FILED
August 12, 2016
INDIANA UTILITY
REGULATORY COMMISSION

BEFORE THE

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF CITIZENS WASTEWATER OF WESTFIELD, LLC FOR (1) AUTHORITY TO INCREASE RATES AND CHARGES FOR WASTEWATER UTILITY SERVICE AND APPROVAL OF A NEW SCHEDULE OF RATES AND CHARGES; AND (2) APPROVAL OF CERTAIN REVISIONS TO ITS TERMS AND CONDITIONS APPLICABLE TO WASTEWATER UTILITY SERVICE	)	**CAUSE NO. 44835**

WORKING PAPERS SUBMITTED PURSUANT TO COMMISSION'S RECOMMENDED BEST PRACTICES FOR RATE CASES (GAO 2013-5)

VOLUME I

170 IAC 1-5-6 through
170 IAC 1-5-8

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(1) Comparative financial statements including the following:

(A) Balance sheets as of the last day of the following:

(i) The test year.

(ii) The twelve (12) month period immediately prior to the test year.

(B) A statement of cash flow for the test year.

(C) Income statements for the following:

(i) The test year.

(ii) The twelve (12) month period immediately prior to the test year.

Westfield Wastewater
170 IAC 1-5-6 (1)(A)
Statements of Financial Position
as of December 31

Line No.		2015	2014
	Assets		
	Utility Plant:		
	Plant in service at original cost		
1	Utility plant in service	$ 88,841,680	$ 87,095,472
2	Accumulated depreciation	(22,397,636)	(20,235,086)
3	Net plant in service at original cost	66,444,044	66,860,386
4	Acquisition adjustment, net	8,093,548	8,292,769
5	Net plant in service	74,537,592	75,153,155
6	Construction work in progress	4,700,921	1,107,598
7	Net Utility Plant	79,238,513	76,260,753
	Current Assets:		
8	Cash on hand	1,423,251	1,289,224
9	Accounts receivable, net	929,979	734,857
10	Accrued utility revenue	590,203	352,209
11	Other receivables	-	1,167,514
12	Prepayments and deposits	26,403	30,560
13	Total Current Assets	2,969,836	3,574,364
14	Deferred Charges	207,878	272,381
15	Total Assets	$ 82,416,227	$ 80,107,498
	Capitalization and Liabilities		
	Capitalization:		
16	Retained earnings	$ 1,539,989	$ 1,019,259
17	Additional paid-in capital	44,622,492	44,622,492
18	Total Equity	46,162,481	45,641,751
19	Long-Term Debt	15,270,000	15,270,000
20	Total Capitalization	61,432,481	60,911,751
	Non-Current Liabilities:		
21	Contributions in Aid of Construction	17,893,666	17,338,163
22	Other Non-Current Liabilities	597,417	164,272
23	Total Non-Current Liabilities	18,491,083	17,502,435
	Current Liabilities:		
24	Short term borrowings	1,000,000	1,000,000
25	Accounts payable and accrued expenses	1,492,663	693,312
26	Total Current Liabilities	2,492,663	1,693,312
27	Total Capitalization and Liabilities	$ 82,416,227	$ 80,107,498

Westfield Wastewater
170 IAC 1-5-6 (1)(A)
Statements of Financial Position
as of December 31

wp 103

	2015	2014
Assets		
Utility Plant:		
Utility Plant in Service		
101100 Plant in Service	88,841,680.15	87,095,472.09
Accumulated Depreciation		
108100 Accumulated Depreciation	(22,397,636.35)	(20,235,086.48)
Net Plant in Service	66,444,043.80	66,860,385.61
Acquisition adjustment, net		
114010 Utility Plant Acquisition Adjustment	8,447,539.22	8,447,539.22
115010 Accumulated Amortization of Acquisition Adjustment	(353,990.76)	(154,770.50)
Net plant in service	74,537,592.26	75,153,154.33
Construction Work in Progress		
105010 Construction Work in Progress	4,673,212.82	1,005,405.02
106010 Completed Construction not Classified	27,708.00	102,193.00
Net Utility Plant	79,238,513.08	76,260,752.35
Current Assets:		
Cash and Short-Term Investments		
131230 Cash	72,355.57	594,469.68
131236 Cash - BMO Harris Bank Account Clearing	1,350,895.31	694,754.25
Accounts Receivable, net		
141050 Accounts Receivable - Customers	995,186.94	809,429.60
141051 Cash Clearing	1,295.81	(37,247.38)
142001 Accounts Receivable - Misc.	86.11	-
143001 Accumulated Provision for Uncollectible Accounts	(66,590.00)	(37,325.00)
Accrued Utility Revenue		
173100 Accrued Utility Revenue - Unbilled Revenue	590,203.00	352,209.00
Other Receivables		
233010 Intercompany A/P and A/R	-	1,167,514.41
Prepayments and Deposits		
162010 Prepaid - Insurance	26,403.12	30,560.07
Total Current Assets	2,969,835.86	3,574,364.63
Deferred Charges:		
181269 Bond Issuance Expense Westfield Wastewater 2014 Utility Bon	207,877.54	272,380.51
Total Deferred Charges	207,877.54	272,380.51
Total Assets and Other Debits	82,416,226.48	80,107,497.49
Capitalization and Liabilities		
Capitalization:		
Retained Earnings		
215100 Retained Earnings	(3,895,839.61)	(1,454,493.84)
215140 Distributions	3,181,295.00	1,071,295.00
Undistributed Retained Earnings	(825,444.39)	(636,060.30)
Additional Paid-in Capital		
211100 Additional Paid-In Capital	(44,622,491.68)	(44,622,491.68)
Long-Term Debt		
221269 Bonds - Westfield Wastewater 2014 Utility Bonds	(15,270,000.00)	(15,270,000.00)
Total Capitalization	(61,432,480.68)	(60,911,750.82)
Non-Current Liabilities:		
Contributions in Aid of Construction		
271010 Contributions in Aid of Construction	(22,423,885.06)	(21,323,825.96)
272010 Accumulated Amortization for CIAC	4,530,219.38	3,985,663.39
Other Long-Term Liabilities		
252100 Customer Advances for Construction	(421,080.00)	-
253210 Derivative Liability	(176,337.00)	(164,272.00)
Total Non-Current Liabilities	(18,491,082.68)	(17,502,434.57)
Current Liabilities:		
Short-Term Borrowings		
232109 PNC Bank Line of Credit - Westfield Wastewater	(1,000,000.00)	(1,000,000.00)
Accounts Payable and Accrued Expenses		
231010 Accounts Payable	(308,133.91)	(432,531.36)
231013 Accounts Payable - PO Receipt Accrual	-	(5,589.03)
233010 Intercompany A/P and A/R	(212,435.93)	
237142 Accrued Interest - Westfield Utilities 2014 Utility Bonds	(581.76)	-

237222 Accrued Interest - PNC Line of Credit	(7,312.95)	-
237267 Accrued Interest - Westfield Utilities 2014 Utility Bonds	(40,144.66)	(40,144.66)
241010 Accrued Payroll Earnings	(4,142.10)	(3,743.85)
241012 Accrued Employer Thrift Plan Contribution	(659.45)	(318.00)
241017 Misc. Current Liabilities Other	(311,621.47)	(133,546.56)
241020 Accrued Incentive Plan-Short Term	(11,701.89)	(11,784.00)
236110 Accrued Taxes - IN Employment Security Tax	-	(85.08)
236111 Accrued Taxes - Employer FICA Tax	(2,187.81)	(1,178.28)
236116 Accrued Taxes - IN Utilities Receipts Tax	(9,221.19)	(64,391.28)
236117 Accrued Taxes - Property Tax	(584,520.00)	-
Total Current Liabilities	(2,492,663.12)	(1,693,312.10)
Total Capitalization and Liabilities	(82,416,226.48)	(80,107,497.49)

Westfield Wastewater
170 IAC 1-5-6 (1)(B)
Statement of Cash Flow
12 months ended December 31, 2015

Line No.			
	Operating Activities:		
1	Net income	$	2,630,730
2	Depreciation and amortization		1,918,822
	Changes in operating assets and liabilities:		
3	Accounts receivable and accrued utility revenue		(433,116)
4	Prepayments and deposits		4,157
5	Accounts payable and accrued expenses		1,624,786
6	Other long-term liabilities		433,145
7	Net cash provided by operating activities		6,178,524
8	Investing Activities:		(5,623,417)
9	Financing Activities:		(421,080)
10	Net change in cash and cash equivalents		134,027
11	Cash and cash equivalents at beginning of period		1,289,224
12	Cash and cash equivalents at end of period	$	1,423,251

Westfield Wastewater
Statements of Operations
12 months ended December 31

Line No.			2015	2014
1	Operating Revenues	$	9,432,070	
	Operating Expenses:			
2	Operations & maintenance		3,520,214	
3	Depreciation & amortization		2,006,556	Not available*
4	Taxes		723,122	
5	Total Operating Expenses		6,249,892	
6	**Operating Income**		**3,182,178**	
7	Other Income (Expense), Net		864	
8	Interest Charges		552,312	
9	**Net Income**	**$**	**2,630,730**	

* Comparative statements for the twelve months ended December 31, 2014 are not available. Citizens Wastewater of Westfield was acquired on March 21, 2014.

Westfield Wastewater **wp 104**
170 IAC 1-5-6 (1)(C)
Statements of Operations - by GL account
for the 12 months ended December 31

	2015	2014
Operating Revenues		
521110 Flat Rate Revenues-Residenti	(221,410.59)	n/a - not in
521210 Flat Rate Revenues-Commercia	(31,362.96)	operation for 12 months
521510 Flat Rate Revenues-Multiple	(5,949.00)	
522110 Measured Revenue-Residential	7,528,369.13	
522210 Measured Revenue-Commercial	2,093,032.77	
522410 Measured Revenue-Public Auth	-	
522510 Measured Revenue-Multiple Fa	22,560.00	
532010 Late Payment Charges	40,669.04	
536010 Other Wastewater Revenues	6,161.88	
	9,432,070.27	
Operating Expenses		
Operations & maintenance		
701011 Salary - Collection Exp, Ops	207,160.79	
701021 Salary - Collection Exp, Mtc	(16.15)	
701031 Salary - Pumping Exp, Ops	(109.97)	
701041 Salary - Pumping Exp, Mtce	-	
701051 Short-Term Incentive Plan	9,838.09	
701053 Salary - T&D, Primary, Ops	303,398.19	
701063 Salary - T&D, Primary, Mtce	1,181.58	
701071 Salary - Customer Accts	126,876.61	
701081 Salary - Admin & General	555,356.31	
704011 Benefits - Collection Exp, O	11.78	
704053 Benefits - T&D, Primary, Ops	421.78	
704063 Benefits - T&D, Primary, Mtc	2.17	
704071 Benefits - Customer Accts	37.16	
704081 Benefits - Admin & General	29,994.78	
711063 Sludge Removal - T&D, Primar	167,234.33	
715011 Prch Pwr - Collection Exp, O	65,741.43	
715053 Prch Pwr - T&D, Primary, Ops	265,920.84	
715081 Prch Pwr - Admin & General	5,422.54	
716053 Fuel-Pwr - T&D, Primary, Ops	2.82	
718021 Chemicals - Collection Exp,	54,901.90	
718053 Chemicals - T&D, Primary, Op	58,678.47	
720011 Mat/Sply - Collection Exp, O	5,506.72	
720021 Mat/Sply - Collection Exp, M	17,721.94	
720041 Mat/Sply - Pumping Exp, Mtce	362.44	
720053 Mat/Sply - T&D, Primary, Ops	3,118.02	
720055 Mat/Sply - T&D, Secondary, O	10,595.60	
720063 Mat/Sply - T&D, Primary, Mtc	30,328.04	
720065 Mat/Sply - T&D, Secondary, M	12,021.03	
720071 Mat/Sply - Customer Accts	2,245.57	
720081 Mat/Sply - Admin & General	68,555.51	
732081 OS-Acct - Admin & General	9,870.02	
733081 OS-Lgl - Admin & General	17,735.97	
736011 OS-Other - Collection Exp, O	189,047.66	
736021 OS-Other - Collection Exp, M	78,291.93	
736053 OS-Other - T&D, Primary, Ops	701,062.64	
736055 OS-Other - T&D, Secondary, O	9,920.00	
736063 OS-Other - T&D, Primary, Mtc	5,625.00	
736065 OS-Other - T&D, Secondary, M	-	
736071 OS-Other - Customer Accts	40,432.83	
736081 OS-Other - Admin & General	180,521.89	
741011 Rent-Prop - Collection Exp,	4.24	
741053 Rent-Prop - T&D, Primary, Op	9,283.00	
741081 Rent-Prop - Admin & General	6,595.40	
742021 Rent-Eq - Collection Exp, Mt	58.85	
742063 Rent-Eq - T&D, Primary, Mtce	1,487.75	
742065 Rent-Eq - T&D, Secondary, Mt	-	
742081 Rent-Eq - Admin & General	2,679.51	
750011 Transp - Collection Exp, Ops	16,399.77	
750021 Transp - Collection Exp, Mtc	88.68	

750053 Transp - T&D, Primary, Ops	10,312.04
750063 Transp - T&D, Primary, Mtce	-
750071 Transp - Customer Accts	30.45
750081 Transp - Admin & General	877.03
757081 Ins-Gen - Admin & General	12,714.42
758081 Ins-WC - Admin & General	3,985.23
759081 Ins-Other - Admin & General	33,675.70
760081 Advertising Expense - Admin	2,986.68
770071 Bad Debt Expense - Customer	29,265.00
775011 Misc - Collection Exp, Ops	74.97
775021 Misc - Collection Exp, Mtce	436.21
775053 Misc - T&D, Primary, Ops	7,684.55
775063 Misc - T&D, Primary, Mtce	1.73
775071 Misc - Customer Accts	62,128.50
775081 Misc - Admin & General	48,290.17
775085 Bank Fees	36,135.79
	3,520,213.93
Depreciation and Amortization	
403001 Amortization CIAC	(544,555.99)
403010 Depreciation	2,351,891.93
406010 Amortization Acquisition Adj	199,220.26
Taxes	
408111 Tax Expense - Property	589,423.71
408121 Tax Expense - FICA	2,585.53
408131 Tax Expense - Indiana Utilit	131,055.73
408132 Tax Expense - Misc.	56.72
Total Operating Expenses	6,249,891.82
Total Operating Income (Loss)	3,182,178.45
Other Income (Expense)	
Other, net	
416040 Service Appliance-No Charge	0.26
421010 Misc. Non-Operating Income	863.55
Total Other Income (Expense)	863.81
Interest Charges	
427320 Westfield Wastewater 2014 Ut	447,710.89
427321 Interest Expense - PNC Swap	12,065.00
428030 Bond Issuance Expense	64,502.97
420010 Allowance for Funds Used Dur	(467.57)
427200 Line of Credit Interest Expe	28,501.11
Total Interest Charges	552,312.40
Net Income	2,630,729.86

Westfield Wastewater **wp 105**
170 IAC 1-5-6 (1)(C)
Statements of Operations - by NARUC subaccount
for the 12 months ended December 31

	2015	2014
Operating Revenues		
Flat Rate Revenues	(258,722.55)	
Measured Revenue	9,643,961.90	n/a - not in
Other Wastewater Revenues	46,830.92	operation for 12 months
Total Operating Revenues	9,432,070.27	
Operating Expenses		
Operations & maintenance		
Collection-Operations	483,947.36	
Collection-Maintenance	151,483.36	
Pumping-Operations	(109.97)	
Pumping-Maintenance	362.44	
Treat & Disp-Operations	1,390,236.04	
Treat & Disp-Maintenance	217,881.63	
Customer Accounts	261,016.12	
Admin & General	1,015,396.95	
Total operations & maintenance	3,520,213.93	
Depreciation	1,807,335.94	
Amortization of Acquisition Adjustment	199,220.26	
Taxes	723,121.69	
Total Operating Expenses	6,249,891.82	
Total Operating Income (Loss)	3,182,178.45	
Other Income (Expense), net	863.81	
Interest Charges	552,312.40	
Net Income	2,630,729.86	

Westfield Wastewater **wp 104**
170 IAC 1-5-6 (1)(C)
Statements of Operations - by NARUC account
for the 12 months ended December 31

	2015	2014
Operating Revenues		
Flat Rate Revenues	(258,722.55)	
Measured Revenue	9,643,961.90	n/a - not in
Other Wastewater Revenues	46,830.92	operation for 12 months
	9,432,070.27	
Operating Expenses		
Operations & maintenance		
Salaries & Wages	1,203,685.45	
Employee Pensions & Benefits	30,467.67	
Sludge Removal Expense	167,234.33	
Purchased Power	337,084.81	
Fuel for Power Production	2.82	
Chemicals	113,580.37	
Materials & Supplies	150,454.87	
Contractual Services-Accounting	9,870.02	
Contractual Services-Legal	17,735.97	
Contractual Services-Other	1,204,901.95	
Rental of Building/Real Property	15,882.64	
Rental of Equipment	4,226.11	
Transportation Expenses	27,707.97	
Insurance-General Liability	12,714.42	
Insurance-Workman's Comp	3,985.23	
Insurance-Other	33,675.70	
Advertising Expenses	2,986.68	
Bad Debt Expense	29,265.00	
Miscellaneous Expense	154,751.92	
Total operations & maintenance	3,520,213.93	
Depreciation	1,807,335.94	
Amortization of Acquisition Adjustment	199,220.26	
Taxes	723,121.69	
Total Operating Expenses	6,249,891.82	
Total Operating Income (Loss)	3,182,178.45	
Other Income (Expense), net	863.81	
Interest Charges	552,312.40	
Net Income	2,630,729.86	

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(2) Revenue requirement calculation.

Citizens Wastewater of Westfield, LLC
Index of Attachment KLK-1

Page No.	
Page 1	Test Year Statement of Income and Pro Forma Revenue Requirement
Page 2	Test Year and Pro Forma Billing Instances, Sales, and Revenues
Page 3 & 4	Pro Forma Revenue at Present Rates
Page 5 & 6	Change in Billing Instances & Volume Adjustment
Page 7 & 8	Change in Rate Adjustments
Page 9 & 10	Other Adjustments
Page 11	Computation of Pro Forma Other Revenues
Page 12	Computation of Pro Forma Other Operating Expenses
Page 13	Indiana Utility Regulatory Commission Fee Adjustment
Page 14	Indiana Utility Receipts Tax Adjustment
Page 15	Revenue Increase Adjusted for IURC Fee, IURT, and Net Write-Off Non-Gas Cost
Page 16	Net Write-Off Non-Gas Cost on Incremental Revenue
Page 17	Indiana Utility Regulatory Commission Fee on Incremental Revenue
Page 18	Indiana Utility Receipts Tax on Incremental Revenue

Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

Line No.		A Actual per Books	B Pro Forma Adjustments Increase (Decrease)	C Pro Forma Results Based on Current Rates	D Pro Forma Adjustments Increase (Decrease)	E Pro Forma Results Based on Proposed Rates	F Reference
	Operating Revenues						
1	Test Year Revenues	$9,432,070					Income Statement
2	Customer Number Volume Adjustment - Base Charge		$51,612				page 4 & 5
3	Customer Number Volume Adjustment - Treatment Charge Adj		7,076,054				page 4 & 5
4	Change in Rate Adjustment - Chg in Minimum Chrg Revenue		(484,580)				page 6 & 7
5	Change in Rate Adjustment - Chg in Monthly Treatment Rate		(6,315,772)				page 6 & 7
6	Unbilled		(237,994)				page 8 & 9
7	Rounding		1				-
8	Billing Correction Adjustment		18,330				page 8 & 9
9	Other Revenue		0				page 10
10	Revenue Requirement Increase				$2,412,841		page 14
11	Total Operating Revenues	$9,432,070	$107,651	$9,539,721	$2,412,841	$11,952,562	
	Other Operating Expenses						
12	Test Year Other Operating Expenses	$3,520,214					Income Statement
13	Amortized Regulatory Expense		63,500				page 11
14	Net Write-Off		18,434		12,064		page 11 & 15
15	Payroll		43,175				Attachment SEK-3
16	Payroll Taxes		3,589				Attachment SEK-3
17	Purchased Power		35,177				Attachment SEK-3
18	Purchased Wastewater Treatment		244,007				Attachment SEK-3
19	Normalized Expenses		24,644				Attachment SEK-3
20	Out of Period Expenses		(28,361)				Attachment SEK-3
21	Non-Recurring Expenses		(79,710)				Attachment SEK-3
22	Non-Allowed Expenses		(950)				Attachment SEK-3
23	IURC Fee		11,070		2,828		page 12 & 16
24	Total Other Operating Expenses	$3,520,214	$334,575	$3,854,789	$14,892	$3,869,681	
	Depreciation & Amortization						
25	Test Year Depreciation & Amortization	$2,006,556					Income Statement
26	Depreciation & Amortization Adjustment		482,983				Attachment SEK-3
27	Pro Forma Depreciation & Amortization	$2,006,556	$482,983	$2,489,539	$0	$2,489,539	
	Taxes						
28	Test Year Taxes	$723,122					Income Statement
29	Pro Forma Change in IURT		$2,076		$33,674		page 13 & 17
30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
31	**Operating Income**	$3,182,178	($711,983)	$2,470,195	$2,364,276	$4,834,471	

Annualized Test Year Revenues at Present Versus Proposed Rates
Citizens Wastewater of Westfield, LLC
Summary Schedule of all Rate Class Revenues

(A) Line Number	(B) Class Description	(C) Water Rate No.	(D) Test Year Billing Instances	(E) Test Year Billing Instances To Total	(F) Test Year Billed Volume in 1,000 gallons	(G) Test Year Billed Volume in 1,000 gallons %	(H) Test Year Revenues	(I) Percent of Revenue To Total	(J) Pro forma Billing Instances	(K) Pro forma Billing Instances To Total	(L) Pro Forma Billed Volume in 1,000 gallons	(M) Pro Forma Billed Volume in 1,000 gallons %	(N) Pro forma at Present Rates Revenue	(O) Percent of Revenue To Total	(P) Total Revenue Increase	(Q) Total Revenue Increase (%)
	Wastewater Billed															
1	Residential	1	125,008	93.87%	294,733	53.86%	$ 7,285,560	77.24%	127,492	93.94%	732,462	71.65%	$ 7,179,855	75.28%	$ (105,705)	-1.45%
2	Unmetered	1	238	0.22%	0	0.00%	21,398	0.23%	288	0.21%	0	0.00%	$ 22,781	0.24%	$ 1,382	N/A
3	Correction Factor	1	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	(2,692)	-0.03%	(2,692)	N/A
4	**Total Rate 1**		**125,246**	**93.87%**	**294,733**	**53.86%**	**$ 7,306,958**	**77.24%**	**127,780**	**94.16%**	**732,462**	**71.65%**	**$ 7,199,944**	**75.47%**	**$ (107,015)**	**-1.46%**
5	Commercial	2	7,871	5.91%	252,494	46.14%	2,061,669	21.80%	7,932	5.84%	289,836	28.35%	2,271,923	23.82%	210,254	10.20%
6	Multi Family	2	0	0.00%	0	0.00%	16,611	0.18%	0	0.00%	0	0.00%	0	0	(16,611)	-100.00%
7	Industrial	2	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0	0	0.00%
8	Public Authority	2	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0	0	0.00%
9	Correction Factor	2	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	21,023	0.22%	21,023	N/A
10	**Total Rate 2**		**7,871**	**5.91%**	**252,494**	**46.14%**	**$ 2,078,280**	**22.14%**	**7,932**	**5.84%**	**289,836**	**28.35%**	**$ 2,292,946**	**24.04%**	**$ 214,666**	**10.33%**
11	**Total Wastewater Billed**		**133,117**	**100.00%**	**547,227**	**100.00%**	**$ 9,385,238**	**99.50%**	**135,712**	**100.00%**	**1,022,298**	**100.00%**	**$ 9,492,890**	**99.51%**	**$ 107,652**	**1.15%**
	Other Revenues															
12	Forfeit Discount						$ 40,669	0.43%					$40,669	0.43%	$ 0	0.00%
13	Miscellaneous Revenues						6,162	0.07%					6,162	0.06%	$ (0)	0.00%
14	**Total Other Revenues**						**$ 46,831**	**0.50%**					**$ 46,831**	**0.49%**	**$ 0**	**0.00%**
15	**Pro Forma Total Operating Revenues**						**$ 9,432,070**	**100.00%**					**$ 9,538,721**	**100.00%**	**$ (107,652)**	**-1.13%**

Note: Unbilled Revenue is included in the TY Revenues

Annualized Test Year Revenues at Present Versus Proposed Rates
Citizens Wastewater of Westfield, LLC
Summary Schedule of all Rate Class Revenues

	Pro Forma Summary at Current Rates	(A) Cause No. 44273 Approved Rates	(B) Sources	(C) 2015 - 2016 Number & Type of Units	(D) Pro forma Revenues
	Sewer Rate 1 - Residential Sewage Disposal Service				
	Residential Base Charge Revenue				
1	Residential Base - 5/8" meter	$ 16.10 /month		123,329 services	$ 1,985,597
2	Residential Base - 1" meter	$ 16.10 /month		4,151 services	$ 66,831
3	Residential Base - 1 1/2" meter	$ 16.10 /month		12 services	$ 193
4	Residential Base - 2" meter	$ 16.10 /month		0 services	$ -
5	Residential Base - 3" meter	$ 16.10 /month		0 services	$ -
6	Residential Base - 4" meter	$ 16.10 /month		0 services	$ -
7	Residential Base - 6" meter	$ 16.10 /month		0 services	$ -
8	Residential Base - 8" meter	$ 16.10 /month		0 services	$ -
9	Total Residential Base Charge Revenue (sum of lines 1 thru 8)			127,492 services	$ 2,052,621
	Residential Volumetric Revenue				
10	First 5,000 gallons	$ 7.0000 Mgal		637,460 1,000 gal	4,462,220
11	Over 5,000 gallons	$ 7.0000 Mgal		95,002 1,000 gal	665,014
12	Total Residential Volumetric Revenue (line 10 + line 11)			732,462	$ 5,127,234
13	Unmetered Revenue	$ 79.10		288	$22,781
14	Total Rate 1 Pro Forma Revenue (line 9 + line 12 + line 13)				$ 7,202,636
15	Reconciliaton factor	0.999626			0.99963
16	Adjusted Total Rate 1 Pro Forma Revenue at Present Rates (line 14 * line 15)				$ 7,199,944
	Sewer Rate 2 - Non-Residential Sewage Disposal Service				
	Non-Residential Base Charge Revenue				
17	Non-Residential Base - 5/8" meter	$ 16.10 /month		3,151 services	$ 50,731
18	Non-Residential Base - 1" meter	$ 40.23 /month		2,440 services	$ 98,161
19	Non-Residential Base - 1 1/2" meter	$ 40.23 /month		141 services	$ 5,672
20	Non-Residential Base - 2" meter	$ 40.23 /month		2,152 services	$ 86,575
21	Non-Residential Base - 3" meter	$ 40.23 /month		0 services	$ -
22	Non-Residential Base - 4" meter	$ 40.23 /month		0 services	$ -
23	Non-Residential Base - 6" meter	$ 40.23 /month		0 services	$ -
24	Non-Residential Base - 8" meter	$ 40.23 /month		48 services	$ 1,931
25	Total Non-Residential Base Charge Revenue (sum of lines 17 thru 24)			7,932	$ 243,071
	Non-Residential Volumetric Revenue				
26	First 5,000 gallons (5/8" and 3/4" meters)	$ 7.00 Mgal		15,755 services	$ 110,285
27	Over 5,000 gallons (5/8" and 3/4" meters)	$ 7.00 Mgal		34,879 services	$ 244,153
28	First 12,000 gallons (1" and larger meters)	$ 7.00 Mgal		57,372 services	$ 401,604
29	Over 12,000 gallons (1" and larger meters)	$ 7.00 Mgal		181,830 services	$ 1,272,810
30	Total Non-Residential Volumetric Revenue (sum of lines 26 thru 29)			289,836	$ 2,028,852
31	Total Rate 2 Pro Forma Revenue (line 25 + line 30)				2,271,923
32	Reconciliaton factor	1.00925			1.00925
33	Adjusted Total Rate 2 Pro Forma Revenue at Present Rates (line 31 * line 32)				2,292,946
	Miscellaneous Revenue				
34	470010 - Forfeited Discounts				$40,669
35	471010 - Miscellaneous Revenue				$6,162
36	**Total Pro forma Revenue**				$ 9,539,721

Citizens Wastewater of Westfield, LLC
Billing Instances/Volume Adjustment

Line No		A 521110 Rate 1	B 522110 Rate 1	C Total Rate 1
	Customer Change			
1	Net Change in Annual Meter/Billing Instances	-	2,484	2,484
2	Test Year Average Fixed Charge	$74.30	$20.10	
3	Fixed Charge Adjustment	$0	$49,927	$49,927
	Volumetric Change			
4	Net Change in Annual Treatment CCF	-	437,729	437,729
5	Test Year Average Treatment Charge	$0.00	$15.55	
6	Treatment Charge Adjustment	$0	$6,808,110	$6,808,110

Citizens Wastewater of Westfield, LLC
Billing Instances/Volume Adjustment

Line No		A 521210 Rate 2	B 521310 Rate 2	C 521510 Rate 2	D 522210 Rate 2	E 522310 Rate 2	F 522410 Rate 2	G 522510 Rate 2	H Total Rate 2
	Customer Change								
1	Net Change in Annual Meter/Billing Instances	-	-	-	61	-	-	-	61
2	Test Year Average Fixed Charge	$0.00	$0.00	$0.00	$27.63	$0.00	$0.00	$0.00	
3	Fixed Charge Adjustment	$0	$0	$0	$1,685	$0	$0	$0	$1,685
	Volumetric Change								
4	Net Change in Annual Treatment CCF	-	-	-	37,342	-	-	-	37,342
5	Test Year Average Treatment Charge	$0.00	$0.00	$0.00	$7.1754061	$0.0000000	$0.0000000	$0.0000000	
6	Treatment Charge Adjustment	$0	$0	$0	$267,944	$0	$0	$0	$267,944

Citizens Wastewater of Westfield, LLC
Change in Rate Adjustments

Line No		A 521110 Rate 1	B 522110 Rate 1	C Total Rate 1
	Change In Fixed Charge Revenue:			
1	Pro Forma Average Fixed Charge Rate	$79.100000	$16.100000	
2	Test Year Average Fixed Charge Rate	$74.302083	$20.099426	
3	Change in Fixed Charge Rate	$4.797917	($3.999426)	
4	Pro Forma Bill Counts	288	127,492	-
5	Fixed Charge Rate Adjustment	$1,382	($509,895)	($508,513)
	Change In Monthly Treatment Rate:			
6	Pro Forma Average Treatment Rate	$0.000000	$7.000000	
7	Test Year Average Treatment Rate	$0.000000	$15.553253	
8	Change in Treatment Rate	$0.000000	($8.553253)	
9	Pro Forma 1,000 gallons	-	732,462	732,462
10	Treatment Rate Adjustment	$0	($6,264,933)	($6,264,933)

Citizens Wastewater of Westfield, LLC
Change in Rate Adjustments

Line No		A 521210 Rate 2	B 521310 Rate 2	C 521510 Rate 2	D 522210 Rate 2	E 522310 Rate 2	F 522410 Rate 2	G 522510 Rate 2	H Total Rate 2
	Change in Fixed Charge Revenue:								
1	Pro Forma Average Fixed Charge Rate	$0.000000	$0.000000	$0.000000	$30.644318	$0.000000	$0.000000	$0.000000	
2	Test Year Average Fixed Charge Rate	$0.000000	$0.000000	$0.000000	$27.627112	$0.000000	$0.000000	$0.000000	
3	Change in Fixed Charge Rate	$0.000000	$0.000000	$0.000000	$3.017206	$0.000000	$0.000000	$0.000000	
4	Pro Forma Bill Counts	-	-	-	7,932	-	-	-	-
5	Fixed Charge Rate Adjustment	$0	$0	$0	$23,932	$0	$0	$0	$23,932
	Change in Monthly Treatment Rate:								
6	Pro Forma Average Treatment Rate	$0.000000	$0.000000	$0.000000	$7.000000	$0.000000	$0.000000	$0.000000	
7	Test Year Average Treatment Rate	$0.000000	$0.000000	$0.000000	$7.175406	$0.000000	$0.000000	$0.000000	
8	Change in Treatment Rate	$0.000000	$0.000000	$0.000000	($0.175406)	$0.000000	$0.000000	$0.000000	
9	Pro Forma 1,000 gallons	-	-	-	289,836	-	-	-	-
10	Treatment Rate Adjustment	$0	$0	$0	($50,839)	$0	$0	$0	($50,839)

Citizens Wastewater of Westfield, LLC
Other Adjustments

Line No		A 521110 Rate 1	B 522110 Rate 1	C Total Rate 1
1	Pro forma Correction Factor Revenue	$0	$0	($2,692)
2	Test Year Correction Factor Revenue	0	0	0
3	Correction Factor Adjustment	$0	$0	($2,692)
4	Pro forma Unbilled Adjustments	$0	$0	$0
5	Test Year Unbilled Adjustments	(242,810)	431,724	188,914
6	Unbilled Adjustment	$242,810	($431,724)	($188,914)

Citizens Wastewater of Westfield, LLC
Other Adjustments

Line No		A 521210 Rate 2	B 521310 Rate 2	C 521510 Rate 2	D 522210 Rate 2	E 522310 Rate 2	F 522410 Rate 2	G 522510 Rate 2	H Total Rate 2
1	Pro forma Correction Factor Revenue	$0	$0	$0	$0	$0	$0	$0	$21,022
2	Test Year Correction Factor Revenue	0	0	0	0	0	0	0	0
3	Correction Factor Adjustment	$0	$0	$0	$0	$0	$0	$0	$21,022
4	Pro forma Unbilled Adjustments	$0	$0	$0	$0	$0	$0	$0	$0
5	Test Year Unbilled Adjustments	(31,459)	0	(5,949)	63,928	0	0	22,560	49,080
6	Unbilled Adjustment	$31,459	$0	$5,949	($63,928)	$0	$0	($22,560)	($49,080)

Citizens Wastewater of Westfield, LLC
Computation of Pro Forma Other Revenues

Line No.		
1	Pro Forma Increase/(Decrease) in Other Revenue	$0
2	Pro Forma Increase/(Decrease) in Late Payment/Reconnect Fees	0
3	Pro Forma Increase/(Decrease) in Return Check Fees	0
4	Pro Forma Increase/(Decrease) in Collections Fees	0
5	Pro Forma Other Revenue Adjustment	$0

Citizens Wastewater of Westfield, LLC
Computation of Pro Forma Other Operating Expenses

Line No.		
1	Test Year Other Operating Expenses	$3,520,214
2	O & M Adjustments per Attachment SEK-3	(6,791)
3	Adjustment for Net Write-Offs	18,434
4	Adjustment for Rate Case Expense	63,500
5	IURC Fee	11,070
6	Pro Forma Other Operating Expenses	$3,606,427

Citizens Wastewater of Westfield, LLC
Indiana Utility Regulatory Commission (IURC) Fee Adjustment

Line No.		
1	Pro Forma Revenue at Present Rates	$9,539,721
2	Less: Pro Forma Miscellaneous Revenue	46,831
3	Less: Pro Forma Net Write-Offs	47,699
4	Pro Forma Revenue at Present Rates Subject to IURC Fee	$9,445,192
5	IURC Fee Rate	0.001171996
6	IURC Fee	$11,070
7	Less: Test Year IURC Fee	0
8	Pro Forma IURC Fee Adjustment	$11,070

Citizens Wastewater of Westfield, LLC
Indiana Utility Receipts Tax Adjustment

Line No.		
1	Pro Forma Margin Revenue @ Present Rates	$9,539,721
2	Less: Exemption	1,000
3	Less: Pro Forma Net Write-Offs	29,265
4	Pro Forma Margin Revenue Less Exemption and Net Write-Offs	$9,509,456
5	IURT Rate	1.4000%
6	Pro Forma IURT at Present Rates	$133,132
7	Less: Test Year Amount	131,056
8	Adjustment	$2,076
9	IURT Effective Tax Rate	1.39560%

Citizens Wastewater of Westfield, LLC
Revenue Increase Adjusted
for IURC Fee, IURT and Net Write-Off Non-Gas Cost

Line No.			
1	Total Required Net Operating Income		$4,834,471
2	Pro Forma at Present Rates Net Operating Income		2,470,195
3	Increase in Net Operating Income (ln 1 - ln 2)		$2,364,276
4	One	1.0000000	
5	Less: Indiana Utility Regulatory Commission Fee	0.0011720	
6	Less: Indiana Utility Receipts Tax Effective Rate	0.0139560	
7	Less: Net Write-Offs	0.0050000	
8	Incremental Revenue Conversion Factor (ln 4 - ln 5 - ln 6 - ln 7)		0.9798720
9	Total Revenue Requirement Increase (ln 3 / ln 8)		$2,412,841

Citizens Wastewater of Westfield, LLC
Net Write-Offs
on Incremental Revenue

Line No.		
1	Pro Forma Total Revenue Requirement Increase	$2,412,841
2	Net Write-Offs as % of Revenue	0.500000%
3	Pro Forma Increase in Net Write-Offs	$12,064

Citizens Wastewater of Westfield, LLC
Indiana Utility Regulatory Commission Fee
on Incremental Revenue

Line No.		
1	Pro Forma Total Revenue Requirement Increase	$2,412,841
2	IURC Fee Rate	0.1171996%
3	Pro Forma Increase in IURC Fee	$2,828

Citizens Wastewater of Westfield, LLC
Indiana Utility Receipts Tax
on Incremental Revenue

Line No.		
1	Pro Forma Total Revenue Requirement Increase	$2,412,841
2	Indiana Utility Receipts Tax Effective Rate	1.39560%
3	Pro Forma Increase in Indiana Utility Receipts Tax	$33,674

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(3) Net operating income on a jurisdictional basis as:

(A) set forth in the utility's operating financial statements; and

(B) adjusted for ratemaking purposes under present and proposed rates.

Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

Line No.		A Actual per Books	B Pro Forma Adjustments Increase (Decrease)	C Pro Forma Results Based on Current Rates	D Pro Forma Adjustments Increase (Decrease)	E Pro Forma Results Based on Proposed Rates	F Reference
	Operating Revenues						
1	Test Year Revenues	$9,432,070					Income Statement
2	Customer Number Volume Adjustment - Base Charge		$51,612				page 4 & 5
3	Customer Number Volume Adjustment - Treatment Charge Adj		7,076,054				page 4 & 5
4	Change in Rate Adjustment - Chg in Minimum Chrg Revenue		(484,580)				page 6 & 7
5	Change in Rate Adjustment - Chg in Monthly Treatment Rate		(6,315,772)				page 6 & 7
6	Unbilled		(237,994)				page 8 & 9
7	Rounding		1				-
8	Billing Correction Adjustment		18,330				page 8 & 9
9	Other Revenue		0				page 10
10	Revenue Requirement Increase				$2,412,841		page 14
11	Total Operating Revenues	$9,432,070	$107,651	$9,539,721	$2,412,841	$11,952,562	
	Other Operating Expenses						
12	Test Year Other Operating Expenses	$3,520,214					Income Statement
13	Amortized Regulatory Expense		63,500				page 11
14	Net Write-Off		18,434		12,064		page 11 & 15
15	Payroll		43,175				Attachment SEK-3
16	Payroll Taxes		3,589				Attachment SEK-3
17	Purchased Power		35,177				Attachment SEK-3
18	Purchased Wastewater Treatment		244,007				Attachment SEK-3
19	Normalized Expenses		24,644				Attachment SEK-3
20	Out of Period Expenses		(28,361)				Attachment SEK-3
21	Non-Recurring Expenses		(79,710)				Attachment SEK-3
22	Non-Allowed Expenses		(950)				Attachment SEK-3
23	IURC Fee		11,070		2,828		page 12 & 16
24	Total Other Operating Expenses	$3,520,214	$334,575	$3,854,789	$14,892	$3,869,681	
	Depreciation & Amortization						
25	Test Year Depreciation & Amortization	$2,006,556					Income Statement
26	Depreciation & Amortization Adjustment		482,983				Attachment SEK-3
27	Pro Forma Depreciation & Amortization	$2,006,556	$482,983	$2,489,539	$0	$2,489,539	
	Taxes						
28	Test Year Taxes	$723,122					Income Statement
29	Pro Forma Change in IURT		$2,076		$33,674		page 13 & 17
30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
31	**Operating Income**	$3,182,178	($711,983)	$2,470,195	$2,364,276	$4,834,471	

Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

Line No.		A Actual per Books	B Pro Forma Adjustments Increase (Decrease)	C Pro Forma Results Based on Current Rates	D Pro Forma Adjustments Increase (Decrease)	E Pro Forma Results Based on Proposed Rates	F Reference
	Operating Revenues						
1	Test Year Revenues	$9,432,070					Income Statement
2	Customer Number Volume Adjustment - Base Charge		$51,612				page 4 & 5
3	Customer Number Volume Adjustment - Treatment Charge Adj		7,076,054				page 4 & 5
4	Change in Rate Adjustment - Chg in Minimum Chrg Revenue		(484,580)				page 6 & 7
5	Change in Rate Adjustment - Chg in Monthly Treatment Rate		(6,315,772)				page 6 & 7
6	Unbilled		(237,994)				page 8 & 9
7	Rounding		1				-
8	Billing Correction Adjustment		18,330				page 8 & 9
9	Other Revenue		0				page 10
10	Revenue Requirement Increase				$2,412,841		page 14
11	Total Operating Revenues	$9,432,070	$107,651	$9,539,721	$2,412,841	$11,952,562	
	Other Operating Expenses						
12	Test Year Other Operating Expenses	$3,520,214					Income Statement
13	Amortized Regulatory Expense		63,500				page 11
14	Net Write-Off		18,434		12,064		page 11 & 15
15	Payroll		43,175				Attachment SEK-3
16	Payroll Taxes		3,589				Attachment SEK-3
17	Purchased Power		35,177				Attachment SEK-3
18	Purchased Wastewater Treatment		244,007				Attachment SEK-3
19	Normalized Expenses		24,644				Attachment SEK-3
20	Out of Period Expenses		(28,361)				Attachment SEK-3
21	Non-Recurring Expenses		(79,710)				Attachment SEK-3
22	Non-Allowed Expenses		(950)				Attachment SEK-3
23	IURC Fee		11,070		2,828		page 12 & 16
24	Total Other Operating Expenses	$3,520,214	$334,575	$3,854,789	$14,892	$3,869,681	
	Depreciation & Amortization						
25	Test Year Depreciation & Amortization	$2,006,556					Income Statement
26	Depreciation & Amortization Adjustment		482,983				Attachment SEK-3
27	Pro Forma Depreciation & Amortization	$2,006,556	$482,983	$2,489,539	$0	$2,489,539	
	Taxes						
28	Test Year Taxes	$723,122					Income Statement
29	Pro Forma Change in IURT		$2,076		$33,674		page 13 & 17
30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
31	**Operating Income**	$3,182,178	($711,983)	$2,470,195	$2,364,276	$4,834,471	

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(4) Jurisdictional rate base as:

(A) set forth in the utility's operating financial statements; and

(B) adjusted for ratemaking purposes.

