUDIT ANALYSIS:** The utility's water and wastewater average rate base balances are overstated by \$15,833 and understated by \$331, respectively, as of December 31, 2007

In its filing, the utility included average balances of \$15,338 for water organizational cost and \$7,933, each, for water and wastewater franchise fees. The filing included corresponding average accumulated depreciation of \$2,820 and \$1,008 for water organizational cost and water franchise fees, and average accumulated depreciation of \$5 and \$2,231 for wastewater organization and wastewater franchise fees.

The organizational cost balance was removed for rate case purposes in the utility's last rate filing and not included in the rate base balance established by the Commission as of December 31, 2003. Therefore, the organizational cost balance of \$15,338 with the corresponding accumulated depreciation of \$2,820, and \$5 for water and wastewater, respectively, should be removed for this rate case filing also. The audit staff calculated the average accumulated depreciation of franchise fees to be \$1,503.

The filing includes depreciation expense of \$198 for wastewater franchise fees for the year 2007, but did not include depreciation expense of the same amount for the water franchise fees. Therefore, it should be increased by \$198 (\$7,993 x 2.5% Rule Rate). Also, the accumulated depreciation for water franchise fees should be increased by \$594 (\$198 x 3 years 2005, 2006, 2007)

**EFFECT ON GENERAL LEDGER IF THE FINDING IS ACCEPTED:** The following entry should be made to correct the water and wastewater organization and franchise fee accounts.

Acct. No.	Acct. No.	Account Description	<u>Debit</u>	Credit
1083002	108	Acc/Dep - Franchise - Water		\$594
4032002	403	Dep. Exp Franchise Water	\$198	
1084002	108	Acc/Dep - Franchise - Wwater	\$231	
3013021	301	Water - Organization		\$15,338
1083001	108	Acc/Dep - Organization - Water	\$2,820	
1084001	108	Acc/Dep - Organization - WWater	\$10	
2151000	215	Retained Earning	\$12,673	

**EFFECT ON FILING IF THE FINDING IS ACCEPTED:** The utility's water and wastewater average rate base balances should be reduced by \$15,833 and increased by \$331, respectively, as of December 31, 2007. The utility's water and wastewater year end rate base balances should be reduced by \$594 and increased by \$231 respectively, as of December 31, 2007, and its water depreciation expense balance should be increased by \$198, for the 12-month period ended December 31, 2007. See our calculations below.

Acct. No. 301 - Organization Cost Per Audit Per Utility Adjustment	Average <u>Water</u> \$0 <u>15,338</u> (\$15,338)	Average <u>W/Water</u> -na- <u>-na-</u> -na-			
	Average	Average	2007	2007	
Acct. No. 108 - Acc/Dep - Franchise Fee:	Water	<u>W/Water</u>	Water	W/Water	
Per Audit	(\$1,503)	(\$1,900)	(\$1,602)	(\$1,999)	
Per Utility	<u>(1,008)</u>	<u>(\$2,231)</u>	(1,008)	<u>(\$2,230)</u>	
Adjustment	(\$495)	\$331	(\$594)	\$231	
Average Rate Base Adjustment	<u>(\$15,833)</u>	<u>\$331</u>			
	Balance	Balance	Balance	Balance	
Acct. No. 108 - Acc/Dep - Franchise Fee	<u>Dec-04</u>	<u>Dec-05</u>	<u>Dec-06</u>	<u>Dec-07</u>	<u>Average</u>
Water	(\$1,008)	(\$1,206)	(\$1,404)	(\$1,602)	(\$1,503)
Wastewater	(\$1,405)	(\$1,603)	(\$1,801)	(\$1,999)	(\$1,900)
	2007	2007			
Acct. No. 403 - Dep. Exp Franchise Fe	Water	W/Water			
Per Audit	\$198	\$198			
Per Utility	<u>0</u>	<u>(198)</u>			
Dep. Expense Adjustment	<u>\$198</u>	<u>\$0</u>			
	Average	Average			
Acct. No. 108 - Acc/Dep - Organization I	Water	W/Water			
Per Audit	\$0	\$0			
Per Utility	2,820	<u>\$5</u>			
Adjustment	(\$2,820)	(\$5)			

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#### SUBJECT: ADJUSTMENT TO RETIRE UTILITY PLANT IN SERVICE

**AUDIT ANALYSIS:** The utility's average rate base is understated by \$1,361 and \$344 for water and wastewater, respectively, as of December 31, 2007.

