

BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of
Long Island American Water
Case 11-W-0200
September 2011

Prepared Exhibit of:

Tshepo Simpson
Senior Auditor
Office of Accounting & Finance
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

STAFF OF THE DEPARTMENT OF PUBLIC SERVICE
INTERROGATORY/DOCUMENT REQUEST
LONG ISLAND AMERICAN WATER

Request No.: STAFF-123 TJS-11
Requested By: Tshepo Simpson
Date of Request: July 7, 2011
Response Due: July 17, 2011
Witness: James G. Bozman
Subject: Rate Case Expense

Follow-up to company's responses to Staff-58 (TJS-3)

Please provide any supporting documentation and rationale for the Revenue Requirement costs included in Rate Case Expense.

Response:

The revenue requirement line item consists of labor and labor related charges performed by Service Company personnel, specifically the Shared Services Center Rates group, who assist with the preparation and filing of the rate case. The work product consists of exhibits, testimony and work papers required to file the rate cases as well as responding to information requests and discovery pertaining to the rate case. The Company proposes to update this expense for actual expenses incurred. The hours and titles of the Service Company employees charging time are below through May 2011.

Financial Analyst I (Rates)	72
Financial Analyst II (Rates)	12
Financial Analyst III (Rates)	1,349
Team Lead Rates	32
Mgr Rates	248
Sr Mgr Rates	<u>32</u>
Total	1,745

STAFF OF THE DEPARTMENT OF PUBLIC SERVICE
INTERROGATORY/DOCUMENT REQUEST
LONG ISLAND AMERICAN WATER

Request No.: STAFF-124 TJS-12
Requested By: Tshepo Simpson
Date of Request: July 7, 2011
Response Due: July 17, 2011
Witness: George Conroy
Subject: Leased Vehicles

Please provide the fuel costs associated with leased vehicles expense for the fiscal years 2008 and 2009.

Response:

The fuel costs associated with leased vehicles for the calendar years 2008 and 2009 were \$216,423 and \$152,443, respectively.

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INTERROGATORY/DOCUMENT REQUEST
LONG ISLAND AMERICAN WATER

Request No.: STAFF-152 TJS-13
Requested By: Tshepo Simpson
Date of Request: July 25, 2011
Response Due: August 5, 2011
Witness: George Conroy
Subject: Leased Vehicles

Does the Company keep records of the amount of fuel consumed/purchased? If so, please provide the amounts for the years 2008-2011.

Response:

Fuel Units for the years 2008 through 2011 are listed below:

2008 (12 Months) - 57,762 gallons
2009 (12 Months) - 58,245 gallons
2010 (12 Months) - 56,918 gallons
2011 (6 Months) - 23,158 gallons

STAFF OF THE DEPARTMENT OF PUBLIC SERVICE
INTERROGATORY/DOCUMENT REQUEST
LONG ISLAND AMERICAN WATER

Request No.: STAFF-153 TJS-14
Requested By: Tshepo Simpson
Date of Request: July 25, 2011
Response Due: August 5, 2011
Witness: James G. Bozman
Subject: Rate Case Expense

Please provide any documentation regarding the inclusion of a Service Company Study with the rate case. Was the Company ordered to provide a study in compliance with a previous rate case?

Response:

The Market Cost Comparison of Service Company Charges to LIAW is conducted to provide a market based comparison of the charges incurred by LIAW from its affiliate to prove the costs are reasonable and below the cost of the actual market. The precise objectives of this study are set out in Mr. Baryenbruch's testimony at p. 2, line 17 to p. 3, line 5. The Company was not ordered to provide this study.

STAFF OF THE DEPARTMENT OF PUBLIC SERVICE
INTERROGATORY/DOCUMENT REQUEST
LONG ISLAND AMERICAN WATER

Request No.: STAFF-169 TJS-18
 Requested By: Tshepo Simpson
 Date of Request: August 10, 2011
 Response Due: August 22, 2011
 Witness: James G. Bozman
 Subject: Rate Case Expense

Follow-up to company's response to Staff-58 (TJS-3)

Please provide actual costs for 2011 rate case expenses from the month ending June 30, 2011 to latest known (provide monthly updates when available). Provide any supporting documentation.

Response:

The costs to date for the 2011 rate case through July 31, 2011 are \$277,954. Please see the attached schedule for the breakdown by category. Attached is the supporting documentation for AUS-Cost of Capital, Harris Beach-Legal and the miscellaneous category.

	Thru	Activity	Activity	
<u>2011 Rate Case</u>	<u>05/31/11</u>	<u>06/30/11</u>	<u>07/31/11</u>	<u>Total</u>
Legal	\$14,998	\$22,254	\$7,254	\$44,506
Consultant - Cost of Capital	16,048	993	2,666	19,707
Revenue Requirement	133,887	13,702	10,993	158,582
Service Company Study	42,874	-	-	42,874
Miscellaneous	1,235	10,796	254	12,285
Litigation Contingency	-	-	-	-
Total	<u>\$209,042</u>	<u>\$47,745</u>	<u>\$21,167</u>	<u>\$277,954</u>