Westfield Wastewater
170 IAC 1-5-6 (4)
Rate Base

Line No.		Amount
	Per Order in Cause No. 44273 and approved Settlement Agreement	
	(A)	
1	Net "12/31/2011-Plant" as of 12/31/2015, testimony of Aaron Johnson	$ 27,477,000
	(B)	
2	Remaining Fair Value Increment as of 12/31/2015, testimony of Aaron Johnson	$ 16,283,048
	Net original cost of plant put in service after 12/31/2011	
	(C)	
3	Original cost added since 12/31/2011 through end of test year	$ 9,051,337
4	Accum. depreciation on assets added since 12/31/2011, through 12/31/2015	$ (453,105)
5	Expected major additions through 12/31/2016	$ 5,695,562
6	Net plant added since 12/31/2011	$ 14,293,794
	(D)	
7	Original cost of contributions in aid of construction (CIAC) included in (C)	$ (3,340,245)
8	Original cost of customer advances for construction (CAFC) included in (C)	$ (421,080)
9	Accum. depreciation on CIAC and CAFC property included in (C)	$ 167,658
10	Total net contributed property and advances	$ (3,593,667)
	(E)	
	Shared Services plant in service as of 12/31/2015	
11	Corporate Support Services, original cost net of depreciation	$ 45,605,305
12	% to Westfield Wastewater	1.57%
13	Amount to Westfield Wastewater	$ 716,003
14	Shared Field Services, original cost net of depreciation	$ 2,277,444
15	% to Westfield Wastewater	0.52%
16	Amount to Westfield Wastewater	$ 11,843
	(F)	
17	**Total Rate Base** lines 1, 2, 6, 10, 13, 16	**$ 55,188,021**

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(5) Capital structure and cost of capital, including supporting schedules.

WP 170 IAC 1-5-13 (3)
WP 170 IAC 1-5-6 (5)
Citizens Wastewater of Westfield
Capital Strusture and Cost of Capital

	Amount	% of Total	Cost %	WACC%
Common Equity	$46,162,000	75.14%	10.70%	8.04%
Long-Term Debt	$15,270,000	24.86%	2.89%	0.72%
Customer Deposits	$0	0%	0	0
Deferred Income Taxes	$0	0%	0	0
Prepaid Pension Asset or Post-Retirement Liability	$0	0%	0	0
Post-1970 Investment Tax Credits	$0	0%	0	0
TOTALS	$61,432,000	100.00%		8.76%

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(6) Gross revenue conversion factor.

Citizens Wastewater of Westfield, LLC
Revenue Increase Adjusted
for IURC Fee, IURT and Net Write-Off Non-Gas Cost

Line No.			
1	Total Required Net Operating Income		$4,834,471
2	Pro Forma at Present Rates Net Operating Income		2,470,195
3	Increase in Net Operating Income (ln 1 - ln 2)		$2,364,276
4	One	1.0000000	
5	Less: Indiana Utility Regulatory Commission Fee	0.0011720	
6	Less: Indiana Utility Receipts Tax Effective Rate	0.0139560	
7	Less: Net Write-Offs	0.0050000	
8	Incremental Revenue Conversion Factor (ln 4 - ln 5 - ln 6 - ln 7)		0.9798720
9	Total Revenue Requirement Increase (ln 3 / ln 8)		$2,412,841

170 IAC 1-5-6 Filing of Case-in-Chief

Sect. 6. An electing utility shall submit the following basic accounting exhibits with its case-in-chief under the sponsorship of one (1) or more witnesses submitting prefiled, direct testimony in support of the utility request for relief:

(7) Effective income tax rate for the utility.

Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(1) A chart of accounts that:

(A) details the types of charges incurred in specific subaccounts.

(B) describes the utility's format for:

(i) account numbering; and

(ii) coding.

Segment Values and Descriptions: Business Unit and Inter-Business Unit **wp 511**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 2-digit business unit is the first segment. Non-accounting personnel do not code directly to this segment; instead, they select a project and task which maps to the general ledger segment.
The 2-digit inter-business unit is the fifth segment. It is generally populated by systems transactions when intercompany liabilities are created.

Value	Description
00	Unspecified Business Unit
01	Corporate Support Services
02	Gas Operations
03	Trust Holdings
04	Discontinued Operations
06	Steam Division
07	West Street Chilled Water (WSCW)
17	Shared Field Services
20	Water Production & Distribution
30	Citizens By-Products Coal Co. (CBP)
35	Citizens Energy Services Corp. (CESCO)
38	Citizens Westfield Utilities, LLC
39	Kinetrex Energy Holding Company, LLC
40	Citizens Gas of Westfield
44	Indianapolis Coke Enterprises (ICE)
47	Citizens of South Madison Water
48	Citizens Water of Westfield
49	Citizens Wastewater of Westfield
50	Kinetrex Energy, LLC
51	Kinetrex Energy Exploration & Production, LLC
59	CBP Elimination Company
89	Trust Elimination Company
90	Citizens ICON
91	Warm Heart Warm Home (WHWH)
92	CWA Authority

Segment Values and Descriptions: Area **wp 512**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 4-digit area is the second segment. Non-accounting personnel do not code directly to this segment; instead, they select a project and task which maps to the general ledger segment.
Areas are departmental cost centers for internal reporting purposes, activated at the discretion and according to the needs of the department head.

Value	Description
0000	Unspecified Area
1000	Chief Officer
1003	Trust Administration
1004	General Office Facility Costs
1005	Variable Pay, Benefits & Taxes
1011	Corporate Development
1020	Finance Administration
1022	Gas Accounting
1023	Thermal Accounting
1024	General Accounting
1026	Business Applications
1029	Strategic Finance Admin.
1035	Property Records
1036	Water/Wastewater Accounting
1040	Treasury Administration
1041	Insurance Costs
1042	Accounts Payable
1043	Insurance & Claims Administration
1080	Internal Audit
1100	Human Resources Administration
1101	Human Resources Payroll
1102	Human Resources Employment
1103	Human Resources Benefits
1104	Human Resources Records
1105	Human Resources Employee Relations
1106	Human Resources Compensation
1107	Human Resources Health & Wellness
1109	Human Resources Training
1200	Customer Services Administration
1202	Contact Center Administration
1204	Residential Contact Center Operations
1205	Business Contact Center Operations
1206	Contact Center Performance Assurance
1207	Energy Efficiency
1208	Digital Experience Administration
1220	Information Services Administration
1221	Infrastructure
1222	Telephony/Network
1223	Administrative Services
1224	Support Center
1231	Customer Facing Applications
1232	Enterprise Applications
1235	Security/DR
1236	Solution Delivery Admin.
1237	Business Analysis
1239	Project Management
1260	Environmental Stewardship Administration
1261	Laboratory Services
1270	Occupational Health & Safety
1271	Security
1280	Supply Chain
1281	Storeroom Operations
1290	Quality
1300	Corporate Affairs
1302	Legal & Auditing Fees
1303	Home/Trade/Community Events
1304	Safety & Conservation Advertising
1320	Regulatory Affairs

1321	Government and External Affairs
1330	Legal Administration
1400	Customer Relationships Administration
1402	Sales Administration
1450	Revenue Assurance Administration
1451	Operational/Strategic Analysis
1452	Field Services
1453	Billing
1600	Capital Program and Engineering Administration
1601	Energy Distribution Engineering Administration
1611	Energy Distribution Design
1612	Energy Distribution Construction
1613	Wet Distribution Engineering Admin
1614	Distribution & Collection Design
1615	Distribution & Collection Construction
1616	Distribution & Collection STEP
1617	Westfield Distribution & Collection
1630	Plant Engineering Admin.
1631	Plant Engineering - Energy
1632	Plant Engineering - Wet
1640	Special Projects Admin.
1642	Planning & Design
1643	Construction Management
1650	Program Management Admin.
1660	AM & Tech Services Admin.
1662	System Modeling
1663	Technical Standards & Measurement
1664	Engineering Tech Support
1700	Shared Field Services Admin.
1701	Fleet
1703	Real Estate
1704	Field Operations Administration
1705	Customer Field Services
1706	SFS Executive
1707	Dispatch
1708	Meter Reading
7085	WF Wastewater Administration & Accounting
7086	WF Wastewater Collections
7087	WF Wastewater Treatment
7088	WF Wastewater Environmental
9849	SFS Services Received-Westfield Wastewater
9949	CSS Services Received-Westfield Wastewater

Segment Values and Descriptions: Accounts (FERC) - used by Shared Services **wp 513**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 6-digit account is the third segment. Non-accounting personnel do not code directly to this segment; instead, they select a project and task which maps to the general ledger segment.
The first three digits of this segment denote the FERC account per the Uniform System of Accounts.
The types of charges generally contained in each account are described in the FERC Uniform System of Accounts.

Value	Description	FERC acct	Types of Charges
101100	Plant in Service	101	Utility plant in service
106010	Completed Construction not Classified	106	Shared Services CWIP allocated to utility
107100	Construction Work in Progress	107	Construction Work in Progress (CWIP)
107900	Asset Clearing	107	Construction Work in Progress (CWIP)
107999	Construction Work In Progress - PA Conversion	107	Construction Work in Progress (CWIP)
108010	Accumulated Depreciation	108	Accumulated Depreciation
131010	Cash	131	Cash
131011	Cash Clearing	131	Cash
131071	Cash - Payroll-Chase Bank	131	Cash
131072	Cash - Refunds-Chase Bank	131	Cash
142010	Accounts Receivable - Customers	142	Accounts Receivable
142150	Check Refunds	142	Accounts Receivable
142200	Cash Refund Returned Checks	142	Accounts Receivable
142550	Cash Clearing	142	Accounts Receivable
143030	Accounts Receivable - Christ Church Cathedral Assistance	143	Accounts Receivable
143070	Accounts Receivable - Energy Assistance Program (EAP)	143	Accounts Receivable
143140	Accounts Receivable - Misc.	143	Accounts Receivable
143150	Accounts Receivable - Trustees	143	Accounts Receivable
143160	Accounts Receivable Officers & Employees	143	Accounts Receivable
143170	Accounts Receivable - Keep the Heat On - CAGI	143	Accounts Receivable
143180	Accounts Receivable - Winter Assistance Fund	143	Accounts Receivable
144020	Uncollectible Account Write-offs	144	Accumulated Provision for Uncollectible Accounts
154700	Inventory - Materials & Supplies	154	Material and Supplies Inventory
165100	Prepaid - Insurance	165	Prepayments
165300	Prepaid - Other Prepaid Assets	165	Prepayments
165400	Prepaid - Postage	165	Prepayments
165700	Prepaid - Shared Services	165	Prepayments
184100	Clearing Accounts - Shop Orders	184	Clearing accounts
184107	Clearing Accounts - IT	184	Clearing accounts
184108	Clearing Accounts - Compliance	184	Clearing accounts
186330	Misc. Deferred Debits - Deferred Earned Vacation	186	Deferred charges
186370	Misc. Deferred Debits - Split Dollar Life Insurance	186	Deferred charges
186390	Misc. Deferred Debits - Universal Service Program (USP) Fund	186	Deferred charges
216010	Retained Earnings	216	Retained earnings
219010	Other Comprehensive Income	219	Other comprehensive income
228310	L-T Disability Benefits Reserve	228	Pensions and benefits reserve
228330	457b Employer Deferred Compensation	228	Pensions and benefits reserve
228341	Retirement NonQualified Restoration Plan	228	Pensions and benefits reserve
228350	SFAS 106 Other Post-Retirement Benefits (Opb) Obligation	228	Pensions and benefits reserve
228360	Accrued Incentive Plan-Long Term	228	Pensions and benefits reserve
228410	Severance Pay Program	228	Pensions and benefits reserve
232010	Accounts Payable	232	Accounts payable

232090	Accounts Payable - Item Cost Variance Suspense	232	Accounts payable
232150	Accounts Payable - Payroll Misc.-Reimbursement	232	Accounts payable
232160	Accounts Payable - WHWH Payroll Deduction	232	Accounts payable
232170	Accounts Payable - PO Receipt Accrual	232	Accounts payable
232171	Accounts Payable - Inventory AP Accrual	232	Accounts payable
232180	Accounts Payable - PR Credit Union Reimbursement	232	Accounts payable
232400	Credit Card Clearing	232	Accounts payable
234160	Intercompany A/P and A/R	234	Accounts payable to associated companies
236100	Accrued Taxes - IN Employment Security Tax	236	Accrued taxes
236300	Accrued Taxes - Employer FICA Tax	236	Accrued taxes
236400	Accrued Taxes - Property Tax	236	Accrued taxes
241100	Tax Collections Payable - Federal	241	Tax collections payable
241200	Tax Collections Payable - State-Local Option Tax	241	Tax collections payable
241300	Tax Collections Payable - FICA	241	Tax collections payable
242130	Accrued Payroll Earnings	242	Miscellaneous current and accrued liabilities
242150	Accrued Incentive Plan-Short Term	242	Miscellaneous current and accrued liabilities
242155	Executive Incentive Plan-Short Term	242	Miscellaneous current and accrued liabilities
242400	Accrued Employee Thrift Plan Contribution	242	Miscellaneous current and accrued liabilities
242410	Accrued Employer Thrift Plan Contribution	242	Miscellaneous current and accrued liabilities
242435	Accrued Employee Unum Life Insurance	242	Miscellaneous current and accrued liabilities
242436	Accrued Employee Liberty Mutual Term Life Insurance	242	Miscellaneous current and accrued liabilities
242440	Accrued Employee Flex Spending-Dependant Care	242	Miscellaneous current and accrued liabilities
242450	Accrued Employee Flex Spending Account-Medical	242	Miscellaneous current and accrued liabilities
242460	Accrued Health-Accident Insurance	242	Miscellaneous current and accrued liabilities
242470	Accrued Workers Comp Self-Insurance	242	Miscellaneous current and accrued liabilities
242480	Accrued Pension	242	Miscellaneous current and accrued liabilities
242700	Accrued Liability - Earned Vacation	242	Miscellaneous current and accrued liabilities
242900	Misc. Current Liabilities Other	242	Miscellaneous current and accrued liabilities
253100	Unclaimed Property	253	Other deferred credits
403010	Depreciation	403	Depreciation
408110	Tax Expense - Payroll Tax Expense	408	Payroll Taxes
408130	Tax Expense - FICA	408	Payroll Taxes
408160	Tax Expense - Misc.	408	Other Taxes
408180	Tax Expense - Property	408	Property Taxes
415010	Service Appliance-Charge Revenue	415	Field Services expenses
416040	Service Appliance-No Charge	416	Field Services expenses
421020	Vendor Coupon Income	421	Miscellaneous nonoperating income
421490	Other Income/Expense	421	Miscellaneous nonoperating income
432010	Allowance for Funds Used During Construction	432	Capitalized interest
856050	Valve Inspect-Transmission	856	Mains expenses
870010	Operation Supervision, Engineering & Administration	870	Distribution operation supervision & engineering
870020	Meetings & Development - Distribution - Supervision	870	Distribution operation supervision & engineering
870999	Nonproductive Labor Capitalized Credit - Operations	870	Distribution operation supervision & engineering
874010	Operation Labor - Distribution - Mains & Services	874	Distribution mains and services expenses
874050	Equipment Repair	874	Distribution mains and services expenses
874090	Line Locates-All	874	Distribution mains and services expenses
874170	Valve Inspection-Distribution	874	Distribution mains and services expenses
874180	Curb Box-Loc, Repair, T-Off/On	874	Distribution mains and services expenses
874190	CAD Down	874	Distribution mains and services expenses
875020	Odorant Test	875	Measuring & regulating station expenses
875040	Charts	875	Measuring & regulating station expenses

878010	Inspect Meter	878	Meter and house regulator expenses
878120	Meter Verification	878	Meter and house regulator expenses
878130	Meter/Piping-Max 425	878	Meter and house regulator expenses
878180	Meter/Service Relocated-No Charge	878	Meter and house regulator expenses
879010	Bill Complaint	879	Customer installations expenses
879020	Fire-All Emergency	879	Customer installations expenses
879030	Gas Leak-All Meter (Utilization)	879	Customer installations expenses
879040	No Gas-All	879	Customer installations expenses
879050	Red/Black Tag Inspection	879	Customer installations expenses
879060	CGI (Unable To Gain Entrance)	879	Customer installations expenses
880020	Material / Truck Inventory	880	Other distribution expenses
880030	Truck Down	880	Other distribution expenses
880040	Inventory Adjustments	880	Other distribution expenses
880130	CNG Plant Operation Expense	880	Other distribution expenses
880150	CNG Vehicle Operation	880	Other distribution expenses
880170	Engineer Services	880	Other distribution expenses
880180	Dispatching	880	Other distribution expenses
880190	Meter Off By Collection	880	Other distribution expenses
880210	Breaks	880	Other distribution expenses
880300	Distribution - Misc. Expenses	880	Other distribution expenses
880305	Distribution - Misc. Garage	880	Other distribution expenses
880350	Other Work Equipment Operation - Distribution Operation	880	Other distribution expenses
880370	Vans 1 Ton & Under Operation	880	Other distribution expenses
880460	Medium Duty Truck Over 1 Ton Operation	880	Other distribution expenses
880999	Quality Team Meetings	880	Other distribution expenses
886010	Structures and Improvements Maintenance - Distribution	886	Maintenance of structures and improvements
886020	CNG Plant Maintenance Expense - Distribution - Maintenance Structure & Improveme	886	Maintenance of structures and improvements
887020	Grade Valve Box-All	887	Maintenance of mains
887030	Distribution Main Repair/Replace	887	Maintenance of mains
887050	Distribution Main Sup/Repl Over Excavation	887	Maintenance of mains
887650	Distribution Main Repair	887	Maintenance of mains
892010	Service Dig-Up Inspects - Distribution - Maintenance of Services	892	Maintenance of services
892020	Support Service Over Excavation - Distribution - Maintenance of Services	892	Maintenance of services
892030	Service Repair/Transfer-All - Distribution - Maintenance of Services	892	Maintenance of services
893010	PM, Paint, Index Change-Max 425	893	Maintenance of meters and house regulators
894010	Other Equipment - Distribution	894	Maintenance of other equipment
901010	Supervisory Labor - Customer Accounts - Supervision	901	Customer accounts expenses supervision
902010	Meter Reading	902	Meter reading expenses
902030	Office Supplies and Expenses - Meter Reading	902	Meter reading expenses
903010	Administrative and General Salaries - Customer Accounts	903	Customer records and collection expenses
903020	Office Supplies and Expenses - Customer Accounts - Customer Records & Collection	903	Customer records and collection expenses
903050	Service Recovery	903	Customer records and collection expenses
903070	Collection Expense	903	Customer records and collection expenses
903110	Collections Agents Expense	903	Customer records and collection expenses
903130	Cashiers Over/Short	903	Customer records and collection expenses
903150	Credit Bureau Expense	903	Customer records and collection expenses
903170	Customer Relations Interview Misc. Expense	903	Customer records and collection expenses
903190	Customer Relations Telephone Center Misc. Expense	903	Customer records and collection expenses
903700	Customer Records	903	Customer records and collection expenses
905010	Office Supplies and Expenses - Customer Accounts - Misc. Expense	905	Miscellaneous customer accounts expenses
907010	Supervisory Labor - Customer Service	907	Customer service expenses supervision

909090	Earth Day	909	Informational and instructional advertising expenses
909166	Water Conservation	909	Informational and instructional advertising expenses
909175	Media	909	Informational and instructional advertising expenses
909180	Market Research-Residential	909	Informational and instructional advertising expenses
909190	Market Research-Commercial	909	Informational and instructional advertising expenses
909200	Market Research-Industrial	909	Informational and instructional advertising expenses
909220	Signage	909	Informational and instructional advertising expenses
909275	Production	909	Informational and instructional advertising expenses
909325	Education & Outreach	909	Informational and instructional advertising expenses
909326	Safety Awareness	909	Informational and instructional advertising expenses
909420	Energy Conference	909	Informational and instructional advertising expenses
909440	Customer Newsletters	909	Informational and instructional advertising expenses
909630	WH-Rebates	909	Informational and instructional advertising expenses
910020	Customer Relations Lead Representative - Nonexempt	910	Miscellaneous customer service expenses
910030	Client Eligibility Services	910	Miscellaneous customer service expenses
910040	Customer Account Services	910	Miscellaneous customer service expenses
910050	Customer Relations Cashier Operation	910	Miscellaneous customer service expenses
910060	Bilingual Services	910	Miscellaneous customer service expenses
910070	Customer Information Plan	910	Miscellaneous customer service expenses
910160	Misc. Customer Service and Informational Expenses	910	Miscellaneous customer service expenses
910170	Office Supplies and Expenses - Customer Service	910	Miscellaneous customer service expenses
910180	Conservation Education	910	Miscellaneous customer service expenses
910210	Administrative and General Salaries - Customer Service	910	Miscellaneous customer service expenses
910900	Customer Service Learning	910	Miscellaneous customer service expenses
920010	Administrative and General Salaries	920	Administrative and general salaries
920020	Severance Pay Program	920	Administrative and general salaries
920999	Nonproductive Labor Capitalized Credit - Admin & General	920	Administrative and general salaries
921010	Office Supplies and Expenses - Admin & General	921	Office supplies and expenses
921030	Records Retention - Admin & General	921	Office supplies and expenses
921050	Computer Operation Expense	921	Office supplies and expenses
921070	Film & Photo Services	921	Office supplies and expenses
921110	Bank Administration Fees	921	Office supplies and expenses
921815	Software	921	Office supplies and expenses
921820	PC Hardware	921	Office supplies and expenses
921830	Hardware Maintenance	921	Office supplies and expenses
921835	Network Expenses	921	Office supplies and expenses
921990	Administration & General Employee Expense	921	Office supplies and expenses
923010	Outside Services	923	Outside services
924010	Insurance - Property	924	Property insurance
924015	Director and Officer Liability Insurance	924	Property insurance
924020	Insurance Expense	924	Property insurance
925010	Injuries & Damages	925	Injuries and damages
926015	Misc. Retiree Benefits	926	Employee pensions and benefits, net of loadings
926020	Employee Insurance	926	Employee pensions and benefits, net of loadings
926030	Disability Insurance - Short Term	926	Employee pensions and benefits, net of loadings
926040	Disability Insurance - Long Term	926	Employee pensions and benefits, net of loadings
926050	Employee Thrift Plan	926	Employee pensions and benefits, net of loadings
926055	Supplemental Retirement Benefit	926	Employee pensions and benefits, net of loadings
926060	Post Retirement Benefits	926	Employee pensions and benefits, net of loadings
926070	Employee Pension	926	Employee pensions and benefits, net of loadings
926075	Employee Pension (Non-Active)	926	Employee pensions and benefits, net of loadings

926080	Employee Life Insurance	926	Employee pensions and benefits, net of loadings
926090	Deferred Compensation	926	Employee pensions and benefits, net of loadings
926100	Workman's Comp Self Insurance	926	Employee pensions and benefits, net of loadings
926110	Employment/Recruiting	926	Employee pensions and benefits, net of loadings
926150	Physicals	926	Employee pensions and benefits, net of loadings
926200	Medical Supplies	926	Employee pensions and benefits, net of loadings
926210	Wellness Programs	926	Employee pensions and benefits, net of loadings
926480	Customer Service Training	926	Employee pensions and benefits, net of loadings
926490	Leadership Training	926	Employee pensions and benefits, net of loadings
926540	CSS External Training -CSS External Training - HR	926	Employee pensions and benefits, net of loadings
926590	CSS External Training - Safety	926	Employee pensions and benefits, net of loadings
926700	Educational Assistance	926	Employee pensions and benefits, net of loadings
926705	CSS Educational Assistance - CPE	926	Employee pensions and benefits, net of loadings
926710	CSS Educational Assistance - Customer Service	926	Employee pensions and benefits, net of loadings
926740	CSS Educational Assistance - ISD	926	Employee pensions and benefits, net of loadings
926763	CSS Educational Assistance - SFS	926	Employee pensions and benefits, net of loadings
926790	Executive Development	926	Employee pensions and benefits, net of loadings
926820	Quarter Century Club Expense	926	Employee pensions and benefits, net of loadings
926830	Service Awards	926	Employee pensions and benefits, net of loadings
926840	Uniforms & Safety Shoes	926	Employee pensions and benefits, net of loadings
926860	Employee Surveys	926	Employee pensions and benefits, net of loadings
926870	Employee Dev-Educational Materials	926	Employee pensions and benefits, net of loadings
926880	Employee Development	926	Employee pensions and benefits, net of loadings
926890	Employee Benefits Other	926	Employee pensions and benefits, net of loadings
926940	Safety Expense- Operation	926	Employee pensions and benefits, net of loadings
926990	Employee Recognition Awards	926	Employee pensions and benefits, net of loadings
926992	Fringe Benefits Allocations Contra	926	Employee pensions and benefits, net of loadings
929100	Payroll Earnings Expense	929	Clearing account
930231	iExpense Clearing	930	Miscellaneous general expenses
930250	Cash Discounts	930	Miscellaneous general expenses
930257	Messengers & Mail Delivery	930	Miscellaneous general expenses
930263	Contingency Planning	930	Miscellaneous general expenses
930275	Publication Employee Communication	930	Miscellaneous general expenses
930277	Public Affairs Projects	930	Miscellaneous general expenses
930286	Annual Report Expenses	930	Miscellaneous general expenses
930290	Directors & Trustees Fees	930	Miscellaneous general expenses
930297	Diversity	930	Miscellaneous general expenses
932010	Maintenance Office Furniture & Equipment - Admin & General	932	Miscellaneous general expenses
932020	Structures and Improvements Maintenance	932	Miscellaneous general expenses
926820	Quarter Century Club Expense	926	Employee pensions and benefits, net of loadings
926830	Service Awards	926	Employee pensions and benefits, net of loadings
926840	Uniforms & Safety Shoes	926	Employee pensions and benefits, net of loadings
926860	Employee Surveys	926	Employee pensions and benefits, net of loadings
926870	Employee Dev-Educational Materials	926	Employee pensions and benefits, net of loadings
926880	Employee Development	926	Employee pensions and benefits, net of loadings
926890	Employee Benefits Other	926	Employee pensions and benefits, net of loadings
926940	Safety Expense- Operation	926	Employee pensions and benefits, net of loadings
926990	Employee Recognition Awards	926	Employee pensions and benefits, net of loadings
926992	Fringe Benefits Allocations Contra	926	Employee pensions and benefits, net of loadings
929100	Payroll Earnings Expense	929	Clearing account
930231	iExpense Clearing	930	Miscellaneous general expenses

930250	Cash Discounts	930	Miscellaneous general expenses
930257	Messengers & Mail Delivery	930	Miscellaneous general expenses
930263	Contingency Planning	930	Miscellaneous general expenses
930275	Publication Employee Communication	930	Miscellaneous general expenses
930277	Public Affairs Projects	930	Miscellaneous general expenses
930286	Annual Report Expenses	930	Miscellaneous general expenses
930290	Directors & Trustees Fees	930	Miscellaneous general expenses
930297	Diversity	930	Miscellaneous general expenses
932010	Maintenance Office Furniture & Equipment - Admin & General	932	Miscellaneous general expenses
932020	Structures and Improvements Maintenance	932	Miscellaneous general expenses

Segment Values and Descriptions: Accounts (NARUC) **wp 514**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 6-digit account is the third segment. Non-accounting personnel do not code directly to this segment; instead, they select a project and task which maps to the general ledger segment.
The first three digits of this segment denote the FERC account per the Uniform System of Accounts.
The types of charges generally contained in each account are described in the FERC Uniform System of Accounts.

Value	Description	NARUC acct	O&M subacct	Types of Charges
101100	Plant in Service	101		Utility plant in service
105010	Construction Work in Progress	105		Construction Work in Progress (CWIP)
106010	Completed Construction not Classified	106		Shared Services CWIP allocated to utility
108010	Accumulated Depreciation	108		Accumulated Depreciation
114010	Utility Plant Acquisition Adjustment	114		Gas plant acquisition adjustment
115010	Accumulated Amortization of Acquisition Adjustment	115		Accumulated provision for amortization of gas plant acquisition adjustm
131230	Cash	131		Cash
131236	Cash - BMO Harris Bank Account Clearing	131		Cash
141050	Accounts Receivable - Customers	141		Accounts Receivable
141051	Cash Clearing	141		Accounts Receivable
142001	Accounts Receivable - Misc.	142		Accounts Receivable
143001	Accumulated Provision for Uncollectible Accounts	143		Accumulated Provision for Uncollectible Accounts
162010	Prepaid - Insurance	162		Prepayments
173100	Accrued Utility Revenue - Unbilled Revenue	173		Accrued utility revenues
181269	Bond Issuance Expense Westfield Wastewater 2014 Utility Bonds	181		Unamortized debt discount and expense
211100	Additional Paid-In Capital	211		Miscellaneous paid-in capital
215100	Retained Earnings	215		Retained earnings
215140	Distributions	215		Retained earnings
221269	Bonds - Westfield Wastewater 2014 Utility Bonds	221		Long-term debt
231010	Accounts Payable	231		Accounts payable
232109	PNC Bank Line of Credit - Westfield Wastewater	232		Line of Credit
233010	Intercompany A/P and A/R	233		Accounts payable to associated companies
236111	Accrued Taxes - Employer FICA Tax	236		Taxes accrued
236116	Accrued Taxes - IN Utilities Receipts Tax	236		Taxes accrued
236117	Accrued Taxes - Property Tax	236		Taxes accrued
237142	Accrued Interest - Westfield Utilities 2014 Utility Bonds	237		Interest accrued
237222	Accrued Interest - PNC Line of Credit	237		Interest accrued
237267	Accrued Interest - Westfield Utilities 2014 Utility Bonds	237		Interest accrued
241010	Accrued Payroll Earnings	241		Miscellaneous current & accrued liabilities
241012	Accrued Employer Thrift Plan Contribution	241		Miscellaneous current & accrued liabilities
241017	Misc. Current Liabilities Other	241		Miscellaneous current & accrued liabilities
241020	Accrued Incentive Plan-Short Term	241		Miscellaneous current & accrued liabilities
252100	Customer Advances for Construction	252		Advances for construction
253210	Derivative Liability	253		Other deferred credits
271010	Contributions in Aid of Construction	271		Contributions in aid of construction
272010	Accumulated Amortization for CIAC	272		Accumulated amortization of contributions in aid of construction
403001	Amortization CIAC	403		Depreciation expenses
403010	Depreciation	403		Depreciation expenses
406010	Amortization Acquisition Adjustment	406		Amortization expenses
408111	Tax Expense - Property	408		Property taxes
408121	Tax Expense - FICA	408		Payroll taxes
408131	Tax Expense - Indiana Utility Receipts Tax	408		Other taxes

408132	Tax Expense - Misc.	408		Other taxes
416040	Service Appliance-No Charge	416		Field Service expenses
420010	Allowance for Funds Used During Construction	420		Capitalized interest
421010	Misc. Non-Operating Income	421		Miscellaneous non-utility income
427200	Line of Credit Interest Expense	427		Interest on short-term debt
427320	Westfield Wastewater 2014 Utility Bonds Interest	427		Interest on long-term debt
427321	Interest Expense - PNC Swap	427		Interest on long-term debt
428030	Bond Issuance Expense	428		Amortization of bond discount and expense
521110	Flat Rate Revenues-Residential	521		Flat rate revenues
521210	Flat Rate Revenues-Commercial	521		Flat rate revenues
521510	Flat Rate Revenues-Multiple Family Dwelling	521		Flat rate revenues
522110	Measured Revenue-Residential	522		Measured revenues
522210	Measured Revenue-Commercial	522		Measured revenues
522510	Measured Revenue-Multiple Family Dwelling	522		Measured revenues
532010	Late Payment Charges	532		Forfeited discounts
536010	Other Wastewater Revenues	536		Other wastewater revenues
701011	Salary - Collection Exp, Ops	701	01	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701021	Salary - Collection Exp, Mtce	701	02	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701031	Salary - Pumping Exp, Ops	701	03	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701051	Short-Term Incentive Plan	701	05	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701053	Salary - T&D, Primary, Ops	701	05	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701063	Salary - T&D, Primary, Mtce	701	06	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701071	Salary - Customer Accts	701	07	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
701081	Salary - Admin & General	701	08	Salaries & Wages; Benefit Loadings; Payroll Tax Loadings;
704011	Benefits - Collection Exp, Ops	704	01	Benefits net of benefit loadings
704053	Benefits - T&D, Primary, Ops	704	05	Benefits net of benefit loadings
704063	Benefits - T&D, Primary, Mtce	704	06	Benefits net of benefit loadings
704071	Benefits - Customer Accts	704	07	Benefits net of benefit loadings
704081	Benefits - Admin & General	704	08	Benefits net of benefit loadings
711063	Sludge Removal - T&D, Primary, Mtce	711	06	Sludge Removal Expense
715011	Prch Pwr - Collection Exp, Ops	715	01	Purchased power
715053	Prch Pwr - T&D, Primary, Ops	715	05	Purchased power
715081	Prch Pwr - Admin & General	715	08	Purchased power
716053	Fuel-Pwr - T&D, Primary, Ops	716	05	Fuel for power production
718021	Chemicals - Collection Exp, Mtce	718	02	Chemicals
718053	Chemicals - T&D, Primary, Ops	718	05	Chemicals
720011	Mat/Sply - Collection Exp, Ops	720	01	Materials and Supplies
720021	Mat/Sply - Collection Exp, Mtce	720	02	Materials and Supplies
720041	Mat/Sply - Pumping Exp, Mtce	720	04	Materials and Supplies
720053	Mat/Sply - T&D, Primary, Ops	720	05	Materials and Supplies
720055	Mat/Sply - T&D, Secondary, Ops	720	05	Materials and Supplies
720063	Mat/Sply - T&D, Primary, Mtce	720	06	Materials and Supplies
720065	Mat/Sply - T&D, Secondary, Mtce	720	06	Materials and Supplies
720071	Mat/Sply - Customer Accts	720	07	Materials and Supplies
720081	Mat/Sply - Admin & General	720	08	Materials and Supplies
732081	OS-Acct - Admin & General	732	08	Contractual Services - Accounting
733081	OS-Lgl - Admin & General	733	08	Contractual Services - Legal
736011	OS-Other - Collection Exp, Ops	736	01	Contractual Services - Other
736021	OS-Other - Collection Exp, Mtce	736	02	Contractual Services - Other
736053	OS-Other - T&D, Primary, Ops	736	05	Contractual Services - Other
736055	OS-Other - T&D, Secondary, Ops	736	05	Contractual Services - Other

736063	OS-Other - T&D, Primary, Mtce	736	06	Contractual Services - Other
736071	OS-Other - Customer Accts	736	07	Contractual Services - Other
736081	OS-Other - Admin & General	736	08	Contractual Services - Other
741011	Rent-Prop - Collection Exp, Ops	741	01	Rental of Building/Real Property
741053	Rent-Prop - T&D, Primary, Ops	741	05	Rental of Building/Real Property
741081	Rent-Prop - Admin & General	741	08	Rental of Building/Real Property
742021	Rent-Eq - Collection Exp, Mtce	742	02	Rental of Equipment
742063	Rent-Eq - T&D, Primary, Mtce	742	06	Rental of Equipment
742081	Rent-Eq - Admin & General	742	08	Rental of Equipment
750011	Transp - Collection Exp, Ops	750	01	Transportation Expenses
750021	Transp - Collection Exp, Mtce	750	02	Transportation Expenses
750053	Transp - T&D, Primary, Ops	750	05	Transportation Expenses
750071	Transp - Customer Accts	750	07	Transportation Expenses
750081	Transp - Admin & General	750	08	Transportation Expenses
757081	Ins-Gen - Admin & General	757	08	Insurance - General Liability
758081	Ins-WC - Admin & General	758	08	Insurance - Workman's Compensation
759081	Ins-Other - Admin & General	759	08	Insurance - Other
760081	Advertising Expense - Admin & General	760	08	Advertising
770071	Bad Debt Expense - Customer Accts	770	07	Bad Debt Expense
775011	Misc - Collection Exp, Ops	775	01	Miscellaneous Expense
775021	Misc - Collection Exp, Mtce	775	02	Miscellaneous Expense
775053	Misc - T&D, Primary, Ops	775	05	Miscellaneous Expense
775063	Misc - T&D, Primary, Mtce	775	06	Miscellaneous Expense
775071	Misc - Customer Accts	775	07	Miscellaneous Expense
775081	Misc - Admin & General	775	08	Miscellaneous Expense
775085	Bank Fees	775	08	Miscellaneous Expense

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Segment Values and Descriptions: Expense Type **wp 515**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 4-digit expense type is the fourth segment. Non-accounting personnel are able to select the expense type in purchasing transactions.
See wp 516 for a coding guide explaining the appropriate use of expense types.

Value	Description
0000	Unspecified Expense Type
0107	Payroll Accrual
0112	Uniforms & Safety Shoes
0116	Paid Absences - Clerical
0117	Paid Absences - Regular
0118	Paid Absences - Supervision
0131	Labor - Regular
0132	Labor - Regular OT
0133	Labor - Regular Part-Time
0134	Labor - Regular Part-Time OT
0135	Labor - Regular Temporary
0141	Labor - Supervisory
0142	Labor - Supervisory OT
0151	Labor - Clerical
0152	Labor - Clerical OT
0154	Labor - Clerical Part-Time
0155	Labor - Clerical Part-Time OT
0156	Labor - Clerical Temporary
0163	Labor - Supplemental Pay
0170	Benefits - Insurance
0171	Benefits - Other
0180	LTIC
0181	STIP
0201	Medicare ER
0202	SS ER
0203	SUI ER
0204	Payroll Accrual - Tax
1002	Software Maintenance
1003	Billing/Printing
1005	Business Travel Expense
1011	Employee Dues & Memberships
1014	Computer Hardware
1016	Janitorial Cleaning Supplies
1020	Meals
1022	Office Furniture & Equipment
1023	Office Supplies
1024	Other/Misc
1025	Postage & Shipping
1027	Rents/Lease
1029	Software Purchases
1030	Telecommunications Equipment
1031	Telephone & Mobile Device
1034	Utilities

1035	Commissions
1037	Tax
1038	Outdoor Signage
1039	Print Advertising
1040	Radio
1041	Television
1046	Conservation Education
1049	Building Rental
1052	Drug & Alcohol Screening
1054	Physicals
1106	Insurance
1118	Insurance-General Liability Damage Claims
1200	Amortization
1201	Depreciation
1260	Interest Expense
1261	Interest and Dividend Income
2150	Equipment & Tools
2173	Fuel Natural Gas
2175	Gas & Diesel
2181	Gas Cost
2201	Chiller Maintenance
2208	Other Maintenance
2213	Lab Instrument Maintenance
2313	Electric Power
2318	Lubricants & Gases
2319	Permits, Licenses & Fees
2411	Material & Supply
2417	Inventory Issue
2418	Inventory Return
2422	Lab Supplies
2423	Lab Audit & Cert Materials
2505	Safety Supplies
3001	OS - Auditing
3002	OS - Consulting
3003	OS - Legal
3004	OS - Collection Expense
3005	OS - Contracted Services
3006	OS - Temporary Clerical
3007	OS - Training
3008	OS - Security
3010	OS - Janitorial
3011	OS - Landscaping/Mowing
3034	OS - Repaving
4010	Base Rate
4050	Delivery Charge
4055	Facility Charge
4060	Forfeited Discounts
4065	Gas Supply Charges
4080	Miscellaneous Service Fees
4120	Unbilled Chg-Margin
4121	Unbilled Chg-Recovery

4135	Usage Balancing Service - Std Groups
4140	Decoupling Sales Component
4141	Normal Temperature Adjustment
4200	Administrative Service Fee
4210	Other Revenue
9200	Wastewater CSS Redistribution
9500	Loadings - Variable Pay
9504	Loadings - Benefits Insurance
9505	Loadings - Benefits Pension
9506	Loadings - Benefits Thrift
9507	Loadings - Benefits Non-Productive
9510	Loadings - Variable Pay Thrift
9511	Loadings - Variable Pay Payroll Taxes
9513	Loadings - NPL Payroll Taxes
9514	Loadings - NPL Benefits Insurance
9515	Loadings - NPL Benefits Pension
9516	Loadings - NPL Benefits Thrift
9530	AFUDC

Expense Type Coding Guide **wp 516**
170 IAC 1-5-7 (1)

CEG's general ledger account string is divided into five segments for a total of 18 digits.
The 4-digit expense type is the fourth segment. Non-accounting personnel are able to select the expense type in purchasing transactions.
Below is a coding guide for the appropriate use of expense types.