The utility recorded eight capital additions to utility plant in service that should have included a corresponding retirement amount. The utility's policy is to retire 75 percent of the capital asset's purchase price when the original cost cannot be determined.

Year	Utility	NARUC	RETIREM	IENT SCHEDULE		Associated	Dep.	Dep.	Acc.
Added	Acct. No.	Acct. No.	. Acct. Description	Invoice Ref# and Vendor	Amount	Retirement	Rate	Exp.	Dep.
2004	3113025	311	Pumping Equip.	08189*Thompson	\$4,662	\$3,497	5.00%	\$175	\$612
2006	3113025	311	Pumping Equip.	N14878*Ken's Bush Hog Svc	\$3,058	\$2,294	5.00%	\$115	\$172
2005	3345046	334	Meters	00109*Badger M	2,269	1,702	5.00%	85	213
2005	3345046	334	Meters	00109*Badger M	7,350	<u>5,513</u>	5.00%	<u>276</u>	<u>689</u>
						13,005		651	1,686
2006	3542011	354	Structure&Improv	N14878*Ken's Bush Hog Svcs	2,210	1,658	3.13%	52	78
2006	3804005	380	Treatment&Disp.Equip	36815*UtilEquip Svcs Inc.	2,980	2,235	5.56%	124	186
2006	3804005	380	Treatment&Disp.Equip		2,087	1,565	5.56%	87	131
2006	3804005	380		R36815*UtilEquip Svcs Inc	1,940	1,455	5.56%	<u>81</u>	<u>121</u>
					-,- · · ·	\$6,913		\$344	\$516
				WaterAcc/Dep adjustment @ 12	-	,686 - \$651)		\$1,035	
				WaterAcc/Dep adjustment @ 12	2/31/07				\$1,686
				SewerAcc/Dep adjustment @ 12	2/31/06 (\$5	516 - \$344)		\$172	
				SewerAcc/Dep adjustment @ 12	2/31/07				\$516
Retirer	ment amoun	t was calcu	lated as 75 percent of the	cost of the new asset addition.					
-	-		x 5.0% x 1 year of service						
Acc/D	ep of \$612 =	= \$3,497 x	5.0% x 3.5 years of servi	ce					
Dep. E	Exp. of \$115	= \$2,294 >	x 5.0% x 1 year of service	2					
	•	-	5.0% x 1.5 years of servi	ce					
•	•		0% x 1 year of service						
	•		5.0% x 2.5 years of servi	ce					
•	•		$.0\% \times 1$ year of service						
			5.0% x 2.5 years of servi						
•	•		3.13% x 1 year of service						
	•	-	.13% x 1.5 year of servic						
•	•		x 5.56% x 1 year of service						
	•		5.56% x 1.5 year of servi						
-	•		5.56% x 1 years of servic						
			5.56% x 1.5 year of servi						
Den E	xp. of \$81 =	= \$1.455 x	5.56% x 1 years of servic	e					

Dep. Exp. of \$81 = \$1,455 x 5.56% x 1 years of service Acc/Dep of \$121 = \$1,455 x 5.56% x 1.5 year of service **EFFECT ON GENERAL LEDGER IF THE FINDING IS ACCEPTED:** The following entries are needed to correct the utility's general ledger balances to properly record the retirements discussed above.

