BEFORE THE				
FLORIDA PUBLIC SERVICE COMMISSION				
In the Matter of	<b>:</b>			
	DOCKET NO. 150269-WS			
APPLICATION FOR LIMITED PROCEEDING WATER RATE INCREASE IN MARION, PASCO, AND SEMINOLE				
	/			
PROCEEDINGS:	COMMISSION CONFERENCE AGENDA ITEM NO. 6			
COMMISSIONERS	CHATDMAN THE E DOOMN			
PARTICIPATING:	CHAIRMAN JULIE I. BROWN COMMISSIONER LISA POLAK EDGAR			
	COMMISSIONER ART GRAHAM COMMISSIONER RONALD A. BRISÉ			
21.77	COMMISSIONER JIMMY PATRONIS			
DATE:	Thursday, July 7, 2016			
PLACE:	Betty Easley Conference Center Room 148			
	4075 Esplanade Way Tallahassee, Florida			
REPORTED BY:	LINDA BOLES, CRR, RPR			
	Official FPSC Reporter (850) 413-6734			

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## PROCEEDINGS

**CHAIRMAN BROWN:** All right. Moving to Item 6.
3 Hi, again.

MR. SLEMKEWICZ: John Slemkewicz on behalf of staff.

Item No. 6 is Docket No. 150269-WS, which is Utilities, Inc. of Florida's application for a limited proceeding to increase water rates in Marion, Pasco, and Seminole Counties. Subsequent to its filing, UIF has requested that the water rate increase portion related to Pasco County be bifurcated from this proceeding. As a result, this recommendation addresses only the water rate increase portions related to Marion and Seminole Counties.

The water rate increases are intended to recover the costs for the replacement of galvanized iron pipes in Marion County and the preliminary costs associated with interconnecting the Ravenna Park and Crystal Lake water systems in Seminole County.

In its recommendation, staff has corrected errors made by UIF in determining the overall cost of capital, the calculation of income taxes, and the amount of regulatory assessment fees. Rate case expense has also been reduced.

Staff is recommending that the appropriate

water rate increases are \$45,663 for Marion County and six, excuse me, and \$16,142 for Seminole County, which represent a 28.85 percent and a 1.61 percent increase respectively. Staff has an oral modification that has been distributed previously to the Commissioners and the parties to this docket.

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two.

And I would note that no customers attended the customer meeting for Marion and Seminole Counties. Representatives from the utility are present to address the Commission, and the Office of Public Counsel has intervened in this docket and is here to address the Commission. And staff is prepared to answer any of the Commissioners' questions.

CHAIRMAN BROWN: Thank you, Mr. Slemkewicz.

Mr. Friedman, haven't seen you in a month or

MR. FRIEDMAN: It's been a while.

CHAIRMAN BROWN: How are you doing?

MR. FRIEDMAN: Good. Good. Thank you. How about yourself?

CHAIRMAN BROWN: Good.

MR. FRIEDMAN: Marty Friedman on behalf of
Utilities, Inc. of Florida. While we don't object to
the rate case expense reduction, there does need to be a
reallocation to be consistent with really the philosophy

that the staff is trying to do, which is to cut the -the rate case expense associated with Pasco out of the
process and just deal today with the rate case expense
for Marion and Seminole. And we agree with that
philosophy, and Mr. Hoy, President of Utilities, Inc. of
Florida, is going to go through the analysis that's
going to show you why it needed -- it just needs a
little tweaking because the way it is now, the
Summertree Pasco County customers are going to be
burdened with more rate case expense than we think is
fair to burden them with.

CHAIRMAN BROWN: Mr. Hoy.

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MR. HOY: Good morning, Commissioners. And I'm not going to go through a full analysis, but really what it amounts to is, I think when staff, and rightly so, tried to move the rate case expense and allocate it amongst the counties, the proper countries, what they initially did was took all of the Pasco-only costs and allocated it to Pasco but didn't do the same thing for the Marion and Seminole County costs that were allocated or directed just to those counties. So they left all of that in and then allocated that out to all three counties.

So what we feel should been done was, you know, separate all the costs and then allocate the rest.