Administrative Expenses - includes costs associated with carrying out the day-to-day administrative tasks of the organization.
See Outside Services – Training (3007) for training by an outside service provider

1003 Billing & Printing
1005 Business Travel Expense
include hotels, lodging, airfare, parking, cab fare, mileage reimbursement, transportation
1008 Contributions & Donations
include charitable contributions, community support, fundraising support, sponsorships
1009 Copying Machine
1011 Dues & Memberships
1020 Meals
include meals, food service, catering, lunch meetings
1022 Office Equipment & Furniture
1023 Office Supplies & Expenses
include books, periodicals, magazines, subscriptions, code updates, office supplies
1025 Postage & Shipping
include freight, courier, FedEx, UPS
1035 Commissions
for payments to third parties only, e.g. vending machine, collection agencies, etc.

Advertising and Branding Expenses - includes costs for advertising and branding in all media and for all types of messaging

1038 Outdoor Signage
1039 Print Advertising
1040 Radio
1041 Television
1046 Conservation Education
1047 Online Advertising
1048 Other Marketing and Advertising
include promotional expense, customer entertainment expenses, sporting events, golf outings

Chemicals - includes all chemicals used in operations

2103 Other Chemicals
2111 Alum
2112 Ammonia
2113 Carbon
2114 Fluoride
2115 Hypochlorite
2116 Permanganate
2117 Polymers
2118 Sodium Bisulfate
2119 Sodium Hydroxide
2120 Oxygen

Employee Support Expenses - includes various employee benefits and employee related costs

0112 Uniforms & Safety Shoes
0170 Benefits-Insurance
include health and accident insurance, life insurance, disability, insurance, workman's compensation
0171 Benefits-Other
include all other fringe benefits not related to employee insurance, e.g. wellness expenses, employee awards, gift certificates, etc.
1052 Drug & Alcohol Screening
1054 Physicals
2502 OSHA Medical
2505 Safety Supplies

Fuel - includes costs incurred in the consumption of fuel used in production, transportation, and powered equipment

2170 FAC Fuel
2173 Fuel Natural Gas
2175 Gasoline & Diesel
2307 Coal

Insurance - includes premium costs incurred for property and casualty insurance coverage to protect the organization against losses or damages to owned or leased property, and injury or damage claims by others which the organization shall become legally obligated to pay.

1106 Insurance

Licenses and Permits - includes costs incurred for construction permits and licenses, work permits, street operating permits, licenses for various operating personnel and other such types of required permits.

2319 Permits, Licenses, Fees

Material, Supplies and Equipment - includes the cost of materials and supplies acquired by purchase or through inventory issue, inventory adjustments, tools, parts, salvage

1016 Janitorial Cleaning Supplies
2150 Equipment & Tools
2318 Lubricants & Gases
2403 Ash Removal System Parts
2411 Material & Supplies
2412 Pump Parts
2416 Turbine Parts
2417 Inventory Issue
Note: this account is a system-account. It is not available for general coding.
2418 Inventory Return
Note: this account is a system-account. It is not available for general coding.
2422 Lab Supplies
2423 Lab Audit & Certification Material
2505 Safety Supplies

Operations - includes costs specific to the operation of Thermal Plant, Water and Wastewater Plant, and costs related to excavation and restoration for all business units. These expenditure types should be used for costs internal to the organization – not related to an outside service or contractor.

2301 Ash Operations
2304 Boilers
2308 Coal Operations
2310 Environmental Sampling

2314 Excavate & Restore
2325 Sludge & Dredging Operations
2424 Purchased Water
Note: this expense type is exclusively reserved for use by Water Operations

Outside Services - includes costs for services of a professional nature, services received in maintenance, operation, construction and protection of equipment, facilities and grounds, and services which are required to conduct company functions when such services are performed by persons other than company employees.

3001 OS-Audit
3002 OS-Consulting
Definition: Consultants are independent contractors who generally offer only advice or propose solutions to problems (they are not "doers"), but they do not direct, carry out, or implement solutions. CEG cannot control either the result of the Consultant's service or the way it is performed. A Consultant requires little or no guidance in providing input. Examples of consulting work include leadership development, environmental analysis, actuarial studies, engineering studies.
3003 OS-Legal
3004 OS-Collection Expense
3005 OS-Contracted Services
Definition: Contracted services are performed by independent contractors who are engaged to build, install, construct, repair, or perform other tasks on behalf of Citizens.
3006 OS-Temporary Clerical
3007 OS-Training
3008 OS-Security
3010 OS-Janitorial
3011 OS-Landscaping/Moving
3024 OS-Leak Repairs
3029 OS-R Stamp work
3033 OS-Refractory, Mortar, Brick
3034 OS-Repaving
3041 OS-Valve repair & replace
3042 OS-Street Sweeping
3043 OS-United Water Contract-Incentive Fee
3044 OS-United Water ASA

Rents and Leases - includes the costs to rent or lease property of others in order to occupy, operate or otherwise use that property in connection with any function of the organization.

1027 Rents & Leases
Include building rents and vehicle leases
2151 Equipment Rental

Repair and Maintenance - includes the cost of repairs, ongoing maintenance of buildings, grounds, machinery and equipment. These expenditure types should be used for costs internal to the organization – not related to outside services or contractors.

2201 Chiller Maintenance
2202 Cooling Tower Maintenance
2203 Distribution Maintenance
2204 Electrical Maintenance
2206 Primary Pump Maintenance
2207 Secondary Pump Maintenance
2208 Other Maintenance
2211 Water Treatment Maintenance
2213 Lab Instrument Maintenance
2305 Building Maintenance

2320 Plant Electrical System
2321 Plant Instrumentation
2329 Valve Repair & Replacement
2330 Valve, Traps, Pipe, Misc IUPUI
4510 Customer Instrumentation

Taxes - includes all taxes paid to Federal, State, County, Municipal or other local governmental authorities, such as income tax, property tax, severance tax, PILOT, utility receipts tax, other taxes
1037 Tax

Technology Expenses - includes costs such as hardware and software purchases or maintenance costs
1002 Software Maintenance
1014 Computer Hardware
include purchases and maintenance
1029 Software Purchases
1030 Telecommunications Equipment

Utilities - includes costs for utility services provided to the organization, such as electricity, gas, water, sewer, telephone, mobile device charges
1031 Telephone & Mobile Devices
1034 Utilities
2313 Electric Power

170 IAC 1-5-7 Working Papers and Date: General Information

Sec. 7. An electing utility shall submit the following information:

(2) A listing of standard monthly journal entries.

Westfield Wastewater **wp 110**
170 IAC 1-5-7 (2)
Standard monthly journal entries

JE NUMBER	JOURNAL ENTRY NAME
382	Westfield Waste Water Unbilled Accrual
386	Adjust Bad Debt Reserve-WFWW
392	Transfer Miscellaneous Cash Receipts
830	Misc Cash Receipts Transfer-WFWW
839	Accrue Power - WFWW
845	Accrue Westfield Expenses

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(3) All annual and quarterly reports to shareowners of the utility and its ultimate parent corporation, if any, or, if public information, the web address where the reports can be viewed for the:

(A) last two (2) years; and

(B) year subsequent to the test year, as available.

Citizens Westfield Utilities, LLC and Subsidiaries

Consolidated Financial Statements as of and for the Years Ended September 30, 2015 and 2014, and Independent Auditors' Report

CITIZENS WESTFIELD UTILITIES, LLC and SUBSIDIARIES

TABLE OF CONTENTS

	Page
INDEPENDENT AUDITORS' REPORT	1
CONSOLIDATED FINANCIAL STATEMENTS:	
Statements of Financial Position as of September 30, 2015 and 2014	3
Statements of Operations for the Years Ended September 30, 2015 and 2014	4
Statements of Changes in Member's Equity for the Years Ended September 30, 2015 and 2014	5
Statements of Cash Flows for the Years Ended September 30, 2015 and 2014	6
Notes to Consolidated Financial Statements as of and for the Years Ended September 30, 2015 and 2014	7-18

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INDEPENDENT AUDITORS' REPORT

To the Board of Directors of
Citizens Westfield Utilities, LLC:

We have audited the accompanying consolidated financial statements of Citizens Westfield Utilities, LLC and its subsidiaries (the "Company"), which comprise the consolidated statements of financial position as of September 30, 2015 and 2014, and the related consolidated statements of operations, changes in member's equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Company's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Citizens Westfield Utilities, LLC and its subsidiaries as of September 30, 2015 and 2014, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis-of-Matter

As discussed in Note 10 to the financial statements, the Company engages in significant transactions with affiliates of Citizens Energy Group. Portions of certain income and expenses represent allocations made from Citizens for items applicable to the Company as a whole. Therefore, the accompanying financial statements have been prepared from the separate records maintained by the Company and may not be indicative of the conditions that would have existed or the results of operations if the Company had been operated as unaffiliated company.

Deloitte & Touche LLP

December 16, 2015

CITIZENS WESTFIELD UTILITIES, LLC

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
FOR THE YEAR ENDED SEPTEMBER 30, 2015 AND 2014
(In Thousands)

ASSETS	**2015**	**2014**
PROPERTY PLANT AND EQUIPMENT:		
Utility plant	$ 167,518	$ 163,307
Accumulated depreciation	(41,824)	(37,967)
Construction work in progress	6,552	2,266
Total property and equipment	132,246	127,606
CURRENT ASSETS:		
Cash and cash equivalents	6,241	5,587
Accounts receivable, less allowance for doubtful accounts of $124 and $75, respectively	2,337	2,599
Accrued utility revenue	887	680
Natural gas in storage	500	615
Materials & supplies	33	-
Recoverable gas costs	-	127
Prepayments and deposits	196	231
Total current assets	10,194	9,839
NONCURRENT ASSETS:		
Bond issuance cost — net	1,360	1,752
Other deferred charges	515	241
Total noncurrent assets	1,875	1,993
TOTAL ASSETS	$ 144,315	$ 139,438
CAPITALIZATION AND LIABILITIES		
CAPITALIZATION AND NON-CURRENT LIABILITIES:		
Member's equity	$ 14,103	$ 11,324
Long-term debt	88,695	90,998
Contributions in aid of construction	30,848	30,514
Non-current liabilities	1,985	520
Total capitalization and noncurrent liabilities:	135,631	133,356
CURRENT LIABILITIES:		
Current maturities of long term debt	2,303	1,727
Short-term borrowings	2,000	2,000
Accounts payable and accrued expenses	3,163	2,008
Accrued taxes	1,097	265
Customer deposits and advance payments	121	82
Total current liabilities	8,684	6,082
COMMITMENTS AND CONTINGENCIES (see Note 9)		
TOTAL CAPITALIZATION AND LIABILITIES	$ 144,315	$ 139,438

The accompanying notes are an integral part of these consolidated financial statements.

CITIZENS WESTFIELD UTILITIES, LLC

CONSOLIDATED STATEMENTS OF OPERATIONS
FOR THE YEAR ENDED SEPTEMBER 30, 2015 AND 2014
(In Thousands)

	2015	2014
OPERATING REVENUES	$ 21,498	$ 13,330
OPERATING EXPENSES:		
Cost of goods sold	2,232	2,266
Other operating expenses	7,646	4,755
Depreciation and amortization	3,412	1,941
Taxes	1,183	356
Total operating expenses	14,473	9,318
TOTAL OPERATING INCOME	7,025	4,012
OTHER INCOME (EXPENSE)	161	24
INTEREST CHARGES:		
Interest on long term debt	3,963	2,153
Other interest	444	241
Total interest charges	4,407	2,394
NET INCOME	$ 2,779	$ 1,642

The accompanying notes are an integral part of these consolidated financial statements.

CITIZENS WESTFIELD UTILITIES, LLC

CONSOLIDATED STATEMENTS OF CHANGES IN MEMBER'S EQUITY
FOR THE YEAR ENDED SEPTEMBER 30, 2015 AND 2014
(In Thousands)

	Total Member's Equity
BALANCE - September 30, 2013	$ 9,682
Net income for the year ended September 30, 2014	1,642
BALANCE - September 30, 2014	11,324
Net income for the year ended September 30, 2015	2,779
BALANCE - September 30, 2015	$ 14,103

The accompanying notes are an integral part of these consolidated financial statements.

CITIZENS WESTFIELD UTILITIES, LLC

CONSOLIDATED STATEMENTS OF CASH FLOWS
FOR THE YEAR ENDED SEPTEMBER 30, 2015 AND 2014
(In Thousands)

	2015	2014
CASH FLOWS FROM OPERATING ACTIVITIES:		
Net income	$ 2,779	$ 1,642
Depreciation	3,448	1,950
Allowance for doubtful accounts	68	58
Changes in operating assets and liabilities:		
Accounts receivable and accrued utility revenue	(676)	(1,186)
Natural gas in storage	115	(3)
Recoverable/refundable gas and fuel costs	127	(110)
Prepayments and deposits	35	14
Accounts payable and accrued expenses	687	(777)
Other assets and liabilities	1,471	528
Net change in deferred charges	(275)	475
Net cash provided by operating activities	7,779	2,591
CASH FLOWS FROM INVESTING ACTIVITIES:		
Capital expenditures	(5,398)	(1,845)
Acquisition of business, net of cash acquired	-	(89,177)
Net cash used in investing activities	(5,398)	(91,022)
CASH FLOWS FROM FINANCING ACTIVITIES:		
Proceeds from bank line of credit	-	2,000
Proceeds from long-term debt	-	92,725
Principal payment of long-term debt	(1,727)	-
Bond issuance costs	-	(1,927)
Net cash provided by (used in) financing activities	(1,727)	92,798
NET CHANGE IN CASH AND CASH EQUIVALENTS	654	4,367
CASH AND CASH EQUIVALENTS AT BEGINNING OF PERIOD	5,587	1,220
CASH AND CASH EQUIVALENTS AT END OF PERIOD	$ 6,241	$ 5,587
SUPPLEMENTAL CASH FLOWS INFORMATION		
Interest paid	$ 3,988	$ 1,526
Income taxes paid	$ -	$ 38
NON-CASH INVESTING AND OPERATING ACTIVITIES:		
Property and equipment additions included in accounts payable and accrued expenses	$ 1,907	$ 477

The accompanying notes are an integral part of these consolidated financial statements.

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS AS OF AND FOR THE YEARS ENDED SEPTEMBER 30, 2015 AND 2014

1. NATURE OF OPERATIONS AND PRESENTATION

Nature of Operations — Citizens Westfield Utilities, LLC (CWU or the Company) was formed on January 10, 2014, when its Articles of Organization were certified by the State of Indiana, Office of the Secretary of State. CWU was formed as a wholly owned subsidiary of Citizens Energy Services Corporation LLC (CESCO), which is ultimately wholly owned by Citizens Energy Group (Citizens).

In March 2014, Citizens and CESCO performed a series of reorganizations with the purpose of making CWU the holding company for the three Citizens Westfield utilities: Westfield Gas Corporation (Westfield Gas) (previously operated under CESCO), Citizens Water of Westfield (Westfield Water) and Citizens Wastewater of Westfield (Westfield Wastewater).

On March 21, 2014, Westfield Water and Westfield Wastewater acquired the assets and operating rights to the water and wastewater utilities of the City of Westfield, Indiana, respectively. Major assets acquired included underground mains and services, treatment and production plant, wells, and the accounts receivable. Significant excluded assets include the City of Westfield's stormwater system assets (unless the assets are used jointly by the wastewater system), and the Westfield Public Works building.

Westfield Gas, Westfield Water, and Westfield Wastewater are operated as regulated investor-owned utilities. The rates and charges for gas, water and wastewater services are regulated by the Indiana Utility Regulatory Commission (IURC).

Basis of Presentation — The accompanying financial statements reflect the consolidated operations of Westfield Gas, Water and Wastewater. The accounting records conform to the accounting standards prescribed by the Federal Energy Regulatory Commission, National Association of Regulatory Utility Commissioners and accounting principles generally accepted in the United States of America (GAAP). The effects of all intercompany transactions have been eliminated.

As a wholly owned subsidiary of Citizens, certain administrative functions are performed by Citizens on behalf of the Company. Such functions include, but are not limited to, legal, utilities, and labor. Applicable common expenses incurred by Citizens have been allocated to the Company and included in the accompanying financial statements. Management believes such allocations are reasonable, however, they may not be indicative of the actual expense that would have been incurred had the Company been operating as a separate stand-alone entity.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Use of Estimates — The presentation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities and the reported amounts of revenue and expenses. Actual results could differ from those estimates. The most significant of such estimates include accrued utility revenue, and the fair value of assets and liabilities acquired as part of the Westfield Water and Wastewater acquisitions.

Property, Plant and Equipment— Construction costs include costs directly incurred plus overhead allocation relating to payroll, administrative and general costs, and, for certain utility plant, capitalized interest. Depreciation on Gas, Water and Wastewater plant is computed on a straight-line basis using rates approved by the IURC. Periodic depreciation rate studies include a review of depreciable plant remaining useful lives. Maintenance and repairs of property units are charged to expense as incurred. CWU utilizes the composite method of depreciation. Accordingly, the original cost of depreciable property and equipment retired or replaced and the cost of removal, less salvage, are charged to accumulated depreciation.

Plant in service at September 30 (in thousands):

	2015	2014	Useful Lives
Collection	$ 65,057	$ 63,799	40 years
Distribution	46,436	43,774	25 – 50 years
Treatment	39,047	38,985	40 – 50 years
Source of Supply	11,579	11,482	50 years
System Pumping	3,641	3,525	40 - 50 years
General Plant	1,758	1,742	40 – 50 years
	$ 167,518	$ 163,307	

Depreciation expense was $3.4 million and $1.9 million for the years ended September 30, 2015 and 2014, respectively.

Interest capitalized represents the cost of borrowed funds used for construction purposes and is charged to major construction projects during the construction period with a corresponding credit to Other Interest Charges. No amount of interest was capitalized for the years ended September 30, 2015 and 2014, respectively.

Revenue Recognition — Revenue is recorded when earned, either when the product is delivered or when services are performed. Westfield Gas customer billings for all rate classes are billed near the end of the calendar month, whereas Westfield Water and Westfield Wastewater customer billings are rendered near the middle of the calendar month. The estimated revenue for gas, water delivered, and wastewater service since the last customer billing dates to month-end is accrued based on actual demand data for the calendar month. The accrual for unbilled revenues is reversed in the subsequent accounting period when meters are actually read and customers are billed.

Natural Gas in Storage — Natural gas in storage is recoverable through gas cost adjustments and is maintained at the weighted average cost of gas.

Taxes — CWU is generally subject to payroll, property, utility receipts, and other miscellaneous taxes. Utility receipts taxes are included in rates charged to customers in all rate regulated business units except Wastewater, which is exempt from utility receipts taxes pursuant to Indiana law.

As a limited liability company, CWU is treated as a pass through entity for income tax purposes. Accordingly, the accompanying financial statements do not include any provision for Federal income taxes.

Recoverable (Refundable) Gas — The difference between actual gas costs and the amounts of gas costs recovered by Westfield Gas through rates is deferred and recovered (or refunded) through gas cost adjustments (GCA) permitted by the IURC. Westfield Gas is authorized to change its GCA factors quarterly as a result of changes in market prices.

Bond Issuance Costs — Bond premiums and discounts, debt issuance costs, and retirement gains and losses are amortized over the lives of the respective issues through the effective interest method. The unamortized portion of bond issuance costs of the refunded bonds is amortized over the life of the refunding bond issue.

Cash and Cash Equivalents — For purposes of the Consolidated Statements of Financial Position and Cash Flows, CWU considers investments purchased with a maturity of three months or less to be cash equivalents. The carrying value equals fair value for these financial instruments.

Fair Value Measurements — FASB guidance requires additional disclosures about CWU's financial assets and liabilities that are measured at fair value. Assets and liabilities recorded at fair value in the statements of financial position are categorized based upon the level of judgment associated with the inputs used to measure their value. Hierarchical levels, as defined in FASB guidance and explained in the following paragraphs, are directly related to the amount of subjectivity associated with the inputs to fair valuations of these assets and liabilities:

Level 1—Inputs are unadjusted quoted prices in active markets for identical assets or liabilities at the measurement date. The types of assets carried at Level 1 fair value generally are financial derivatives, investments and equity securities listed in active markets.

Level 2—Inputs, other than quoted prices included in Level 1, are observable for the asset or liability, either directly or indirectly. Level 2 inputs include quoted prices for similar instruments in active markets, and inputs other than quoted

prices that are observable for the asset or liability. Fair value assets and liabilities that are generally included in this category are derivatives with fair values based on inputs from actively quoted markets. The fair value of the interest rate swap is determined by calculating the net present value of the forecasted cash flow difference between the fixed and variable rates of the swap. The interest rate swap is classified as Level 2.

Level 3—Inputs are unobservable for the asset or liability, and include situations where there is little, if any, market activity for the asset or liability. In certain cases, the inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, the level in the fair value hierarchy within which the fair value measurement in its entirety falls has been determined based on the lowest level input that is significant to the fair value measurement in its entirety.

There were no financial assets measured at fair value as of September 30, 2015 and 2014. The following table presents the financial liabilities measured at fair value on a recurring basis, based on the hierarchy, as of September 30, 2015 and September 30, 2014 (in thousands):

	2015 Fair Value Measurements Using		
Description	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Financial Liabilities:			
Derivative Liabilities	$ -	$ 1,460	$ -
Total financial liabilities measured at fair value	$ -	$ 1,460	$ -

	2014 Fair Value Measurements Using		
Description	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Financial Liabilities:			
Derivative Liabilities	$ -	$ 518	$ -
Total financial liabilities measured at fair value	$ -	$ 518	$ -

The fair values of the interest rate swaps are determined by significant other observable inputs. There were no transfers between levels during 2015 and 2014. Due to the variable nature of CWU's outstanding debt, carrying value approximates fair value.

Asset Impairment — Long-lived assets and certain amortizing intangible assets held and used by CWU are reviewed for impairment using undiscounted cash flows, whenever events or changes in circumstances indicate that the carrying amount of these assets may not be recoverable. Measurement of an impairment loss is based on the discounted value cash flows related to these specific assets or asset group. No impairments were recorded in 2015 or 2014.

Regulatory Matters — Westfield Gas' most recent rate order became effective March 15, 2010.

Acquisition of Westfield Water and Wastewater — In November 2012, Westfield Water and Westfield Wastewater, two indirect subsidiaries of Citizens Resources, entered into separate asset purchase agreements with the City of Westfield for the purchase of Westfield's water and wastewater utility assets. The aggregate purchase price under the agreements was $91 million for the purchase of both the water utility assets and the wastewater utility assets. In November 2012, the City of Westfield, Westfield Water and Westfield Wastewater filed a joint petition with the IURC seeking approval of the proposed acquisitions. The Commission held hearings on the acquisition proposal in June 2013. A settlement agreement among the two Citizen Resources indirect subsidiaries, the City of Westfield, and the OUCC was reached and filed with the IURC in October 2013. The IURC issued an Order approving the acquisitions and the settlement agreement in November 2013. The acquisitions closed in March 2014. After purchase price adjustments, the combined actual purchase price for both utilities was $89.4 million. See also Note 3.

Regulatory Assets and Liabilities - CWU's rates are designed to recover the costs of providing service, thus certain items that would normally be reflected in the Consolidated Statements of Operations are deferred on the Consolidated Statements of Financial Position. Regulatory assets represent probable future revenues associated with certain incurred costs, which will be recovered from customers through the rate-making process. Regulatory assets are charged to earnings as collection of the cost in rates is recognized or when future recovery is no longer

probable. Conversely, regulatory liabilities represent future reductions in revenues associated with amounts that are to be credited to expense through the rate-making process. CWU continuously monitors changes in market and regulatory conditions and considers the effects of any changes in assessing the continual applicability of the FASB guidance related to regulated entities.

Regulatory assets were comprised of the following at September 30, 2015 and 2014 (in thousands):

	2015	2014	Recovery Period	Statement of Financial Position Location
Decoupled Sales Component	$ 511	$ 241	1 – 15 months	Other deferred charges
Deferred Fuel Tracking Adjustment	-	127	1 – 15 months	Recoverable gas costs
	$ 511	$ 368		

Regulatory liabilities were comprised of the following at September 30, 2015 and 2014:

	2015	2014	Refund Period	Statement of Financial Position Location
Contributions in Aid of Construction	$ 30,848	$ 30,514	40 – 50 years	Contributions in aid of construction
Refundable Gas Costs	148	-	1 – 15 months	Accounts payable and accrued expenses
Other	25	23	1 – 15 months	Accounts payable and accrued expenses
	$ 31,021	$ 30,537		

Advances and Contributions in Aid of Construction (CIAC) — Westfield Water and Wastewater may receive advances and contributions from customers, home builders and real estate developers to fund construction necessary to extend service to new areas. Water advances for construction are refundable for up to ten years as new customers begin to receive service or other contractual obligations are fulfilled. Advances not refunded within 10 years are transferred to CIAC. Balances of advances for construction are reported in the Statement of Financial Position in Other long-term liabilities, and are $0.5 million for CWU at September 30, 2015 and $0.0 at September 30, 2014.

Contributions in aid of construction are permanent collections of plant assets or cash for a particular construction project. The IURC requires CWU to record CIAC as a deferred credit. Utility plant funded by contributions is depreciated and contribution balances are amortized as a reduction to depreciation expense. The values of CIAC, net of amortization, are $30.8 million and $30.5 million at September 30, 2015 and 2014, respectively. Also see Note 3 for additional information regarding CIAC and purchase accounting adjustments.

New Accounting Guidance —

In May 2014, the FASB issued Accounting Standards Update (ASU) 2014-09 providing guidance regarding the principles and standards for revenue recognition. The standard creates a framework for recognizing revenue to improve comparability of revenue recognition practices across entities and industries. This guidance per ASU 2014-09 becomes effective for CWU's report ending September 30, 2018; however in August 2015, the FASB issued ASU 2015-14 which deferred the effective date of this revenue recognition guidance by one year. The Company does not anticipate a material impact to the combined financial statements upon adoption.

In April 2015, the FASB issued ASU 2015-03 which contains new guidance on accounting for debt issuance costs which changes the presentation of debt issuance costs in financial statements. This ASU requires an entity to present such costs in the balance sheet as a direct deduction from the related debt liability rather than as an asset. Amortization of the costs will continue to be reported as interest expense. This ASU is effective for annual reporting periods beginning after December 15, 2015. Early adoption is permitted. The new guidance will be applied retrospectively to each prior period presented. Adoption of these changes is not expected to have a material impact to the Company's combined financial statements.

In July 2015 the FASB issued ASU 2015-11 containing guidance with the objective of simplifying the measurement of inventory valuation at the lower of cost or net realizable value. Net realizable value is the estimated selling price in the ordinary course of business, less reasonably predictable costs of completion, disposal and transportation. It is effective for annual reporting periods beginning after December 15, 2016 and interim periods within fiscal years beginning after December 15, 2017. Adoption of these changes is not expected to have a material impact to the Company's combined financial statements.

3. ACQUISITIONS

Westfield Water and Westfield Wastewater — On March 21, 2014, Westfield Water and Westfield Wastewater, subsidiaries of CWU, acquired the assets and operating rights to the water and wastewater utilities of the City of Westfield, Indiana, respectively. Major assets acquired included underground mains and services, treatment and production plant, wells, and the accounts receivable. Significant excluded assets include the City of Westfield's stormwater system assets (unless the assets are used jointly by the wastewater system), and the Westfield Public Works building.

Consideration Transferred — Westfield Water and Westfield Wastewater acquired the water and wastewater system assets for a cash purchase price of $29.5 million and $59.9 million, respectively. See also Note 4 for additional information on debt issued relating to the acquisitions. Rates and charges will be regulated by the IURC. The utilities are operated as investor-owned utilities. Westfield Water and Westfield Wastewater assumed the rate schedules in place for the systems' customers at the acquisition date which include rate increases of 5%, 3%, and 5% on January 1, 2014, 2015 and 2016, respectively, for Westfield Water and 4%, 3%, and 2% on January 1, 2014, 2015, and 2016, respectively, for Westfield Wastewater. Westfield Water and Westfield Wastewater agreed that such rates shall remain in effect through December 31, 2016 (subject to unforeseen emergency rate relief needs). The acquisitions have been accounted for as business combinations. The purchase price allocation disclosed in the September 30, 2014 financial statements was preliminary. During 2015, an appraisal of the systems was conducted which found that the fair value of the systems was equal to the consideration transferred. As a result of the finalized appraisal of the assets during the measurement period, intangibles decreased by $16.2 million, plant in service increased by $16.9 million, and depreciation expense increased $0.2 million. In accordance with guidance for Business Combinations at ASC 805, these adjustments have been reflected in the September 30, 2014 consolidated financial statements.

The following table (in thousands) summarizes the purchase price allocation to assets acquired and liabilities assumed:

Water	Preliminary allocation as of September 30, 2014	Adjustments to finalize purchase price allocation	Final allocation as of March 31, 2015
Property, Plant, Equipment	$ 33,022	$ 9,195	$ 42,217
Intangible Assets	8,375	(8,375)	-
Current Assets	575	-	575
Total Assets Acquired	41,972	820	42,792
Current Liabilities	42	41	83
Contributions in Aid of Construction	12,428	779	13,207
Total Liabilities Assumed	12,470	820	13,290
Net Assets Acquired	$ 29,502	$ -	$ 29,502

Wastewater	Preliminary allocation as of September 30, 2014	Adjustments to finalize purchase price allocation	Final allocation as of March 31, 2015
Property, Plant, Equipment	$ 69,239	$ 7,749	$ 76,988
Intangible Assets	7,805	(7,805)	-
Current Assets	1,015	-	1,015
Total Assets Acquired	78,059	(56)	78,003
Current Liabilities	163	225	388
Contributions in Aid of Construction	18,033	(281)	17,752
Total Liabilities Assumed	18,196	(56)	18,140
Net Assets Acquired	$ 59,863	$ -	$ 59,863

Regulatory accounting standards require that utility plant acquired be recorded at its original cost. The difference between original cost and the estimated fair market value is the acquisition adjustment, and is reflected in Property, Plant and Equipment for financial reporting purposes. The final acquisition adjustment amounts are $4.8 million for Westfield Water and $8.4 million for Westfield Wastewater.

Acquisition Costs — Acquisition costs included those incurred to bring about the acquisition transaction (transactional costs), those incurred to acquire the financing (financing costs), and those incurred to bring about the integration of the utilities into Citizens (integration costs). Transactional and integration costs of $0.3 million were incurred in 2014 and were expensed as incurred; no such costs were incurred in 2015. Financing costs were $2.0 million through September 30, 2014 and were recorded as deferred charges.

4. LONG-TERM DEBT

Long-term debt consisted of the following (in thousands):

	September 30, 2015	September 30, 2014
Citizens Westfield Utilities Revenue Bonds Series 2014A, 74% of 3-month LIBOR +2.20% with a swap to effectively fix 80% of bonds at 3.56% (see note 8); due 2016 to 2019	**$ 67,363**	$ 69,090
Citizens Westfield Water Revenue Bonds Series 2014A, 74% of 1-month LIBOR +1.60% with a swap to effectively fix the rate at 2.89% (see note 8); due 2019	**8,365**	8,365
Citizens Westfield Wastewater Revenue Bonds Series 2014A, 74% of 1-month LIBOR +1.60% with a swap to effectively fix the rate at 2.89% (see note 8); due 2019	**15,270**	15,270
Current Maturities	**(2,303)**	(1,727)
Total Long-Term Bonds Outstanding	**$ 88,695**	**$ 90,998**

Principal maturities of long-term debt for the next four fiscal years are as follows (in thousands):

2016	$ 2,303
2017	2,303
2018	2,303
2019	84,089
Total principal maturities	$ 90,998

The Citizens Westfield Utilities revenue bonds were issued to provide capital for investment in subsidiaries pursuant to a CWU indenture dated March 1, 2014. The bonds are secured by an assignment of certain interests in the ownership rights of the CWU subsidiaries and payable with funds from dividends of the CWU subsidiaries. The bonds were purchased by a syndicate of banks (the Lenders) under a Continuing Covenant Agreement dated March 21, 2014. PNC Bank, National Association served as administrative agent for the Lenders. The bonds amortize on a 30-year level principal amortization schedule beginning December 31, 2014 and are subject to a mandatory tender by the Lenders on March 20, 2019. Interest on the bonds is at a floating rate of 74 percent of 3-month LIBOR plus 2.2 percent; however, the interest on 80 percent of the bonds was effectively fixed at a rate of approximately 3.56% through October 1, 2018 by means of an interest rate swap with PNC Bank, National Association as the counterparty (see Note 8).

The Westfield Water revenue bonds were issued pursuant to a Westfield Water indenture dated March 1, 2014 to fund a portion of the $29.5 million acquisition price of the assets and operating rights to the water utility of the City of Westfield, Indiana (see also Note 3), as well as to provide $1.1 million to fund a portion of future capital expenditures for the water utility. The remainder of the acquisition price of the water utility was funded with cash proceeds from the CWU Revenue Bonds. The Westfield Water bonds are secured by and payable from the net revenues of Westfield Water. Secondarily, the bonds are collateralized by certain non-operating assets of the utility. The bonds were purchased by a syndicate of banks (the Lenders) under a Continuing Covenant Agreement dated March 21, 2014. PNC Bank, National Association served as administrative agent for the Lenders. The bonds are subject to a mandatory tender by the Lenders on March 20, 2019. Interest on the bonds is a floating rate of 74 percent of 1-month LIBOR plus 1.6 percent effectively fixed at a rate of approximately 2.89% through October 1, 2018 by means of an interest rate swap with PNC Bank, National Association as the counterparty (see Note 8).

The Westfield Wastewater revenue bonds were issued pursuant to a Westfield Wastewater indenture dated March 1, 2014 to fund a portion of the $59.9 million acquisition price of the assets and operating rights to the water utility of the City of Westfield, Indiana (see also Note 3), as well as to provide $0.5 million to fund a portion of future

capital expenditures for the wastewater utility. The remainder of the acquisition price of the wastewater utility was funded with cash proceeds from the Citizens Westfield Utilities Revenue Bonds. The Westfield Wastewater bonds are secured by and payable from the net revenues of Westfield Wastewater. Secondarily, the bonds are collateralized by certain non-operating assets of the utility. The bonds were purchased by a syndicate of banks (the Lenders) under a Continuing Covenant Agreement dated March 21, 2014. PNC Bank, National Association served as administrative agent for the Lenders. The bonds are subject to a mandatory tender by the Lenders on March 20, 2019. Interest on the bonds is a floating rate of 74 percent of 1-month LIBOR plus 1.6 percent effectively fixed at a rate of approximately 2.89% through October 1, 2018 by means of an interest rate swap with PNC Bank, National Association as the counterparty (see Note 8).

Rate Covenants

CWU is obligated to satisfy certain covenants, including meeting certain minimum rate covenant debt service coverage requirements for each debt issue which are generally calculated as earnings before interest, taxes, depreciation and amortization, including certain adjustments, divided by the relevant debt service. CWU's rate covenant debt service coverage ratios, as defined by each indenture, are summarized as follows for 2015:

	Minimum Covenant Requirement	2015 Actual
Westfield Wastewater Utility Revenue Bonds Series 2014A	3.5	11.13
Westfield Water Utility Revenue Bonds Series 2014A	3.5	16.92
Citizens Westfield Utility LLC Revenue Bonds Series 2014A	2.25	3.53

5. SHORT-TERM AND OTHER BORROWINGS

Concurrent with the closing of the acquisition of Westfield Water and Wastewater on March 21, 2014, both utilities established lines of credit. The Westfield Water line of credit has a capacity of $10.3 million and is intended to fund working capital and capital expenditures. Interest rate on the line of credit is LIBOR plus 2.4 percent with a commitment fee of 0.175 percent. As of September 30, 2015 and 2014, $1.0 million was outstanding on the line, respectively. The Westfield Wastewater line of credit has a capacity of $11.0 million and is intended to fund working capital and capital expenditures. Interest rate on the line of credit is LIBOR plus 2.4 percent with a commitment fee of 0.175 percent. As of September 30, 2015 and 2014, $1.0 million was outstanding on the line, respectively.

6. ACCOUNTS PAYABLE AND ACCRUED EXPENSES

Accounts payable and accrued expenses as shown in the accompanying Consolidated Statements of Financial Position are comprised of the following components at September 30, 2015 and 2014, respectively (in thousands):

	2015	2014
Accounts payable	**$ 2,666**	$ 1,641
Related party payable – Citizens	**298**	205
Accrued interest	**139**	113
Salaries and employee benefits	**60**	49
Total accounts payable and accrued expenses	**$ 3,163**	$ 2,008

7. FINANCIAL SEGMENT INFORMATION

Operations of CWU include activities in three reportable segments and Parent. The segments are Westfield Gas, Westfield Water, and Westfield Wastewater.

CWU is the holding company for the three utilities serving residential, commercial and industrial customers in Westfield:

- Westfield Gas activities include purchasing and distributing natural gas.
- Westfield Water activities include treatment and distribution of drinking water.
- Westfield Wastewater activities include wastewater collection and treatment services.

Operating revenues and operating expenses are set forth in the Consolidated Statements of Operations. Operating income represents operating revenues less operating expenses directly attributable to the segments and an allocation of certain shared services operating expenses benefiting each. Shared services are comprised of various administrative and operational departments that provide support services to each of Citizens' business segments, certain affiliates and the combined enterprise as a whole; the associated cost of the services is allocated to the appropriate segment based on an allocation methodology that is reviewed and refined as necessary by management on a regular basis. The operating utilities received shared services allocations of $3.2 million and $1.7 million in 2015 and 2014, respectively.