Utility	NARUC			
Acct. No.	Acct. No.	Account Description	Debit	Credit
1083025	108	Acc/Dep - Pumping Equipment	\$6,575	
1083046	108	Acc/Dep - Meters	\$8,116	
2151000	215	Retained Earnings		\$1,292
3113025	311	Pumping Equipment		\$5,791
3345046	334	Meters		\$7,214
4032025	403	Dep. Exp Pumping Equipment		\$290
4032046	403	Dep. Exp Meters		\$276
1085040	108	Acc/Dep - Structure & Improv.	\$1,736	
1088000	108	Acc/Dep - Treatment & Disp. Equip	\$5,693	
3547003	354	Structural & Improv		\$1,658
3804005	380	Treatment & Disp. Equip		\$5,255
4033003	403	Dep. Exp Structure & Improv.		\$52
4033005	403	Dep. Exp Treatment & Dispos. Equip.		\$292
	Colculation	o.		

Calculations:\$6,575 = \$3,497 + \$2,294 + \$612 + \$172\$8,116 = \$1,702 + \$5,512 + \$213 + \$689\$5,791 = \$3,497 + \$2,294\$7,214 = \$1,702 + \$5,512\$361 = \$85 + \$276\$7,214 = \$1,702 + \$5,512\$1,736 = \$1,658 + \$78\$5,255 = \$2,235 + \$1,565 + \$1,455\$5,255 = \$2,235 + \$1,565 + \$1,455\$292 = \$124 + \$87 + \$81

**EFFECT ON FILING IF THE FILING IS ACCEPTED:** The corresponding decreases to utility plant in service and accumulated depreciation have no effect on the utility's rate base filing since they offset each other. However, average test year accumulated depreciation and depreciation expense should be reduced by 1,361 (1,035 + 1,686)/2 and 651, and 344 (172 + 516)/2 and 344 for water and wastewater, respectively, to remove the cumulative effect of the audit staff's retirement entries on the utility's filing.

#### SUBJECT: UPIS MISCELLANEOUS ADJUSTMENTS

**AUDIT ANALYSIS:** The utility's filing reflects the following balances for the indicated accounts as of December 31, 2007.

Acct. No.	Description	UPIS	Acc. Dep.	Dep. Expense
311	Pumping Equipment	\$126,476	\$15,408.00	\$6,345.00
333	Services	\$29,633	(\$4,355.00)	\$709.00
380	Treatment & Disp. Equip.	\$482,012	\$88,389.00	\$13,563.00

The utility's UPIS and accumulated depreciation balances are overstated by \$9,083 and \$671, and \$440 and \$12 for water and wastewater respectively, as of December 31, 2007, because of the following audit staff findings.

- 1. The \$126,476 balance for Account No. 311 includes 2006 invoice of \$8,000 that represents the expense to terminate a contract of roof repair with a subcontractor, and a lost profit due to a contract termination. The amount should be removed per the NARUC rule as it represents expenses that should be recorded in Account 426 Miscellaneous Nonutility Expense. The utility also included 2006 invoice of \$808 that represents a repair of a service pump. This amount should be removed and should have been recorded in an expense account.
- 2. The \$29,633 balance for Account 333 includes 2006 invoice of \$275 that represents a repair of 1" meter. This amount should be removed and should have been recorded in an expense account.
- **3.** The \$482,012 balance for Account 380 includes 2007 double entry of \$440 for the same vendor, the same month, and the same amount. The utility supported one invoice and failed to support the second one. The amount \$440 should be removed for the lack of support.

Additionally, the above adjustments will require a corresponding reduction of 447 (400 + 40 + 57) and 12 to depreciation expenses for water and wastewater respectively, for the 12-month period ended December 31, 2007. See the audit staff's calculations that follow.