So, for example, the cost of the meeting today is really 1 2 for Seminole and Marion and should not be borne by the 3 Pasco County customers. So that's our recommendation, 4 that that cost be changed. It comes to, you know, in the neighborhood of \$3,500 that should be attributable 5 to Marion and Pasco. 6 7 **CHAIRMAN BROWN:** \$3,500? MR. HOY: \$3,500 in total. 8 9 CHAIRMAN BROWN: Okay. 10 MR. HOY: Sorry, that should be going -- that 11 should go to Seminole and Marion and not to Pasco. 12 CHAIRMAN BROWN: Okay. Thank you. And before 13 I get to Office of Public Counsel, staff, do you have 14 any comments on Utilities, Inc.'s suggestion? 15 MR. SLEMKEWICZ: No, I don't. But I don't 16 have that calculation, so I cannot give you the -- a 17 revised rate increase number at this time. 18 CHAIRMAN BROWN: Okay. Can you work on it 19 while we listen to Office of Public Counsel, please? 20 Mr. Sayler, how are you? 21 MR. SAYLER: Outstanding. Good morning, 22 Chairman, Commissioners. We have -- Erik Sayler with the Office of Public Counsel on behalf of all of 23 24 Utilities, Inc.'s customers, both Marion and Seminole

and even the Pasco customers. We understand that the

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utility bifurcated the proceeding to focus on Marion and Seminole Counties, but there may be some unintended consequences as it relates to the Pasco customers, which I will address momentarily.

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Just to give you a brief roadmap, we have concerns about rate case expense as well as Issue 3, which is the, what we say, the premature prejudging and the granting of temporary rates in event -- if there is some protest of this order.

Starting with rate case expense. The Office of Public Counsel, as a general matter, is always concerned with the level of rate case expense, especially the high cost and rates of consultants and attorneys that are brought before this Commission for review and approval. And on a number of occasions, we've mentioned the high cost of the consultants and attorneys for Utilities, Inc., but we also note that this Commission has reviewed those and approved those in the past. And we're not making arguments for a change at this time, but we'd just note that for the record. But if at some time in the future the Commission wants to look at the dollar amount for the fees, then that is something we are certainly willing and able to do.

As it relates to the Marion County -- or rate case expense in this case, we understand that the rate

case expense has been separately identified for the Pasco County customers. There's a specific amount for Pasco related to the large customer meeting that was held in April. We also understand that there's some sort of pro rata general rate case expense that's also been allocated to Pasco County.

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As far as the change that the utility is suggesting be made today, we don't weigh in on having an opinion one way or the other, other than at the appropriate time in the future when the Pasco portion of this bifurcated proceeding comes before you, we can challenge the reasonableness and prudence of the Pasco County specific rate case expense. Staff's recommendation doesn't -- doesn't delve into that area. It's probably something that wasn't on their radar. if at the future, if there's an opportunity for our office or the customers of Pasco to make arguments, then that would be great. Because we just don't want this PAA order to be -- prejudge the reasonableness and the prudence of the Pasco County rate case expense and then prejudice be used res judicata for those customers in that future proceeding.

So if there's some clarification either on the record or some language in the order that says that the Pasco County rate case expense identified in this order

is not precedent or binding on the Commission in the future, should there be any arguments to make that there -- some of the rate case expense was unreasonable.

That's the first part.

The other part we notice is a change in the Commission's allocation methodology as it relates to rate case expense. And in consulting with Ms. Vandiver, my understanding is that rate case expense is generally allocated on an ERC basis, and in this case, it has been split into two types. A certain amount was identified and split on a one-third basis. Another amount was identified and split on an ERC basis. We are -- Office of Public Counsel is curious if this is a going-forward change in the Commission's policy or if this is just a different allocation of rate case expense due to the unique facts and circumstances.

CHAIRMAN BROWN: Mr. Sayler, could I just stop you for a sec?

MR. SAYLER: Sure.

CHAIRMAN BROWN: You said it was two different ways. It was based on an ERC basis, and what was the second?

MR. SAYLER: On a one-third basis. If you look at -- if you look at Schedule 4, page 16 -- CHAIRMAN BROWN: Okay.