Segment information as of and for the years ended September 30, 2015 and 2014 is summarized as follows:

Segment Footnote - Consolidated Statement of Financial Position
CITIZENS WESTFIELD UTILITIES, LLC
At September 30, 2015
(In Thousands)

	Parent	Westfield Gas	Westfield Water	Westfield Wastewater	Eliminations	Total
Assets						
Property, Plant and Equipment	$ -	$ 8,815	$ 45,145	$ 78,286	$ -	$ **132,246**
Investments	81,429				(81,429)	**-**
Cash and Cash Equivalents	122	1,012	2,460	2,647		**6,241**
Other Current Assets	-	898	1,608	1,447		**3,953**
Deferred Charges and Other Non-Current Assets	1,014	515	122	224		**1,875**
Total Assets	$ 82,565	$ 11,240	$ 49,335	$ 82,604	$ (81,429)	$ **144,315**
Capitalization and Liabilities						
Member's Equity	$ 14,103	$ 10,382	$ 25,145	$ 45,902	$ (81,429)	$ **14,103**
Long-Term Debt	65,060		8,365	15,270		**88,695**
Other Long-Term Liabilities	996	-	13,472	18,365		**32,833**
Current Maturities of Long-Term Debt	2,303					**2,303**
Short-Term Borrowings			1,000	1,000		**2,000**
Current Liabilities	103	858	1,353	2,067		**4,381**
Total Capitalization and Liabilities	$ 82,565	$ 11,240	$ 49,335	$ 82,604	$ (81,429)	$ **144,315**

Segment Footnote - Consolidated Statement of Financial Position
CITIZENS WESTFIELD UTILITIES, LLC
At September 30, 2014
(In Thousands)

	Parent	Westfield Gas	Westfield Water	Westfield Wastewater	Eliminations	Total
Assets						
Property, Plant and Equipment	$ -	$ 8,602	$ 42,648	$ 76,356	$ -	$ **127,606**
Investments	79,393				(79,393)	**-**
Cash and Cash Equivalents	50	830	3,103	1,604		**5,587**
Other Current Assets	185	1,270	736	2,061		**4,252**
Deferred Charges and Other Non-Current Assets	1,253	241	177	322		**1,993**
Total Assets	$ 80,881	$ 10,943	$ 46,664	$ 80,343		$ **139,438**
Capitalization and Liabilities						
Member's Equity	$ 11,324	$ 10,292	$ 23,615	$ 45,486	$ (79,393)	$ **11,324**
Long-Term Debt	67,363		8,365	15,270		**90,998**
Other Long-Term Liabilities	367	1	13,096	17,570		**31,034**
Current Maturities of Long-Term Debt	1,727					**1,727**
Short-Term Borrowings			1,000	1,000		**2,000**
Current Liabilities	100	650	587	1,018		**2,355**
Total Capitalization and Liabilities	$ 80,881	$ 10,943	$ 46,663	$ 80,344		$ **139,438**

Segment Footnote - Consolidated Statement of Operations
CITIZENS WESTFIELD UTILITIES, LLC
For the Year Ended September 30, 2015
(In Thousands)

	Parent	Westfield Gas	Westfield Water	Westfield Wastewater	Eliminations	Total
OPERATING REVENUES	$ -	$ 4,769	$ 7,641	$ 9,088		**$ 21,498**
OPERATING EXPENSES:						
Cost of goods sold	-	2,232	-	-		**2,232**
Other operating expenses	406	1,047	2,777	3,416		**7,646**
Depreciation and amortization	-	542	896	1,974		**3,412**
Taxes	-	176	524	483		**1,183**
Total operating expenses	406	3,997	4,197	5,873		**14,473**
TOTAL OPERATING INCOME (LOSS)	(406)	772	3,444	3,215		**7,025**
OTHER INCOME (EXPENSE)	-	-	161	-		**161**
EQUITY IN EARNINGS OF SUBSIDIARIES	6,382	-	-	-	(6,382)	**-**
INTEREST CHARGES:						
Interest on long term debt	2,958	-	356	649		**3,963**
Other interest	239	1	80	124		**444**
Total interest charges	3,197	1	436	773		**4,407**
NET INCOME	2,779	771	3,169	2,442	(6,382)	**2,779**

Segment Footnote - Consolidated Statement of Operations
CITIZENS WESTFIELD UTILITIES, LLC
For the Year Ended September 30, 2014
(In Thousands)

	Parent	Westfield Gas	Westfield Water	Westfield Wastewater	Eliminations	Total
OPERATING REVENUES	$ -	$ 4,618	$ 4,086	$ 4,626	$ -	**$ 13,330**
OPERATING EXPENSES:						
Cost of goods sold	-	2,266	-	-	-	**2,266**
Other operating expenses	863	821	1,357	1,714	-	**4,755**
Depreciation and amortization	-	485	441	1,015	-	**1,941**
Taxes	-	234	57	65	-	**356**
Total operating expenses	863	3,806	1,855	2,794	-	**9,318**
TOTAL OPERATING INCOME	(863)	812	2,231	1,832	-	**4,012**
OTHER INCOME (EXPENSE)	-	(1)	25	-	-	**24**
EQUITY IN EARNINGS OF SUBSIDIARIES	4,309	-	-	-	(4,309)	**-**
INTEREST CHARGES:						
Interest on long term debt	1,597	-	192	364	-	**2,153**
Other interest	207	-	21	13	-	**241**
Total interest charges	1,804	-	213	377	-	**2,394**
NET INCOME	1,642	811	2,043	1,455	(4,309)	**1,642**

Capital Expenditures – Accrual Basis

	Capital Expenditures (in thousands)			
	Westfield Gas	Westfield Water	Westfield Wastewater	Total
2015	**$ 649**	**$ 2,996**	**$ 3,179**	**$ 6,824**
2014	838	923	553	2,314

8. DERIVATIVES AND HEDGING

Interest Rate Swaps — Concurrent with the CWU revenue bonds described in Note 4, CWU entered into a fixed rate pay interest rate swap agreement with PNC Bank, National Association as the counterparty through October 1, 2018. The notional value of the swap was $53.9 million and $55.3 million as of September 30, 2015, and September 30, 2014, respectively, representing 80 percent of the bond issuance. Under the terms of the swap agreement CWU pays a quarterly fixed rate of approximately 1.36 percent of the notional amount to the swap provider and receives a quarterly variable rate payment equal to 74 percent of the average three month LIBOR rate for each quarterly period. The variable rate received from the counterparty approximates the variable rate paid to the bondholders on the CWU bonds. The market value of the interest rate swap derivative was $1.0 million and $0.4 million as of September 30, 2015 and 2014, respectively.

Concurrent with the Westfield Water and Westfield Wastewater revenue bonds described in Note 4, the utilities entered into fixed rate pay interest rate swap agreements with PNC Bank, National Association as the counterparty through October 1, 2018. The notional values of the swaps were $8.4 million and $15.3 million, respectively, as of September 30, 2015. Under the terms of the swap agreement Westfield Water and Westfield Wastewater pay a monthly fixed rate of approximately 1.29 percent of the notional amount to the swap provider and receive a monthly variable rate payment equal to 74 percent of the average one month LIBOR rate for each period. The variable rate received from the counterparty approximates the variable rate paid to the bondholders on the Westfield Water and Westfield Wastewater bonds. The market value of the interest rate swap derivatives for Westfield Water and Westfield Wastewater were $0.5 million and $0.2 million as of September 30, 2015 and 2014, respectively.

The following tables present information about CWU's derivative instruments and hedge activities. The first table provides a financial position overview of Citizens' Derivative Assets and Liabilities as of September 30, 2015 and September 30, 2014, respectively, while the latter table provides a breakdown of the related impact on the results of operations for the year ended September 30, 2015 and 2014, respectively. Both tables are in thousands.

Fair Value of Derivative Instruments

			September 30, 2015		September 30, 2014	
Derivative instrument	Derivative Designation	Statement of Financial Position Location	Derivative Assets Fair Value	Derivative Liabilities Fair Value	Derivative Assets Fair Value	Derivative Liabilities Fair Value
Interest rate swaps	Not accounted for as a hedge	Non-Current Liabilities	**$0**	**$1,460**	$0	$518

The fair value shown for the fixed rate interest swap agreements with the bank effective March 21, 2014 to fix the interest rate through October 1, 2018 is determined by using the contractual fixed rate less the LIBOR rate at the time of the interest payment times a multiplier of 0.74. The result is the settlement rate. The outstanding loan balance is multiplied by the settlement rate less a discount factor as provided by the bank.

Derivative Impact on Statement of Operations

Derivative instrument	Derivative Designation	Statement of Operations Location	**September 30, 2015**	September 30, 2014
Interest rate swaps	Not accounted for as a hedge	Interest Expense	**$1,889**	$518

9. COMMITMENTS AND CONTINGENCIES

Environmental Commitments and Contingencies — CWU is subject to various environmental laws and regulations and believes it is in material compliance with existing federal, state and local statutes, ordinances, rules and regulations governing environmental matters. CWU has no way of estimating the enactment or promulgation of future environmental laws and regulations.

Legal Contingencies — CWU is party to litigation in the normal course of business in which the payments for damages may be substantial but cannot be determined. Management regularly analyzes current information and, as necessary, provides accruals for probable liabilities on the eventual disposition of these matters. Management believes that these matters ultimately will be resolved in a manner which will not materially adversely affect the financial position, operations, equity or cash flows of CWU.

Lease Contractual Commitments — CWU has entered into operating leases for storage of natural gas at various sites and for miscellaneous equipment. Lease expenses were $175 thousand and $181 thousand for the years ended September 30, 2015 and 2014, respectively, and recorded in operating expense on the statement of operations. Future minimum lease payments under noncancelable operating leases as of September 30, 2015 are as follows (in thousands):

2016	$ 96
Thereafter	-
Total minimum lease payments	$ 96

10. RELATED PARTY TRANSACTIONS

As part of the settlement agreement from the acquisition of Westfield Water and Wastewater, Citizens Water of Westfield was assigned the Raw Water Purchase Agreement with Citizens Water. The agreement provides for five million gallons per day of raw water to Citizens Water. During the years ended September 30, 2015 and September 30, 2014, related party revenues of $429 thousand and $273 thousand, respectively, were recorded.

The related party payable of $298 thousand and $205 thousand at September 30, 2015 and 2014 (see Note 6), respectively, represents charges from Citizens for allocated shared services and other operating expenses awaiting cash settlement. Total related party expenses charged by Citizens were $3.2 million and $1.7 million for the years ended September 30, 2015 and September 30, 2014, respectively. The related party payable is offset by a related party receivable of $33 thousand and $568 thousand at September 30, 2015 and September 30, 2014, respectively.

11. SUBSEQUENT EVENTS

Management has considered the impact of subsequent events through December 16, 2015, the date at which these consolidated financial statements were available to be issued.

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(4) All reports of the utility and its parent corporation, if any, filed with the Securities and Exchange Commission for the:

(A) test year;

(B) year preceding the test year; and

(C) year following the test year;

as available. In lieu of hard copies, the utility may provide a listing of the reports filed, entity filing name, and web address where the reports may be viewed.

Not applicable. Citizens Wastewater of Westfield filed no such reports with the Securities and Exchange Commission.

I\10498816.1

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(5) The results of the latest FERC staff audit of the utility for compliance with the FERC Uniform System of Accounts

I\10498816.1

Not applicable. Citizens Wastewater of Westfield is not subject to FERC audits.

I\10498816.1

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(6) The utility's operating and construction budgets for the following:

(A) The test year.

(B) The year following the test year.

I\10498816.1

Westfield Wastewater **wp 131**
170 IAC 1-5-7 (6) and (7)
Fiscal Year 2015 Operating Budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

	2015 Budget
Operating Revenues	9,188,685
Operating Expenses:	
Other Operations and Maintenance	3,503,517
Depreciation and Amortization	1,986,668
Taxes	936,800
Total Operating Expenses	6,426,985
Total Operating Income (Loss)	2,761,700
Other Income (Expense), net	-
Interest Charges	629,350
Net Income	2,132,350

Budgeting Assumptions:

Revenues reflect customer count growth assumptions. O&M costs, depreciation and property taxes reflect increases due to system growth. Utility receipts tax is calculated at 1.4% of revenue.

Westfield Wastewater **wp 132**
170 IAC 1-5-7 (6) and (7)
Fiscal Year 2016 Operating Budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

	2016 Budget
Operating Revenues	9,460,403
Operating Expenses:	
Other Operations and Maintenance	3,990,322
Depreciation and Amortization	2,030,461
Taxes	1,340,496
Total Operating Expenses	7,361,279
Total Operating Income (Loss)	2,099,124
Other Income (Expense), net	-
Interest Charges	622,114
Net Income	1,477,010

Budgeting Assumptions:

Revenues reflect customer count growth assumptions. O&M costs, depreciation and property taxes reflect increases due to system growth. Utility receipts tax is calculated at 1.4% of revenue.

Westfield Wastewater **wp 133**
170 IAC 1-5-7 (6) and (7)
170 IAC 1-5-10 (3)
Fiscal Year 2015 construction budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

		2015 Budget
Facilities	$	167,721
Collection System	$	5,136,000
Technology & Support Services	$	222,000
Subtotal Westfield	**$**	**5,525,721**
Westfield portion of CSS capital		137,115
Westfield portion of SFS capital		740
Total Westfield	**$**	**5,663,576**

Budgeting Assumptions:
The capital improvement plan is designed to accommodate system growth.

Westfield Wastewater **wp 134**
170 IAC 1-5-7 (6) and (7)
170 IAC 1-5-10 (3)
Fiscal Year 2016 construction budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

		2016 Budget
Facilities	$	-
Collection System	$	4,555,000
Technology & Support Services	$	195,000
Subtotal Westfield	**$**	**4,750,000**
Westfield portion of CSS capital		201,677
Westfield portion of SFS capital		630
Total Westfield	**$**	**4,952,307**

Budgeting Assumptions:
The capital improvement plan is designed to accommodate system growth.

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(7) A statement of the budgeting assumptions included in the budgets listed in subdivision (6).

Westfield Wastewater **wp 131**
170 IAC 1-5-7 (6) and (7)
Fiscal Year 2015 Operating Budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

	2015 Budget
Operating Revenues	9,188,685
Operating Expenses:	
Other Operations and Maintenance	3,503,517
Depreciation and Amortization	1,986,668
Taxes	936,800
Total Operating Expenses	6,426,985
Total Operating Income (Loss)	2,761,700
Other Income (Expense), net	-
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Net Income	2,132,350

Budgeting Assumptions:

Revenues reflect customer count growth assumptions. O&M costs, depreciation and property taxes reflect increases due to system growth. Utility receipts tax is calculated at 1.4% of revenue.

Westfield Wastewater **wp 132**
170 IAC 1-5-7 (6) and (7)
Fiscal Year 2016 Operating Budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

	2016 Budget
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Other Operations and Maintenance	3,990,322
Depreciation and Amortization	2,030,461
Taxes	1,340,496
Total Operating Expenses	7,361,279
Total Operating Income (Loss)	2,099,124
Other Income (Expense), net	-
Interest Charges	622,114
Net Income	1,477,010

Budgeting Assumptions:

Revenues reflect customer count growth assumptions. O&M costs, depreciation and property taxes reflect increases due to system growth. Utility receipts tax is calculated at 1.4% of revenue.

Westfield Wastewater **wp 133**
170 IAC 1-5-7 (6) and (7)
170 IAC 1-5-10 (3)
Fiscal Year 2015 construction budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

		2015 Budget
Facilities	$	167,721
Collection System	$	5,136,000
Technology & Support Services	$	222,000
Subtotal Westfield	**$**	**5,525,721**
Westfield portion of CSS capital		137,115
Westfield portion of SFS capital		740
Total Westfield	**$**	**5,663,576**

Budgeting Assumptions:
The capital improvement plan is designed to accommodate system growth.

Westfield Wastewater **wp 134**
170 IAC 1-5-7 (6) and (7)
170 IAC 1-5-10 (3)
Fiscal Year 2016 construction budget

Westfield Wastewater budgets by fiscal year only (12 months ending September 30).
A budget for the test year is not available, since the test year crosses two fiscal years.

		2016 Budget
Facilities	$	-
Collection System	$	4,555,000
Technology & Support Services	$	195,000
Subtotal Westfield	**$**	**4,750,000**
Westfield portion of CSS capital		201,677
Westfield portion of SFS capital		630
Total Westfield	**$**	**4,952,307**

Budgeting Assumptions:
The capital improvement plan is designed to accommodate system growth.

170 IAC 1-5-7 Working Papers and Data: General Information

Sec. 7. An electing utility shall submit the following information:

(8) For an electric utility, the current system interconnection or operating agreement governing system power operations between affiliates.

I\10498816.1

Not applicable. Citizens Wastewater of Westfield is not an electric utility.

I\10498816.1

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(1) Operating income statements as follows:

(A) An unadjusted income statement for the test year.

(B) An income statement for the test year under the utility's present rates after adjustments for ratemaking purposes to the following:

(i) Revenues.

(ii) Expenses.

(iii) Taxes.

(C) An income statement for the test year under the rates being proposed by the electing utility with expenses summarized by the following classifications

(i) Operating expenses.
(ii) Depreciation.
(iii) Taxes other than income taxes.
(iv) Operating income before taxes.
(v) Current federal income taxes.
(vi) Current state income taxes.
(vii) Deferred federal income taxes.
(viii) Deferred state income taxes.
(ix) Income tax credits.
(x) Other charges and credits.
(xi) Net utility operating income.

Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

Line No.		A Actual per Books	B Pro Forma Adjustments Increase (Decrease)	C Pro Forma Results Based on Current Rates	D Pro Forma Adjustments Increase (Decrease)	E Pro Forma Results Based on Proposed Rates	F Reference
	Operating Revenues						
1	Test Year Revenues	$9,432,070					Income Statement
2	Customer Number Volume Adjustment - Base Charge		$51,612				page 4 & 5
3	Customer Number Volume Adjustment - Treatment Charge Adj		7,076,054				page 4 & 5
4	Change in Rate Adjustment - Chg in Minimum Chrg Revenue		(484,580)				page 6 & 7
5	Change in Rate Adjustment - Chg in Monthly Treatment Rate		(6,315,772)				page 6 & 7
6	Unbilled		(237,994)				page 8 & 9
7	Rounding		1				-
8	Billing Correction Adjustment		18,330				page 8 & 9
9	Other Revenue		0				page 10
10	Revenue Requirement Increase		-		$2,412,841		page 14
11	Total Operating Revenues	$9,432,070	$107,651	$9,539,721	$2,412,841	$11,952,562	
	Other Operating Expenses						
12	Test Year Other Operating Expenses	$3,520,214					Income Statement
13	Amortized Regulatory Expense		63,500				page 11
14	Net Write-Off		18,434		12,064		page 11 & 15
15	Payroll		43,175				Attachment SEK-3
16	Payroll Taxes		3,589				Attachment SEK-3
17	Purchased Power		35,177				Attachment SEK-3
18	Purchased Wastewater Treatment		244,007				Attachment SEK-3
19	Normalized Expenses		24,644				Attachment SEK-3
20	Out of Period Expenses		(28,361)				Attachment SEK-3
21	Non-Recurring Expenses		(79,710)				Attachment SEK-3
22	Non-Allowed Expenses		(950)				Attachment SEK-3
23	IURC Fee		11,070		2,828		page 12 & 16
24	Total Other Operating Expenses	$3,520,214	$334,575	$3,854,789	$14,892	$3,869,681	
	Depreciation & Amortization						
25	Test Year Depreciation & Amortization	$2,006,556					Income Statement
26	Depreciation & Amortization Adjustment		482,983				Attachment SEK-3
27	Pro Forma Depreciation & Amortization	$2,006,556	$482,983	$2,489,539	$0	$2,489,539	
	Taxes						
28	Test Year Taxes	$723,122					Income Statement
29	Pro Forma Change in IURT		$2,076		$33,674		page 13 & 17
30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
31	**Operating Income**	$3,182,178	($711,983)	$2,470,195	$2,364,276	$4,834,471	

Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

Line No.		A Actual per Books	B Pro Forma Adjustments Increase (Decrease)	C Pro Forma Results Based on Current Rates	D Pro Forma Adjustments Increase (Decrease)	E Pro Forma Results Based on Proposed Rates	F Reference
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2	Customer Number Volume Adjustment - Base Charge		$51,612				page 4 & 5
3	Customer Number Volume Adjustment - Treatment Charge Adj		7,076,054				page 4 & 5
4	Change in Rate Adjustment - Chg in Minimum Chrg Revenue		(484,580)				page 6 & 7
5	Change in Rate Adjustment - Chg in Monthly Treatment Rate		(6,315,772)				page 6 & 7
6	Unbilled		(237,994)				page 8 & 9
7	Rounding		1				-
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28	Test Year Taxes	$723,122					Income Statement
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30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
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Citizens Wastewater of Westfield, LLC
Summary of Pro Forma Revenue Requirement

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	Taxes						
28	Test Year Taxes	$723,122					Income Statement
29	Pro Forma Change in IURT		$2,076		$33,674		page 13 & 17
30	Pro Forma Taxes	$723,122	$2,076	$725,198	$33,674	$758,871	
31	**Operating Income**	$3,182,178	($711,983)	$2,470,195	$2,364,276	$4,834,471	

Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(2) All supporting working papers for each pro forma adjustment listed in subdivision (1), including the following:

(A) Actual test year expenses.

(B) Adjustments to test year expenses.

(C) Actual description of adjustment methodology.

Westfield Wastewater **wp 300**

Summary of Payroll and Payroll Tax Adjustments

Line	A Description	B Reference	C Amount
	Test Year		
1	Total Base Payroll	wp 301, line 3	291,913
2	Plus Total Overtime	wp 301, line 6	13,280
3	Plus Short Term Incentive Pay	expense type 0181	12,758
4	Total Payroll	sum of line 1 through line 3	317,952
5	Less Total Capitalized Payroll	wp 301, line 14	(79,501)
6	**Total Expensed Payroll**	line 4 + line 5	**238,451**
7	**Expensed Payroll Taxes**	wp 301, line 20	**19,724**
	Pro Forma		
8	Total Base Payroll	wp 302, line 15, col L	326,977
9	Plus Total Overtime	same as test year (see line 2)	13,280
10	Plus Short Term Incentive Pay	wp 302, line 15, col M	30,232
11	Total Payroll	sum of line 8 through line 10	370,489
12	Less Total Capitalized Payroll	wp 304, line 9	(88,863)
13	**Total Expensed Payroll**	line 11 + line 12	**281,626**
14	**Expensed Payroll Taxes**	wp 301, line 22 * line 13	**23,313**
	Adjustment		
15	Total Base Payroll	line 8 - line 1	35,063
16	Plus Total Overtime	line 9 - line 2	-
17	Plus Short Term Incentive Pay	line 10 - line 3	17,474
18	Total Payroll	sum of line 15 through line 17	52,537
19	Less Total Capitalized Payroll	line 12 - line 5	(9,362)
20	**Total Expensed Payroll**	line 13 - line 6	**43,175**
21	**Expensed Payroll Taxes**	line 14 - line 7	**3,589**

Westfield Wastewater **wp 301**
Summary of Total Test Year Payroll and Payroll Taxes

	A	B	C
Line	**Description**	**Reference**	**Amount**
Payroll			
1	Expensed Base Pay	wp 301-S1, line 12	213,973
2	Capitalized Base Pay	wp 301-S2, line 12	77,941
3	Total Base Pay	line 1 : line 2	291,913
4	Expensed Overtime Pay	wp 301-S1, line 19	11,720
5	Capitalized Overtime Pay	wp 301-S2, line 20	1,560
6	Total Overtime Pay	line 4 : line 5	13,280
7	Total Regular Payroll	line 3 + line 6	305,194
8	Expensed Supplemental Pay	wp 301-S1, line 21	-
9	Capitalized Supplemental Pay	wp 301-S2, line 22	-
10	Total Supplemental Pay	line 8 + line 9	-
For informational purposes only (all amounts are included above):			
11	Expensed Paid Absences	wp 301-S1, lines 2 to 4	26,229
12	Capitalized Paid Absences	wp 301-S2, lines 2 to 4	-
13	Total Paid Absences	line 11 : line 12	26,229
14	Total Capitalized Pay	line 2 + line 5 + line 9	79,501
15	Total Expensed Payroll	line 1 + line 4 + line 8	225,693
Payroll Taxes			
16	Medicare Taxes (etype 0201)	income statement accounts	3,614
17	Social Security taxes (etype 0202)	income statement accounts	15,572
18	State Unemployment (etype 0203)	income statement accounts	554
19	Payroll Tax Accrual (etype 0204)	income statement accounts	(15)
20	Total Payroll Taxes	line 16 : line 18	19,724
21	Total Payroll Taxes excluding accrual	line 20 - line 19	19,739
22	Payroll Taxes as % of expensed payroll	line 21 / line 6 on wp 300	8.28%

Westfield Wastewater **wp 301-S1**
Supporting Workpaper
Determination of Test Year Expensed Regular Payroll

	A	B	C
Line	**E-type #**	**E-type Description**	**Amount**
	Base Payroll		
1	0107	Payroll Accrual	651
2	0116	Paid Absences - Clerical	-
3	0117	Paid Absences - Regular	17,355
4	0118	Paid Absences - Supervision	8,874
5	0131	Labor - Regular	132,625
6	0133	Labor - Regular Part-Time	3,644
7	0135	Labor - Regular Temporary	-
8	0141	Labor - Supervisory	50,824
9	0151	Labor - Clerical	-
10	0154	Labor - Clerical Part-Time	-
11	0156	Labor - Clerical Temporary	-
12	**Total Base Payroll**		213,973
13	% allocation		
	Overtime Payroll		
14	0132	Labor - Regular OT	11,720
15	0134	Labor - Regular Part-Time OT	-
16	0142	Labor - Supervisory OT	-
17	0152	Labor - Clerical OT	-
18	0155	Labor - Clerical Part-Time OT	-
19	**Total Overtime Payroll**		11,720
20	**Total Expensed Regular Payroll**		**225,693**
	Supplemental Payroll		
21	0163	Labor - Supplemental Pay	-
22	**Total Expensed Regular & Supp Payroll**		**225,693**

This workpaper presents the expensed regular payroll for the Test Year, by expense type ("E-type").
* Source: Oracle E Business Suite, General Ledger, all income statement accounts

Westfield Wastewater **wp 301-S2**
Supporting Workpaper
Determination of Test Year Capitalized Payroll

	A	B	C
Line	**Etype #**	**Etype Description**	**Amount**
	Base Payroll		
1	0107	Payroll Accrual	(253)
2	0116	Paid Absences - Clerical	-
3	0117	Paid Absences - Regular	-
4	0118	Paid Absences - Supervision	-
5	0131	Labor - Regular	52,033
6	0133	Labor - Regular Part-Time	-
7	0135	Labor - Regular Temporary	-
8	0141	Labor - Supervisory	15,057
9	0151	Labor - Clerical	11,104
10	0154	Labor - Clerical Part-Time	-
11	0156	Labor - Clerical Temporary	-
12	**Total Base Payroll**		77,941
	Overtime Payroll		
13	0132	Labor - Regular OT	1,097
14	0134	Labor - Regular Part-Time OT	-
15	0136	Labor - Regular Temporary OT	-
16	0142	Labor - Supervisory OT	-
17	0152	Labor - Clerical OT	464
18	0155	Labor - Clerical Part-Time OT	-
19	0157	Labor - Clerical Temporary OT	-
20	**Total Overtime Payroll**		1,560
21	**Total Capitalized Regular Payroll**		**79,501**
	Supplemental Payroll		
22	0163	Labor - Supplemental Pay	-
23	**Total Capitalized Payroll**		**79,501**

This workpaper presents the capitalized regular payroll for the Test Year, by expense type.
* Source: Oracle E Business Suite, General Ledger, WIP accounts

Westfield Wastewater **wp 302**

Determination of Total Pro Forma Payroll

A	B	C	D	E	F	G	H	I	J	K	L	M
Line	Employee Number	Unit	Status	Labor Union Member	Department	Pro Forma Base Comp	STIP %	STIP	Total Comp	% to Westfield	Base Comp to Westfield	STIP to Westfield
1	7654	CSS	FT	No	Capital Programs & Engi	66,400	9%	5,976	72,376	14.0%	9,284	836
2	7665	CSS	FT	No	Capital Programs & Engi	69,700	9%	6,273	75,973	12.2%	8,528	768
3	7770	CSS	FT	No	Capital Programs & Engi	56,005	9%	5,040	61,046	18.2%	10,205	918
4	7774	CSS	FT	No	Capital Programs & Engi	54,111	9%	4,870	58,981	20.4%	11,059	995
5	7975	CSS	FT	No	Capital Programs & Engi	80,773	9%	7,270	88,042	3.2%	2,585	233
6	8000	CSS	FT	No	Capital Programs & Engi	92,018	9%	8,282	100,300	2.8%	2,593	233
7	8134	CSS	FT	No	Capital Programs & Engi	52,280	9%	4,705	56,985	4.0%	2,086	188
8	8222	CSS	FT	No	Capital Programs & Engi	84,356	9%	7,592	91,948	1.0%	844	76
9	8368	CSS	FT	No	Capital Programs & Engi	85,078	9%	7,657	92,735	21.0%	17,866	1,608
10	6101	Water	FT	No	Operations	100,481	11%	11,053	111,534	40.0%	40,192	4,421
11	0512	Water	FT	No	Operations	50,763	9%	4,569	55,332	100.0%	50,763	4,569
12	8154	Water	FT	No	Operations	70,246	9%	6,322	76,568	100.0%	70,246	6,322
13	8158	Water	FT	No	Operations	56,043	9%	5,044	61,087	100.0%	56,043	5,044
14	8159	Water	FT	No	Operations	44,683	9%	4,021	48,705	100.0%	44,683	4,021
15	**TOTALS**					**962,938**		**88,674**	**1,051,612**		**326,977**	**30,232**

Methodology for pro forma base payroll:

* Establish ongoing employee count at current pay

Westfield Wastewater **wp 304**
Determination of Pro Forma Capitalized Payroll

	A	B	C
Line	**Description**	**Reference**	**Amount**
1	Test Year Expensed Base Payroll	wp 301, line 1	213,973
2	Test Year Capitalized Base Payroll	wp 301, line 2	77,941
3	Test Year Total Base Payroll	line 1 + line 2	291,913
4	Capitalized Base Payroll as a % of Total Base Payroll	line 2 / line 3	26.70%
5	Pro Forma Base Payroll	wp 302, line 15, col L	326,977
6	Pro Forma Capitalized Base Payroll	line 5 * line 4	87,302
7	Pro Forma Capitalized Overtime Payroll to Westfield	same as test year (see wp 301, line 5)	1,560
8	Total Test Year Capitalized Payroll to Westfield	wp 301, line 14	79,501
9	Total Pro Forma Capitalized Payroll to Westfield	line 6 + line 7	88,863
10	**Pro Forma Adjustment to Capitalized Payroll**	**line 6 - line 2**	**9,362**

Methodology for pro forma adjustment:
* determine test year total base payroll capitalized and expensed
* establish capitalized base payroll as a percentage of total base payroll
* apply this percentage to total pro forma base payroll
* add capitalized overtime and capitalized supplemental pay established in other workpapers

Westfield Wastewater **wp 401**

Determination of Pro Forma Purchased Power Expense

	A	B	C
Line	**Description**	**Reference**	**Amount**
	Test Year		
1	Purchased Power	Account 49.7086.715011.2313.00	65,741
2	Purchased Power	Account 49.7087.715053.2313.00	265,921
3	Total Test Year	line 1 : line 2	331,662
	Pro Forma Purchased Power		
4	Test Year Invoices, excluding accruals	wp 401-S1, line 13, col B	332,689
5	Incremental cost for new/upgraded equipment	wp 402-S2, line 5, col N	34,151
6	Total Pro Forma Purchased Power	line 4 : line 5	366,840
7	**Pro Forma Adjustment**	line 3 - line 6	**35,177**

Methodology for Pro Forma Adjustment:

* Obtain estimated load and utilization for new equipment
* Calculate the pro forma riders based on the most recently published approved or effective-dated pending riders
* Apply the pro forma riders to the new equipment load

Westfield Wastewater **wp 401-S1**
Supporting Workpaper
Reconciliation of Test Year Charges for Purchased Power to General Ledger

	A	B
Line	**Bill dated**	**Total Bill**
1	JAN-2015	37,096
2	FEB-2015	30,521
3	MAR-2015	33,751
4	APR-2015	27,920
5	MAY-2015	26,482
6	JUN-2015	26,652
7	JUL-2015	27,042
8	AUG-2015	25,449
9	SEP-2015	25,297
10	OCT-2015	22,944
11	NOV-2015	20,921
12	DEC-2015	28,613
13	**Total**	**332,689**
14	Net Accruals	(1,027)
15	GL balance	331,662

Westfield Wastewater **wp 401-S2**
Supporting Workpaper
Estimated purchased power expenses for new equipment

	A	B	C	D	F	G	H	I	J	K	L	M	N	O
Line	**Equipment**	**Items**	**HP**	**Avg. Use**	**Total HP** (B * C)	**KW/Unit** (C * line 19)	**Avg. KW** (B * D * G)	**Avg KWH/Yr** (H *365*24)	**Avg KWH/Mo** (I / 12)	**Cost KWH/Yr first 2,000** (2,000 * line 9)	**Cost KWH/Yr over 2,000** (J - 2,000 * line 10)	**Connection Charge/yr** (line 11 * 12)	**Test Year Expense**	**Total incremental cost/ yr** (K + L + M - N)
1	Downtown/Roudebush	3	20.1	0.20	60	15	9	78,812	6,568	$ 2,597	$ 4,162	$ 192	$ -	$ 6,951
2	156th Street	2	15	0.15	30	11	3	29,407	2,451	$ 2,597	$ 411	$ 192	$ -	$ 3,200
3	Chatham Hills	2	30	0.20	60	22	9	78,420	6,535	$ 2,597	$ 4,132	$ 192	$ -	$ 6,922
4	Washington Woods	3	84.5	0.18	254	63	34	298,190	24,849	$ 2,597	$ 20,820	$ 192	$ 6,531	$ 17,078
5	**Total for new equipment**													**$ 34,151**

Per KW Rates used in calculation:

6	Energy Charges for rate WP effective Jan 2016 first 2,000 kWh	$0.076000
7	Energy Charges for rate WP effective Jan 2016	$0.043710
8	Current riders (wp 401-S3, line 11)	$0.032222
9	Total Cost first 2,000 kWh (line 6 + line 8)	$0.108222
10	Total Cost (line 7 + line 8)	$0.075932
11	Connection charge effective Jan 2016	$ 16.00
12	KW to HP Coversion	0.746

Westfield Wastewater **wp 401-S3**
Supporting Workpaper
Determination of current Duke riders applicable to rate WP
Source: Duke Energy, http://www.duke-energy.com/rates/indiana/tariff.asp

	A	B	C	D
Line	Rider	Description	Effective	Rate WP
1	60	Fuel Adjustment	Jul-16	0.014484
2	61	Coal Gasification Adjustment	Jan-16	0.009277
3	62	Pollution Control Adjustment	Jan-16	0.002490
4	63	Emission Allowance Adjustment	Mar-16	(0.000036)
5	66A	Energy Efficiency Adjustment	Mar-16	0.000332
6	67	Cinergy Merger Credit	Jun-16	(0.000262)
7	68	MISO Adjustment	Jul-16	0.001451
8	70	Reliability Adjustment	Mar-16	0.000413
9	71	Clean Coal Adjustment	Jan-16	0.004029
10	72	Federally Mandated Cost Rate Adjustment	Jan-16	0.000044
11		Total		0.032222

Westfield Wastewater **wp 402**

Determination of Pro Forma Purchased Wastewater Treatment

	A	B	C	D
Line	**Billing Month**	**Gallons (millions)**	**$ per million**	**Amount**
	Test Year consumption and cost			
1	Jan-15	47.012	$ 1,106.54	$ 52,021
2	Feb-15	60.023	$ 1,106.54	$ 66,418
3	Mar-15	40.601	$ 1,106.54	$ 44,927
4	Apr-15	53.241	$ 1,106.54	$ 58,913
5	May-15	72.472	$ 1,106.54	$ 80,193
6	Jun-15	43.332	$ 1,106.54	$ 47,949
7	Jul-15	58.166	$ 1,106.54	$ 64,363
8	Aug-15	68.6	$ 1,106.54	$ 75,909
9	Sep-15	37.821	$ 1,106.54	$ 41,850
10	Oct-15	36.259	$ 1,106.54	$ 40,122
11	Nov-15	43.116	$ 1,106.54	$ 47,710
12	Dec-15	37.295	$ 1,106.54	$ 41,268
13	Total, see account 49.7087.736053.3005.00	597.938		$ 661,642
	Pro Forma consumption and cost			
14	Annual volume, NARUC 710050	597.938	$ 1,514.62	$ 905,649
15	**Pro Forma Adjustment**	line 14 - line 13		**$244,007**

Methodology for Pro Forma Adjustment:

* Establish test year volumes and pricing
* Establish current pricing
* Apply current pricing to annual volumes

City of Carmel Utilities

30 W. Main St., Ste. 220 Carmel, IN 46032 / 317-571-2443 / 317-571-2265 fax

September 21, 2015

Mr. Randy Edgemon
Citezens Westfield Wastewater
P.O. Box 7067
Indianapolis, IN 46207-7067

RE: Wholesale Treatment Rate Increase

Dear Mr. Edgemon,

Per Section 16 D of the Municipal Wastewater Service Agreement between the City of Carmel and the Town of Westfield, the City of Carmel Wastewater Utility is providing you 90 days written notice of a 36.88% rate increase. The new proposed rate will be $1514.62 per million gallons treated.

For your review, I have enclosed rate report that has been completed by Crowe Horwath that details the justification for the proposed increase. Per the Agreement, you will have 90 days to review and either accept or dispute the proposed increase.