Acct. No.	Description	UPIS	Acc. Dep.	Dep. Rate	Dep. Expense
311	Pumping Equipment	\$8,000	\$600	5.00%	\$400
311	Pumping Equipment	\$808	\$61	5.00%	\$40
333	Services	<u>\$275</u>	<u>\$10</u>	2.50%	<u>\$7</u>
		\$9,083	\$671		\$447
380	Treatment & Disp.Equip.	\$440	\$12	5.56%	\$12
		\$400 = \$8, \$600 = \$8.	000 * 5% 000 * 5% *	1.5 Years of	service
		\$40 = \$808			
		¢<1 - ¢000	* 50/ * 1 5	Voora of cor	viaa

\$61 = \$808 \* 5% \* 1.5 Years of service \$7 = \$275 \* 2.5%

\$10 = \$275 \* 2.50% \* 1.5 Years of service \$12 = \$440 \* 5.56% \* 1/2 year of service

EFFECT ON THE GENERAL LEDGER IF THE FINDING IS ACCEPTED: The

following entries are needed to correct the utility's general ledger balances.

Utility	NARUC			
Acct. No.	Acct. No.	Account Description	<u>Debit</u>	<u>Credit</u>
1083025	108	Acc/Dep - Pumping Equipment	\$661	
1083330	108	Acc/Dep - Services	\$10	
2151000	215	Retained Earnings	\$9,299	
3113025	311	Pumping Equipment		\$8,808
3335046	333	Services		\$275
4032025	403	Dep. Exp Pumping Equipment		\$440
4032046	403	Dep. Exp Services		\$7
1088000	108	Acc/Dep - Treatment & Disp. Equip	\$12	
3804005	380	Treatment & Disp. Equip		\$440
4033005	403	Dep. Exp Treatment & Dispos. Equip.		\$12

Calculations:

\$661 = \$600+\$61 \$440 =\$400+\$40 \$361 =\$85 + \$276 \$8,808 =\$8,000 + \$808

**EFFECT ON THE FILING IF THE FINDING IS ACCEPTED:** The utility's average rate base balance should be decreased by \$8,412 (\$9,083 - \$671), and \$428 (\$440 - \$12) for water and wastewater respectively, as of December 31, 2007. The depreciation expense should be decreased by \$447 and \$12 for water and wastewater respectively, for the 12-month period ended December 31, 2007.

#### SUBJECT: ADJUSTMENT TO REMOVE CONTRIBUTION

AUDIT ANALYSIS: The utility's rate base is understated by \$329 as of December 31, 2007

The utility recorded \$342 of Water CIAC in 2005, and recorded \$8 and \$9 of amortization of CIAC in the years 2006, and 2007 respectively. Order PSC-03-0638-PAA-WS, states, "... since the utility was built-out at the time of certification, we did not authorize the utility to collect service availability charges on a going-forward basis."

Since the Commission did not authorize the company to collect service availability fees, then the amount should be refunded to the customer charged.

**EFFECT ON GENERAL LEDGER IF THE FINDING IS ACCEPTED:** The following entry should be made to correct the CIAC and accumulated amortization of CIAC account balances.

Utility	NARUC			
Acct. No.	Acct. No.	Account Description	Debit	<u>Credit</u>
1411000	141	Acct. Receivable (customer refund)		\$342
2711010	271	CIAC - Water	\$342	
2722010	272	Acc. Amoritzation of CIAC - Water		\$17
4072072	403	Amortization of CIAC - Water	\$9	
2151000	215	Retained Earning	\$8	

**EFFECT ON FILING IF THE FILING IS ACCEPTED:** Average CIAC should be reduced by \$329 (\$342 - \$13 that represents the average accumulated amortization of CIAC) for the year ended December 31, 2007.

#### SUBJECT: ADJUSTMENT TO EXPENSES - SYSTEM MISCLASSIFICATION

**AUDIT ANALYSIS:** Labrador recorded \$2,910 to Miscellaneous Expenses – Account No. 775 in March 2007. Per the invoice this expense should have been recorded to the Sandalhaven utility system.

The expense was for cleaning seven lift stations at Sandalhaven performed by Lehigh Environmental Service, Inc., on March 5, 2007.