MR. SAYLER: -- as I understand, reading this, 1 you have a line called adjusted rate case expense 2 3 one-third to each county where they divide 17,959 by 3. And then you look down at the customer notices, postage 4 stock, you see that's on a, as I understand it, an ERC 5 basis. So if this is one off for this case, that's a 6 7 policy decision of this Commission. But if it is a -something that is going to be policy going forward, we 8 9 just would like to understand that and just if there can 10 be some additional explanation why this was done, so. 11 CHAIRMAN BROWN: Okay. Thank you. 12 MR. SAYLER: And that's related to rate case I can get into Issue 3 now, or if you want to 13 14 discuss the rate case expense items now --15 CHAIRMAN BROWN: I'm going to give -- take 16 about a five-minute break so that staff can work on 17 their numbers and all the stuff that they're doing over So let's just take a break. 18 there. 19 MR. SAYLER: Certainly. 20 CHAIRMAN BROWN: And then get back to you in 21 the next five minutes. Okay? 22 MR. SAYLER: All right. Fantastic. Thank 23 you. 24 (Recess taken.) 2.5 CHAIRMAN BROWN: Mr. Slemkewicz, thank you for

preparing this spreadsheet, handout to the 1 2 Commissioners. We appreciate you working on it. I know 3 you ran up to your office. Thank you very much for 4 that. MR. SLEMKEWICZ: You're welcome. 5 CHAIRMAN BROWN: Before we go to OPC, would 6 7 you like to address the Commission? MR. SLEMKEWICZ: Based on the changes to the 8 9 rate case expense, the water rate increase would change 10 to -- for Marion County would be \$46,327, which would 11 represent a 29.27 percent rate increase, and the 12 four-year rate reduction would increase to \$2,416. And 13 as reflected on Schedule 2 for Seminole County, the water rate increase would be \$16,400, which would 14 15 represent a 1.64 percent increase, and the four-year 16 rate reduction would increase to \$2,278. 17 CHAIRMAN BROWN: Thank you. Thank you, again, for providing those numbers to us. 18 19 MR. SLEMKEWICZ: You're welcome. 20 CHAIRMAN BROWN: This is helpful. 21 All right. Mr. Sayler, would you like to 22 continue addressing the Commission? You're on three. 23 MR. SAYLER: Yes, ma'am. Commissioners, Chairman, Issue 3 is -- relates to the issue of 24 2.5 temporary rates if the PAA order is protested by a party

other than the utility. But before I get to that, just stepping back to one of my other issues related to Pasco County, whether their rate case expense would be subject to challenge, the amount that's identified in whatever PAA order that comes out of this proceeding, if that rate case expense amount, even though it's identified as for illustrative purposes, but if our -- if OPC or the customers make arguments that rate case expense is too high, will we have the opportunity to do that? And that's just something we need clarification because it goes into the calculus of whether there's eventually a protest of this order or not. And so if we have some clarification on the record, that would be helpful. Or if the utility doesn't mind allowing us to make those arguments down the road, that would be helpful as well.

CHAIRMAN BROWN: I'm going to defer real quickly to Ms. Mapp or, Mary Anne, if you want to provide some comments to Mr. Sayler's request.

MS. HELTON: I'm sorry. I had stepped out and I did not hear Mr. Sayler's request.

CHAIRMAN BROWN: Go ahead.

MR. SAYLER: Yes. Our concern is that under the old staff recommendation there's about, I want to say, \$13,000 of rate case expense that was identified as being either specifically related to Pasco County or

their share of the overall rate case expense. This proceeding has been bifurcated. It's premature really to make arguments about the reasonableness of the Pasco County-specific rate case expense here today, but we would like to preserve the right to make those arguments down the road when the Pasco County portion comes before this Commission. And we were wondering if something either on the record or a line in the order saying that while the amounts identified for Pasco County are illustrative, at the appropriate time and place people can make arguments to challenge the reasonableness of those amounts. Do you follow?

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CHAIRMAN BROWN: Since it's a bifurcated proceeding, he wants -- I think he just wants clarification or comfort in that they will be able to challenge the Pasco County rate case expense.

MS. HELTON: Well, let me just make sure I understand. It's my understanding that the customers — or the utility will not be receiving recovery for those Pasco County-related expenses through the course of your vote today; is that correct? Okay. Yes, then I see no problem with the OPC being able to take up issues concerning cost recovery that is not addressed today but will be addressed in a later decision concerning Pasco County.