Upon you review we are happy to discuss the report in more detail with you, and will provide any additional information you need in a timely manner. I look forward to discussing this further with you

Director of Utilities

Westfield Wastewater **wp 405**

Adjustments to Normalize Certain Test Year Expenses

	A	B	C
Line	**Description**	**Reference**	**Amount**
	Test Year		
1	ADS Environmental Flow & Rating Gauge Monitoring	Account 49.7086.736021.3005.00	34,075
2	MODSPACE rent, partial year incl. one-time installation cost	Account 49.7085.741053.1049.00	9,283
3	Confined space air monitor, capitalizable	Account 49.7085.720081.2505.00	7,736
4	Business Insurance	see wp 405-S1, line 3	32,848
5	Test Year Total	line 1 : line 4	83,942
	Pro Forma		
6	ADS Environmental Flow & Rating Gauge Monitoring	NARUC 736021	47,100
7	Rental of trailer from Modular Space Corp, $491.50/mo	NARUC 741053	5,898
8	Confined space air monitor, capitalizable	remove expense	-
9	Business Insurance	see wp 405-S1, line 9	55,588
10	Pro Forma Total	line 6 : line 9	108,586
	Pro Forma Adjustments		
11	ADS Environmental Flow & Rating Gauge Monitoring	line 6 - line 1	13,025
12	MODSPACE rent, partial year incl. one-time installation cost	line 7 - line 2	(3,385)
13	Confined space air monitor, capitalizable	line 8 - line 3	(7,736)
14	Business Insurance	line 9 - line 4	22,740
15	**Total Pro Forma Adjustment to Normalize Expenses**	line 11 : line 14	**24,644**

Methodology for pro forma adjustment:

Determine test year expenses which:

* do not reflect a full year of charges
* do not reflect current or expected pricing
* should have been capitalized

Westfield Wastewater
Supporting Workpaper
Business Insurance

wp 405-S1

	A	B	C
Line	**Description**	**Reference**	**Amount**
1	Test Year Insurance Expense	49.7085.759081.1106.00	20,134
2	Test Year Insurance Expense	49.7085.757081.1106.00	12,714
3	Total Test Year	line 1 : line 2	32,848
	Pro Forma Business Insurance Expense	**Policy Period**	
4	General Liability	Feb2016-Jan2017	12,828
5	Excess Liability	Mar2016-Feb2017	27,836
6	Property	Oct2015-Sep2016	13,819
7	Brokerage	Jan2016-Dec2016	540
8	Workers Comp	Feb2016-Jan2017	565
9	Total	line 4 : line 8	55,588

Westfield Wastewater wp 413
Determination of Out-of-Period Expenses

	A	B	C
Line	**Description**	**Reference**	**Westfield**
	Test Year		
1	Reversed accrual estimates in Test Year for prior period expenses	wp 413-S1, line 5	(70,820)
2	Prior period actual expenses in Test Year	wp 413-S2, line 18	120,699
3	Accrual estimates for Test Year expenses	wp 413-S3, line 3	75,985
4	Total Test Year Out-of-Period Expenses	line 1 : line 3	125,864
	Pro Forma		
5	Actual Test Year expenses charged to periods outside the Test Year	wp 413-S4, line 9	97,503
6	**Pro Forma Adjustment for Net Out-of-Period Expenses**	line 5 - line 4	**(28,361)**

Methodology for pro forma adjustment (consider only items at $1,000 or above):
* determine test year impact from out-of-period expenses
  * test year reversals of accruals made prior to test year = credits to expense
  * prior period invoices charged to test year = debits to expense
  * test year accruals made for invoices not yet received = debits to expense
* determine pro forma amount of out-of-period expenses
  * invoices charged to periods outside the test year for services rendered during the test year

Westfield Wastewater **wp 413-S1**
Supporting Workpaper
Prior period reversed accrual estimates in test year

	A	B	C
Line	**GL Account**	**Reversed Accrual in Test Year**	**Vendor/Description**
1	49.7085.775085.2319.00	(5,367.94)	Huntington Service Charges
2	49.7085.775085.2319.00	(4,395.60)	Quarterly Availability Fee PNC
3	49.7086.736011.3005.00	(9,035.73)	SAMCO
4	49.7087.736053.3005.00	(52,020.66)	Carmel Utilities
5	**Total**	**(70,819.93)**	

Westfield Wastewater **wp 413-S2**
Supporting Workpaper
Prior period actual expenses in test year

	A	B	C	D
Line	**GL Account**	**Actual Amount**	**Vendor**	**Invoice**
1	49.7085.736081.3005.00	19,500.00	HNTB Corporation	1-62600-PL-001
2	49.7085.736081.3005.00	1,217.46	HNTB Corporation	2-62600-CN-101
3	49.7085.736081.3005.00	1,351.70	HNTB Corporation	3-62600-CN-101
4	49.7085.736081.3005.00	1,718.70	HNTB Corporation	I-62600-CN-101
5	49.7086.736021.3005.00	4,867.00	American Pump Repair & Service	74169
6	49.7087.718053.2111.00	2,818.24	Chemtrade Solutions, LLC	90647827R
7	49.7087.718053.2111.00	2,830.14	Chemtrade Solutions, LLC	90656967
8	49.7087.718053.2111.00	2,809.26	Chemtrade Solutions, LLC	90666300
9	49.7087.718053.2111.00	2,821.71	Chemtrade Solutions, LLC	90676633
10	49.7087.718053.2111.00	4,586.21	Chemtrade Solutions, LLC	90684908
11	49.7087.718053.2111.00	3,410.68	Chemtrade Solutions, LLC	90691372
12	49.7085.775085.2319.00	5,367.94	Huntington National Bank	801401062086-010915
13	49.7085.736081.3005.00	1,088.00	Cripe Architects and Engineering	2022325
14	49.7086.736011.3005.00	9,461.57	SAMCO	14-1042
15	49.7086.750011.2175.00	745.69	Speedway Superamerica, LLC	1001642055 (18 days OOP)
16	49.7087.736053.3005.00	52,020.66	Carmel Utilities	DEC14
17	49.7087.736081.3005.00	4,083.78	Ray's Trash Service, Inc.	0004131564
18	**Total**	**120,698.74**		

Westfield Wastewater **wp 413-S3**
Supporting Workpaper
Accrual estimates at end of test year

	A	B	C
Line	**GL Account**	**Accrual Estimate**	**Vendor**
1	49.7086.736011.3005.00	16,014.60	SAMCO (line locates for December 2015)
2	49.7087.736053.3005.00	59,970.29	Carmel Utilities (wastewater processing for December 2015)
3	**Total**	**75,984.89**	

Westfield Wastewater **wp 413-S4**
Supporting Workpaper
Test year expenses charged outside test year

	A	B	C	D
Line	**GL Account**	**Actual Amount**	**Vendor**	**Invoice**
1	49.7085.733081.3003.00	1,449.00	Ice Miller, LLP	1401154
2	49.7086.736011.3005.00	14,525.10	SAMCO	15-1264
3	49.7086.736021.3005.00	3,713.20	Indiana Reclamation & Excavating, Inc.	17640
4	49.7086.736021.3005.00	3,818.00	Indiana Reclamation & Excavating, Inc.	17839
5	49.7086.718021.2103.00	6,960.00	Biochem, Inc.	14226
6	49.7086.736021.3005.00	3,060.00	Indiana Reclamation & Excavating, Inc.	18053
7	49.7087.736053.3005.00	4,007.50	Biochem, Inc.	14218
8	49.7087.736053.3005.00	59,970.29	Carmel Utilities	DECEMBER 2015
9	**Total**	**97,503.09**		

Westfield Wastewater **wp 431**
Determination of Non-Recurring Expenses

	A	B	C
Line	**Description**	**Reference**	**Amount**
	Test Year		
1	Business consulting projects	wp 431-S1, line 7	12,390
2	Facilities	wp 431-S1, line 13	6,574
3	Legacy billing system processing costs	wp 431-S1, line 37	60,746
4	Total	line 1 : line 3	79,710
5	Pro Forma Amount		-
6	**Pro Forma Adjustment for Non-Recurring Expenses**	line 5 - line 4	**(79,710)**

Methodology for pro forma adjustment:
* Determine expenses incurred during the test year that are non-recurring in nature

Westfield Wastewater **wp 431-S1**
Supporting Workpaper
Test Year Non-Recurring Expenses Detail

Line	A Description	B Period	C Account	D NARUC	E Amount
	Business consulting projects				
1	NEW GEN STRATEGIES	MAR-2015	49.7085.736081.3005.00	736081	$ 2,961.91
2	NEW GEN STRATEGIES	APR-2015	49.7085.736081.3005.00	736081	$ 2,487.50
3	NEW GEN STRATEGIES	OCT-2015	49.7085.736081.3005.00	736081	$ 1,052.50
4	BITWISE SOLUTIONS, INC.	APR-2015	49.7085.775081.1002.00	775081	$ 2,570.00
5	BITWISE SOLUTIONS, INC.	MAR-2015	49.7085.775081.1002.00	775081	$ 2,568.00
6	BITWISE SOLUTIONS, INC.	MAY-2015	49.7085.775053.1002.00	775053	$ 750.00
7	Subtotal				$ 12,389.91
	Facilities				
8	CITY OF WESTFIELD - building rent	JAN-2015	49.7085.741081.1049.00	741081	$ 800.00
9	CITY OF WESTFIELD - building rent	FEB-2015	49.7085.741081.1049.00	741081	$ 400.00
10	CITY OF WESTFIELD - building rent	MAR-2015	49.7085.741081.1049.00	741081	$ 400.00
11	CITY OF WESTFIELD - building rent	SEP-2015	49.7085.741081.1049.00	741081	$ 4,374.00
12	CITY OF WESTFIELD - building rent	OCT-2015	49.7085.741081.1049.00	741081	$ 600.00
13	Subtotal				$ 6,574.00
	Legacy billing system processing costs				
14	HUNTINGTON NATIONAL BANK5647	FEB-2015	49.7085.775071.1025.00	775071	$ 3,464.32
15	HUNTINGTON NATIONAL BANK5647	FEB-2015	49.7085.775071.1025.00	775071	$ 3,510.84
16	HUNTINGTON NATIONAL BANK5647	MAR-2015	49.7085.775071.1025.00	775071	$ 3,464.32
17	HUNTINGTON NATIONAL BANK5647	MAR-2015	49.7085.775071.1025.00	775071	$ (3,464.32)
18	HUNTINGTON NATIONAL BANK5647	APR-2015	49.7085.775071.1025.00	775071	$ 2,743.60
19	HUNTINGTON NATIONAL BANK5647	MAY-2015	49.7085.775071.1025.00	775071	$ 3,304.39
20	HUNTINGTON NATIONAL BANK5647	JUN-2015	49.7085.775071.1025.00	775071	$ 3,517.37
21	HUNTINGTON NATIONAL BANK5647	JUL-2015	49.7085.775071.1025.00	775071	$ 3,616.07
22	HUNTINGTON NATIONAL BANK5647	SEP-2015	49.7085.775071.1025.00	775071	$ 7,319.44
23	HUNTINGTON NATIONAL BANK5647	OCT-2015	49.7085.775071.1025.00	775071	$ 3,674.95
24	HUNTINGTON NATIONAL BANK5647	NOV-2015	49.7085.775071.1025.00	775071	$ 3,704.15
25	HUNTINGTON NATIONAL BANK5647	FEB-2015	49.7085.736071.3005.00	736071	$ 1,874.54
26	HUNTINGTON NATIONAL BANK5647	FEB-2015	49.7085.736071.3005.00	736071	$ 1,796.96
27	HUNTINGTON NATIONAL BANK5647	MAR-2015	49.7085.736071.3005.00	736071	$ 1,874.54
28	HUNTINGTON NATIONAL BANK5647	MAR-2015	49.7085.736071.3005.00	736071	$ (1,874.54)
29	HUNTINGTON NATIONAL BANK5647	APR-2015	49.7085.736071.3005.00	736071	$ 2,743.61
30	HUNTINGTON NATIONAL BANK5647	MAY-2015	49.7085.736071.3005.00	736071	$ 1,952.78
31	HUNTINGTON NATIONAL BANK5647	JUN-2015	49.7085.736071.3005.00	736071	$ 1,997.10
32	HUNTINGTON NATIONAL BANK5647	JUL-2015	49.7085.736071.3005.00	736071	$ 1,986.35
33	HUNTINGTON NATIONAL BANK5647	SEP-2015	49.7085.736071.3005.00	736071	$ 4,909.75
34	HUNTINGTON NATIONAL BANK5647	OCT-2015	49.7085.736071.3005.00	736071	$ 2,882.62
35	HUNTINGTON NATIONAL BANK5647	NOV-2015	49.7085.736071.3005.00	736071	$ 2,879.64
36	HUNTINGTON NATIONAL BANK5647	DEC-2015	49.7085.736071.3005.00	736071	$ 2,867.40
37	Subtotal				$ 60,745.88
38	**Total**				**$ 79,709.79**

Westfield Wastewater **wp 432**
Determination of Non-Allowed Expenses

	A	B	C	D
Line	**Description**	**Reference**	**Reference**	**Amount**
1	Indianapolis Zoo	Apr-15	49.7085.775081.1008.00	$ 950
2	Pro Forma Amount	n/a		-
3	**Pro Forma Adjustment to Non-Allowed Expenses**	line 2 - line 1		**$ (950)**

Methodology for pro forma adjustment:
* Determine expenses in test year O&M that are non-allowed in nature

Westfield Wastewater **wp 473**
Determination of Depreciation Expense

	A	B	C
Line	**Description**	**Reference**	**Amount**
	Test Year		
1	Depreciation Expense	Account 49.7085.403010.1201.00	2,199,654
2	Amortization of CIAC	Account 49.7085.403001.1201.00	(544,556)
3	Total	line 1 : line 2	1,655,098
	Pro Forma		
4	Depreciation on Plant in Service as of December 31, 2015	wp 473-S1, lines 30	2,194,912
5	Plus Depreciation on expected additions	wp 473-S2, lines 3	142,389
6	Total	line 4 : line 5	2,337,301
7	**Pro Forma Adjustment to Depreciation Expense**	line 6 - line 3	**682,203**

Methodology for pro forma adjustment:
* establish ongoing depreciation on most current plant in service schedule
* add depreciation on major additions after plant cut-off date

Westfield Wastewater **wp** **473-S1**
Supporting Workpaper
Depreciation on Utility Plant in Service

Line	A	B	C Depr Rate	D Balance December 31 2015	E Annual Depreciation (C * D)
	WESTFIELD WASTEWATER				
	Collection Plant				
1	**WC-353-20**	Land		825,743	
2	**WC-354-20**	Structures & Improvements	2.50%	647	16
3	**WC-360-20**	Collecting Sewers Force	2.50%	5,457,555	136,439
4	**WC-360-25**	CIAC Force Sewers	2.50%	157,773	3,944
5	**WC-361-20**	Collecting Sewers Gravity	2.50%	29,939,612	748,490
6	**WC-361-25**	CIAC Gravity Sewers	2.50%	22,687,192	567,180
7	**WC-363-20**	Services	2.50%	28,023	701
8	**WC-364-20**	Flow Measuring Devices	2.50%	1,282,486	32,062
9				60,379,031	1,488,832
	System Pumping Plant				
10	**WS-353-30**	Land		9,179	
11	**WS-354-30**	Structures & Improvements	2.50%	1,308,082	32,702
12	**WS-371-30**	Pumping Equipment	2.50%	1,820,223	45,506
13				3,137,484	78,208
	Treatment Plant				
14	**WT-353-40**	Land		210,269	
15	**WT-354-40**	Structures & Improvements	2.50%	16,819,637	420,491
16	**WT-380-40**	Treatment & Disposal Equipment	2.50%	7,131,095	178,277
17				24,161,000	598,768
	General Plant				
18	**WG-390-71**	Office Furniture	2.50%	26,666	667
19	**WG-390-72**	Office Machinery	2.50%	24,322	608
20	**WG-390-73**	Computer Equipment	2.50%	82,889	2,072
21	**WG-390-74**	Software	2.50%	328,633	8,216
22	**WG-391-70**	Transportation Equipment	2.50%	205,667	5,142
23	**WG-393-70**	Tools, Shop and Garage Equipment	2.50%	61,373	1,534
24	**WG-394-70**	Laboratory Equipment	2.50%	38,004	950
25	**WG-395-70**	Power Operated Equipment	2.50%	165,927	4,148
26	**WG-396-70**	Communication Equipment	2.50%	21,151	529
27	**WG-397-70**	Miscellaneous Equipment	2.50%	63,619	1,590
28	**WG-398-70**	Other Equipment	2.50%	145,914	3,648
29				1,164,165	29,104
30		**TOTAL WESTFIELD WASTEWATER**		**88,841,680**	**2,194,912**

Westfield Wastewater
Supporting Workpaper
Determination of Depreciation of Expected Asset Additions

wp 473-S2

	A	B	C	D	E	F	G
							(F * G)
Line	**Asset Category**	**Project Number**	**Project Name**	**Notes**	**WIP as of 6/30/2015**	**Depr Rate**	**Depreciation**
1	WC-361-20	49IN01227	156th St Interceptor Phase 1	In Service May 2016	3,291,158	2.50%	82,279
2	WS-371-30	49LS00868	WestfieldDowntownLiftStation	In Service Feb 2016	2,404,404	2.50%	60,110
3					**5,695,562**		**142,389**

Westfield Wastewater **wp 475**
Removal of Non-Recoverable Amortization Expense

	A	B	C
Line	**Description**	**Reference**	**Amount**
1	Test Year Amortization of Acquisition Adjustment	Account 406010	199,220
2	Pro Forma Amortization Expense	n/a	-
3	**Pro Forma Adjustment to Non-Recoverable Amortization Expense**	line 2 - line 1	**(199,220)**

Methodology for pro forma adjustment:
* remove test year amount for non-recoverable amortization expense

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(3) The following monthly information by rate class for the test year:

(A) Operating revenues.

(B) Sales or deliveries.

(C) Number of customers.

(D) Unbilled revenues.

Citizens Wastewater of Westfield, LLC
January, 2015 - December, 2015

Line No.	Account No.	Account Description	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	July 2015	August 2015	September 2015	October 2015	November 2015	December 2015	Total
			A	B	C	D	E	F	G	H	I	J	K	L	M
		Unbilled Revenue ($)													
1	522110	Residential	$72,332	$20,957	$60,621	$11,700	($18,345)	$41,596	($2,159)	($20,588)	($89,037)	$22,710	$82,866	$6,261	$188,914
2	522210	Non-Res (Commercial)	$19,555	$4,252	$4,060	$4,543	($205)	$7,016	$11,233	($23,910)	($3,178)	($6,301)	$13,378	$2,026	$32,469
3	522310	Non-Res (Industrial)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
4	522410	Non_Res (Public Authority)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
5	522510	Non-Res (Multiple Family)	$4,848	$5,952	$130	$366	($1,104)	$6,226	$5,198	($9,758)	$299	($4,245)	$3,428	$5,271	$16,611
6		**Total Unbilled Revenue**	$96,735	$31,161	$64,811	$16,609	($19,654)	$54,838	$14,272	($54,256)	($91,916)	$12,164	$99,672	$13,558	$237,994
		Operating Revenues ($)													
7	522110	Residential	$855,961	$563,226	$621,130	$570,827	$528,307	$617,102	$576,921	$549,893	$501,561	$600,572	$708,858	$612,598	$7,306,957
8	522210	Non-Res (Commercial)	19,697	188,285	170,686	195,278	195,147	201,147	228,892	138,245	202,849	167,844	172,016	181,582	2,061,669
9	522310	Non-Res (Industrial)	0	0	0	0	0	0	0	0	0	0	0	0	0
10	522410	Non_Res (Public Authority)	0	0	0	0	0	0	0	0	0	0	0	0	0
11	522510	Non-Res (Multiple Family)	4,848	5,952	130	366	(1,104)	6,226	5,198	(9,758)	299	(4,245)	3,428	5,271	16,611
12	470010	Forfeit Discount	2,658	4,017	3,135	2,742	2,784	3,441	3,612	3,702	3,003	3,435	3,252	4,889	40,670
13	471010	Misc Revenues	31	85	697	1,280	629	618	856	715	55	903	89	200	6,162
14		**Total I/S Revenue**	$883,195	$761,565	$795,778	$770,493	$725,763	$828,534	$815,480	$682,798	$707,768	$768,509	$887,643	$804,540	$9,432,069
		Customer Count (#)													
15	522110	Residential 5/8" or 3/4"	9,812	9,883	9,884	9,867	9,878	10,123	10,079	10,115	10,202	10,295	10,349	10,358	120,845
16	522110	Residential 1"	343	345	345	342	345	350	344	346	347	348	348	348	4,151
17	522110	Residential 1.5"	1	1	1	1	1	1	1	1	1	1	1	1	12
18	522110	Residential Unmetered	22	22	22	22	22	23	25	25	24	27	27	27	288
19	522210	Non-Res (Commercial) 5/8" or 3/4"	260	259	259	260	260	261	261	262	266	267	269	267	3,151
20	522210	Non-Res (Commercial) 1"	201	200	200	201	200	198	196	198	196	198	196	196	2,380
21	522210	Non-Res (Commercial) 1.5"	12	11	12	12	11	12	12	12	12	11	12	12	141
22	522210	Non-Res (Commercial) 2"	172	186	176	176	170	181	178	178	182	184	184	185	2,152

Citizens Wastewater of Westfield, LLC
January, 2015 - December, 2015

Line No.	Account No.	Account Description	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	July 2015	August 2015	September 2015	October 2015	November 2015	December 2015	Total
			A	B	C	D	E	F	G	H	I	J	K	L	M
23	522210	Non-Res (Commercial) 3"	0	0	0	0	0	0	0	0	0	0	0	0	0
24	522210	Non-Res (Commercial) 4"	0	0	0	0	0	0	0	0	0	0	0	0	0
25	522210	Non-Res (Commercial) 6"	0	0	0	0	0	0	0	0	0	0	0	0	0
26	522210	Non-Res (Commercial) 8"	3	4	4	4	4	4	4	4	4	4	4	4	47
27	522310	Non-Res (Industrial)	0	0	0	0	0	0	0	0	0	0	0	0	0
28	522410	Non-Res (Public Authority) 5/8" or 3/4"	0	0	0	0	0	0	0	0	0	0	0	0	0
29	522410	Non-Res (Public Authority) 1"	0	0	0	0	0	0	0	0	0	0	0	0	0
30	522410	Non-Res (Public Authority) 1.5"	0	0	0	0	0	0	0	0	0	0	0	0	0
31	522410	Non-Res (Public Authority) 2"	0	0	0	0	0	0	0	0	0	0	0	0	0
32	522510	Non-Res (Multiple Family)	0	0	0	0	0	0	0	0	0	0	0	0	0
33		**Total Customer Count**	10,826	10,911	10,903	10,885	10,891	11,153	11,100	11,141	11,234	11,335	11,390	11,398	133,167
		Customer Volumes													
34	522110	Residential First 5 Mgal	22,001	10,314	13,910	14,835	13,348	18,470	18,280	15,325	20,920	14,948	15,900	21,480	199,731
35	522110	Residential Over 5 Mgal	11,719	4,124	6,721	6,764	4,796	7,813	8,025	6,510	9,681	6,232	12,708	9,909	95,002
36	522110	Non-Res (Commercial): First 5 Mgal	340	275	335	310	345	385	420	395	415	330	350	320	4,220
37	522110	Non-Res (Commercial): Over 5 Mgal	4,085	2,652	2,127	6,141	5,541	3,391	5,188	897	1,404	969	901	1,583	34,879
38	522110	Non-Res (Commercial): First 12 Mgal	2,441	2,352	2,424	2,424	2,616	2,688	2,736	2,664	2,964	2,952	2,592	2,712	31,565
39	522110	Non-Res (Commercial): Over 12 Mgal	15,268	15,150	13,408	12,761	14,078	15,972	17,654	13,825	19,640	15,334	13,163	15,577	181,830
40	522310	Non-Res (Industrial)	0	0	0	0	0	0	0	0	0	0	0	0	0
41	522110	Non-Res (Public Authority): First 5 Mgal	0	0	0	0	0	0	0	0	0	0	0	0	0
42	522110	Non-Res (Public Authority): Over 5 Mgal	0	0	0	0	0	0	0	0	0	0	0	0	0
43	522110	Non-Res (Public Authority): First 12 Mgal	0	0	0	0	0	0	0	0	0	0	0	0	0

Citizens Wastewater of Westfield, LLC
January, 2015 - December, 2015

Line No.	Account No.	Account Description	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	July 2015	August 2015	September 2015	October 2015	November 2015	December 2015	Total
			A	B	C	D	E	F	G	H	I	J	K	L	M
44	522110	Non-Res (Public Authority): Over 12 Mgal	0	0	0	0	0	0	0	0	0	0	0	0	0
45	522510	Non-Res (Multiple Family)	0	0	0	0	0	0	0	0	0	0	0	0	0
46		**Total Volumes (Mgal)**	55,854	34,867	38,925	43,235	40,724	48,719	52,303	39,616	55,024	40,765	45,614	51,581	547,227

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(4) Pro forma:

(A) revenues;

(B) sales or deliveries; and

(C) numbers of customers;

for the test year, including detailed calculations supporting adjustments, if any, for annualization.

Annualized Test Year Revenues at Present Versus Proposed Rates
Citizens Wastewater of Westfield, LLC
Summary Schedule of all Rate Class Revenues

	Pro Forma Summary at Current Rates	(A) Cause No. 44273 Approved Rates	(B) Sources	(C) 2015 - 2016 Number & Type of Units	(D) Pro forma Revenues
	Sewer Rate 1 - Residential Sewage Disposal Service				
	Residential Base Charge Revenue				
1	Residential Base - 5/8" meter	$ 16.10 /month		123,329 services	$ 1,985,597
2	Residential Base - 1" meter	$ 16.10 /month		4,151 services	$ 66,831
3	Residential Base - 1 1/2" meter	$ 16.10 /month		12 services	$ 193
4	Residential Base - 2" meter	$ 16.10 /month		0 services	$ -
5	Residential Base - 3" meter	$ 16.10 /month		0 services	$ -
6	Residential Base - 4" meter	$ 16.10 /month		0 services	$ -
7	Residential Base - 6" meter	$ 16.10 /month		0 services	$ -
8	Residential Base - 8" meter	$ 16.10 /month		0 services	$ -
9	Total Residential Base Charge Revenue (sum of lines 1 thru 8)			127,492 services	$ 2,052,621
	Residential Volumetric Revenue				
10	First 5,000 gallons	$ 7.0000 Mgal		637,460 1,000 gal	4,462,220
11	Over 5,000 gallons	$ 7.0000 Mgal		95,002 1,000 gal	665,014
12	Total Residential Volumetric Revenue (line 10 + line 11)			732,462	$ 5,127,234
13	Unmetered Revenue	$ 79.10		288	$22,781
14	Total Rate 1 Pro Forma Revenue (line 9 + line 12 + line 13)				$ 7,202,636
15	Reconciliaton factor	0.999626			0.99963
16	Adjusted Total Rate 1 Pro Forma Revenue at Present Rates (line 14 * line 15)				$ 7,199,944
	Sewer Rate 2 - Non-Residential Sewage Disposal Service				
	Non-Residential Base Charge Revenue				
17	Non-Residential Base - 5/8" meter	$ 16.10 /month		3,151 services	$ 50,731
18	Non-Residential Base - 1" meter	$ 40.23 /month		2,440 services	$ 98,161
19	Non-Residential Base - 1 1/2" meter	$ 40.23 /month		141 services	$ 5,672
20	Non-Residential Base - 2" meter	$ 40.23 /month		2,152 services	$ 86,575
21	Non-Residential Base - 3" meter	$ 40.23 /month		0 services	$ -
22	Non-Residential Base - 4" meter	$ 40.23 /month		0 services	$ -
23	Non-Residential Base - 6" meter	$ 40.23 /month		0 services	$ -
24	Non-Residential Base - 8" meter	$ 40.23 /month		48 services	$ 1,931
25	Total Non-Residential Base Charge Revenue (sum of lines 17 thru 24)			7,932	$ 243,071
	Non-Residential Volumetric Revenue				
26	First 5,000 gallons (5/8" and 3/4" meters)	$ 7.00 Mgal		15,755 services	$ 110,285
27	Over 5,000 gallons (5/8" and 3/4" meters)	$ 7.00 Mgal		34,879 services	$ 244,153
28	First 12,000 gallons (1" and larger meters)	$ 7.00 Mgal		57,372 services	$ 401,604
29	Over 12,000 gallons (1" and larger meters)	$ 7.00 Mgal		181,830 services	$ 1,272,810
30	Total Non-Residential Volumetric Revenue (sum of lines 26 thru 29)			289,836	$ 2,028,852
31	Total Rate 2 Pro Forma Revenue (line 25 + line 30)				2,271,923
32	Reconciliaton factor	1.00925			1.00925
33	Adjusted Total Rate 2 Pro Forma Revenue at Present Rates (line 31 * line 32)				2,292,946
	Miscellaneous Revenue				
34	470010 - Forfeited Discounts				$40,669
35	471010 - Miscellaneous Revenue				$6,162
36	**Total Pro forma Revenue**				$ 9,539,721

Citizens Wastewater of Westfield, LLC
Pro Forma Volumes
January - December
Rate 1

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Adjusted Test Year														
1	First 5 Mgal	wp #620	22,001	10,314	13,910	14,835	13,348	18,470	18,280	15,325	20,920	14,948	15,900	21,480	199,731
2	Over 5 Mgal	wp #620	11,719	4,124	6,721	6,764	4,796	7,813	8,025	6,510	9,681	6,232	12,708	9,909	95,002
3	Total		33,720	14,438	20,631	21,599	18,144	26,283	26,305	21,835	30,601	21,180	28,608	31,389	294,733
	Pro Forma Additions														
4	First 5 Mgal	wp #630-5	29,814	41,866	38,275	37,250	38,807	34,935	34,875	38,020	32,865	39,307	38,625	33,090	437,729
5	Over 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
6	Total		29,814	41,866	38,275	37,250	38,807	34,935	34,875	38,020	32,865	39,307	38,625	33,090	437,729
	Pro Forma Deletions														
7	First 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
8	Over 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
9	Total		-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Pro Forma														
10	First 5 Mgal	(ln1 + ln4 - ln7)	51,815	52,180	52,185	52,085	52,155	53,405	53,155	53,345	53,785	54,255	54,525	54,570	637,460
11	Over 5 Mgal	(ln2 + ln5 - ln8)	11,719	4,124	6,721	6,764	4,796	7,813	8,025	6,510	9,681	6,232	12,708	9,909	95,002
12	Total	(ln10 + ln11)	63,534	56,304	58,906	58,849	56,951	61,218	61,180	59,855	63,466	60,487	67,233	64,479	732,462

Citizens Wastewater of Westfield, LLC
Pro Forma Volumes
January - December
Rate 2

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Adjusted Test Year Total														
1	First 5 Mgal	wp #620	340	275	335	310	345	385	420	395	415	330	350	320	4,220
2	Over 5 Mgal	wp #620	4,085	2,652	2,127	6,141	5,541	3,391	5,188	897	1,404	969	901	1,583	34,879
3	Total		4,425	2,927	2,462	6,451	5,886	3,776	5,608	1,292	1,819	1,299	1,251	1,903	39,099
	Pro Forma Additions														
4	First 5 Mgal	wp #630-6, ln 12	960	1,020	960	990	955	920	885	915	915	1,005	995	1,015	11,535
5	Over 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
6	Total		960	1,020	960	990	955	920	885	915	915	1,005	995	1,015	11,535
	Pro Forma Deletions														
7	First 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
8	Over 5 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
9	Total		-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Pro Forma														
10	First 5 Mgal	(ln1 + ln4 - ln7)	1,300	1,295	1,295	1,300	1,300	1,305	1,305	1,310	1,330	1,335	1,345	1,335	15,755
11	Over 5 Mgal	(ln2 + ln5 - ln8)	4,085	2,652	2,127	6,141	5,541	3,391	5,188	897	1,404	969	901	1,583	34,879
12	Total	(ln 10 + ln 11)	5,385	3,947	3,422	7,441	6,841	4,696	6,493	2,207	2,734	2,304	2,246	2,918	50,634
	Adjusted Test Year Total														
13	First 12 Mgal	wp #620	2,441	2,352	2,424	2,424	2,616	2,688	2,736	2,664	2,964	2,952	2,592	2,712	31,565
14	Over 12 Mgal	wp #620	15,268	15,150	13,408	12,761	14,078	15,972	17,654	13,825	19,640	15,334	13,163	15,577	181,830
15	Total		17,709	17,502	15,832	15,185	16,694	18,660	20,390	16,489	22,604	18,286	15,755	18,289	213,395
	Pro Forma Additions														
16	First 12 Mgal	wp #630-6, ln 15	2,287	2,520	2,340	2,352	2,064	2,112	2,004	2,100	1,824	1,872	2,220	2,112	25,807
17	Over 12 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
18	Total		2,287	2,520	2,340	2,352	2,064	2,112	2,004	2,100	1,824	1,872	2,220	2,112	25,807
	Pro Forma Deletions														
19	First 12 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
20	Over 12 Mgal		-	-	-	-	-	-	-	-	-	-	-	-	-
21	Total		-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Pro Forma														
22	First 12 Mgal	(ln13 + ln16 - ln19)	4,728	4,872	4,764	4,776	4,680	4,800	4,740	4,764	4,788	4,824	4,812	4,824	57,372
23	Over 12 Mgal	(ln14 + ln17 - ln 20)	15,268	15,150	13,408	12,761	14,078	15,972	17,654	13,825	19,640	15,334	13,163	15,577	181,830
24	Total	(ln 22 + ln 23)	19,996	20,022	18,172	17,537	18,758	20,772	22,394	18,589	24,428	20,158	17,975	20,401	239,202
25	Total Pro Forma	(ln12 + ln24)	25,381	23,969	21,594	24,978	25,599	25,468	28,887	20,796	27,162	22,462	20,221	23,319	289,836

Citizens Wastewater of Westfield, LLC
Adjusted Test Year Customer Counts
January - December
Rate 1

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Adjusted Test Year														
	Base Charge														
1	5/8" or 3/4" Meter	wp # 620	9,812	9,883	9,884	9,867	9,878	10,123	10,079	10,115	10,202	10,295	10,349	10,358	120,845
2	1" Meter	wp # 620	343	345	345	342	345	350	344	346	347	348	348	348	4,151
3	1.5" Meter	wp # 620	1	1	1	1	1	1	1	1	1	1	1	1	12
4	Total		10,156	10,229	10,230	10,210	10,224	10,474	10,424	10,462	10,550	10,644	10,698	10,707	125,008
	Pro Forma Additions														
	Base Charge														
5	5/8" or 3/4" Meter		207	207	207	207	207	207	207	207	207	207	207	207	2484
6	1" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
7	1.5" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
8	Total		207	207	207	207	207	207	207	207	207	207	207	207	2,484
	Pro Forma Deletions														
	Base Charge														
9	5/8" or 3/4" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
10	1" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
11	1.5" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
12	Total		-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Pro Forma														
	Base Charge														
13	5/8" or 3/4" Meter	(ln1 + ln5 - ln9)	10,019	10,090	10,091	10,074	10,085	10,330	10,286	10,322	10,409	10,502	10,556	10,565	123,329
14	1" Meter	(ln2 + ln6 - ln10)	343	345	345	342	345	350	344	346	347	348	348	348	4,151
15	1.5" Meter	(ln3 + ln7 - ln11)	1	1	1	1	1	1	1	1	1	1	1	1	12
16	Total	(ln13 + ln14 + ln15)	10,363	10,436	10,437	10,417	10,431	10,681	10,631	10,669	10,757	10,851	10,905	10,914	127,492

Citizens Wastewater of Westfield, LLC
Adjusted Test Year Customer Counts
January - December
Rate 2

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Adjusted Test Year														
	Base Charge														
1	5/8" or 3/4" Meter	wp #620	260	259	259	260	260	261	261	262	266	267	269	267	3,151
2	1" Meter	wp #620	201	200	200	201	200	198	196	198	196	198	196	196	2,380
3	1.5" Meter	wp #620	12	11	12	12	11	12	12	12	12	11	12	12	141
4	2" Meter	wp #620	172	186	176	176	170	181	178	178	182	184	184	185	2,152
5	3" Meter	wp #620	-	-	-	-	-	-	-	-	-	-	-	-	-
6	4" Meter	wp #620	-	-	-	-	-	-	-	-	-	-	-	-	-
7	6" Meter	wp #620	-	-	-	-	-	-	-	-	-	-	-	-	-
8	8" Meter	wp #620	3	4	4	4	4	4	4	4	4	4	4	4	47
9	Total		648	660	651	653	645	656	651	654	660	664	665	664	7,871
	Pro Forma Additions														
	Base Charge														
10	5/8" or 3/4" Meter														
11	1" Meter		5	5	5	5	5	5	5	5	5	5	5	5	60
12	1.5" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
13	2" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
14	3" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
15	4" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
16	6" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
17	8" Meter		1	-	-	-	-	-	-	-	-	-	-	-	1
18	Total		6	5	5	5	5	5	5	5	5	5	5	5	61
	Pro Forma Deletions														
	Base Charge														
19	5/8" or 3/4" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
20	1" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
21	1.5" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
22	2" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
23	3" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
24	4" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
25	6" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
26	8" Meter		-	-	-	-	-	-	-	-	-	-	-	-	-
27	Total		-	-	-	-	-	-	-	-	-	-	-	-	-

Citizens Wastewater of Westfield
Adjusted Test Year Customer Counts
January - December
Rate 2

	Total Pro Forma														
	Base Charge														
28	5/8" or 3/4" Meter	(ln1 + ln10 - ln19)	260	259	259	260	260	261	261	262	266	267	269	267	3,151
29	1" Meter	(ln2 + ln11 - ln20)	206	205	205	206	205	203	201	203	201	203	201	201	2,440
30	1.5" Meter	(ln3 + ln12 - ln21)	12	11	12	12	11	12	12	12	12	11	12	12	141
31	2" Meter	(ln4 + ln13 - ln22)	172	186	176	176	170	181	178	178	182	184	184	185	2,152
32	3" Meter	(ln5 + ln14 - ln23)	-	-	-	-	-	-	-	-	-	-	-	-	-
33	4" Meter	(ln6 + ln15 - ln24)	-	-	-	-	-	-	-	-	-	-	-	-	-
34	6" Meter	(ln7 + ln16 - ln25)	-	-	-	-	-	-	-	-	-	-	-	-	-
35	8" Meter	(ln8 + ln17 - ln26)	4	4	4	4	4	4	4	4	4	4	4	4	48
36	Total	(ln28 + ln29 + ln30 + ln31 + ln32 + ln33 + ln34 + ln35)	654	665	656	658	650	661	656	659	665	669	670	669	7,932

Citizens Wastewater of Westfield, LLC
Pro Forma Minimum Charge Calculation
January - December
Rate 1

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Pro Forma Billing Instances														
1	Rate 1	wp #630-3, ln 16	10,363	10,436	10,437	10,417	10,431	10,681	10,631	10,669	10,757	10,851	10,905	10,914	127,492
2	Minimum Volume	(ln 1 * 5)	51,815	52,180	52,185	52,085	52,155	53,405	53,155	53,345	53,785	54,255	54,525	54,570	637,460
3	Adjusted Test Year Volume	wp #630-1, ln 1	22,001	10,314	13,910	14,835	13,348	18,470	18,280	15,325	20,920	14,948	15,900	21,480	199,731
4	Pro Forma Adjustment	(ln 2 - ln 3)	29,814	41,866	38,275	37,250	38,807	34,935	34,875	38,020	32,865	39,307	38,625	33,090	437,729

Citizens Wastewater of Westfield, LLC
Pro Forma Minimum Charge Calculation
January - December
Rate 2

			A	B	C	D	E	F	G	H	I	J	K	L	M
Line No	Description	Source	January	February	March	April	May	June	July	August	September	October	November	December	Total
	Pro Forma Billing Instances														
1	5/8" or 3/4" Meter	wp #630-4, ln 28	260	259	259	260	260	261	261	262	266	267	269	267	3,151
2	1" Meter	wp #630-4, ln 29	206	205	205	206	205	203	201	203	201	203	201	201	2,440
3	1.5" Meter	wp #630-4, ln 30	12	11	12	12	11	12	12	12	12	11	12	12	141
4	2" Meter	wp #630-4, ln 31	172	186	176	176	170	181	178	178	182	184	184	185	2,152
5	3" Meter	wp #630-4, ln 32	-	-	-	-	-	-	-	-	-	-	-	-	-
6	4" Meter	wp #630-4, ln 33	-	-	-	-	-	-	-	-	-	-	-	-	-
7	6" Meter	wp #630-4, ln 34	-	-	-	-	-	-	-	-	-	-	-	-	-
8	8" Meter	wp #630-4, ln 35	4	4	4	4	4	4	4	4	4	4	4	4	48
9	Total		654	665	656	658	650	661	656	659	665	669	670	669	7,932
	First 5 Mgal - 5/8" or 3/4"														
10	Minimum Volume	(ln 1 * 5)	1,300	1,295	1,295	1,300	1,300	1,305	1,305	1,310	1,330	1,335	1,345	1,335	15,755
11	Adjusted Test Year Volume	wp #630-2, ln 1	340	275	335	310	345	385	420	395	415	330	350	320	4,220
12	Pro Forma Adjustment	(ln 10 - ln 11)	960	1,020	960	990	955	920	885	915	915	1,005	995	1,015	11,535
	First 12 Mgal 1" or Greater														
13	Minimum Volume	(sum ln 2 thru ln 8) * 12	4,728	4,872	4,764	4,776	4,680	4,800	4,740	4,764	4,788	4,824	4,812	4,824	57,372
14	Adjusted Test Year Volume	wp #630-2, ln 13	2,441	2,352	2,424	2,424	2,616	2,688	2,736	2,664	2,964	2,952	2,592	2,712	31,565
15	Pro Forma Adjustment	(ln 13 - ln 14)	2,287	2,520	2,340	2,352	2,064	2,112	2,004	2,100	1,824	1,872	2,220	2,112	25,807

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(5) Pro forma revenue adjustment and support therefor relating to the proposed change in any nonrecurring charge, including, but not limited to, the following, as applicable:

(A) Insufficient funds check charge.

(B) Reconnect charge.

(C) Disconnect charge.

(D) Records charge.

(E) Collection charge.

(F) Meter testing charge.

(G) Meter reading charge.

(H) Meter tampering charge.

(I) Connection or tap fee.

Citizens Wastewater of Westfield, LLC wp WS660
Miscellaneous Revenues

Line No.		CY 2015	Pro Forma	Adjustment
1	Late Payment Charges	40,067	40,067	0
2	Reconnection Fees	-	-	0
3	Return Check Fees	275	275	0
4	Collection Fees	6,111	6,111	0
5	Other Revenue	378	378	0
		46,831	46,831	0

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(6) The utility's written policies and procedures, if any, related to the write-off of any customer accounts as uncollectible.

Citizens Energy Group writes off inactive accounts a minimum of 150 days from the due date of the final bill. The automated write off process is run twice a month - mid month and end of month.

The bad debt provision is recorded monthly for at least the first seven months of the fiscal year using one of three calculation methods:

a. The budgeted amount of bad debt expense.
b. The budgeted bad debt expense percentage multiplied by actual revenue.
c. The five month lag, which looks at recent, historical write off percentages. This method matches up recent revenue and its corresponding write off. The historical write off percentage is then multiplied by the current month's revenue. The five month lag method uses actual data to recognize any write off trends and does not consider budgeted amounts or percentages.

To arrive at the appropriate year end reserve, each month between May and September, the remaining net write off for the fiscal year is determined by systematically selecting inactive accounts eligible for write off by fiscal year end and reducing the amount by recovery percentages using historical recovery data.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(7) The utility's actual operating expenses by account and subaccount for the test year.

