

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Lake Region Water & Sewer)	File No. SR-2010-0110
Company's Application to Implement a General)	Tariff No. YS-2010-0250
Rate Increase in Water & Sewer Service)	

In the Matter of Lake Region Water & Sewer)	File No. WR-2010-0111
Company's Application to Implement a General)	Tariff No. YW-2010-0251
Rate Increase in Water & Sewer Service)	

RECONCILIATION

COME NOW the Staff of the Missouri Public Service Commission (Staff) and states:

1. Attached as Appendix A is an updated reconciliation of (1) Staff, (2) Office of Public Counsel, and (3) Lake Region Water & Sewer Company.

WHEREFORE the Staff submits the attached Reconciliation.

Respectfully submitted,

/s/ Jaime N. Ott

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of June 2010.

/s/ Jaime N. Ott

**Lake Region Water & Sewer Company
Case Nos. WR-2010-0110 & SR-2010-0111**

**TRUE-UP Reconciliation Updated and Revised for June 24 hearings as
Requested by the Commission**

	<u>Shawnee Bend Water</u>	<u>Shawnee Bend Sewer</u>	<u>Horseshoe Bend Sewer</u>
Revenue Requirement at Time of True-Up Direct Filed April 16, 2010	\$19,372	\$101,204	\$32,394
Revenue Requirement at Time of True-Up Hearings corrected-- April 21, 2010:	\$23,078	\$105,533	\$41,120

Commission Requested Most Current Reconciliation--

Revenue Requirement at Time of True-UP Hearings Corrected-- May 18th	\$22,252	\$112,327	\$44,552
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TRUE-UP ISSUES:

1a. Availability Charges (Fees)¹

Company	--\$0--	--\$0--	--\$0--
Staff	(129,600)	(194,400)	--0--
Public Counsel	(154,200)	(231,300)	--0-- (A)
(A) No Availability Charges for Horseshoe Bend Sewer			

The above amounts of Availability Charges for Staff and Public Counsel would result in a reduction to the above true-up revenue requirement amounts depending on which position the Commission adopts for this issue. Staff amounts reflect a reduction for

¹ Lake Region does not agree that availability charges constitute a relevant issue in this proceeding for any purpose and objects to any reconciliation including estimates of those charges as part of the case. Lake Region further objects to the alternative set out in the surrebuttal testimony of Mr. Featherstone as it depends upon analysis of availability fees.

uncollectibles of 10% cited by Lake Region at the evidentiary hearings March 31, 2010. Public Counsel's position is advocating that no reduction be made for uncollectibles.

If the Commission adopts the Company's position no reduction to the above revenue requirements is necessary.

Staff is not advocating that the inclusion of the Availability Charges result in a rate reduction, but eliminating any resulting rate increase for the Shawnee Bend Water and Sewer operating systems as follows:

UPDATED for Commission Request---

Revenue Requirement at
Time of True-Up Hearings
corrected-- April 21, 2010--
corrected-- May 18th

	\$22,252	\$112,327	\$44,552
Staff	<u>(129,600)</u>	<u>(194,400)</u>	<u>--0--</u>
Net Rate Increase/ (Decrease)	--0--	--0--	\$44,552

Staff is recommending Scenario 3 be used to determine rates in the Lake Region rate case filings presented in the June 7, 2010 Report filed with the Commission in response to the April 8 and May 27, 2010 Orders

Pubic Counsel is advocating that the availability fees result in a reduction to Lake Region's Shawnee Bend Water and Sewer rates as follows:

Revenue Requirement at
Time of True-Up Hearings
corrected-- April 21, 2010
and corrected-- May 18th

	\$22,252	\$112,327	\$44,552
Public Counsel	<u>(154,200)</u>	<u>(231,300)</u>	<u>--0--</u>
Net Rate Increase/ (Decrease)	(\$131,948)	(\$118,973)	\$ 44,552

b. In the alternative, if the Commission does not treat Availability Charges in the Lake Region rate structure, Staff is proposing to treat Lake Utility Availability as a separate entity assigning certain costs to it through a re-allocation of these costs that have initially been assigned to Lake Region in the above true-up revenue requirements at true-up hearing. As presented in Staff surrebuttal [Featherstone surrebuttal- page 19 & Featherstone True-Up direct page 39] there is a \$17,493 reduction in executive management compensation and payroll costs broken out as:

Operating System	Payroll Allocation	Amount of cost reduction assigned to each operating system
Shawnee Bend Water	25.5%	(\$4,461)
Shawnee Bend Sewer	26.8%	(4,688)
Horseshoe Bend Sewer	<u>47.7%</u>	<u>(8,344)</u>
Total Cost Reduction	100.0%	(\$17,493)

The above amounts would be a reduction to each of the three Lake Region operating systems if the Commission excludes Availability Charges in the rate structure but adopts Staff's alternative position.

Public Counsel reserves the right to address Staff's alternative position regarding Availability Charges at a later date.

2. Executive Management--

Compensation/ Management Fees (True-up did not change amounts identified in the Original Reconciliation filed March 19, 2010)

	Shawnee Bend Water <u>25.5%</u>	Shawnee Bend Sewer <u>26.8%</u>	Horseshoe Bend Sewer <u>47.7%</u>	Total <u>100%</u>
Company	\$25,422	\$26,718	\$47,555	\$99,695
Revised Position at Hearings	\$12,711	\$13,359	\$23,777	\$49,848
Staff	7,115	7,477	13,309	27,901
Public Counsel	200	200	200	600

The amount of executive management compensation for Staff is reflected in each of the operating systems for the starting true-up revenue requirements at true-up hearings above.

If the Commission adopts the Company position the difference between Staff and Company would be added to the above starting true-up revenue requirements at time of true-up hearings for each of the operating systems.

If the Commission adopts Public Counsel's position the difference between Staff and Public Counsel would be subtracted from the above starting true-up revenue requirements at time of true-up hearings for each of the operating systems.

3. Rate Case Expense (Issue Presented at True-Up Hearings)

Company (3-year recovery)	Total \$42,997 amortized 3-year
	Annual \$14,332 (Summers True-up p 2) allocated 1/3 to each operating entity:
	Shawnee Bend Water \$4,777
	Shawnee Bend Sewer \$4,777
	Horseshoe Bend Sewer \$4,777
Staff (3-year recovery)	Total \$22,498 amortized 3-year
	Annual \$7,499 (EMS Runs) allocated 1/3 to each operating entity:
	Shawnee Bend Water \$2,500
	Shawnee Bend Sewer \$2,500
	Horseshoe Bend Sewer \$2,500
Public Counsel (5-year recovery)	Total \$25,830 amortized 5-year
	Annual \$5,166 (Robertson True-up p 2) allocated 1/3 to each operating entity:
	Shawnee Bend Water \$1,722
	Shawnee Bend Sewer \$1,722
	Horseshoe Bend Sewer \$1,722

(Public Counsel proposes disallowance of certain costs)

The amount of rate case expense for Staff is reflected in each of the operating systems for the starting true-up revenue requirements at true-up hearings above. Staff has not changed its position on rate case expense since the true-up. However, both Lake Region and Public Counsel have made adjustments to reflect rate case invoices received post the true-up hearing.

If Commission adopts Company's position the difference between Staff and Company annual totals (allocated 1/3 to each operating system) would be added to the above starting true-up revenue requirements for each operating system at the time of true-up hearings.

If the Commission adopts Public Counsel's position the difference between Staff and Public Counsel annual totals (allocated 1/3 to each operating system) would be subtracted from the above starting true-up revenue requirements for each operating system at the time of true-up hearings.