CHAIRMAN BROWN: Mr. Mouring.

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MR. MOURING: Yes, thank you, Commissioner. It's certainly staff's intent that all rate case expense associated with Pasco County would be deferred later on. The last sentence in the paragraph entitled "Rate Case Expense" on page 5 reads, "The recovery of any rate case expense related to Pasco County will be determined in the bifurcated portion."

CHAIRMAN BROWN: There it is. That's clear.

MR. MOURING: That's certainly staff's intention.

CHAIRMAN BROWN: There it is, Erik. weren't reading.

Thank you. All right.

Mr. Sayler, would you like to go on?

MR. SAYLER: Certainly. And thank you for that clarification, Mr. Mouring.

Regarding Issue 3 on page 9 of staff's recommendation, we have two issues with the prejudging of eligibility for temporary rates in a limited proceeding.

First is a legal concern or issue and a second one is a policy concern. As staff recommendation states, the Commission does not expressly -- or the limited proceeding statute does not expressly grant the

authority to allow for temporary rates in event of a protest by a party other than the utility, and staff's recommendation is clear on that. Staff's recommendation — or the recommend — excuse me, the recommendation goes on to say it's well-settled precedent that temporary rates can be granted in the case of a protest on a case-by-case basis. It cites a number of orders. I've reviewed the orders. The last time our office challenged this as not being statutorily authorized was in 2010 in the Cypress Lakes case.

However, our position is still the same, that it can't be well-settled precedent if there's no express statutory authorization to do this.

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Just because the Cypress Lakes order wasn't protested and that wasn't an issue in any kind of hearing or any of the other limited proceedings where the Commission has allowed temporary rates if something is protested, it doesn't mean that even though it's the Commission's practice or unadopted rule, it doesn't necessarily mean that the Commission has that authority.

When it comes to statutory interpretation, it's a fundamental principle. When looking at the statutes, you look at what the statute says and what it doesn't say. The proposed agency action rate case statute expressly allows for temporary rates. The

staff-assisted rate case statute expressly allows for temporary rates. The limited proceeding statute is silent on that matter. So it's a question of interpretation, and we understand how the Commission came to its interpretation in 2010, but we still disagree with that here today.

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We think that whenever there's an ambiguity about what an agency has authority to do or not to do, any ambiguity ought to be resolved against that authority to do. So that's what we wanted to raise today as it relates to -- we believe the limited proceeding statute doesn't grant you the ability to do Issue 3. So that is the legal argument.

On the policy argument, if this Commission disagrees with the Public Counsel's Office position on this, we also think that there's a little bit of a chicken and an egg issue as it relates to this issue.

Nobody has protested this issue, so we don't know if there will be any need for entitlement to temporary rates. Staff's recommendation says that it should be done on a case-by-case basis in the event of a protest.

My reading or understanding of that is a protest should happen, and then the Commission would determine on a case-by-case basis should there be entitlement to temporary rates.

For instance, the health and the robust financial position of the utility is certainly something that would play into a factor of whether or not that utility really needs temporary rates or not. If it's a utility that is having difficulties making ends meet, that's an argument for and against.

And here today our question is really when is the appropriate time to make those arguments for Issue 3 that perhaps we don't think Utilities, Inc. is entitled to temporary rates in a situation where we haven't had a protest?

So I hope you can understand the conundrum that we have here with Issue 3. But notwithstanding that policy conundrum, when should this issue really be done, whether it should be done now or after a protest is done, that's up to the Commission to decide. But we still --

CHAIRMAN BROWN: Thank you. Mr. Sayler, and I will tell you it is very helpful when Office of Public Counsel files written remarks and correspondence in advance so that the Commissioners and staff can have time to review your arguments to be better prepared. So this would be probably one of those situations where it would have been much more helpful elucidating what you're trying to argue under Issue 3. But thank you.

Are you -- does that complete your comments?

MR. SAYLER: Yes, ma'am, that completes our comments. While we understand there's a policy consideration if the Commission disagrees with our position on the statutory interpretation, but we still maintain that we think the statute is clear and that case law is clear. If you don't have express or implied authority to do something, then it's better policy to -- practice to just go against that.