Westfield Wastewater **wp 100**
170 IAC 1-5-8 (7)
Trial Balance - all accounts
as of December 31, 2015

Account	Account Description	Amount
101100	Plant in Service	88,841,680.15
105010	Construction Work in Progress	4,673,212.82
106010	Completed Construction not Classified	27,708.00
108100	Accumulated Depreciation	(22,397,636.35)
114010	Utility Plant Acquisition Adjustment	8,447,539.22
115010	Accumulated Amortization of Acquisition Adjustment	(353,990.76)
131230	Cash	72,355.57
131236	Cash - BMO Harris Bank Account Clearing	1,350,895.31
141050	Accounts Receivable - Customers	995,186.94
141051	Cash Clearing	1,295.81
142001	Accounts Receivable - Misc.	86.11
143001	Accumulated Provision for Uncollectible Accounts	(66,590.00)
162010	Prepaid - Insurance	26,403.12
173100	Accrued Utility Revenue - Unbilled Revenue	590,203.00
181269	Bond Issuance Expense Westfield Wastewater 2014 Utility Bonds	207,877.54
211100	Additional Paid-In Capital	(44,622,491.68)
215100	Retained Earnings	(2,090,554.14)
215140	Distributions	3,181,295.00
221269	Bonds - Westfield Wastewater 2014 Utility Bonds	(15,270,000.00)
231010	Accounts Payable	(308,133.91)
232109	PNC Bank Line of Credit - Westfield Wastewater	(1,000,000.00)
233010	Intercompany A/P and A/R	(212,435.93)
236111	Accrued Taxes - Employer FICA Tax	(2,187.81)
236116	Accrued Taxes - IN Utilities Receipts Tax	(9,221.19)
236117	Accrued Taxes - Property Tax	(584,520.00)
237142	Accrued Interest - Westfield Utilities 2014 Utility Bonds	(581.76)
237222	Accrued Interest - PNC Line of Credit	(7,312.95)
237267	Accrued Interest - Westfield Utilities 2014 Utility Bonds	(40,144.66)
241010	Accrued Payroll Earnings	(4,142.10)
241012	Accrued Employer Thrift Plan Contribution	(659.45)
241017	Misc. Current Liabilities Other	(311,621.47)
241020	Accrued Incentive Plan-Short Term	(11,701.89)
252100	Customer Advances for Construction	(421,080.00)
253210	Derivative Liability	(176,337.00)
271010	Contributions in Aid of Construction	(22,423,885.06)
272010	Accumulated Amortization for CIAC	4,530,219.38
403001	Amortization CIAC	(544,555.99)
403010	Depreciation	2,351,891.93
406010	Amortization Acquisition Adjustment	199,220.26
408111	Tax Expense - Property	589,423.71
408121	Tax Expense - FICA	2,585.53
408131	Tax Expense - Indiana Utility Receipts Tax	131,055.73
408132	Tax Expense - Misc.	56.72
416040	Service Appliance-No Charge	(0.26)
420010	Allowance for Funds Used During Construction	(467.57)
421010	Misc. Non-Operating Income	(863.55)
427200	Line of Credit Interest Expense	28,501.11
427320	Westfield Wastewater 2014 Utility Bonds Interest	447,710.89
427321	Interest Expense - PNC Swap	12,065.00
428030	Bond Issuance Expense	64,502.97
521110	Flat Rate Revenues-Residential	221,410.59
521210	Flat Rate Revenues-Commercial	31,362.96
521510	Flat Rate Revenues-Multiple Family Dwelling	5,949.00
522110	Measured Revenue-Residential	(7,528,369.13)
522210	Measured Revenue-Commercial	(2,093,032.77)
522510	Measured Revenue-Multiple Family Dwelling	(22,560.00)
532010	Late Payment Charges	(40,669.04)
536010	Other Wastewater Revenues	(6,161.88)
701011	Salary - Collection Exp, Ops	207,160.79
701021	Salary - Collection Exp, Mtce	(16.15)
701031	Salary - Pumping Exp, Ops	(109.97)
701051	Short-Term Incentive Plan	9,838.09
701053	Salary - T&D, Primary, Ops	303,398.19

701063	Salary - T&D, Primary, Mtce	1,181.58
701071	Salary - Customer Accts	126,876.61
701081	Salary - Admin & General	555,356.31
704011	Benefits - Collection Exp, Ops	11.78
704053	Benefits - T&D, Primary, Ops	421.78
704063	Benefits - T&D, Primary, Mtce	2.17
704071	Benefits - Customer Accts	37.16
704081	Benefits - Admin & General	29,994.78
711063	Sludge Removal - T&D, Primary, Mtce	167,234.33
715011	Prch Pwr - Collection Exp, Ops	65,741.43
715053	Prch Pwr - T&D, Primary, Ops	265,920.84
715081	Prch Pwr - Admin & General	5,422.54
716053	Fuel-Pwr - T&D, Primary, Ops	2.82
718021	Chemicals - Collection Exp, Mtce	54,901.90
718053	Chemicals - T&D, Primary, Ops	58,678.47
720011	Mat/Sply - Collection Exp, Ops	5,506.72
720021	Mat/Sply - Collection Exp, Mtce	17,721.94
720041	Mat/Sply - Pumping Exp, Mtce	362.44
720053	Mat/Sply - T&D, Primary, Ops	3,118.02
720055	Mat/Sply - T&D, Secondary, Ops	10,595.60
720063	Mat/Sply - T&D, Primary, Mtce	30,328.04
720065	Mat/Sply - T&D, Secondary, Mtce	12,021.03
720071	Mat/Sply - Customer Accts	2,245.57
720081	Mat/Sply - Admin & General	68,555.51
732081	OS-Acct - Admin & General	9,870.02
733081	OS-Lgl - Admin & General	17,735.97
736011	OS-Other - Collection Exp, Ops	189,047.66
736021	OS-Other - Collection Exp, Mtce	78,291.93
736053	OS-Other - T&D, Primary, Ops	701,062.64
736055	OS-Other - T&D, Secondary, Ops	9,920.00
736063	OS-Other - T&D, Primary, Mtce	5,625.00
736071	OS-Other - Customer Accts	40,432.83
736081	OS-Other - Admin & General	180,521.89
741011	Rent-Prop - Collection Exp, Ops	4.24
741053	Rent-Prop - T&D, Primary, Ops	9,283.00
741081	Rent-Prop - Admin & General	6,595.40
742021	Rent-Eq - Collection Exp, Mtce	58.85
742063	Rent-Eq - T&D, Primary, Mtce	1,487.75
742081	Rent-Eq - Admin & General	2,679.51
750011	Transp - Collection Exp, Ops	16,399.77
750021	Transp - Collection Exp, Mtce	88.68
750053	Transp - T&D, Primary, Ops	10,312.04
750071	Transp - Customer Accts	30.45
750081	Transp - Admin & General	877.03
757081	Ins-Gen - Admin & General	12,714.42
758081	Ins-WC - Admin & General	3,985.23
759081	Ins-Other - Admin & General	33,675.70
760081	Advertising Expense - Admin & General	2,986.68
770071	Bad Debt Expense - Customer Accts	29,265.00
775011	Misc - Collection Exp, Ops	74.97
775021	Misc - Collection Exp, Mtce	436.21
775053	Misc - T&D, Primary, Ops	7,684.55
775063	Misc - T&D, Primary, Mtce	1.73
775071	Misc - Customer Accts	62,128.50
775081	Misc - Admin & General	48,290.17
775085	Bank Fees	36,135.79

Westfield Wastewater **wp 101**
170 IAC 1-5-8 (7)
Test Year Income Statement trial balance by account (December 31, 2015)

Account	Account Description	Amount
403001	Amortization CIAC	(544,555.99)
403010	Depreciation	2,351,891.93
406010	Amortization Acquisition Adjustment	199,220.26
408111	Tax Expense - Property	589,423.71
408121	Tax Expense - FICA	2,585.53
408131	Tax Expense - Indiana Utility Receipts Tax	131,055.73
408132	Tax Expense - Misc.	56.72
416040	Service Appliance-No Charge	(0.26)
420010	Allowance for Funds Used During Construction	(467.57)
421010	Misc. Non-Operating Income	(863.55)
427200	Line of Credit Interest Expense	28,501.11
427320	Westfield Wastewater 2014 Utility Bonds Interest	447,710.89
427321	Interest Expense - PNC Swap	12,065.00
428030	Bond Issuance Expense	64,502.97
521110	Flat Rate Revenues-Residential	221,410.59
521210	Flat Rate Revenues-Commercial	31,362.96
521510	Flat Rate Revenues-Multiple Family Dwelling	5,949.00
522110	Measured Revenue-Residential	(7,528,369.13)
522210	Measured Revenue-Commercial	(2,093,032.77)
522510	Measured Revenue-Multiple Family Dwelling	(22,560.00)
532010	Late Payment Charges	(40,669.04)
536010	Other Wastewater Revenues	(6,161.88)
701011	Salary - Collection Exp, Ops	207,160.79
701021	Salary - Collection Exp, Mtce	(16.15)
701031	Salary - Pumping Exp, Ops	(109.97)
701051	Short-Term Incentive Plan	9,838.09
701053	Salary - T&D, Primary, Ops	303,398.19
701063	Salary - T&D, Primary, Mtce	1,181.58
701071	Salary - Customer Accts	126,876.61
701081	Salary - Admin & General	555,356.31
704011	Benefits - Collection Exp, Ops	11.78
704053	Benefits - T&D, Primary, Ops	421.78
704063	Benefits - T&D, Primary, Mtce	2.17
704071	Benefits - Customer Accts	37.16
704081	Benefits - Admin & General	29,994.78
711063	Sludge Removal - T&D, Primary, Mtce	167,234.33
715011	Prch Pwr - Collection Exp, Ops	65,741.43
715053	Prch Pwr - T&D, Primary, Ops	265,920.84
715081	Prch Pwr - Admin & General	5,422.54
716053	Fuel-Pwr - T&D, Primary, Ops	2.82
718021	Chemicals - Collection Exp, Mtce	54,901.90
718053	Chemicals - T&D, Primary, Ops	58,678.47
720011	Mat/Sply - Collection Exp, Ops	5,506.72
720021	Mat/Sply - Collection Exp, Mtce	17,721.94
720041	Mat/Sply - Pumping Exp, Mtce	362.44
720053	Mat/Sply - T&D, Primary, Ops	3,118.02
720055	Mat/Sply - T&D, Secondary, Ops	10,595.60
720063	Mat/Sply - T&D, Primary, Mtce	30,328.04
720065	Mat/Sply - T&D, Secondary, Mtce	12,021.03
720071	Mat/Sply - Customer Accts	2,245.57
720081	Mat/Sply - Admin & General	68,555.51
732081	OS-Acct - Admin & General	9,870.02
733081	OS-Lgl - Admin & General	17,735.97
736011	OS-Other - Collection Exp, Ops	189,047.66
736021	OS-Other - Collection Exp, Mtce	78,291.93
736053	OS-Other - T&D, Primary, Ops	701,062.64
736055	OS-Other - T&D, Secondary, Ops	9,920.00
736063	OS-Other - T&D, Primary, Mtce	5,625.00
736071	OS-Other - Customer Accts	40,432.83
736081	OS-Other - Admin & General	180,521.89
741011	Rent-Prop - Collection Exp, Ops	4.24
741053	Rent-Prop - T&D, Primary, Ops	9,283.00
741081	Rent-Prop - Admin & General	6,595.40
742021	Rent-Eq - Collection Exp, Mtce	58.85

742063	Rent-Eq - T&D, Primary, Mtce	1,487.75
742081	Rent-Eq - Admin & General	2,679.51
750011	Transp - Collection Exp, Ops	16,399.77
750021	Transp - Collection Exp, Mtce	88.68
750053	Transp - T&D, Primary, Ops	10,312.04
750071	Transp - Customer Accts	30.45
750081	Transp - Admin & General	877.03
757081	Ins-Gen - Admin & General	12,714.42
758081	Ins-WC - Admin & General	3,985.23
759081	Ins-Other - Admin & General	33,675.70
760081	Advertising Expense - Admin & General	2,986.68
770071	Bad Debt Expense - Customer Accts	29,265.00
775011	Misc - Collection Exp, Ops	74.97
775021	Misc - Collection Exp, Mtce	436.21
775053	Misc - T&D, Primary, Ops	7,684.55
775063	Misc - T&D, Primary, Mtce	1.73
775071	Misc - Customer Accts	62,128.50
775081	Misc - Admin & General	48,290.17
775085	Bank Fees	36,135.79
	Net	(2,630,729.86)

Westfield Wastewater **wp 102**
170 IAC 1-5-8 (7)
Test Year Income Statement trial balance by expense type (December 31, 2015)

Expense Type	Expense Type Description	Test Year Balance
0107	Payroll Accrual	(213.20)
0112	Uniforms & Safety Shoes	2,583.14
0116	Paid Absences - Clerical	8,423.44
0117	Paid Absences - Regular	40,577.51
0118	Paid Absences - Supervision	51,926.23
0131	Labor - Regular	235,484.41
0132	Labor - Regular OT	24,100.78
0133	Labor - Regular Part-Time	9,483.92
0134	Labor - Regular Part-Time OT	114.12
0135	Labor - Regular Temporary	12.04
0141	Labor - Supervisory	262,343.83
0142	Labor - Supervisory OT	67.34
0151	Labor - Clerical	43,845.98
0152	Labor - Clerical OT	4,436.90
0154	Labor - Clerical Part-Time	2,302.12
0155	Labor - Clerical Part-Time OT	2.58
0156	Labor - Clerical Temporary	81.16
0163	Labor - Supplemental Pay	16,619.60
0170	Benefits - Insurance	101,166.44
0171	Benefits - Other	211,561.88
0180	LTIC	(184.33)
0181	STIP	68,181.50
0201	Medicare ER	11,822.04
0202	SS ER	46,587.65
0203	SUI ER	1,346.53
0204	Payroll Accrual - Tax	(201.95)
1002	Software Maintenance	45,212.80
1003	Billing/Printing	5,849.83
1005	Business Travel Expense	2,951.13
1008	Contributions and Donations	950.00
1011	Employee Dues & Memberships	2,226.61
1014	Computer Hardware	5,482.56
1016	Janitorial Cleaning Supplies	1,621.59
1020	Meals	2,241.87
1022	Office Furniture & Equipment	364.71
1023	Office Supplies	10,527.30
1024	Other/Misc	29,265.00
1025	Postage & Shipping	54,556.06
1027	Rents/Lease	3,291.02
1029	Software Purchases	631.03
1030	Telecommunications Equipment	500.80
1031	Telephone & Mobile Device	13,392.86
1034	Utilities	926.17
1035	Commissions	2,767.28
1037	Tax	720,529.36
1038	Outdoor Signage	239.94
1039	Print Advertising	43.81
1040	Radio	201.16
1041	Television	353.22
1046	Conservation Education	2,148.55
1049	Building Rental	15,878.40
1052	Drug & Alcohol Screening	150.50
1054	Physicals	9.53
1106	Insurance	46,389.88
1118	Insurance-General Liability Damage Claims	0.24
1200	Amortization	(480,053.02)
1201	Depreciation	2,551,112.19
1260	Interest Expense	488,277.00
2103	Chemicals	54,901.90
2111	Alum	46,539.18
2117	Polymers	12,139.29
2150	Equipment & Tools	3,341.40
2151	Equipment Rental	1,546.60
2173	Fuel Natural Gas	2.82

2175	Gas & Diesel	27,100.70
2201	Chiller Maintenance	49.77
2208	Other Maintenance	24,894.70
2213	Lab Instrument Maintenance	349.45
2305	Building Maintenance	15,743.09
2313	Electric Power	337,084.81
2318	Lubricants & Gases	17.97
2319	Permits, Licenses & Fees	63,125.30
2321	Plant Instrumentation	6,119.20
2335	Sludge Removal Expense Wastewater	167,234.33
2411	Material & Supply	12,377.44
2412	Pump Parts	42.38
2417	Inventory Issue	4,658.28
2418	Inventory Return	(1,077.33)
2422	Lab Supplies	14,259.65
2423	Lab Audit & Cert Materials	93.37
2505	Safety Supplies	12,739.50
3001	OS - Auditing	9,870.02
3002	OS - Consulting	11,151.89
3003	OS - Legal	17,735.97
3004	OS - Collection Expense	1,164.75
3005	OS - Contracted Services	1,161,764.47
3006	OS - Temporary Clerical	8,833.19
3007	OS - Training	6,732.61
3008	OS - Security	4,208.43
3010	OS - Janitorial	4,186.96
3011	OS - Landscaping/Mowing	4,067.93
4010	Base Rate	(2,751,441.33)
4011	Volume Rate	(6,395,804.02)
4060	Forfeited Discounts	(40,669.04)
4080	Miscellaneous Service Fees	(6,161.88)
4120	Unbilled Chg-Margin	(237,994.00)
4210	Other Revenue	(863.55)
9500	Loadings - Variable Pay	(7,112.06)
9504	Loadings - Benefits Insurance	31,091.84
9505	Loadings - Benefits Pension	90,598.64
9506	Loadings - Benefits Thrift	1,848.21
9507	Loadings - Benefits Non-Productive	(10,490.08)
9510	Loadings - Variable Pay Thrift	(260.14)
9511	Loadings - Variable Pay Payroll Taxes	(882.84)
9513	Loadings - NPL Payroll Taxes	(802.94)
9514	Loadings - NPL Benefits Insurance	(2,099.34)
9515	Loadings - NPL Benefits Pension	(2,496.71)
9516	Loadings - NPL Benefits Thrift	(234.11)
9530	AFUDC	(467.57)
	Net	(2,630,729.86)

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(8) A schedule detailing purchases for resale of gas, electricity, and water, including costs and volumes purchased during the test year.

I\10498816.1

Not applicable. No such sales for resale were made.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(9) The number of employees by month for the test year categorized by the following:

(A) Bargaining unit.

(B) Exempt status.

(C) Nonexempt status.

Number of Employees by month for the test year **wp 501**
170 IAC 1-5-8 (9)

Unit	EE Type	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15
CSS	Bargaining	10	10	9	10	10	9	10	10	10	10	10	10
CSS	Exempt	304	310	302	298	294	293	288	288	286	282	284	284
CSS	Non-Exempt	181	185	184	189	191	192	190	195	197	207	206	215
CSS	Total	495	505	495	497	495	494	488	493	493	499	500	509
SFS	Bargaining	67	67	69	70	69	69	67	67	68	70	73	73
SFS	Exempt	17	17	17	17	17	17	17	17	16	16	16	16
SFS	Non-Exempt	154	152	169	168	168	161	156	161	163	162	162	162
SFS	Total	238	236	255	255	254	247	240	245	247	248	251	251

Westfield Wastewater does not have employees.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(10) Actual payroll dollars charged to the test year to accounts for the following:

(A) Construction.

(B) Operation.

(C) Maintenance.

(D) Other.

Westfield Wastewater **wp 161**
170 IAC 1-5-8 (10)
Actual payroll charged and allocated for the test year
(12 months ended December 31, 2015)

	Westfield	CSS	SFS	Total
		at Westfield share		
Construction	79,500.79	19,304.56	(44.94)	98,760.40
Operation	238,226.53	(4,493.55)	49,825.32	283,558.30
Maintenance	224.40		449.16	673.56
Other	(0.01)	450,957.38	14,998.99	465,956.36
Total	317,951.71	465,768.39	65,228.53	848,948.62

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(11) The following information by employee category identified in subdivision (9) for each payroll increase during the test year:

(A) The date.

(B) The percentage increase.

Payroll increases during the test year **wp 503**
170 IAC 1-5-8 (11)

EE Category	Effective date	% increase
Bargaining	29-Jun-15	3.00%
Exempt	20-Apr-15	1.90% average
Nonexempt	20-Apr-15	1.50% average

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(12) A description of the utility's other employee compensation programs paid or granted by the utility during the test year, including, but not limited to, the following:

(A) Performance bonuses.

(B) Incentive payments.

(C) Stock and stock options.

citizens energy group™

Memo

From: Jodi Whitney

To: All Employees
Date: November 19, 2015
Re: Fiscal Year 2016 Short Term Incentive Pay (STIP) Plan

Citizens Pay Philosophy:

Citizens Energy Group targets pay for employees at the 50th percentile of the market, as a whole. This means approximately 50% of the market pays more than Citizens and 50% of the market pays less than Citizens. Pay is divided into two components, Base Pay and Short-term Incentive Pay (STIP).

What is the Short Term Incentive Pay (STIP) Plan?

The STIP plan is a pay at risk plan for all employees. This program gives Citizens the opportunity to reward employees for outstanding team performance by using a Balanced Scorecard Approach. Citizens' fiscal year runs 10/1/15 through 9/30/16. The 2016 STIP Plan includes a financial trigger and three performance measure components – Customer Satisfaction, Safety and Cost Containment. No one measure is more important, therefore all have the same 33.3% weighting.

For fiscal 2016, the main change is that Quality has been removed as a performance measure. We have utilized the Baldridge scoring and feedback for many years to assess our quality processes. While we will still utilize the Baldrige framework in our daily activities, we will not be completing a report or applying for the award in 2016. Quality continues to be a significant focus in our daily work activities and one of Citizens' five Core Values. We are currently evaluating a variety of other Quality frameworks and anticipate reintroducing a new Quality framework in 2016 and incorporate it into our 2017 performance measures.

What are the trigger and the components?

Financial Trigger:

The trigger determines if any incentive will be paid to employees. It is based on EBITDA (Earnings before Interest, Taxes, Depreciation and Amortization). For 2016, EBITDA must be more than $256 million for STIP to be triggered. The STIP plan expenses are excluded from the formula, so the payout on the STIP plan will not cause EBITDA to be unmet.

33.3% Customer Satisfaction

Since all employees have internal and/or external customers, everyone at Citizens impacts customer satisfaction in some manner. Many employees, including field personnel, customer service and marketing representatives, interface directly with external customers and have a more overt impact on our Customer Service Commitment and Corporate Accountability measures. Others indirectly influence customer perceptions by providing services to

internal customers who are trying to meet external customer needs or by contributing to the credibility of Citizens as a well-run company that can be trusted. For instance, areas such as Finance, Environmental Stewardship, Water Production, Steam Distribution and Supply Chain can all influence the perception others have of Citizens as a well-respected company by the delivery of their day-to-day work. Outside of our work environment, we are all ambassadors of Citizens, and our actions can impact customer or potential customer perceptions. There are two components currently measured each quarter through customer surveys.

Key Driver: Customer Service Commitment – This is included in the STIP plan by indexing percent positive (6-10 ratings on a scale of 0-10) performance for three nationally benchmarked attributes – *Showing Concern and Caring, Being Responsive to Customer Needs, and Being Easy to do Business With.* Performance is calculated by dividing Citizens' rank by the total number of companies in the national benchmark database.

Key Driver: Corporate Accountability – This is included in the STIP plan by indexing percent positive (6-10 ratings on a scale of 0-10) performance for two nationally benchmarked attributes – *Being Well-Managed and Being a Company You Can Trust*. Performance is calculated by dividing Citizens' rank by the total number of companies in the national benchmark database.

33.3% Safety Results

Safety is important to both our customers and our employees. Employee participation in safety educational sessions is a leading indicator based on benchmark studies. Again this year, the Outstanding Trigger for safety is attendance at safety meetings above 80%. Beyond the trigger, there are two safety components:

DART Rate – An Occupational Safety & Heath Administration required metric. Each division is measured independently. This calculation illustrates the days away, restricted or transferred due to recordable safety incidents.

Chargeable Vehicle Accidents – Our goal is for each employee to arrive home safely to their friends and families each day. Measuring chargeable vehicle accidents is also a best practice that limits company risk. Each division is measured independently.

33.3% Cost Containment

Controlling costs through process improvement, innovation and working efficiently is imperative to keeping rates low for our customers. The 2016 budget numbers were utilized in determining the achievement scale. As with Customer Satisfaction and Safety, Cost Containment is another way Citizens can demonstrate continuous improvement and value to our customers, while minimizing necessary rate increases.

The STIP model provides additional details regarding the program. All employees, except company Officers, are eligible for up to a 150% payout for Outstanding Performance. Company Officers are eligible for a 100% maximum payout.

FY 2016 Short Term Incentive Plan

Financial Trigger: The trigger determines if any incentive will be paid to employees. It is based on EBITDA (Earnings before Interest, Taxes, Depreciation and Amortization) This value includes affiliate dividends. ≥ $256

Performance Measures: Performance measures and targets determine the value to be paid to each employee.

		Achievement Scale		
		Threshold 50%	Target 100%	Outstanding 150%
Overall Customer Satisfaction				
33.3%	Gas, Water and Combination customer survey results by 3rd party.			
		Placement in National Benchmark Group		
		Top 30%	Top 20%	Top 10%
	Key Driver: Customer Service Commitment(16.65%)			
	Key Driver: Corporate Accountability(16.65%)			
Safety				
33.3%	Working safely is important to both our customers and our employees. Employees participating in safety educational programs is a leading indicator. **Outstanding Trigger:** To receive above a 100% payout in any division, that division must have average annual attendance at safety meetings above 80%.			
	The DART Rate is an Occupational Safety & Health Administration required metric. Each division is measured independently. This calculation illustrates the days away, restricted or transferred due to recordable safety incidents.	Recordable DART Cases		
	CSS (20%)	1.35	0.9	0.3
	Energy (20%)	2.25	1.8	1.35
	SFS (20%)	2.25	1.8	1.35
	Water (20%)	2.25	1.8	1.35
	Measuring chargeable vehicle accidents is also a best practice. Those employees driving company insured vehicles are responsible for following safe driving practices to limit personal and company risk. Each division is measured independently.	Chargeable Incidents		
	CSS(13.3%)	2	1	0
	Energy (13.3%)	3	2	1
	SFS (13.3%)	3	2	1
	Water (13.3%)	3	2	1
Cost Containment				
33.3%	Operations and Maintenance expense are impacted by all employees through innovation, working efficiently and controlling capital expenditures.	≤ $267,924	≤ $264,776	≤ $259,480

Please Note:
A fatality may result in a zero payout for safety
All measures on a sliding scale
Customer Satisfaction is based on a weighting of 90% residential and 10% commercial customers
Officers max at 100% opportunity and all other employees max at 150% opportunity
Quality removed as a measure from 2016 as Citizens evaluates Quality Tools

170 IAC 1-5-8(a)(12)(A) is not applicable to Citizens Wastewater of Westfield, which does not have a performance bonus program.

170 IAC 1-5-8(a)(12)(C) is not applicable to Citizens Wastewater of Westfield, which is not a corporation, and therefore does not have stock nor does it provide stock options to employees.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(13) Regarding benefits provided by the utility to employees, the following:

(A) A list of the categories of benefits.

(B) The associated cost of each category.

(C) The amount charged to operation and maintenance expense during the test year with respect to each category.

(D) The amount of payroll benefits capitalized during the test year with respect to each category.

Westfield Wastewater **wp 162**
170 IAC 1-5-8 (13)
Charges for benefits provided to employees for the test year
(12 months ended December 31, 2015)

Charged and allocated to O&M in the test year

	Westfield	CSS	SFS	Total
		at Westfield share		
Insurance				
Health Insurance		81,146.90	12,416.91	93,563.81
Disability Insurance (Short)		107.58	12.44	120.02
Disability Insurance (Long)		800.27		800.27
Life Insurance		2,168.91	185.51	2,354.42
Workers Comp Insurance		3,240.80	744.43	3,985.23
Pension				-
Pension		117,435.51	12,715.86	130,151.37
Post-Retirement		36,529.50	9,508.11	46,037.61
Thrift	341.45	14,692.71	1,535.28	16,569.44
All Other	1,650.83	22,852.65	307.65	24,811.13
Benefits prior to loadings	1,992.28	278,974.83	37,426.19	318,393.30
Net loadings in O&M*	185,702.57	(61,896.10)	(5,097.94)	118,708.53
Net benefits in O&M	187,694.85	217,078.73	32,328.25	437,101.83

* includes credits for loadings to capital or other units

Benefit loadings charged and allocated to capital

	Westfield	CSS	SFS	
		at Westfield share		
Insurance	14,890.05	3,781.86	(9.20)	18,662.71
Pension	26,827.60	6,657.26	(15.30)	33,469.56
Thrift	2,413.01	635.29	(1.06)	3,047.25
Benefits loaded to capital	44,130.66	11,074.41	(25.56)	55,179.52

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(14) The utility's pension expense for the test year and an identification of any unfunded amounts.

Westfield Wastewater **wp 162**
170 IAC 1-5-8 (14)
Charges for benefits provided to employees for the test year
(12 months ended December 31, 2015)

Charged and allocated to O&M in the test year

	Westfield	CSS	SFS	Total
		at Westfield share		
Insurance				
Health Insurance		81,146.90	12,416.91	93,563.81
Disability Insurance (Short)		107.58	12.44	120.02
Disability Insurance (Long)		800.27		800.27
Life Insurance		2,168.91	185.51	2,354.42
Workers Comp Insurance		3,240.80	744.43	3,985.23
Pension				-
Pension		117,435.51	12,715.86	130,151.37
Post-Retirement		36,529.50	9,508.11	46,037.61
Thrift	341.45	14,692.71	1,535.28	16,569.44
All Other	1,650.83	22,852.65	307.65	24,811.13
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Net loadings in O&M*	185,702.57	(61,896.10)	(5,097.94)	118,708.53
Net benefits in O&M	187,694.85	217,078.73	32,328.25	437,101.83

* includes credits for loadings to capital or other units

Benefit loadings charged and allocated to capital

	Westfield	CSS	SFS	
		at Westfield share		
Insurance	14,890.05	3,781.86	(9.20)	18,662.71
Pension	26,827.60	6,657.26	(15.30)	33,469.56
Thrift	2,413.01	635.29	(1.06)	3,047.25
Benefits loaded to capital	44,130.66	11,074.41	(25.56)	55,179.52

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(15) The latest pension actuarial study used by the utility for determining pension accrual.

Citizens Energy Group
Retirement Plan

Actuarial Valuation

October 1, 2015

Retirement plan administrative and recordkeeping services provided by
MCCREADY AND KEENE, INC.
a ONEAMERICA® *company*

CITIZENS ENERGY GROUP RETIREMENT PLAN

ACTUARIAL VALUATION

VALUATION DATE	October 1, 2015
FISCAL YEAR	October 1, 2015 - September 30, 2016
EFFECTIVE DATE OF PLAN	January 1, 1945
EFFECTIVE DATE OF LATEST RESTATEMENT (Adopted on December 30, 2013)	January 1, 2014

CITIZENS ENERGY GROUP
RETIREMENT PLAN

Summary of Actuarial Valuation as of October 1, 2015

Introduction

This Valuation has been prepared as of October 1, 2015 for the Plan which was originally effective January 1, 1945.

The purpose of this report is to determine a reasonable contribution level for the Retirement Plan. A contribution level takes into consideration the current economic environment, future expectations of the trust fund and potential experience of the current plan participants. The valuation interest rate structure and demographic assumptions are applied to the current covered group (both active and inactive participants) to estimate the current value of future plan liabilities. These liabilities are compared to plan assets to determine the value of liabilities yet to be funded (unfunded liabilities). These unfunded liabilities are then funded over the future lifetime of the plan. This overall approach provides reasonable current funding of future expected liabilities, and anticipates contributions will be calculated and deposited in the current year, as well as in each future year.

The information in this report is intended to be privileged and confidential under the Internal Revenue Service Restructuring and Reform Act of 1998. We have prepared this report for the plan sponsor to use and distribute as needed for the ongoing maintenance of the Plan.

We have established the following contributions for the fiscal year beginning October 1, 2015, which reflect the stated funding policies of Citizens Energy Group. The intension of the employer is to fund using the Frozen Initial Liability Method. This method is described later in this valuation report.

Normal Cost	$ 10,182,699
Fifteen Year Amortization of Unfunded Accrued Liability	7,904,373
Interest for One Year	244,175
Total to Fund	$ 18,331,247

Data Description

The Retirement Plan census data for both active and non-active lives was provided by Citizens Energy Group as of January 1, 2015 and transposed into a computer file for processing. The accuracy of this report depends on the accuracy of all data that has been furnished to us from time to time. Trust information was also furnished by Citizens Energy Group. It is noted that we make no representation concerning the accuracy of any employee data or valuation information that has been furnished to us.

- Salaries were increased by a salary scale factor of 3.50% for the period from January 1, 2015 to October 1, 2015.
- Accrued Benefit Service was estimated as of October 1, 2015.

The census data for active lives was not adjusted for terminations during the period (other than retirements), with the exception of those participants paid lump sum benefits, or the addition of new participants, since it was determined that an adjustment for these participants would not significantly affect the results of the calculation.

Participants who retired during the period were recategorized as retirees. Benefit information was provided by the Citizens Energy Group.

The Market Value of Assets used in this report are as of September 30, 2015.

Actuarial Methods and Assumptions

This Valuation utilizes the Frozen Initial Liability Cost Method to determine the Normal Cost and Unfunded Accrued Liability. Valuation assets are the Market Value of Assets as reported by the employer.

A brief explanation of the methods and a complete summary of the assumptions used may be found in the exhibits titled Actuarial Methods and Actuarial Assumptions. These items were reviewed and continued from the prior valuation except for the interest rate and mortality table. The interest rates are updated as specified in the funding exhibits. Mortality was updated to the RP-2014 Mortality Table adjusted by Projection Scale MP-2015. A complete list of assumptions appears later in the report.

The 2015 limit of $265,000 on annual compensation for benefit purposes has been applied for 2015 and future years. For those participating before January 1, 1996 the governmental compensation limit has been grandfathered into the plan. That current limit is $395,000.

ACTUARIAL CERTIFICATION

This report summarizes the actuarial valuation as of October 1, 2015 for the Citizens Energy Group Retirement Plan. The valuation is based upon our understanding of the plan provisions as summarized at the end of this report. In our opinion, the actuarial assumptions and methods are individually reasonable and in combination represent our best estimate of the anticipated experience of the Plan.

The valuation census data was provided by the employer and transposed into a computer file for processing. Similar information has been furnished to us in the past, and the accuracy of this report depends on the accuracy of all data that has been furnished to us from time to time. Trust information was furnished by employer. It is noted that we make no representation concerning the accuracy of any employee data or valuation information that has been furnished to us.

The Valuation has been prepared for the sole purpose of determining the contribution requirements for the respective plan year. The figures in this Valuation should not be used as the basis for decisions regarding a possible plan termination, plan merger, business acquisition, the application of Generally Accepted Accounting Principles for the plan sponsor's financial reporting and disclosure under FASB ASC 715-20 & 30 (formerly FAS 87), or any other purpose for which it was not designed.

The undersigned member of the American Academy of Actuaries meets the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein. We will be pleased to furnish any additional information or answer any questions which may arise after your review of this report.

Prepared and Submitted by
McCready and Keene, Inc.

By Stanley R. Brown
Stanley R. Brown
Manager, Client Actuarial Services

Submitted and Certified by
McCready and Keene, Inc.

By Ron Vincent
Ron Vincent
A.S.A., M.A.A.A., E.A.
Consulting Principal

DETERMINATION OF OVERALL PLAN CONTRIBUTION

Line No.		
1	Entry Age Normal Accrued Liability	$335,478,983
2	Market Value of Assets	242,241,581
3	Unfunded Accrued Liability	$93,237,402
4	15 Year Amortization of UAL	$7,904,373
5	Present Value of Future Benefit	$446,245,064
6	Unfunded Liability	93,237,402
7	Assets	242,241,581
8	Present Value of Future Normal Costs	$110,766,081
9	Present Value of Future Salaries	793,632,933
10	Normal Cost Percentage	13.9568%
11	Salaries	72,958,484
12	Normal Cost	$10,182,699
	Funding of Normal Cost plus 15 Year Amortization of UAL	
13	Normal Cost	$10,182,699
14	Amortization Payment	7,904,373
15	Interest for 1 Year at First Tier Rate	244,175
16	Total	$18,331,247

DETERMINATION OF PLAN CONTRIBUTION BY DIVISION

Line No.		Corporate Support Services	Gas Operations	Manufacturing Division	Oil Division
1	Entry Age Normal Accrued Liability	$135,353,728	$116,116,288	$21,174,701	$706,208
2	Market Value of Assets	97,735,784	83,844,874	15,289,760	509,936
3	Unfunded Accrued Liability	$37,617,944	$32,271,414	$5,884,941	$196,272
4	15 Year Amortization of UAL	$3,189,131	$2,735,869	$498,907	$16,639
10	Normal Cost Percentage	13.9568%	13.9568%	13.9568%	13.9568%
11	Salaries	38,938,536	8,197,694	0	350,426
12	Normal Cost	$5,434,590	$1,144,139	$0	$48,908
	Funding of Normal Cost plus 15 Year Amortization of UAL				
13	Normal Cost	$5,434,590	$1,144,139	$0	$48,908
14	Amortization Payment	3,189,131	2,735,869	498,907	16,639
15	Interest for 1 Year at First Tier Rate	116,420	52,380	6,735	885
16	Total	$8,740,141	$3,932,388	$505,642	$66,432

DETERMINATION OF PLAN CONTRIBUTION BY DIVISION

Line No.		Steam Division	West Street Chilled Water	Shared Field Services	Water Company
1	Entry Age Normal Accrued Liability	$15,067,290	$5,327,044	$28,767,922	$12,965,802
2	Market Value of Assets	10,879,740	3,846,535	20,772,648	9,362,304
3	Unfunded Accrued Liability	$4,187,550	$1,480,509	$7,995,274	$3,603,498
4	15 Year Amortization of UAL	$355,007	$125,513	$677,814	$305,493
10	Normal Cost Percentage	13.9568%	13.9568%	13.9568%	13.9568%
11	Salaries	3,245,716	1,640,292	8,920,118	11,665,702
12	Normal Cost	$452,999	$228,933	$1,244,967	$1,628,163
	Funding of Normal Cost plus 15 Year Amortization of UAL				
13	Normal Cost	$452,999	$228,933	$1,244,967	$1,628,163
14	Amortization Payment	355,007	125,513	677,814	305,493
15	Interest for 1 Year at First Tier Rate	10,908	4,785	25,958	26,104
16	Total	$818,914	$359,231	$1,948,739	$1,959,760

SUMMARY OF EMPLOYEE DATA

	2014	2015
Active Participants Under Normal Retirement Age	933	925
Active Participants At or Over Normal Retirement Age	23	24
Limited Participants (Lay-Offs, Leaves of Absence, Transfers, etc.)	0	0
Participants Receiving Benefits	737	757
Beneficiaries Receiving Benefits	69	69
Terminated Participants Entitled to Future Benefits	191	179
Total Participants at Beginning of Year	1,953	1,954
Terminations with No Vested Interest in Plan	32	20
Employees Reported but Not Yet Eligible for Participation	0	0
Employees Excluded from Participation	0	0
Anticipated Payroll of Active Participants	$ 73,989,089	$ 72,958,484
Annual Benefits Payable from Trust	$ 13,955,388	$ 15,105,922
Average Age of Active Participants	48.7	49.1
Average Service of Active Participants	11.5	11.7

ANALYSIS OF PLAN PARTICIPATION

Actives	
Active Participants, 10/1/2014	956
Less: Retirements	29
Less: Terminations with Fully Vested Benefits	3
Less: Terminations with Partially Vested Benefits	0
Less: Lump Sums 100% Vested	0
Less: Lump Sums Partially Vested	3
Less: Terminations Not Vested	21
Less: Deaths	0
Less: Disabilities	0
Equals: Continuing Participants, 9/30/2015	900
Plus: Reinstatements or Rehires	2
Plus: New Participants, during the year	47
Plus: New Participants, 10/1/2015	0
Active Participants, 10/1/2015	949

Retirees + Beneficiaries					
Total, 10/1/2014	737	+	69	=	806
Less: Deaths	19		3		22
Less: Period Certain Expired	0		0		0
Plus: Additions	39		3		42
Equals: Total, 10/1/2015	757		69		826

Deferred Vested Participants	
Total, 10/1/2014	191
Less: Payments Commenced	10
Less: Lump Sums Paid	0
Less: Rehired	1
Less: Deaths	4
Plus: Additions	3
Equals: Total, 10/1/2015	179

ACTUARIAL METHODS

Actuarial Cost Method	Frozen Initial Liability (Fresh Start Alternative)
Asset Valuation Method	Market Value

Frozen Initial Liability

This method provides for smooth funding of plan benefits, as a percentage of participant salary, over the future lifetime of the plan. The method has two components, a normal cost and an unfunded accrued liability. The normal cost funds future plan needs (other than the unfunded accrued liability) over the future salaries of participants.

The unfunded accrued liability measures liabilities to date relative to plan assets and amortizes the amount over a fixed period of time. Whenever there is a change in the plan by amendment or a change in assumptions (such as in interest or mortality) the unfunded accrued liability will be measured and reestablished at that time. Annual changes in interest or mortality will cause this to be reestablished each year.

Actuarial Value of Assets

Market Value of Assets.

ACTUARIAL ASSUMPTIONS

	Frozen Initial Liability Assumptions
Segmented Interest Rates	October, 2015
Segment 1 (0-5 years)	1.35%
Segment 2 (5-20 years)	4.01%
Segment 3 (20+ years)	5.04%
Effective Interest Rate	4.44%

The segment interest rates represent expectations of future asset returns and plan liability discounts. They come from tables published by the Internal Revenue Service and represent an independent index of rates for valuing plan liabilities. The Effective Interest Rate is the single interest rate reflecting the application of the segment rates when valuing plan liabilities.

Future Salary Increases	3.50%
Social Security Future Earnings Index	3.00%

Future Salary Increases and the Social Security Future Earnings Index reflect long term expectations relating to plan and inflation experience.

Mortality	RP-2014 Mortality, adjusted by Projection Scale MP-2015. Separate Employee and Annuitant Tables. Separate Gender Tables.

The mortality table used is the most recently published and accepted table issued by the Society of Actuaries as of the Valuation date, for purposes of valuing plan liabilities. It reflects past experience and future expectations based on current professional industry standards.

Disability	None Assumed
Termination	Sarason T-3
Retirement Age	10% for ages 55 to 64, with exceptions of 25% for ages 60 and 62; 100% at age 65
Percent Married	80%
Age Difference in Participant & Spouse	Males two years older than females
Administrative Expense	None Assumed

Other assumptions used represent best actuarial judgment based upon overall professional standards.

