Preparing Water and Sewer Advice Letters per General Order 96-B

Fred L. Curry

Introduction

- Steps in Preparing Advice Letters and Resolutions
- General Order 96-B
- U-8-W

Agenda

- An Advice Letter is a legal document that requests something from the Commission
- Has both format and minimum requirements
- Must be complete or it will be rejected
- Has three levels of review
- Approval and Effective Dates
- Other details

What is an Advice Letter?

- Normally changes tariff sheets
- Must meet certain requirements



Format and Requirements

- Content
- Numbering
- Justification
- Work Papers
- Service List
- Cover Sheet

Look at CPI Advice Letter

1. Master CPI Advice Letter with tariffs.doc

Cover Sheet

Cover Sheet.doc

Three Levels of Review

- Tier 1 Compliance
- Tier 2 Staff has clear standard of review
- Tier 3 Requires a resolution

Approval and Effective Dates

- Ask for what you want
- Dates can be anytime

Types of Advice Letters

- Memorandum Account
- Expense Offset
- Rate Base Offset
- General Rate Case

Summary of Earnings

- Lets do an Earnings Test
- 2. Master Earnings Test.xlsx
- Now Let's Do A CPI Earnings Test
- 3. Master CPI Earnings Test.xlsx

Memorandum Accounts

- First Set up the Account
- Meadow Valley\Meadow Valley AL 14,
 Memorandum and Balancing
 Accounts.docx
- Then Ask for Recovery
 - 2% in one year
 - 5-10% in two years
 - Over 10% in three years

Memorandum Accounts

- Done By Surcharge
- Include Additional Expenses that you incur by changing rates.

Expense Offset

- Changes to Deductable Expenses Only
- 3. Master Expense Offset Workpapers.xlsx

Rate Base Offset

- Requires Calculation of Income Taxes
- Tax on Tax, calculated by 1/Tax Rate
- Hard to calculate if it varies with income
- 4. Master Rate Base Offset Workpapers
 Class D with an earnings test.xlsx

General Rate Case

- Two Sets of Workpapers
- Class D − 5 Sheets
- Class B and C − 63 Sheets
- Class D
- 6. Master Class D GRC Workpapers.xlsx
- Class B and C
- 7. Master Class B and C Rate Adjustment Workbook.xlsx

Summary

- Advice Letters can help you
- Don't ignore the increases you deserve
 - CPI
 - Rate Base Offset
 - Memorandum Accounts
- Request Help if you need it
 - CPUC
 - Consultants