#### EFFECT ON THE GENERAL LEDGER IF THE FINDING IS ACCEPTED:

Sandalhaven: Miscellaneous Expenses – Account No. 775 \$2,910

Labrador: Miscellaneous Expenses – Account No. 775 <\$2,910>

### EFFECT ON THE FILING IF FINDING IS ACCEPTED:

Reduce Labrador's Miscellaneous Expenses – Account No. 775 for \$2,910.

Reduce the Wastewater Working Capital by \$364 (\$2,910/8).

#### SUBJECT: ADJUSTMENT TO RENTAL EXPENSES

**AUDIT ANALYSIS:** Labrador recorded real property lease expense of \$49,140 for the period ending December 31, 2007. The amount recorded for water was \$24,836 to Rental of Building/Real Property Expenses, Account No. 641. The amount recorded for wastewater was \$24,304 to Rental of Building/Real Property Expenses, Account No. 741.

The lease is for the leasing of three parcels of land, the water treatment plant, the wastewater treatment plant and the sprayfield.

FPSC Order No. PSC-04-1281-PAA-WS, issued December 28, 2004, states that the Commission set a cap on the amount that Labrador should be paying to Forest Lake Estates and that the maximum lease amount charged should be the annual rate of return, based on the utility's capital structure, times the original cost of the land when placed in service. The Commission estimated that the total original value of the land for both water and wastewater was \$298,617.

Per the above Order the maximum amount of lease expense that should be allowed for utility operations is \$25,293. (\$298,617 x 8.47% based on the requested Cost of Capital in this rate proceeding)

The utility added Pro Forma adjustments of \$594 for water and \$581 for wastewater based on the 2.9% index per the 2008 Price Index in FPSC Order PSC-08-0104-PAA-WS, issued February 18, 2008.

Per the lease agreement the above lease amount of \$49,140 per year is valid from June 1, 2005 through May 31, 2011. According to the lease agreement "Every six (6) years thereafter, rental amounts shall be increased to an amount equal to the increase in the Consumer Price Index which shall be determined every six (6) years and paid at the new rental rate adjusted by the cumulative increase over the prior six (6) years." Based on the Commission Order and the stated cap, no Pro Forma adjustment is required and should be removed.

### **EFFECT ON THE GENERAL LEDGER IF THE FINDING IS ACCEPTED:**

Miscellaneous Nonutility Expenses - Account No. 426	\$23,847
Rental of Building/Real Property - Account No. 641	\$23,847

See schedule below for details.

### **EFFECT ON THE FILING IF FINDING IS ACCEPTED:**

Miscellaneous Nonutility Expenses - Account No. 426	\$23,847
Rental of Building/Real Property - Account No. 641	\$12,053
Rental of Building/Real Property - Account No. 741	\$11,794

Water working capital allowance should be reduced by \$1,507. Wastewater working capital allowance should be reduced by \$1,474.

Pro Forma Adjustments:

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Rental of Building/Real Property - Account No. 641 should be reduced by \$594. Rental of Building/Real Property – Account No. 741 should be reduced by \$581.

Water working capital allowance should be reduced by \$74 and wastewater should be reduced by \$73.

See schedule below for details.

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<u>Lease Expense</u> Per Audit Per Utility Adjustment	\$ 	<u>Total</u> 25,293 49,140 (23,847)	\$ \$ \$	<u>Water</u> 12,784 24,836 (12,053)	\$ \$ \$	<u>Wastewater</u> 12,509 24,304 (11,794)
Allocated based on customers		(23,017)	<u> </u>	50.54%	<u> </u>	49.46%
Working Capital Adjustment Required at 1/8:	\$	(2,981)	\$	(1,507)	\$	(1,474)
Pro Forma Adjustment: Per Audit	\$		\$		\$	
Per Utility	ъ \$	1,175	ծ Տ	- 594	э \$	581
Adjustment	\$	(1,175)	\$	(594)	\$	(581)
Pro Forma Working Capital						
Adjustment Required at 1/8:	\$	(147)	\$	(74)	\$	(73)
Total O & M Adjustment	\$	(25,022)	\$	(12,647)	\$	(12,375)
Total Working Capital Adjustment	\$	(3,128)	\$	(1,581)	\$	(1,547)

#### SUBJECT: ADJUSTMENT TO PRIOR RATE CASE EXPENSE

**AUDIT ANALYSIS:** FPSC Order PSC-04-1281-PAA-WS, issued December 28, 2004, authorized \$68,988 of rate case expenses to be amortized over four years or \$17,247 per year. The utility's new tariffs per the above Order were effective on February 3, 2005, which is the beginning of the four-year amortization period for rate case expense recovery.