SUMMARY OF PLAN PROVISIONS

EFFECTIVE DATE	January 1, 1945
PARTICIPATION	All permanent full time employees become participants on the first day of the month following their employment.
ELIGIBILITY FOR BENEFITS:	
Normal Retirement	Age 65
Early Retirement	Age 45 and 5 years of service (with reduced benefits). Age 55 and age plus service equal or exceeding 85 (with unreduced benefits).
Late Retirement	Continued employment after normal retirement age
Termination	Five years of service
Death	Age 50 or 5 years of service
AMOUNT OF BENEFITS:	
Normal Retirement Benefit	The standard retirement benefit is a monthly pension payable for five years certain and life thereafter in the amount of: (1) 1.40% of Final Average Earnings times credited service, plus (2) 0.40% of Final Average Earnings in excess of covered compensation times credited service.

AMOUNT OF BENEFITS:

Early Retirement Benefit

A participant will be eligible to retire with unreduced benefits at age 55 if the sum of his age and service is greater than or equal to 85. If the sum of a participant's age and service at retirement is less than 85, his benefit will be reduced 1/15 for each of the first 5 years and 1/30 for each of the next 5 years and thereafter reduced actuarially for each year that the commencement date precedes age 65.

Termination Benefit

A participant who terminates before early or normal retirement will be entitled to the vested portion of his accrued retirement benefit payable at age 65. Vesting is according to the following schedule:

Service	Vesting Percentage
Less than 5 years	0%
5 years	50%
6 years	60%
8 years	80%
9 years	90%
10 or more years	100%

Death Benefit

If an active participant dies after age 50 or 5 years of service, his spouse will be entitled to a monthly pension payable for life in the amount of 60% (but reduced 1/2% per year for each year that the spouse is more than 5 years younger than the participant) of the participant's accrued benefit.

NOTE: If information given in this Summary disagrees or appears to disagree with the provisions of the plan legal document, the provisions of the document prevail.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(16) The latest actuarial study for other postretirement employee benefits.

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CITIZENS ENERGY GROUP

POSTRETIREMENT BENEFIT PLAN

FASB ASC 715-20 & 60 DISCLOSURE FYE 9/30/2015

FASB ASC 715-20 & 60 PRELIMINARY NPPBC FYE 9/30/2016

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CITIZENS ENERGY GROUP
POSTRETIREMENT BENEFIT PLAN

Accounting Information Report According to FASB ASC 715-20 & 60

Introduction

The first section of this report contains the disclosure of the Net Periodic Postretirement Benefit Cost and Funded Status computed according to the provisions of FASB ASC 715-20 & 60 for the Fiscal Year ending September 30, 2015. Also included are various exhibits developing the individual components of this disclosure information. The second section contains the determination of the Preliminary Net Periodic Postretirement Benefit Cost for the Fiscal Year ending September 30, 2016. The measurement date used in each case was September 30, 2015.

This report establishes the following Net Periodic Postretirement Benefit Costs for the Fiscal Years ending 2015 and 2016:

	FYE 9/30/2015	FYE 9/30/2016
Chilled Water - Union	0	0
Chilled Water - Non-Union	135,178	118,596
Corporate - Union	185,510	116,794
Corporate - Non-Union	2,474,486	2,227,017
Gas - Union	1,040,510	893,278
Gas - Non-Union	335,825	292,741
MFG - Union	72,442	53,516
MFG - Non-Union	(36,092)	(46,805)
Oil - Union	28,983	(11,226)
Oil - Non-Union	0	0
Shared Services - Union	507,145	415,784
Shared Services - Non-Union	955,464	877,840
Steam - Union	111,190	110,651
Steam - Non-Union	186,311	178,047
Citizens Water - Grandfathered - Union	708,512	585,138
Citizens Water - Grandfathered - Non-Union	2,425,158	1,617,249
Citizens Water - Non-Grandfathered - Union	426,040	480,929
Citizens Water - Non-Grandfathered - Non-Union	248,587	292,903
Grand Total	9,805,249	8,202,452

Please note that the results of this report reflect Generally Accepted Accounting Principles as contained in the FASB Accounting Standards Codification (ASC), which was effective July 1, 2009. FASB ASC Topic 715 Compensation - Retirement Benefits, Subtopics 20 and 60, contain the primary provisions of the Codification which apply to accounting for Other Postemployment Benefit Plans.

The Net Periodic Postretirement Benefit Cost for the Fiscal Year ending September 30, 2016, must be considered preliminary at this time. Should an event take place prior to the next measurement date, September 30 2016, which would have a significant impact on the Net Periodic Postretirement Benefit Cost, calculations in addition to those already completed and contained within this report must be performed. Examples of such an event would be a plan amendment increasing benefits or the layoff of a significant number of employees. If such an event takes place, we recommend contacting your accountant to determine if further calculations will be required.

Method

The cost method used was the Projected Unit Credit Cost Method as required by the provisions of FASB ASC 715-20 & 60. In order to determine the employer's liability the per capita claims cost was offset by the cost sharing features of the plan and Medicare reimbursement. The attribution period used was from date of hire to the date of full eligibility for benefits.

Assumptions

The assumptions are summarized near the end of this report in the exhibit labeled Method and Assumptions. Such assumptions include, but are not limited too, the per capita claims cost, the health care cost trend rate, the discount rate, and the mortality rate. The most pertinent assumptions are as follows:

		NPPBC for FYE 9/30/2015	Disclosure for FYE 9/30/2015	NPPBC for FYE 9/30/2016
Medical Trend	from	8.50%	8.00%	8.00%
	to	5.00%	5.00%	5.00%
	over	8 Years	7 Years	7 Years
Discount Rate		3.96%	3.92%	3.92%

Assumption Changes Since Last Report

- To determine the discount rate, Citizens Energy Group uses the Citigroup Pension Liability Yield Curve for September. This curve changes each year based on current market conditions. The comparable effective discount rate changed from 3.96% in 2014 to 3.92% in 2015.
- The mortality assumption has been changed. The prior assumption was the RP-2000 Mortality Table (with separate tables for Employees and Healthy Retirees, sex-distinct) with mortality improvement on a generational basis using Scale AA to a generational basis using two-dimensional Scale BB. The new assumption is the RP-2014 Total Data Set Mortality Table (sex-distinct) with mortality improvement on a generational basis using Scale MP-2014.
- The schedule for the "Cadillac tax" provisions of the Affordable Care Act has been pushed back so that the tax amounts are paid one year later than last year's assumption. Additional commentary on this assumption follows below.

The estimated combined effect of the above changes is an increase of $1,164,000 on the APBO as of 9/30/2015 and an increase of $139,000 on the NPPBC as of 9/30/2016.

Plan Changes Since Last Report

There have been no significant plan changes since our last valuation.

Participant Data

The census data used was based on a census listing provided by the employer. Assumptions were made regarding dependent data only. The accuracy of this report depends on the accuracy of all data that has been furnished to us. It is noted that we make no representation concerning the accuracy of any employee data or plan information that has been furnished to us in the past.

Affordable Care Act and the "Cadillac Tax"

This report includes an assumption for the "Cadillac Tax" which becomes effective in 2018. This assumption can be seen in the exhibit labeled Method and Assumptions. It is anticipated that this tax will apply to Citizens Energy Group unless steps are taken to change the plan to reduce benefits and avoid the tax.

ACTUARIAL CERTIFICATION

This determination of Net Periodic Postretirement Benefit Cost is based on the Projected Unit Credit Normal Cost and Accrued Liability as of September 30, 2015. Note that FASB ASC 715-20 & 60 required other information to be disclosed, along with the Net Periodic Postretirement Benefit Cost.

The per capita claims cost, the health care cost trend rate, and other healthcare assumptions were suggested by Crown Point Management Consultants, Inc. Other assumptions, including but not limited to the discount rate and mortality, were suggested by McCready and Keene, Inc. Final acceptance of each actuarial assumption is subject to the approval of Citizens Energy Group, in consultation with the auditors who are responsible for the preparation of your certified financial statement. McCready and Keene, Inc. is solely responsible for the application of these assumptions and the determination of the results. However, Crown Point Management Consultants, Inc. has reviewed these results and believes they are reasonable in light of the assumptions and cost method utilized.

Actuarial computations under FASB ASC 715-20 & 60 are for purposes of fulfilling employer accounting requirements. The calculations reported herein have been made on a basis consistent with our understanding of FASB ASC 715-20 & 60. However, the assumptions on which these calculations are based are decided upon by the plan sponsor and we make no statement in regard to the reasonableness of the final choice of assumptions within the scope of FASB ASC 715-20 & 60. Determinations for purposes other than meeting employer financial accounting requirements may be significantly different from the results reported herein. The calculations reported herein are not applicable for determining the deductibility of employer expenses for postretirement benefits or for determining any funding requirements.

Statement Regarding Tax Information

Any tax information included in the report should be reviewed with the plan's tax advisor, and such information is not intended to be used for the purposes of avoiding tax penalties.

The undersigned members of the American Academy of Actuaries meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein. We will be pleased to furnish any additional information or answer any questions which may arise after your review of this report.

Prepared by
McCready and Keene, Inc. and Crown Point Management Consultants, Inc.

Bradley K. Jones
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FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Combined Results All Divisions -

		Union	Non-Union	Total
A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015			
1.	Service Cost	1,264,647	3,731,859	4,996,506
2.	Interest Cost	1,259,533	2,487,761	3,747,294
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(116,739)	(779,818)	(896,557)
6.	Amortization of (Gain) or Loss	672,891	1,285,115	1,958,006
7.	Net Periodic Postretirement Benefit Cost	3,080,332	6,724,917	9,805,249
B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	1,189,042	3,446,243	4,635,285
2.	Interest Cost	1,175,220	2,290,871	3,466,091
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(109,447)	(761,342)	(870,789)
6.	Amortization of (Gain) or Loss	390,049	581,816	971,865
7.	Net Periodic Postretirement Benefit Cost	2,644,864	5,557,588	8,202,452
C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(3,654,397)	(3,932,294)	(7,586,691)
2.	APBO - Active Other	(10,744,471)	(21,951,054)	(32,695,525)
3.	APBO - Retirees and Beneficiaries	(16,352,032)	(33,978,630)	(50,330,662)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(30,750,900)	(59,861,978)	(90,612,878)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(30,750,900)	(59,861,978)	(90,612,878)
D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	(756,163)	(8,119,562)	(8,875,725)
6.	Amount recognized in NPPBC during year	116,739	779,818	896,557
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	(639,424)	(7,339,744)	(7,979,168)
10.	Total Unrecognized (Gain) or Loss at beginning of year	11,716,612	22,376,804	34,093,416
11.	Amount recognized in NPPBC during year	(672,891)	(1,285,115)	(1,958,006)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(2,566,558)	(8,446,723)	(11,013,281)
14.	Total Unrecognized (Gain) or Loss at end of year	8,477,163	12,644,966	21,122,129
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	7,837,739	5,305,222	13,142,961
E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(21,770,505)	(50,174,233)	(71,944,738)
2.	Net Periodic Postretirement Benefit Cost for year	(3,080,332)	(6,724,917)	(9,805,249)
3.	Actual Cash Expense for year	1,937,676	2,342,394	4,280,070
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(22,913,161)	(54,556,756)	(77,469,917)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS
- Combined Results All Divisions -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	32,730,954	64,431,475	97,162,429
2.	Service Cost	1,264,647	3,731,859	4,996,506
3.	Interest Cost	1,259,533	2,487,761	3,747,294
4.	Actual Cash Expense	(1,937,676)	(2,342,394)	(4,280,070)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(2,566,558)	(8,446,723)	(11,013,281)
7.	Accumulated Postretirement Benefit Obligation at end of year	30,750,900	59,861,978	90,612,878

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	32,730,954	64,431,475	97,162,429
2.	Interest on APBO	1,296,146	2,551,487	3,847,633
3.	Service Cost	1,264,647	3,731,859	4,996,506
4.	Expected Cash Expense	(1,849,168)	(3,218,460)	(5,067,628)
5.	Interest on Expected Cash Expense	(36,613)	(63,726)	(100,339)
6.	Expected APBO as of Current Measurement Date	33,405,966	67,432,635	100,838,601

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	11,716,612	22,376,804	34,093,416
2.	Amount recognized in current year	672,891	1,285,115	1,958,006
3.	Remaining (Gain) or Loss (1) - (2)	11,043,721	21,091,689	32,135,410
4.	Actual APBO as of current measurement date	30,750,900	59,861,978	90,612,878
5.	Expected APBO as of current measurement date	33,405,966	67,432,635	100,838,601
6.	(Gain) or Loss on APBO (4) - (5)	(2,655,066)	(7,570,657)	(10,225,723)
7.	Actual Cash Expense	1,937,676	2,342,394	4,280,070
8.	Expected Cash Expense	1,849,168	3,218,460	5,067,628
9.	(Gain) or Loss on Cash Expense (7) - (8)	88,508	(876,066)	(787,558)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	8,477,163	12,644,966	21,122,129

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	2,792,907	5,648,923	8,441,830
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	253,168	754,407	1,007,575
3.	Effect of 1% Decrease in Trend on APBO	(2,424,794)	(4,843,601)	(7,268,395)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(220,693)	(634,902)	(855,595)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	41	73	114
2.	Active Other	218	770	988
3.	Retiree	229	342	571
4.	Surviving Spouses	0	12	12
5.	Total Participant Count	488	1,197	1,685

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	1,541,611	2,842,832	4,384,443
	2017	1,669,536	3,199,008	4,868,544
	2018	1,870,090	3,456,000	5,326,090
	2019	2,086,227	3,720,213	5,806,440
	2020	2,285,096	3,976,573	6,261,669
	2021 - 2025	12,860,630	22,098,419	34,959,049

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Chilled Water -

		Union	Non-Union	Total
A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015			
1.	Service Cost	0	65,121	65,121
2.	Interest Cost	0	40,226	40,226
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	1,662	1,662
6.	Amortization of (Gain) or Loss	0	28,169	28,169
7.	Net Periodic Postretirement Benefit Cost	0	135,178	135,178
B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	0	62,142	62,142
2.	Interest Cost	0	39,217	39,217
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	1,662	1,662
6.	Amortization of (Gain) or Loss	0	15,575	15,575
7.	Net Periodic Postretirement Benefit Cost	0	118,596	118,596
C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	0	(59,937)	(59,937)
2.	APBO - Active Other	0	(736,247)	(736,247)
3.	APBO - Retirees and Beneficiaries	0	(219,491)	(219,491)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	0	(1,015,675)	(1,015,675)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	0	(1,015,675)	(1,015,675)
D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	0	4,611	4,611
6.	Amount recognized in NPPBC during year	0	(1,662)	(1,662)
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	2,949	2,949
10.	Total Unrecognized (Gain) or Loss at beginning of year	0	490,495	490,495
11.	Amount recognized in NPPBC during year	0	(28,169)	(28,169)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	0	(123,823)	(123,823)
14.	Total Unrecognized (Gain) or Loss at end of year	0	338,503	338,503
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	0	341,452	341,452
E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	0	(536,502)	(536,502)
2.	Net Periodic Postretirement Benefit Cost for year	0	(135,178)	(135,178)
3.	Actual Cash Expense for year	0	(2,543)	(2,543)
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	0	(674,223)	(674,223)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Chilled Water -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	0	1,031,608	1,031,608
2.	Service Cost	0	65,121	65,121
3.	Interest Cost	0	40,226	40,226
4.	Actual Cash Expense	0	2,543	2,543
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	0	(123,823)	(123,823)
7.	Accumulated Postretirement Benefit Obligation at end of year	0	1,015,675	1,015,675

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	0	1,031,608	1,031,608
2.	Interest on APBO	0	40,852	40,852
3.	Service Cost	0	65,121	65,121
4.	Expected Cash Expense	0	(31,601)	(31,601)
5.	Interest on Expected Cash Expense	0	(626)	(626)
6.	Expected APBO as of Current Measurement Date	0	1,105,354	1,105,354

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	0	490,495	490,495
2.	Amount recognized in current year	0	28,169	28,169
3.	Remaining (Gain) or Loss (1) - (2)	0	462,326	462,326
4.	Actual APBO as of current measurement date	0	1,015,675	1,015,675
5.	Expected APBO as of current measurement date	0	1,105,354	1,105,354
6.	(Gain) or Loss on APBO (4) - (5)	0	(89,679)	(89,679)
7.	Actual Cash Expense	0	(2,543)	(2,543)
8.	Expected Cash Expense	0	31,601	31,601
9.	(Gain) or Loss on Cash Expense (7) - (8)	0	(34,144)	(34,144)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	0	338,503	338,503

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	0	116,751	116,751
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	0	15,299	15,299
3.	Effect of 1% Decrease in Trend on APBO	0	(99,089)	(99,089)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	0	(12,788)	(12,788)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	0	2	2
2.	Active Other	0	19	19
3.	Retiree	0	1	1
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	0	22	22

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	0	30,502	30,502
	2017	0	43,418	43,418
	2018	0	43,531	43,531
	2019	0	50,240	50,240
	2020	0	55,510	55,510
	2021 - 2025	0	397,267	397,267

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Corporate -

A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015	Union	Non-Union	Total
1.	Service Cost	108,241	1,732,842	1,841,083
2.	Interest Cost	35,484	588,348	623,832
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	(151,660)	(151,660)
6.	Amortization of (Gain) or Loss	41,785	304,956	346,741
7.	Net Periodic Postretirement Benefit Cost	185,510	2,474,486	2,659,996

B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	72,815	1,592,345	1,665,160
2.	Interest Cost	27,722	606,004	633,726
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	(133,290)	(133,290)
6.	Amortization of (Gain) or Loss	16,257	161,958	178,215
7.	Net Periodic Postretirement Benefit Cost	116,794	2,227,017	2,343,811

C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(71,948)	(2,223,347)	(2,295,295)
2.	APBO - Active Other	(422,876)	(11,055,776)	(11,478,652)
3.	APBO - Retirees and Beneficiaries	(237,356)	(2,441,892)	(2,679,248)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(732,180)	(15,721,015)	(16,453,195)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(732,180)	(15,721,015)	(16,453,195)

D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	0	(1,296,461)	(1,296,461)
6.	Amount recognized in NPPBC during year	0	151,660	151,660
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	(1,144,801)	(1,144,801)
10.	Total Unrecognized (Gain) or Loss at beginning of year	727,581	5,309,996	6,037,577
11.	Amount recognized in NPPBC during year	(41,785)	(304,956)	(346,741)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(332,469)	(1,485,107)	(1,817,576)
14.	Total Unrecognized (Gain) or Loss at end of year	353,327	3,519,933	3,873,260
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	353,327	2,375,132	2,728,459

E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(201,884)	(11,118,271)	(11,320,155)
2.	Net Periodic Postretirement Benefit Cost for year	(185,510)	(2,474,486)	(2,659,996)
3.	Actual Cash Expense for year	8,541	246,874	255,415
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(378,853)	(13,345,883)	(13,724,736)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Corporate -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	929,465	15,131,806	16,061,271
2.	Service Cost	108,241	1,732,842	1,841,083
3.	Interest Cost	35,484	588,348	623,832
4.	Actual Cash Expense	(8,541)	(246,874)	(255,415)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(332,469)	(1,485,107)	(1,817,576)
7.	Accumulated Postretirement Benefit Obligation at end of year	732,180	15,721,015	16,453,195

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	929,465	15,131,806	16,061,271
2.	Interest on APBO	36,807	599,220	636,027
3.	Service Cost	108,241	1,732,842	1,841,083
4.	Expected Cash Expense	(66,807)	(549,084)	(615,891)
5.	Interest on Expected Cash Expense	(1,323)	(10,872)	(12,195)
6.	Expected APBO as of Current Measurement Date	1,006,383	16,903,912	17,910,295

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	727,581	5,309,996	6,037,577
2.	Amount recognized in current year	41,785	304,956	346,741
3.	Remaining (Gain) or Loss (1) - (2)	685,796	5,005,040	5,690,836
4.	Actual APBO as of current measurement date	732,180	15,721,015	16,453,195
5.	Expected APBO as of current measurement date	1,006,383	16,903,912	17,910,295
6.	(Gain) or Loss on APBO (4) - (5)	(274,203)	(1,182,897)	(1,457,100)
7.	Actual Cash Expense	8,541	246,874	255,415
8.	Expected Cash Expense	66,807	549,084	615,891
9.	(Gain) or Loss on Cash Expense (7) - (8)	(58,266)	(302,210)	(360,476)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	353,327	3,519,933	3,873,260

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	44,596	1,490,719	1,535,315
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	10,702	290,862	301,564
3.	Effect of 1% Decrease in Trend on APBO	(40,776)	(1,295,773)	(1,336,549)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(9,848)	(246,324)	(256,172)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	2	44	46
2.	Active Other	8	445	453
3.	Retiree	2	86	88
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	12	575	587

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	49,973	523,452	573,425
	2017	60,204	731,698	791,902
	2018	60,147	877,805	937,952
	2019	89,230	1,002,516	1,091,746
	2020	88,891	1,167,645	1,256,536
	2021 - 2025	379,611	7,492,454	7,872,065

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Gas -

		Union	Non-Union	Total
A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015			
1.	Service Cost	174,439	107,064	281,503
2.	Interest Cost	395,613	183,069	578,682
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	470,458	45,692	516,150
7.	Net Periodic Postretirement Benefit Cost	1,040,510	335,825	1,376,335
B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	161,056	110,036	271,092
2.	Interest Cost	377,670	165,640	543,310
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	354,552	17,065	371,617
7.	Net Periodic Postretirement Benefit Cost	893,278	292,741	1,186,019
C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(2,645,446)	(914,680)	(3,560,126)
2.	APBO - Active Other	(3,408,537)	(1,662,198)	(5,070,735)
3.	APBO - Retirees and Beneficiaries	(3,885,138)	(1,852,347)	(5,737,485)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(9,939,121)	(4,429,225)	(14,368,346)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(9,939,121)	(4,429,225)	(14,368,346)
D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	0	0	0
6.	Amount recognized in NPPBC during year	0	0	0
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	0	0
10.	Total Unrecognized (Gain) or Loss at beginning of year	8,191,767	795,598	8,987,365
11.	Amount recognized in NPPBC during year	(470,458)	(45,692)	(516,150)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(15,637)	(379,030)	(394,667)
14.	Total Unrecognized (Gain) or Loss at end of year	7,705,672	370,876	8,076,548
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	7,705,672	370,876	8,076,548
E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(2,175,810)	(4,072,974)	(6,248,784)
2.	Net Periodic Postretirement Benefit Cost for year	(1,040,510)	(335,825)	(1,376,335)
3.	Actual Cash Expense for year	982,871	350,450	1,333,321
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(2,233,449)	(4,058,349)	(6,291,798)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Gas -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	10,367,577	4,868,572	15,236,149
2.	Service Cost	174,439	107,064	281,503
3.	Interest Cost	395,613	183,069	578,682
4.	Actual Cash Expense	(982,871)	(350,450)	(1,333,321)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(15,637)	(379,030)	(394,667)
7.	Accumulated Postretirement Benefit Obligation at end of year	9,939,121	4,429,225	14,368,346

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	10,367,577	4,868,572	15,236,149
2.	Interest on APBO	410,556	192,796	603,352
3.	Service Cost	174,439	107,064	281,503
4.	Expected Cash Expense	(754,705)	(491,253)	(1,245,958)
5.	Interest on Expected Cash Expense	(14,943)	(9,727)	(24,670)
6.	Expected APBO as of Current Measurement Date	10,182,924	4,667,452	14,850,376

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	8,191,767	795,598	8,987,365
2.	Amount recognized in current year	470,458	45,692	516,150
3.	Remaining (Gain) or Loss (1) - (2)	7,721,309	749,906	8,471,215
4.	Actual APBO as of current measurement date	9,939,121	4,429,225	14,368,346
5.	Expected APBO as of current measurement date	10,182,924	4,667,452	14,850,376
6.	(Gain) or Loss on APBO (4) - (5)	(243,803)	(238,227)	(482,030)
7.	Actual Cash Expense	982,871	350,450	1,333,321
8.	Expected Cash Expense	754,705	491,253	1,245,958
9.	(Gain) or Loss on Cash Expense (7) - (8)	228,166	(140,803)	87,363
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	7,705,672	370,876	8,076,548

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	647,522	297,641	945,163
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	49,665	28,982	78,647
3.	Effect of 1% Decrease in Trend on APBO	(588,002)	(265,138)	(853,140)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(43,985)	(24,839)	(68,824)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	27	13	40
2.	Active Other	47	39	86
3.	Retiree	134	89	223
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	208	141	349

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	609,354	407,453	1,016,807
	2017	623,241	410,326	1,033,567
	2018	674,637	364,586	1,039,223
	2019	779,653	327,342	1,106,995
	2020	887,983	359,371	1,247,354
	2021 - 2025	4,643,382	1,502,170	6,145,552

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- MFG -

A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015	Union	Non-Union	Total
1.	Service Cost	0	0	0
2.	Interest Cost	12,648	44,318	56,966
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	59,794	(80,410)	(20,616)
7.	Net Periodic Postretirement Benefit Cost	72,442	(36,092)	36,350

B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	0	0	0
2.	Interest Cost	6,609	28,253	34,862
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	46,907	(75,058)	(28,151)
7.	Net Periodic Postretirement Benefit Cost	53,516	(46,805)	6,711

C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	0	0	0
2.	APBO - Active Other	0	0	0
3.	APBO - Retirees and Beneficiaries	(190,425)	(813,070)	(1,003,495)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(190,425)	(813,070)	(1,003,495)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(190,425)	(813,070)	(1,003,495)

D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	0	0	0
6.	Amount recognized in NPPBC during year	0	0	0
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	0	0
10.	Total Unrecognized (Gain) or Loss at beginning of year	1,041,159	(1,400,128)	(358,969)
11.	Amount recognized in NPPBC during year	(59,794)	80,410	20,616
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	38,101	(311,566)	(273,465)
14.	Total Unrecognized (Gain) or Loss at end of year	1,019,466	(1,631,284)	(611,818)
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	1,019,466	(1,631,284)	(611,818)

E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	669,413	(2,642,650)	(1,973,237)
2.	Net Periodic Postretirement Benefit Cost for year	(72,442)	36,092	(36,350)
3.	Actual Cash Expense for year	232,070	162,204	394,274
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	829,041	(2,444,354)	(1,615,313)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS
- MFG -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	371,746	1,242,522	1,614,268
2.	Service Cost	0	0	0
3.	Interest Cost	12,648	44,318	56,966
4.	Actual Cash Expense	(232,070)	(162,204)	(394,274)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	38,101	(311,566)	(273,465)
7.	Accumulated Postretirement Benefit Obligation at end of year	190,425	813,070	1,003,495

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	371,746	1,242,522	1,614,268
2.	Interest on APBO	14,721	49,203	63,924
3.	Service Cost	0	0	0
4.	Expected Cash Expense	(104,687)	(246,737)	(351,424)
5.	Interest on Expected Cash Expense	(2,073)	(4,885)	(6,958)
6.	Expected APBO as of Current Measurement Date	279,707	1,040,103	1,319,810

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	1,041,159	(1,400,128)	(358,969)
2.	Amount recognized in current year	59,794	(80,410)	(20,616)
3.	Remaining (Gain) or Loss (1) - (2)	981,365	(1,319,718)	(338,353)
4.	Actual APBO as of current measurement date	190,425	813,070	1,003,495
5.	Expected APBO as of current measurement date	279,707	1,040,103	1,319,810
6.	(Gain) or Loss on APBO (4) - (5)	(89,282)	(227,033)	(316,315)
7.	Actual Cash Expense	232,070	162,204	394,274
8.	Expected Cash Expense	104,687	246,737	351,424
9.	(Gain) or Loss on Cash Expense (7) - (8)	127,383	(84,533)	42,850
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	1,019,466	(1,631,284)	(611,818)

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	980	13,097	14,077
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	155	986	1,141
3.	Effect of 1% Decrease in Trend on APBO	(974)	(12,815)	(13,789)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(151)	(960)	(1,111)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	0	0	0
2.	Active Other	0	0	0
3.	Retiree	34	35	69
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	34	35	69

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	43,653	184,663	228,316
	2017	43,925	137,833	181,758
	2018	31,581	136,804	168,385
	2019	5,564	150,634	156,198
	2020	2,929	92,679	95,608
	2021 - 2025	17,294	72,977	90,271

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Oil -

		Union	Non-Union	Total
A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015			
1.	Service Cost	12,827	0	12,827
2.	Interest Cost	11,610	0	11,610
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	4,546	0	4,546
7.	Net Periodic Postretirement Benefit Cost	28,983	0	28,983
B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	0	0	0
2.	Interest Cost	0	0	0
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	0	0
6.	Amortization of (Gain) or Loss	(11,226)	0	(11,226)
7.	Net Periodic Postretirement Benefit Cost	(11,226)	0	(11,226)
C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	0	0	0
2.	APBO - Active Other	0	0	0
3.	APBO - Retirees and Beneficiaries	0	0	0
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	0	0	0
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	0	0	0
D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	0	0	0
6.	Amount recognized in NPPBC during year	0	0	0
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	0	0
10.	Total Unrecognized (Gain) or Loss at beginning of year	79,149	0	79,149
11.	Amount recognized in NPPBC during year	(4,546)	0	(4,546)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(318,579)	0	(318,579)
14.	Total Unrecognized (Gain) or Loss at end of year	(243,976)	0	(243,976)
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	(243,976)	0	(243,976)
E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(214,993)	0	(214,993)
2.	Net Periodic Postretirement Benefit Cost for year	(28,983)	0	(28,983)
3.	Actual Cash Expense for year	0	0	0
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(243,976)	0	(243,976)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Oil -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	294,142	0	294,142
2.	Service Cost	12,827	0	12,827
3.	Interest Cost	11,610	0	11,610
4.	Actual Cash Expense	0	0	0
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(318,579)	0	(318,579)
7.	Accumulated Postretirement Benefit Obligation at end of year	0	0	0

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	294,142	0	294,142
2.	Interest on APBO	11,648	0	11,648
3.	Service Cost	12,827	0	12,827
4.	Expected Cash Expense	(1,943)	0	(1,943)
5.	Interest on Expected Cash Expense	(38)	0	(38)
6.	Expected APBO as of Current Measurement Date	316,636	0	316,636

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	79,149	0	79,149
2.	Amount recognized in current year	4,546	0	4,546
3.	Remaining (Gain) or Loss (1) - (2)	74,603	0	74,603
4.	Actual APBO as of current measurement date	0	0	0
5.	Expected APBO as of current measurement date	316,636	0	316,636
6.	(Gain) or Loss on APBO (4) - (5)	(316,636)	0	(316,636)
7.	Actual Cash Expense	0	0	0
8.	Expected Cash Expense	1,943	0	1,943
9.	(Gain) or Loss on Cash Expense (7) - (8)	(1,943)	0	(1,943)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	(243,976)	0	(243,976)

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	0	0	0
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	1,496	0	1,496
3.	Effect of 1% Decrease in Trend on APBO	0	0	0
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(1,407)	0	(1,407)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	0	0	0
2.	Active Other	0	0	0
3.	Retiree	0	0	0
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	0	0	0

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	0	0	0
	2017	0	0	0
	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
	2021 - 2025	0	0	0

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Shared Services -

A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015	Union	Non-Union	Total
1.	Service Cost	317,615	692,081	1,009,696
2.	Interest Cost	192,288	176,034	368,322
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(41,719)	(54,010)	(95,729)
6.	Amortization of (Gain) or Loss	38,961	141,359	180,320
7.	Net Periodic Postretirement Benefit Cost	507,145	955,464	1,462,609

B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	275,145	683,442	958,587
2.	Interest Cost	177,526	177,061	354,587
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(32,291)	(53,904)	(86,195)
6.	Amortization of (Gain) or Loss	(4,596)	71,241	66,645
7.	Net Periodic Postretirement Benefit Cost	415,784	877,840	1,293,624

C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(736,468)	(336,132)	(1,072,600)
2.	APBO - Active Other	(3,326,816)	(3,936,649)	(7,263,465)
3.	APBO - Retirees and Beneficiaries	(532,236)	(275,225)	(807,461)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(4,595,520)	(4,548,006)	(9,143,526)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(4,595,520)	(4,548,006)	(9,143,526)

D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	(171,097)	(527,896)	(698,993)
6.	Amount recognized in NPPBC during year	41,719	54,010	95,729
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	(129,378)	(473,886)	(603,264)
10.	Total Unrecognized (Gain) or Loss at beginning of year	678,402	2,461,383	3,139,785
11.	Amount recognized in NPPBC during year	(38,961)	(141,359)	(180,320)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(739,334)	(771,690)	(1,511,024)
14.	Total Unrecognized (Gain) or Loss at end of year	(99,893)	1,548,334	1,448,441
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	(229,271)	1,074,448	845,177

E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(4,432,021)	(2,556,594)	(6,988,615)
2.	Net Periodic Postretirement Benefit Cost for year	(507,145)	(955,464)	(1,462,609)
3.	Actual Cash Expense for year	114,375	38,500	152,875
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(4,824,791)	(3,473,558)	(8,298,349)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Shared Services -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	4,939,326	4,490,081	9,429,407
2.	Service Cost	317,615	692,081	1,009,696
3.	Interest Cost	192,288	176,034	368,322
4.	Actual Cash Expense	(114,375)	(38,500)	(152,875)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(739,334)	(771,690)	(1,511,024)
7.	Accumulated Postretirement Benefit Obligation at end of year	4,595,520	4,548,006	9,143,526

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	4,939,326	4,490,081	9,429,407
2.	Interest on APBO	195,597	177,807	373,404
3.	Service Cost	317,615	692,081	1,009,696
4.	Expected Cash Expense	(167,144)	(89,555)	(256,699)
5.	Interest on Expected Cash Expense	(3,309)	(1,773)	(5,082)
6.	Expected APBO as of Current Measurement Date	5,282,085	5,268,641	10,550,726

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	678,402	2,461,383	3,139,785
2.	Amount recognized in current year	38,961	141,359	180,320
3.	Remaining (Gain) or Loss (1) - (2)	639,441	2,320,024	2,959,465
4.	Actual APBO as of current measurement date	4,595,520	4,548,006	9,143,526
5.	Expected APBO as of current measurement date	5,282,085	5,268,641	10,550,726
6.	(Gain) or Loss on APBO (4) - (5)	(686,565)	(720,635)	(1,407,200)
7.	Actual Cash Expense	114,375	38,500	152,875
8.	Expected Cash Expense	167,144	89,555	256,699
9.	(Gain) or Loss on Cash Expense (7) - (8)	(52,769)	(51,055)	(103,824)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	(99,893)	1,548,334	1,448,441

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	403,363	561,571	964,934
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	52,533	130,970	183,503
3.	Effect of 1% Decrease in Trend on APBO	(360,542)	(476,562)	(837,104)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(46,376)	(108,693)	(155,069)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	8	7	15
2.	Active Other	59	172	231
3.	Retiree	9	5	14
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	76	184	260

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	133,590	62,288	195,878
	2017	154,104	118,465	272,569
	2018	202,488	171,071	373,559
	2019	246,264	201,872	448,136
	2020	255,586	240,377	495,963
	2021 - 2025	2,346,174	1,857,037	4,203,211

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Steam -

A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015	Union	Non-Union	Total
1.	Service Cost	65,825	77,270	143,095
2.	Interest Cost	55,005	64,839	119,844
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	2,136	5,016	7,152
6.	Amortization of (Gain) or Loss	(11,776)	39,186	27,410
7.	Net Periodic Postretirement Benefit Cost	111,190	186,311	297,501

B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	77,492	102,931	180,423
2.	Interest Cost	51,380	56,247	107,627
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	0	5,016	5,016
6.	Amortization of (Gain) or Loss	(18,221)	13,853	(4,368)
7.	Net Periodic Postretirement Benefit Cost	110,651	178,047	288,698

C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(74,781)	(336,571)	(411,352)
2.	APBO - Active Other	(1,041,220)	(861,088)	(1,902,308)
3.	APBO - Retirees and Beneficiaries	(210,097)	(255,032)	(465,129)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(1,326,098)	(1,452,691)	(2,778,789)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(1,326,098)	(1,452,691)	(2,778,789)

D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	2,136	13,910	16,046
6.	Amount recognized in NPPBC during year	(2,136)	(5,016)	(7,152)
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	0	8,894	8,894
10.	Total Unrecognized (Gain) or Loss at beginning of year	(205,045)	682,321	477,276
11.	Amount recognized in NPPBC during year	11,776	(39,186)	(27,410)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(202,736)	(342,051)	(544,787)
14.	Total Unrecognized (Gain) or Loss at end of year	(396,005)	301,084	(94,921)
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	(396,005)	309,978	(86,027)

E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(1,615,458)	(981,534)	(2,596,992)
2.	Net Periodic Postretirement Benefit Cost for year	(111,190)	(186,311)	(297,501)
3.	Actual Cash Expense for year	4,545	25,132	29,677
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(1,722,103)	(1,142,713)	(2,864,816)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Steam -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	1,412,549	1,677,765	3,090,314
2.	Service Cost	65,825	77,270	143,095
3.	Interest Cost	55,005	64,839	119,844
4.	Actual Cash Expense	(4,545)	(25,132)	(29,677)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(202,736)	(342,051)	(544,787)
7.	Accumulated Postretirement Benefit Obligation at end of year	1,326,098	1,452,691	2,778,789

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	1,412,549	1,677,765	3,090,314
2.	Interest on APBO	55,937	66,440	122,377
3.	Service Cost	65,825	77,270	143,095
4.	Expected Cash Expense	(47,089)	(80,847)	(127,936)
5.	Interest on Expected Cash Expense	(932)	(1,601)	(2,533)
6.	Expected APBO as of Current Measurement Date	1,486,290	1,739,027	3,225,317

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	(205,045)	682,321	477,276
2.	Amount recognized in current year	(11,776)	39,186	27,410
3.	Remaining (Gain) or Loss (1) - (2)	(193,269)	643,135	449,866
4.	Actual APBO as of current measurement date	1,326,098	1,452,691	2,778,789
5.	Expected APBO as of current measurement date	1,486,290	1,739,027	3,225,317
6.	(Gain) or Loss on APBO (4) - (5)	(160,192)	(286,336)	(446,528)
7.	Actual Cash Expense	4,545	25,132	29,677
8.	Expected Cash Expense	47,089	80,847	127,936
9.	(Gain) or Loss on Cash Expense (7) - (8)	(42,544)	(55,715)	(98,259)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	(396,005)	301,084	(94,921)

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	139,410	109,491	248,901
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	14,892	12,915	27,807
3.	Effect of 1% Decrease in Trend on APBO	(121,445)	(97,717)	(219,162)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(12,743)	(11,450)	(24,193)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	3	6	9
2.	Active Other	21	20	41
3.	Retiree	2	6	8
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	26	32	58

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	30,770	35,645	66,415
	2017	35,019	69,630	104,649
	2018	54,954	94,684	149,638
	2019	58,694	132,554	191,248
	2020	78,009	142,742	220,751
	2021 - 2025	536,738	817,883	1,354,621

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Citizens Water - Grandfathered Group -

A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015	Union	Non-Union	Total
1.	Service Cost	134,856	700,705	835,561
2.	Interest Cost	491,350	1,341,383	1,832,733
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(107)	(466,946)	(467,053)
6.	Amortization of (Gain) or Loss	82,413	850,016	932,429
7.	Net Periodic Postretirement Benefit Cost	708,512	2,425,158	3,133,670

B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	119,363	525,069	644,432
2.	Interest Cost	449,339	1,151,539	1,600,878
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(107)	(466,946)	(467,053)
6.	Amortization of (Gain) or Loss	16,543	407,587	424,130
7.	Net Periodic Postretirement Benefit Cost	585,138	1,617,249	2,202,387

C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	0	0	0
2.	APBO - Active Other	(502,323)	(2,264,178)	(2,766,501)
3.	APBO - Retirees and Beneficiaries	(11,296,780)	(27,900,772)	(39,197,552)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(11,799,103)	(30,164,950)	(41,964,053)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(11,799,103)	(30,164,950)	(41,964,053)

D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	(713)	(5,071,032)	(5,071,745)
6.	Amount recognized in NPPBC during year	107	466,946	467,053
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	(606)	(4,604,086)	(4,604,692)
10.	Total Unrecognized (Gain) or Loss at beginning of year	1,435,003	14,800,724	16,235,727
11.	Amount recognized in NPPBC during year	(82,413)	(850,016)	(932,429)
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(993,047)	(5,092,388)	(6,085,435)
14.	Total Unrecognized (Gain) or Loss at end of year	359,543	8,858,320	9,217,863
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	358,937	4,254,234	4,613,171

E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(11,326,928)	(25,007,335)	(36,334,263)
2.	Net Periodic Postretirement Benefit Cost for year	(708,512)	(2,425,158)	(3,133,670)
3.	Actual Cash Expense for year	595,274	1,521,777	2,117,051
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(11,440,166)	(25,910,716)	(37,350,882)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Citizens Water - Grandfathered Group -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	12,761,218	34,737,027	47,498,245
2.	Service Cost	134,856	700,705	835,561
3.	Interest Cost	491,350	1,341,383	1,832,733
4.	Actual Cash Expense	(595,274)	(1,521,777)	(2,117,051)
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(993,047)	(5,092,388)	(6,085,435)
7.	Accumulated Postretirement Benefit Obligation at end of year	11,799,103	30,164,950	41,964,053