CHAIRMAN BROWN: Okay. Thank you. Thank you for your comments, Mr. Sayler.

Staff, any additional remarks? Mary Anne.

MS. HELTON: Madam Chairman, the limited proceeding statutes states that "The Commission may conduct limited proceedings to consider and act upon any matter within its jurisdiction, including any matter, the resolution of which, requires the utility to adjust its rates." I'm not sure that I understand how the statute could be any broader. And given the broadness of the statute, it seems to me that setting rate case expense falls within the limited proceeding purview.

CHAIRMAN BROWN: Thank you.

MS. HELTON: With respect to the policy for setting rates in a limited proceeding, it's always been my understanding that you have rate -- a file and

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suspend rate case, which covers many issues and involves much rate case expense and it's a very expensive process. So the limited proceeding process allows for the Commission to look at a finite number of issues in a more limited scope to reduce the amount of rate case expense for customers.

So I'm not really sure if Mr. Sayler is arguing that we should look at rates only in the course of a full rate proceeding, which would be much more expensive and much more exhaustive with respect to our resources, OPC's resources, and the utility's resources.

CHAIRMAN BROWN: Thank you. Mr. -- pardon me. Staff, any other additional comments?

MR. FLETCHER: I would only add that for Issue 3, as a result of staff's recalculated numbers, that that would have to be adjusted, and it would only be approximately \$600 to the \$41,308 that is in the recommendation paragraph of Issue 3. It would be increased by that.

CHAIRMAN BROWN: Okay. Thank you.

Commissioners? It got a little messy here, but any comments or questions on this or the handout that was presented to us by staff? I see no lights.

Yes.

MR. FLETCHER: If I may, also there would be a

resulting recalculation of the rates based on across the 1 board. That's something that staff did not have time to 2 3 calculate during the break, but that would be, if your pleasure, administrative authority in order to make that 4 across-the-board calculation. 5 CHAIRMAN BROWN: I think that will cover all 6 7 that. Thank you. All right. Commissioners. 8 9 Commissioner Graham. 10 COMMISSIONER GRAHAM: Thank you, Madam Chair. 11 I guess I will start to wiggle my way through a motion 12 here. I will move the staff recommendation on this 13 14 item for all issues, taking into account the change that 15 was suggested by the utility that staff worked through 16 on the spreadsheet. And any other follow-through 17 numbers that need to come through, I would give staff the flexibility to do that through administrative 18 19 control. 20 CHAIRMAN BROWN: Okay. That makes sense. 21 there a second? 22 COMMISSIONER PATRONIS: Second. 23 CHAIRMAN BROWN: Okay. Is there further 24 discussion on this? Commissioner Edgar. 2.5 COMMISSIONER EDGAR: Thank you, Madam Chair.

I would just, prior to the vote, and thank you for the 1 opportunity to point out that I believe this Commission 2 3 has a very long history of carefully reviewing rate case expense requests by all parties that are involved, and I 4 can think of a number of instances in the past where we 5 have reduced the amount of rate case expense that had 6 7 been requested, and I have complete confidence that that is a practice that will continue. 8 9 CHAIRMAN BROWN: Excellent. Thank you, 10 Commissioner Edgar. 11 Any other comments before we vote? Okay. 12 have a motion and a second. All those in favor, say 13 aye. 14 (Vote taken.) 15 Opposed? The motion passes. Thank you, thank 16 you, parties, for being here today. MS. MAPP: Chairman? 17 CHAIRMAN BROWN: Yes. 18 19 MS. MAPP: Do you also approve staff's oral 20 modification? 21 CHAIRMAN BROWN: Of course, that was in the 22 motion. 23 Thank you. MS. MAPP: 24 CHAIRMAN BROWN: Thank you. 2.5 (Agenda item concluded.)