The utility's general ledger shows \$92,490 to be amortized over the same four-year period.

#### **EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED:**

Account No. 215 - Retained Earnings	\$12,552
Account No. 186.1 Deferred Rate Case Expense	\$6,584
Account No. 666 – Amortization of Rate Case Expense	\$3,016
Account No. 766 – Amortization of Rate Case Expense	\$2,952

See schedule below for details

#### **EFFECT ON FILING IF FINDING IS ACCEPTED:**

The effect on filing will be equal to the effect on the general ledger with an additional adjustment to working capital. Water working capital allowance should be reduced by \$377 and wastewater should be reduced by \$369. See schedule below for details.

UNAMOR	RTIZE	D/RATE CA	ASE	EXPENSE:		Total		Water	Wa	astewater		Water	Wa	astewater
					Una	amortized	Una	amortized	Una	amortized				
	В	leginning	Amo	ount Amortized	Ba	alance at	Ва	alance at	Ba	alance at				
	В	alance at	(Fel	53,05 to Dec	D	ecember	D	ecember	D	ecember		2007		2007
	Febr	uary 3, 2005	-	31, 07)	3	1, 2007	3	1, 2007	3	1, 2007	E	xpense	E	xpense
Per Audit	\$	68,988	\$	50,304	\$	18,684	\$	9,443	\$	9,241	\$	8,717	\$	8,530
Per Utility	\$	92,490	\$	67,222	\$	25,268	\$	12,771	\$	12,497	\$	11,733	\$	11,482
Adjustmen	t \$	(23,502)	\$	(16,918)	\$	(6,584)	\$	(3,328)	\$	(3,256)	\$	(3,016)	\$	(2,952)
Allocated b	based o	on customers						50.54%		49.46%				
Working C Required a	•	Adjustment			\$	(746)					\$	(377)	\$	(369)

Schedule of Water Rate Base

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Company: Labrador Utilities, Inc. Docket No.: 080249-WS Schedule Year Ended: December 31, 2007 Interim [] Fimal (X] Historic [X] Projected [] Schedule: A-1 Page 1 of 1 Preparer: John Hoy

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.

Line	(1)	Avera	(2) ige Amount Per	(J) Utility Test Year			(4) Utility Adjusted	(5) Utility Pro Forma			(6) Adjusted Utility	(7) Supporting
No.	Description	·	Books	Adjustements			Test Year	 Adjustments			Balance	Schedule(s)
1	Utility Plant in Service		650,138	\$ 2,835	(A)	5	652,973	\$ 57,679	(Aj	5	710,652	A-3, A-5
2												
3	Utility Land & Land Rights		123	198	(A)		321		(A)		321	A-3, A-5
4	4.5											
5	Less: Non-Used & Useful Plant											A-7
6												
7	Construction Work in Progress		21,496	(21,496)	(8)				(8)			A-3
8												
9	Less: Accumulated Depreciation		(155,978)	2.099	(C)		(153,879)	(9,613)	(C)		(163,492)	A-3, A-9
10							(7.40)				(2.4.2)	A-12
11	Less: CIAC		(342)				(342)				(342)	A+12
12			13				13				13	A-14
13	Accumulated Amortization of CIAC		13				13				13	0-14
14			(351,387)	351,387	(D)				(D)			A-3
15	Acquisition Adjustments		(351,367)	331,301	(U)				(0)			X-3
16	Access hand of here Adjustments		39.095	(39,005)	(D)				(D)			A-3
17 18	Assum, Amort. of Acq. Adjustments		33.033	(55,655)					(,			
19	Advances For Construction											A-16
20	Additional of Contraction											
21	Working Capital Allowance			18,827	(E)		18,827	3,163	(E)		21,990	A-17
22	The starty Copies Fair Manage							 				
23	Total Rate Base	5	203,157	s 314,755		5	\$17,913	\$ 51,229		\$	569,142	

