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

Fred L. Curry

#### Introduction

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

## Agenda

- Advice Letter is a legal document that request something from the Commission
- It has a format and minimum requirements
- Must be complete or it is to 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