1	STATE OF FLORIDA )					
2	: CERTIFICATE OF REPORTER COUNTY OF LEON )					
3						
4	I, LINDA BOLES, CRR, RPR, Official Commission					
5	Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.					
6						
7	IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this					
8	transcriped under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.					
9	I FURTHER CERTIFY that I am not a relative,					
10	employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties'					
11	attorney or counsel connected with the action, nor am I financially interested in the action.					
12	_					
13	DATED THIS 15th day of July, 2016.					
14						
15	Linda Boles					
16	LINDA BOLES, CRR, RPR					
17	FPSC Official Hearings Reporter (850) 413-6734					
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	IES, INC. OF FLORIDA - MARION COUNTY R REVENUE REQUIREMENTS INCREASE		SCHEDULE NO. 1 DOCKET NO. 150269-WS
WAIL	THE TENDE RECOMENTER IS MERCEASE	UTILITY	STAFF
		FILING	RECOMMENDATION
N			
Line N		6212.070	¢242.070
1	Utility Plant in Service (UPIS)	\$313,978	\$313,978
2	Retirements	(2.554)	/2 654
3	Accumulated Depreciation	(3,651)	(3,651
4	Contributions in Aid of Construction (CIAC)	-	-
5	Accumulated Amortization of CIAC	-	
6	Cash Working Capital	452	289
7	Total Increase in Rate Base	\$310,779	\$310,616
8	Weighted Cost of Capital	8.03%	7.68%
9	Return Required	\$24,968	\$23,855
10	Increase in Depreciation Expenses Due to UPIS Increase	\$7,302	\$7,302
11	Decrease in Depreciation Expense Due to Retirements	_	-
12	Increase in CIAC Amortization	-	_
13	Increase in Rate Case Expense	3,619	2,312
14	Increase in Taxes Other Than Income Taxes	5,170	5,170
15	Total Increase in Operating Expenses Before Income Taxes	\$16,091	\$14,784
16	Total Taxable Income	\$24,968	\$15,127
17	Multiply by State Income Tax (5.5%)	1,373	832
18	Total Federal Taxable Income	\$23,595	\$14,295
19	Multiply by Federal Income Tax (34%)	8,022	4,860
20	Total Revenue Increase Before RAF (L9 + L15 + L17 + L19)	\$50,454	\$44,332
21	Multiply by RAF (4.5%)	2,270	1,995
22	Total Water Revenue Increase	\$52,725	\$46,327
23	Annualized Revenues	\$155,831	\$158,277
24	Percentage Increase in Rates	33.83%	29.27%
25	4 Year Rate Reduction (Rate Case Expense)		\$2,416

UTILITIES, INC. OF FLORIDA - SEMINOLE COUNTY WATER REVENUE REQUIREMENTS INCREASE		SCHEDULE NO. 2 DOCKET NO. 150269-WS		
WAILK	REVEROE REGUIREMENTS INCREASE	UTILITY	STAFF	
		FILING	RECOMMENDATION	
Line No				
1	Utility Plant in Service (UPIS)	\$98,033	\$98,033	
2	Retirements	-	-	
3	Accumulated Depreciation	(1,400)	(1,400)	
4	Contributions in Aid of Construction (CIAC)	(1,400)	(2,100)	
5	Accumulated Amortization of CIAC		_	
6	Cash Working Capital	499	272	
7	Total Increase in Rate Base	\$97,132	\$96,905	
8	Weighted Cost of Capital	8.03%	7.68%	
9	Return Required	\$7,804	\$7,442	
10	Increase in Depreciation Expenses Due to UPIS Increase	\$2,801	\$2,801	
11	Decrease in Depreciation Expense Due to Retirements	-	-	
12	Increase in CIAC Amortization	-	-	
13	Increase in Rate Case Expense	3,992	2,180	
14	Increase in Taxes Other Than Income Taxes	2,269	1,495	
15	Total Increase in Operating Expenses Before Income Taxes	\$9,062	\$6,476	
16	Total Taxable Income	\$7,804	\$4,719	
17	Multiply by State Income Tax (5.5%)	429	260	
18	Total Federal Taxable Income	\$7,374	\$4,460	
19	Multiply by Federal Income Tax (34%)	2,507	1,516	
20	Total Revenue Increase Before RAF (L9 + L15 + L17 + L19)	\$19,802	\$15,694	
21	Multiply by RAF (4.5%)	891	706	
22	Total Water Revenue Increase	\$20,693	\$16,400	
23	Annualized Revenues	\$980,373	\$1,001,476	
24	Percentage Increase in Rates	2.11%	1.64%	
25	4 Year Rate Reduction (Rate Case Expense)		\$2,278	