#### Florida Public Service Commission

Schedula: A-2 Page 1 of 1 Preparer: John Hoy

Schedule of Wastewater Rate Base

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Company: Labrador Utilikies, Inc. Docket No.: 080249.4VS Schedule Year Ended: December 33, 2007 Interim ( | Final (X) Historic (X) Projected ( )

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,

Line No.	(1) Description	Ave	(2) rage Amount Per Books		(3) Utility Test Year Adjustements			(4) Utility Adjusted Test Year		(5) Utility Pro Forma Adjustments			(6) Adjusted Utility Balance	{?) Supporting Schedule(s)
t	Utility Plant in Service	\$	1.769,496	\$	2,775	(A)	\$	1,772,271	\$	56,443	(A)	\$	1,828,714	A-3, A-6
2														
3	Utility Land & Land Rights		120		193	(^)		313			(A)		313	A-3, A-6
4	12.													
s	Less: Non-Used & Useful Plant													<b>A</b> .7
4											<i>.</i>			A-3
7	Construction Work in Progress		20,518		(20,518)	(B)					(8)			<b>A</b> -3
*			(100 170)		2.055	<i>(</i> <b>C</b> )		(478,119)		(9,407)	10		(487,526)	A-3, A-10
9	Less: Accumulated Depreciation		(480,174)		2.035	(0)		(410,113)		(5.407)	(0)		(407,520)	1.5, 11.10
10 11	Less: CIAC													A-12
12	LUSS: CIAC													
13	Accumulated Amortization of CIAC													A-14
14														
15	Acquisition Adjustments													
16	•													
17	Accum, Amort, of Acq, Adjustments													
18													•	
19	Advances For Construction													A-16
20											(0)		21.400	
21	Working Capital Allowance				30,711	(U)		30.711		3.389	(L))		34,100	A-17
22		_			16 310			1 2 26 1 76		60.406			1,375,601	
23	Total Rate Base	5	1,309,960	<u>,</u>	15.216		-	1,325,176	<u>.</u>	50,425		<u> </u>	1,373,601	

Schedule of Water Net Operating Income

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Company: Labrador Utilities, Inc. Docket No.: 080249-WS Test Year Ended: December 31, 2007 Interim [] Final [X] Historic [X] Projected [] Florida Public Service Commission

Schedule: B-1 Page 1 of 1 Preparer: John Hoy

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.

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_ine No	(1) Description		(2) Balance Per Books	(3) Utility Test Year Adjustments		 (4) Utility Adjusted Test Year		(5) Requested Revenue Adjustment		(6) equested Annual evenues	(7) Supporting Schedule(s
1	OPERATING REVENUES	5	172,175 \$	(16,413)	(A)	\$ 155,762	\$	146,521	(A)	\$ 302,283	В-4, В-3
2										 	
3	Operation & Maintenance		165,660	(15.048)	(B)	150,612		25,310	(B)	175,922	B-5, B-3
4 5	Depreciation, net of CIAC Amort.		20,973	3,725	(C)	24,698		9.613	(C)	34,311	B-13, B-3
7	Amortization										
9 10	Taxes Other Than Income		61,555	(41,159)	(D)	20,396		6,775	(D)	27,171	B-15, B-3
10 11 12	Provision for Income Taxes		(23,472)	1,406	(E)	 (22,066)		38,735	(E)	 16.669	C+1, B-3
13	OPERATING EXPENSES		224,715	(51,076)		 173,640		80,433		 254,073	
15	NET OPERATING INCOME	\$	(52,540) \$	34,662	r	\$ (17,878)	5	66,088		\$ 48,210	
16 17											
18 19	RATE BASE	5	203,157 <b>\$</b>	314,755		\$ 517,913	\$	51,229	ı	\$ 569,142	
20											
21	RATE OF RETURN		(25.86) %			 (3.45)	%			 8.47 %	

#### Schedule of Wastewater Net Operating Income

Company: Labrador Utilities, inc. Docket No.: 080249-WS Test Year Ended: December 31, 2007 Interim [] Final [X] Historic [X] Projected []

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Florida Public Service Commission

Schedule: 8-2 Page 1 of 1 Preparer: John Hoy

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	(3) Utility Test Year Adjustments			(4) Utility Adjusted Test Year		(5) Requested Revenue Adjustment			(6) equested Annual levenues	(7) Supporting Schedule(s)
NO.	Description		BUUKS	Adjuatinenta									
	OPERATING REVENUES	5	388,315	\$ (25,866)	(A)	<u> </u>	362,449	\$	181,228	(A)	\$	543,677	8-4 8-3
2 3 4	Operation & Maintenance		222,952	22,734	(8)		245,685		27,115	(B)		272,601	B-6. B-3
5	Depreciation, net of CIAC Amort.		50,966	3,647	(C)		54,613		9,407	(C)		64,020	8-14, 8-3
7	Amortization		-										
8 9 10	Taxes Other Than Income			41,712	(D)		41,712		8,333	(D)		50.045	B-15. B-3
11	Provision for Income Taxes			(10,311)	(E)		(10,311)		50,604	(E)		40,293	C-1, B-3
12					-								
13	OPERATING EXPENSES		273,917	57,781	-		331,699		95,460		<u></u>	427,158	
14 15 16	NET OPERATING INCOME	5	114,397	\$ (83,647)	-	\$	30,750	\$	85,768		\$	116,519	
17													
18 19	RATE BASE	S	1,309,960	\$ 15,216	-	\$	1,325,176	\$	50,425		\$	1,375,601	
20								•					,
21	RATE OF RETURN		8.73	%		200	2.32	. %				8.47 9	6

Schedule of Requested Cost of Capital Simple Average

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Company - Labrador Utilities, Inc. Docket No. 080249-WS Schedule Year Ended: 12/31/07 Interim [] Final [X] Historical [X] Projected []

#### Florida Public Service Commission

Schedule D-1 Page 1 of 1

Preparer: Kirsten Weeks

Explanation: Provide a schedule which calculates the requested cost of capital on a simple average basis. If a year-end basis is used, submit an additional schedule reflecting year-end calculations.

	(t)	Requ	(2) econciled to ested Rate Base	(3)	(4)	(5)	
Line No.	Class of Capital	<u>A'</u>	rE 12/31/07	Ratio	Cost Rate	Weighted Cost	
1	Long Term Debt	s	1,040,951	53.53%	6.65%	3.56%	
2	Short Term Debt		44,818	2.30%	2.44%	0.06%	
3	Preferred Stock		-	0.00%	0.00%	0.00%	
4	Common Equity		805,476	41 42%	11.70%	4.85%	
5	Customer Deposits		-	0.00%	6.00%	0.00%	
6	Tax Credits - Zero Cost		-	0.00%	0.00%	0.00%	
7	Tax Credits - Weighted Cost		-	0.00%	0.00%	0.00%	
8	Accumulated Deferred income Tax		53,498	2.75%	0.00%	0.00%	
9	Other (Explain)		•	0.00%	0.00%	0.00%	
10							
11	Total	S	1,944,743	100.00%		8.47%	
12							

13 14 15

16 17 Note: The cost of equity is based on the leverage formula in effect pursuant to Order No. PSC-070006-WS.

Note: Long term debt, short term debt, preferred stock, and common equity are actual for Labrador's parent company, Utilities, Inc.

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