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	12,761,218	34,737,027	47,498,245
2.	Interest on APBO	505,345	1,375,586	1,880,931
3.	Service Cost	134,856	700,705	835,561
4.	Expected Cash Expense	(706,793)	(1,727,424)	(2,434,217)
5.	Interest on Expected Cash Expense	(13,995)	(34,203)	(48,198)
6.	Expected APBO as of Current Measurement Date	12,680,631	35,051,691	47,732,322

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	1,435,003	14,800,724	16,235,727
2.	Amount recognized in current year	82,413	850,016	932,429
3.	Remaining (Gain) or Loss (1) - (2)	1,352,590	13,950,708	15,303,298
4.	Actual APBO as of current measurement date	11,799,103	30,164,950	41,964,053
5.	Expected APBO as of current measurement date	12,680,631	35,051,691	47,732,322
6.	(Gain) or Loss on APBO (4) - (5)	(881,528)	(4,886,741)	(5,768,269)
7.	Actual Cash Expense	595,274	1,521,777	2,117,051
8.	Expected Cash Expense	706,793	1,727,424	2,434,217
9.	(Gain) or Loss on Cash Expense (7) - (8)	(111,519)	(205,647)	(317,166)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	359,543	8,858,320	9,217,863

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	1,355,964	2,895,633	4,251,597
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	64,461	230,014	294,475
3.	Effect of 1% Decrease in Trend on APBO	(1,134,183)	(2,452,541)	(3,586,724)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(54,652)	(191,096)	(245,748)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	0	0	0
2.	Active Other	9	10	19
3.	Retiree	48	119	167
4.	Surviving Spouses	0	12	12
5.	Total Participant Count	57	141	198

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	672,768	1,577,891	2,250,659
	2017	723,858	1,639,107	2,362,965
	2018	754,585	1,696,749	2,451,334
	2019	766,855	1,750,902	2,517,757
	2020	782,356	1,777,206	2,559,562
	2021 - 2025	3,289,363	8,611,088	11,900,451

FASB ASC 715-20 & 60 ACCOUNTING ITEMS - BREAKDOWN BY DIVISION

- Citizens Water - Non-Grandfathered Group -

		Union	Non-Union	Total
A.	Disclosure Net Periodic Postretirement Benefit Cost for FYE 9/30/2015			
1.	Service Cost	450,844	356,776	807,620
2.	Interest Cost	65,535	49,544	115,079
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(77,049)	(113,880)	(190,929)
6.	Amortization of (Gain) or Loss	(13,290)	(43,853)	(57,143)
7.	Net Periodic Postretirement Benefit Cost	426,040	248,587	674,627
B.	Preliminary Net Periodic Postretirement Benefit Cost for FYE 9/30/2016	Union	Non-Union	Total
1.	Service Cost	483,171	370,278	853,449
2.	Interest Cost	84,974	66,910	151,884
3.	Expected Return on Assets	0	0	0
4.	Amortization of Transition Obligation (Asset)	0	0	0
5.	Amortization of Prior Service Cost (Credit)	(77,049)	(113,880)	(190,929)
6.	Amortization of (Gain) or Loss	(10,167)	(30,405)	(40,572)
7.	Net Periodic Postretirement Benefit Cost	480,929	292,903	773,832
C.	Summary of Funded Status as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO - Active Fully Eligible	(125,754)	(61,627)	(187,381)
2.	APBO - Active Other	(2,042,699)	(1,434,918)	(3,477,617)
3.	APBO - Retirees and Beneficiaries	0	(220,801)	(220,801)
4.	Total Accumulated Postretirement Benefit Obligation (1) + (2) + (3)	(2,168,453)	(1,717,346)	(3,885,799)
5.	Plan Assets at Fair Value as of Measurement Date	0	0	0
6.	APBO (in excess of) or less than Plan Assets (4) + (5)	(2,168,453)	(1,717,346)	(3,885,799)
D.	Summary of Outstanding Unrecognized Items as of FYE 9/30/2015	Union	Non-Union	Total
1.	Transition Obligation (Asset) at beginning of year	0	0	0
2.	Amount recognized in NPPBC during year	0	0	0
3.	Change due to divisional transfers	0	0	0
4.	Transition Obligation (Asset) at end of year	0	0	0
5.	Total Prior Service Cost (Credit) at beginning of year	(586,489)	(1,242,694)	(1,829,183)
6.	Amount recognized in NPPBC during year	77,049	113,880	190,929
7.	Change due to divisional transfers	0	0	0
8.	New Prior Service Cost (Credit) established during year	0	0	0
9.	Total Prior Service Cost (Credit) at end of year	(509,440)	(1,128,814)	(1,638,254)
10.	Total Unrecognized (Gain) or Loss at beginning of year	(231,404)	(763,585)	(994,989)
11.	Amount recognized in NPPBC during year	13,290	43,853	57,143
12.	Change due to divisional transfers	0	0	0
13.	New (Gain) or Loss established during year	(2,857)	58,932	56,075
14.	Total Unrecognized (Gain) or Loss at end of year	(220,971)	(660,800)	(881,771)
15.	Total of Outstanding Unrecognized Items (4) + (9) + (14)	(730,411)	(1,789,614)	(2,520,025)
E.	(Accrued) or Prepaid Postretirement Benefit Expense as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Accrued)/Prepaid Postretirement Benefit Expense at beginning of year	(2,472,824)	(3,258,373)	(5,731,197)
2.	Net Periodic Postretirement Benefit Cost for year	(426,040)	(248,587)	(674,627)
3.	Actual Cash Expense for year	0	0	0
4.	Effect of divisional transfers	0	0	0
5.	(Accrued)/Prepaid Postretirement Benefit Expense at end of year	(2,898,864)	(3,506,960)	(6,405,824)

FASB ASC 715-20 & 60 ACCOUNTING ITEMS

- Citizens Water - Non-Grandfathered Group -

F.	Reconciliation of APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	Accumulated Postretirement Benefit Obligation at beginning of year	1,654,931	1,252,094	2,907,025
2.	Service Cost	450,844	356,776	807,620
3.	Interest Cost	65,535	49,544	115,079
4.	Actual Cash Expense	0	0	0
5.	Effect of Plan Amendments	0	0	0
6.	Actuarial (Gain) or Loss	(2,857)	58,932	56,075
7.	Accumulated Postretirement Benefit Obligation at end of year	2,168,453	1,717,346	3,885,799

G.	Expected APBO as of FYE 9/30/2015	Union	Non-Union	Total
1.	APBO as of Prior Measurement Date	1,654,931	1,252,094	2,907,025
2.	Interest on APBO	65,535	49,583	115,118
3.	Service Cost	450,844	356,776	807,620
4.	Expected Cash Expense	0	(1,959)	(1,959)
5.	Interest on Expected Cash Expense	0	(39)	(39)
6.	Expected APBO as of Current Measurement Date	2,171,310	1,656,455	3,827,765

H.	Calculation of Unrecognized (Gain) or Loss as of FYE 9/30/2015	Union	Non-Union	Total
1.	(Gain) or Loss as of prior measurement date	(231,404)	(763,585)	(994,989)
2.	Amount recognized in current year	(13,290)	(43,853)	(57,143)
3.	Remaining (Gain) or Loss (1) - (2)	(218,114)	(719,732)	(937,846)
4.	Actual APBO as of current measurement date	2,168,453	1,717,346	3,885,799
5.	Expected APBO as of current measurement date	2,171,310	1,656,455	3,827,765
6.	(Gain) or Loss on APBO (4) - (5)	(2,857)	60,891	58,034
7.	Actual Cash Expense	0	0	0
8.	Expected Cash Expense	0	1,959	1,959
9.	(Gain) or Loss on Cash Expense (7) - (8)	0	(1,959)	(1,959)
10.	Effect of Divisional Transfers	0	0	0
11.	Total Unrecognized (Gain) or Loss (3) + (6) + (10) + (11)	(220,971)	(660,800)	(881,771)

I.	Sensitivity Analysis as of FYE 9/30/2015	Union	Non-Union	Total
1.	Effect of 1% Increase in Trend on APBO	201,072	164,020	365,092
2.	Effect of 1% Increase in Trend on Service Cost plus Interest Cost	59,264	44,379	103,643
3.	Effect of 1% Decrease in Trend on APBO	(178,872)	(143,966)	(322,838)
4.	Effect of 1% Decrease in Trend on Service Cost plus Interest Cost	(51,531)	(38,752)	(90,283)

J.	Participant Count as of FYE 9/30/2015	Union	Non-Union	Total
1.	Active Fully Eligible	1	1	2
2.	Active Other	74	65	139
3.	Retiree	0	1	1
4.	Surviving Spouses	0	0	0
5.	Total Participant Count	75	67	142

K.	Estimated Future Benefit Payments (fiscal year ending)	Union	Non-Union	Total
	2016	1,503	20,938	22,441
	2017	29,185	48,531	77,716
	2018	91,698	70,770	162,468
	2019	139,967	104,153	244,120
	2020	189,342	141,043	330,385
	2021 - 2025	1,648,068	1,347,543	2,995,611

SUMMARY OF MAIN PLAN PROVISIONS

Medical, Dental, & Vision

1. The plan provides comprehensive major medical benefits with a PPO network.

2. Participants are eligible at the earlier of (i) age 60 with at least 5 years of service, or (ii) age plus service equal to or greater than 85 with a minimum age of 55.

   Coverage ceases at age 65 for all participants, except grandfathered participants that transferred from the Citizens Water Postretirement Benefit Plan. These participants receive coverage for their lifetime.

3. Cost Sharing features are as follows:

	PPO		Water*
Non-Prescription Coverage	Network	Non-Network	Post-65
Deductible (2x Family)	$600	$600	$300
Physician Copay	$5	30%	N/A
Coinsurance Percentage	10%	30%	20%
Out-of-Pocket Maximum	$1,350	$2,750	$2,500
Lifetime Maximum	Unlimited	Unlimited	N/A
Prescription Coverage			
Copay - Retail Generic	$20		$10
Copay - Formulary Brand	$35		$20
Copay - Nonformulary Brand	$50		$40

* These features apply only to the grandfathered group of Water participants that receive coverage after age 65. The plan also reimburses the standard Medicare Part B premium ($104.90 per month as of the valuation date).

Dental Coverage	
Deductible (2x Family)	$75 (waived for preventative)
Coinsurance	
Preventative	100%
Basic	85%
Major	80%
Orthodontia	50%
Annual Maximum	$2,000
Orthodontia Lifetime Maximum	$1,500

Vision Coverage	
Eye Exam	$5
Frames	At Discount
Single Vision	$50
Bifocal	$70
Trifocal	$105

4. Monthly Premium Rates:

	Medical, Rx, & Vision	Dental	Water* Post-65
Retiree Only	$747.00	$40.00	$299.92
Retiree & Spouse	$1,735.00	$98.00	$599.84

* Does not include the monthly reimbursement of Medicare Part B premium ($104.90).

Medical, Dental, & Vision

5. Retiree Contributions

   Retirees pay a portion of the current premiums for themselves and their spouses. Participants retired prior to January 1, 2014 pay 20%. Participants retired on or after January 1, 2014 pay 25%. Upon the retiree's attainment of age 65, a younger spouse may continue to be covered under the plan until their own ag 65 by paying 100%.

   Certain retirees pay a fixed premium based on the premium levels in effect at their retirement. These participants and their corresponding amounts are identified on the census by Citizens Energy.

   Participants eligible under the grandfathered Water provisions pay a fixed $50 monthly ($100 if covering spouse) for medical coverage. These participants pay dental premiums similar to standard retirees above.

   A select group of executives receive one year of retirement with no premiums paid. This group is also identified on the census.

6. Spousal coverage continues upon the death of the retiree, if the spouse pays the applicable premium (see above).

7. Employee contributions and other cost sharing features are assumed to increase annually at the health care cost trend rate.

Life Insurance

1. Participants are eligible at the earlier of (i) age 60 with at least 5 years of service, or (ii) age plus service equal to or greater than 85 with a minimum age of 55.

2. For most participants, the benefit amount is $10,000. Depending on retirement date, some retirees receive $1,500 or $5,000. These participants are identified on the census listing. Grandfathered Water participants have varying benefits, some of which reduce at age 65. These participants are also identified on the census with their corresponding amounts and reduction dates.

3. The Employer pays the full premium.

METHOD AND ASSUMPTIONS

COST METHOD	Projected Unit Credit
ATTRIBUTION PERIOD	Date of Hire to Full Eligibility
ASSUMPTIONS	
Discount Rate	Citigroup Pension Liability Yield Curve - September 2015 (Effective Rate: 3.92%)
Expected Rate of Return on Assets	Not Applicable
Mortality	RP-2014 Total Data Set Mortality (sex-distinct) with generational mortality improvement using Scale MP-2014
Disability	None Assumed
Salary Scale	Not Applicable
Coverage Rate	100% of eligible employees are assumed to be covered
Spouses	Retirees: Age and marital status based on actual census data
	Actives: 70% will cover a spouse with males 3 years older than females
Administrative Expenses	Included in per capita claim costs
Turnover Rates	Sarason T-3 Turnover (sample rates below)

Age	Rate	Age	Rate
25	5.27%	40	3.84%
30	4.83%	45	3.21%
35	4.47%	50	1.52%

Retirement Rates

Age	Rate	Age	Rate
55 - 59	10%	62	25%
60	25%	63 - 64	10%
61	10%	65+	100%

Medical Per Capita Claims (Pre-65)

Baseline Claim: $6,565

Age Variance: 2010 Society of Actuaries Age Variance (rates below)

Age	Male	Female
55 - 59	1.740	1.835
60 - 64	2.233	2.184

Age- Adjusted Claims

Age	Male	Female
55 - 59	11,423	12,047
60 - 64	14,660	14,338

Medical Per Capita Claims (Post-65): $4,858

Dental Per Capita Claims (all ages): $480

ASSUMPTIONS

Health Care Cost Trend Rates

Year	Medical	Dental
2015	8.0%	4.0%
2016	7.5%	4.0%
2017	7.0%	4.0%
2018	6.5%	4.0%
2019	5.5%	4.0%
2020+	5.0%	4.0%

Per Capita "Cadillac Tax"

Year	Amount	Year	Amount
2015	0	2046	5,631
2016	0	2047	6,095
2017	0	2048	6,589
2018	0	2049	7,112
2019	0	2050	7,668
2020	0	2051	8,257
2021	0	2052	8,882
2022	82	2053	9,545
2023	176	2054	10,247
2024	277	2055	10,991
2025	387	2056	11,780
2026	504	2057	12,615
2027	631	2058	13,499
2028	767	2059	14,435
2029	913	2060	15,425
2030	1,069	2061	16,473
2031	1,237	2062	17,582
2032	1,416	2063	18,755
2033	1,608	2064	19,995
2034	1,813	2065	21,306
2035	2,032	2066	22,693
2036	2,266	2067	24,158
2037	2,515	2068	25,706
2038	2,781	2069	27,342
2039	3,065	2070	29,071
2040	3,367	2071	30,896
2041	3,688	2072	32,824
2042	4,030	2073	34,860
2043	4,395	2074	37,009
2044	4,782	2075	39,279
2045	5,193	2076	41,674

Current Percent of Cadillac Tax Threshold Used: 73%

Future Consumer Price Index: 3.0% per year

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(17) Schedules of net charges by category or account for each affiliated company for services rendered during the test year, including the following:

(A) An explanation of the nature of services provided.

(B) An explanation of the basis or pricing methodology for charges.

(C) If charges are allocated, for each type of charge allocated, the following:

(i) A detailed explanation of the allocation methodology used.
(ii) The specific allocation factors used.

SHARED SERVICES

Overview and Allocation Methodology

Q. PLEASE EXPLAIN SHARED SERVICES.

A. Shared Services is an organizational framework for the consolidation of resources and centralization of costs that provides process or knowledge-based services to the various Citizens business units. Shared Services is composed of two distinct branches, Corporate Support Services ("CSS") and Shared Field Services ("SFS").

CSS provides executive management, administrative, customer service, and engineering capabilities. SFS provides operational services, such as meter reading and customer field services. Both CSS and SFS are designed to deliver high-quality services efficiently and effectively by streamlining high-volume, routine transactions and utilizing resources with specialized skill-sets who are dedicated to providing these services.

Q. HOW ARE SHARED SERVICES COSTS ASSIGNED TO THE VARIOUS BUSINESS UNITS THAT ARE SERVED BY AND BENEFIT FROM THE ACTIVITIES OF SHARED SERVICES PERSONNEL?

A. The first choice is to direct-charge all costs that can clearly be assigned to the business unit driving the cost. A prime example of this is the activity within the engineering group in CSS: most engineering personnel provide services for distinct projects within a given business unit; consequently, rather than charge their time to their home area in CSS which would cause the associated costs to be allocated, they charge their time to the distinct project. Another example is the cost for lawn care at various facilities: these costs can be readily identified with the business unit whose facilities are being maintained and are therefore direct-charged to that business unit, even though the activity itself is managed by Shared Services personnel.

When it is not possible or practical to specifically identify costs as being attributable to a particular business unit, a comprehensive cost allocation methodology is utilized to assign Shared Services costs to the ultimate cost causer or consumer of a particular service based on numerous cost drivers. The objective of the cost allocation methodology is to assign the Shared Services costs as accurately as possible to the consumers or beneficiaries of each service. However, it is important to keep in mind that all allocations are inherently estimates. Consequently, Citizens strives to strike an optimal balance between the most accurate assignment of costs and the avoidance of overly complicated allocations.

Q. PLEASE IDENTIFY THE TYPES OF COST DRIVERS USED IN ALLOCATING COSTS.

A. Citizens uses three main types of cost drivers: (i) statistical drivers where feasible, (ii) estimates of time spent on activities for each business unit where statistical drivers cannot be obtained, or (iii) the Trust Administration driver when there is no other reasonable cost benefit relationship that can be determined.

For example, the costs associated with providing human resources services, such as benefits administration or payroll, are assigned to the different business units based upon the number of employees in each unit (a statistical driver). In the same manner, costs associated with the Citizens customer call center are assigned to the regulated utilities of Citizens Energy Group based on the number of customers in each unit. A list of statistical cost drivers, including their derivation, is provided in my supporting workpaper 270.

In contrast, costs for most accounting functions have no correlation to any statistics that drive the amount of accounting activity for any given unit; the number of journal entries made or the dollar amounts reconciled are not indicators of the amount of time required to accomplish these activities for any business unit, to name but two well-known and frequent accounting activities. Thus, accounting personnel who are dedicated to an operating unit estimate how much time they spend on behalf of the applicable business units. The same concept is true for employees in other departments, such as Environmental Stewardship, Occupational Health and Safety, and others. Some employees may estimate a portion of their time to be allocated to Trust Administration, explained below, in addition to specific business units.

Q. PLEASE DESCRIBE FURTHER THE CIRCUMSTANCES UNDER WHICH THE TRUST ADMINISTRATION DRIVER IS USED.

A. The Trust Administration driver is used to assign costs that cannot otherwise reasonably be assigned to any specific business unit, and for overall entity costs which are incurred to support Citizens. For example, the Financial Business Applications Analyst in Accounting is responsible for the functional administration of the General Ledger, involving activities such as maintaining the chart of accounts, posting and balancing interface transactions, researching and correcting posting errors, or managing system processes for consolidation or financial statement generation. These activities transcend individual business units and are therefore charged to Trust Administration.

Trust Administration costs are allocated to business units based on the respective business unit's percentage of prior year revenues to total Trust prior year revenues. Citizens has applied this methodology since fiscal year 2007, pursuant to the Order in Cause No. 42767 (Citizens Gas), pages 42 to 44.

Q. PLEASE GIVE AN OVERVIEW OF THE PROCESS FOR ESTABLISHING COST ALLOCATIONS.

A. Citizens uses a multi-step model to determine the allocation of Shared Services costs. Because Shared Services costs are predominantly people-driven, the first step is to establish a person-by-person allocation of labor costs using the various cost drivers explained previously.

The second step is to establish a weighted average attributable to each business unit based on the aggregate of the individualized allocations weighted by the estimated expensed wages for each employee. This overall labor-based allocation is then also applied to the estimated payroll-related expenses such as benefits and payroll taxes that are, for the most part, not directly assignable to individual employees.

The third step is to estimate all non-labor expenses for each department and apply appropriate drivers to allocate the costs.

The fourth step is to summarize all of the allocated cost categories (labor, labor-related costs, and non-labor costs) by major department or function. The result is converted to a percentage of total cost for each department or function which is then used as the allocation factor for all charges generated by that department or function.

Q. HOW ARE ALLOCATED COSTS TRANSFERRED TO EACH BUSINESS UNIT?

A. The allocation factors are maintained in Oracle EBS to effect an automated monthly allocation of expensed actual costs by account.

Q. HOW OFTEN ARE ALLOCATION FACTORS UPDATED?

A. Generally, Citizens updates allocation factors annually to establish factors for the new fiscal year, which begins on October 1st, though major organizational changes could warrant an interim update of the allocation factors. Such updates are normally forward-looking and not retroactive.

Q. PLEASE DESCRIBE THE REIMBURSEMENT PROCESS FOR ALLOCATED COSTS.

A. CSS and SFS each have cash accounts with which they fund their expenditures, and business units reimburse allocated costs through ongoing sweeps of intercompany balances. Certain costs that are not unique to CSS are paid from the CSS cash account as a matter of efficiency and are reimbursed within a few business days by the appropriate business units. For example, payroll liabilities for all business units within Citizens are paid from the CSS cash account and reimbursed within three to four business days. Likewise, as a result of combined billing, all customer receipts are collected in the CSS cash account first and then disbursed to the appropriate business unit.

Determination of CSS Expense Allocation % wp 201

Line	A Organization	B Gas	C Water	D CWA	E Steam	F WF Gas	G WF Water	H WF WW	I Other	J Total
1	Chief Officer	1,524,979	870,836	865,564	357,954	22,691	9,848	14,097	459,653	**4,125,622**
2	Community Relations	971,810	631,140	449,255	184,520	11,631	19,263	27,447	200,623	**2,495,689**
3	Corporate Development	-	-	-	-	79,791	50,738	51,900	968,644	**1,151,073**
4	CP&E	860,548	1,008,185	585,404	370,255	23,000	51,387	37,390	84,320	**3,020,489**
5	Customer Relationships	8,211,463	5,527,480	4,202,373	90,307	134,058	211,774	191,372	92,193	**18,661,018**
6	Environmental Stewardship	182,917	2,012,281	322,594	202,453	5,527	100,877	40,819	224,860	**3,092,328**
7	Facilities	202,070	126,699	109,679	42,818	2,500	4,574	6,170	37,393	**531,904**
8	Finance	2,073,063	1,299,109	1,269,316	578,102	90,536	100,933	114,627	782,556	**6,308,243**
9	Human Resources	1,370,340	1,018,517	445,977	285,957	12,466	33,496	40,029	185,388	**3,392,170**
10	Information Technology	5,226,140	3,301,462	2,587,066	1,029,477	69,810	138,267	159,750	913,098	**13,425,071**
11	Internal Audit	259,079	149,759	145,598	60,060	3,871	6,473	9,379	69,610	**703,828**
12	Legal	526,290	301,102	298,240	123,310	7,843	12,904	18,632	137,635	**1,425,956**
13	Legal & Auditing Fees	568,558	325,745	321,546	132,840	8,469	13,761	19,762	149,222	**1,539,904**
14	OHS & Security	537,790	400,211	374,600	229,527	7,059	14,924	19,991	155,389	**1,739,492**
15	Quality	220,382	125,607	125,223	51,816	3,280	5,385	7,733	57,019	**596,445**
16	Regulatory Affairs	483,866	353,166	330,705	272,343	70,417	34,290	101,911	101,694	**1,748,392**
17	Supply Chain	480,549	562,920	667,684	196,829	2,754	5,083	4,567	46,647	**1,967,033**
18	Trust Administration	6,839,342	5,069,992	3,730,168	1,214,316	155,669	229,724	254,719	1,425,602	**18,919,533**
19	**Total Test Year Actual Costs**	**$ 30,539,185**	**$ 23,084,211**	**$ 16,830,993**	**$ 5,422,883**	**$ 711,374**	**$ 1,043,703**	**$ 1,120,294**	**$ 6,091,545**	**$ 84,844,188**
20	Overall allocation %	35.99%	27.21%	19.84%	6.39%	0.84%	1.23%	1.32%	7.18%	**100.00%**
21	CSS redistribution	3,985,741	3,014,006	(8,346,574)	708,263	92,892	-	-	545,672	-
22	Total Test Year incl. redistribution	34,524,926	26,098,217	8,484,419	6,131,146	804,266	1,043,703	1,120,294	6,637,217	84,844,188
23	Overall allocation % after redistribu	40.69%	30.76%	10.00%	7.23%	0.95%	1.23%	1.32%	7.82%	
	Test Year Oct-Dec 2015, fiscal year 2016 allocation %									
24	Total CSS Costs	7,234,443	5,490,683	4,067,683	1,365,378	176,080	316,701	318,113	1,287,981	**20,257,063**
25	Overall allocation %	35.71%	27.11%	20.08%	6.74%	0.87%	1.56%	1.57%	6.36%	**100.00%**
	Test Year Jan-Sep 2015, fiscal year 2015 allocation %									
26	Total CSS Costs	23,304,741	17,593,528	12,763,310	4,057,505	535,295	727,002	802,181	4,803,563	**64,587,125**
27	Overall allocation %	36.08%	27.24%	19.76%	6.28%	0.83%	1.13%	1.24%	7.44%	**100.00%**
	Fiscal Year 2016 budget									
28	Total CSS Costs	31,385,681	23,112,642	17,456,518	5,739,045	742,087	1,301,620	1,329,204	5,411,183	**86,477,981**
29	Overall allocation %	36.29%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**

CSS Allocation Oct 2015 to Dec 2015 wp 201-S1

Line	Organization	Area #	Area Description	Allocation Category	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
1	Chief Officer	1000	Chief Officer	CSS from Sr Executiv	389,224	208,776	231,605	97,021	5,707	8,613	12,244	84,465	**1,037,655**
2	Trust Administration	1003	Trust Administration	CSS from Trust Admir	1,097,547	808,862	610,959	200,929	26,024	45,693	46,601	189,430	**3,026,045**
3	Trust Administration	1003	Trust Administration-Insurance	CSS from Prop & DO	79,449	58,552	44,226	14,545	1,884	3,308	3,373	13,712	**219,048**
4	Facilities	1004	General Office Facility Costs	CSS from Facilities	202,070	126,699	109,679	42,818	2,500	4,574	6,170	37,393	**531,904**
5	Trust Administration	1005	Variable Pay, Benefits & Taxes	CSS from Benefits	324,291	243,287	183,060	61,417	9,061	15,652	15,926	62,607	**915,301**
6	Corporate Developm	1011	Corporate Development	CSS from S&CD Corp	-	-	-	-	16,071	50,738	51,900	213,345	**332,054**
7	Finance	1020	Finance Administration	CSS from FIN Control	44,419	28,687	31,319	14,006	2,574	1,927	2,099	18,766	**143,797**
8	Finance	1022	Gas Accounting	CSS from FIN Control	32,833	21,205	23,150	10,353	1,903	1,424	1,552	13,871	**106,290**
9	Finance	1023	Thermal Accounting	CSS from FIN Control	24,093	15,560	16,987	7,597	1,396	1,045	1,139	10,178	**77,995**
10	Finance	1024	General Accounting	CSS from FIN Control	44,398	28,674	31,304	13,999	2,573	1,926	2,098	18,757	**143,730**
11	Finance	1029	Strategic Finance Admin.	CSS from FIN Control	48,702	31,454	34,339	15,356	2,822	2,113	2,302	20,575	**157,663**
12	Finance	1035	Property Records	CSS from FIN Control	35,051	22,637	24,714	11,052	2,031	1,521	1,657	14,808	**113,471**
13	Finance	1036	Water/Wastewater Accounting	CSS from FIN Control	42,783	27,631	30,165	13,490	2,479	1,856	2,022	18,074	**138,500**
14	Finance	1040	Treasury Administration	CSS from FIN Treasu	57,168	40,562	38,042	18,783	1,909	5,364	5,669	23,383	**190,880**
15	Finance	1042	Accounts Payable	CSS from FIN Treasu	26,716	18,955	17,778	8,777	892	2,507	2,649	10,927	**89,202**
16	Finance	1043	Insurance & Claims Administration	CSS from FIN Treasu	12,986	9,213	8,641	4,266	434	1,218	1,288	5,311	**43,358**
17	Internal Audit	1080	Internal Audit	CSS from Internal Auc	27,060	14,515	16,102	6,745	397	599	851	5,872	**72,142**
18	Human Resources	1100	Human Resources Administration	CSS from HR	161,265	111,621	53,976	33,720	1,522	4,293	4,254	19,631	**390,284**
19	Human Resources	1101	Human Resources Payroll	CSS from HR	20,610	14,266	6,898	4,310	195	549	544	2,509	**49,880**
20	Human Resources	1102	Human Resources Employment	CSS from HR	4,342	3,005	1,453	908	41	116	115	529	**10,507**
21	Human Resources	1103	Human Resources Benefits	CSS from HR	13,872	9,602	4,643	2,901	131	369	366	1,689	**33,572**
22	Human Resources	1105	Human Resources Employee Relations	CSS from HR	51,126	35,387	17,112	10,690	483	1,361	1,349	6,224	**123,731**
23	Human Resources	1106	Human Resources Compensation	CSS from HR	28,220	19,533	9,445	5,901	266	751	744	3,435	**68,296**
24	Human Resources	1107	Human Resources Health & Wellness	CSS from HR	29,404	20,352	9,842	6,148	278	783	776	3,579	**71,161**
25	Human Resources	1109	Human Resources Training	CSS from HR	41,187	28,508	13,785	8,612	389	1,096	1,086	5,014	**99,678**
26	Customer Relationsh	1200	Customer Services Administration	CSS from CR Cust Sr	53,055	36,382	27,092	-	876	1,380	1,236	12	**120,033**
27	Customer Relationsh	1202	Contact Center Administration	CSS from CR Cust Sr	37,917	26,002	19,362	-	626	987	884	9	**85,786**
28	Customer Relationsh	1204	Residential Contact Center Operations	CSS from CR Cust Sr	820,250	562,484	418,847	-	13,547	21,341	19,114	186	**1,855,769**
29	Customer Relationsh	1205	Business Contact Center Operations	CSS from CR Cust Sr	135,141	92,673	69,008	-	2,232	3,516	3,149	31	**305,750**
30	Customer Relationsh	1206	Contact Center Performance Assurance	CSS from CR Cust Sr	100,714	69,064	51,428	-	1,663	2,620	2,347	23	**227,860**
31	Customer Relationsh	1207	Energy Efficiency	CSS from CR Cust Sr	29,076	19,939	14,847	-	480	757	678	7	**65,784**
32	Customer Relationsh	1208	Digital Experience Administration	CSS from CR Cust Sr	58,768	40,300	30,009	-	971	1,529	1,369	13	**132,959**
33	Information Technolo	1220	Information Services Administration	CSS from IT	83,928	51,569	42,754	17,631	1,110	1,857	2,284	12,316	**213,449**
34	Information Technolo	1221	Infrastructure	CSS from IT	118,811	73,003	60,523	24,959	1,571	2,629	3,233	17,435	**302,164**
35	Information Technolo	1222	Telephony/Network	CSS from IT	128,436	78,917	65,426	26,981	1,699	2,842	3,495	18,847	**326,642**
36	Information Technolo	1223	Administrative Services	CSS from IT	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	**(0)**
37	Information Technolo	1224	Support Center	CSS from IT	191,429	117,623	97,516	40,214	2,532	4,236	5,209	28,091	**486,849**
38	Information Technolo	1231	Customer Facing Applications	CSS from IT	174,346	107,126	88,814	36,625	2,306	3,858	4,744	25,584	**443,403**
39	Information Technolo	1232	Enterprise Applications	CSS from IT	122,654	75,364	62,481	25,766	1,622	2,714	3,338	17,999	**311,939**
40	Information Technolo	1235	Security/DR	CSS from IT	45,830	28,160	23,346	9,628	606	1,014	1,247	6,725	**116,556**
41	Information Technolo	1236	Solution Delivery Admin.	CSS from IT	54,572	33,531	27,799	11,464	722	1,207	1,485	8,008	**138,789**
42	Information Technolo	1237	Business Analysis	CSS from IT	106,802	65,624	54,406	22,436	1,412	2,363	2,906	15,673	**271,622**
43	Information Technolo	1239	Project Management	CSS from IT	31,227	19,187	15,907	6,560	413	691	850	4,582	**79,417**
44	Environmental Stewa	1260	Environmental Stewardship Administrati	CSS from Enviro Stew	23,389	249,880	38,065	26,603	465	16,186	5,111	27,532	**387,231**
45	Environmental Stewa	1261	Laboratory Services	CSS from Enviro Stew	26,247	280,413	42,716	29,853	521	18,164	5,736	30,896	**434,546**
46	OHS & Security	1270	Occupational Health & Safety	CSS from OHS & Sec	102,158	73,395	62,490	44,979	1,328	2,465	3,319	25,951	**316,084**
47	OHS & Security	1271	Security	CSS from OHS & Sec	61,527	44,203	37,636	27,089	800	1,485	1,999	15,629	**190,367**
48	Supply Chain	1280	Supply Chain	CSS from Supply Cha	72,479	94,339	109,962	27,530	441	1,575	1,008	7,654	**314,988**
49	Supply Chain	1281	Storeroom Operations	CSS from Supply Cha	48,810	63,531	74,053	18,540	297	1,061	679	5,155	**212,125**
50	Quality	1290	Quality	CSS from Quality	60,830	32,628	36,196	15,163	892	1,346	1,914	13,201	**162,169**
51	Community Relations	1300	Corporate Affairs	CSS from Comm Rela	235,669	143,933	117,834	49,062	2,893	4,400	6,208	42,734	**602,733**
52	Legal & Auditing Fee	1302	Legal & Auditing Fees	CSS from Legal & Auc	118,375	63,495	70,438	29,507	1,736	2,619	3,724	25,688	**315,582**

53	Community Relations	1304	Safety & Conservation Advertising	CSS from Comm Rela	59,386	36,270	29,693	12,363	729	1,109	1,564	10,768	**151,882**
54	Regulatory Affairs	1320	Regulatory Affairs	CSS from Regulatory.	135,746	79,321	71,015	63,009	17,603	7,575	21,563	34,561	**430,392**
55	Regulatory Affairs	1321	Government and External Affairs	CSS from Regulatory.	33,044	19,309	17,287	15,338	4,285	1,844	5,249	8,413	**104,768**
56	Legal	1330	Legal Administration	CSS from Legal	121,993	65,436	72,591	30,409	1,789	2,667	3,773	26,571	**325,228**
57	Customer Relationsh	1400	Customer Relationships Administration	CSS from CR Sales	1	1	1	0	0	0	0	0	**3**
58	Customer Relationsh	1402	Sales Administration	CSS from CR Sales	71,483	53,124	42,248	27,120	8,970	5,694	4,764	18,986	**232,389**
59	Customer Relationsh	1450	Revenue Assurance Administration	CSS from CR Rev As	46,978	32,104	23,685	32	676	1,141	1,014	11	**105,640**
60	Customer Relationsh	1451	Operational/Strategic Analysis	CSS from CR Rev As	119,026	81,340	60,008	80	1,713	2,891	2,569	27	**267,654**
61	Customer Relationsh	1452	Field Services	CSS from CR Rev As	81,670	55,812	41,175	55	1,175	1,983	1,763	18	**183,651**
62	Customer Relationsh	1453	Billing	CSS from CR Rev As	427,187	291,932	215,370	288	6,148	10,375	9,222	96	**960,618**
63	CP&E	1600	Capital Program and Engineering Admir	CSS from CP&E Admi	8,494	8,988	10,275	1,443	89	411	393	614	**30,709**
64	CP&E	1601	Energy Distribution Engineering Adminis	CSS from CP&E Ener	29,492	3,261	3,261	542	-	-	-	542	**37,097**
65	CP&E	1611	Energy Distribution Design	CSS from CP&E Ener	81,408	9,001	9,001	1,495	-	-	-	1,495	**102,401**
66	CP&E	1612	Energy Distribution Construction	CSS from CP&E Ener	22,118	2,445	2,445	406	-	-	-	406	**27,821**
67	CP&E	1613	Wet Distribution Engineering Admin	CSS from CP&E Wet	-	29,724	22,357	-	-	945	988	-	**54,015**
68	CP&E	1614	Distribution & Collection Design	CSS from CP&E Wet	-	7,201	5,416	-	-	229	239	-	**13,086**
69	CP&E	1615	Distribution & Collection Construction	CSS from CP&E Wet	-	8,416	6,330	-	-	268	280	-	**15,293**
70	CP&E	1616	Distribution & Collection STEP	CSS from CP&E Wet	-	13,183	9,915	-	-	419	438	-	**23,956**
71	CP&E	1617	Westfield Distribution & Collection	CSS from CP&E Wet	-	1,034	778	-	-	33	34	-	**1,879**
72	CP&E	1630	Plant Engineering Admin.	CSS from CP&E Plant	124	700	488	2,410	-	5	25	231	**3,984**
73	CP&E	1631	Plant Engineering - Energy	CSS from CP&E Plant	3,315	18,656	13,025	64,277	-	138	680	6,152	**106,244**
74	CP&E	1632	Plant Engineering - Wet	CSS from CP&E Plant	808	4,545	3,173	15,660	-	34	166	1,499	**25,884**
75	CP&E	1640	Special Projects Admin.	CSS from CP&E Spec	-	(84)	(1,583)	-	-	(13)	(20)	-	**(1,700)**
76	CP&E	1642	Planning & Design	CSS from CP&E Spec	-	143	2,690	-	-	23	34	-	**2,890**
77	CP&E	1643	Construction Management	CSS from CP&E Spec	-	906	17,005	-	-	144	216	-	**18,271**
78	CP&E	1650	Program Management Admin.	CSS from CP&E Prog	843	1,709	7,542	128	29	90	176	217	**10,733**
79	CP&E	1660	AM & Tech Services Admin.	CSS from CP&E Asst	4,641	7,416	2,290	1,070	217	610	293	983	**17,519**
80	CP&E	1662	System Modeling	CSS from CP&E Asst	25,585	40,884	12,624	5,901	1,198	3,361	1,613	5,418	**96,585**
81	CP&E	1663	Technical Standards & Measurement	CSS from CP&E Asst	46,209	73,841	22,799	10,658	2,163	6,071	2,913	9,786	**174,441**
82	CP&E	1664	Engineering Tech Support	CSS from CP&E Asst	33,641	53,757	16,598	7,759	1,575	4,419	2,121	7,124	**126,994**
83	**Actual Costs October through December 2015 (using FY2016 allocation factors)**				7,234,443	5,490,683	4,067,683	1,365,378	176,080	316,701	318,113	1,287,981	**20,257,063**
84			Overall allocation %		35.71%	27.11%	20.08%	6.74%	0.87%	1.56%	1.57%	6.36%	**100.00%**

CSS Allocation Jan 2015 to Sep 2015 wp 201-S2

Line	Organization	Area #	Area Description	Allocation Category	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
1	Chief Officer	1000	Chief Officer	CSS from Sr Executive	1,135,754	662,060	633,960	260,933	16,984	1,235	1,853	375,188	**3,087,967**
2	Trust Administration	1003	Trust Administration	CSS from Trust Admin	3,212,379	2,415,730	1,757,784	546,807	74,686	102,248	112,918	668,616	**8,891,167**
3	Trust Administration	1004	General Office Facility Costs	CSS from Facilities	971,161	658,771	488,305	186,033	11,935	23,870	32,692	221,839	**2,594,606**
4	Trust Administration	1005	Variable Pay, Benefits & Taxes	CSS from STIP & Benefits	1,154,516	884,791	645,835	204,585	32,079	38,953	43,208	269,398	**3,273,366**
5	Corporate Developm	1011	Corporate Development	CSS from S&CD Corp Dev	-	-	-	-	63,720	-	-	755,299	**819,019**
6	Finance	1020	Finance Administration	CSS from FIN Accounting	207,351	121,338	126,653	66,114	15,038	9,982	10,695	91,004	**648,173**
7	Finance	1022	Gas Accounting	CSS from FIN Accounting	96,077	56,223	58,686	30,634	6,968	4,625	4,956	42,167	**300,336**
8	Finance	1023	Thermal Accounting	CSS from FIN Accounting	66,551	38,945	40,651	21,220	4,826	3,204	3,433	29,208	**208,037**
9	Finance	1024	General Accounting	CSS from FIN Accounting	102,516	59,991	62,618	32,687	7,435	4,935	5,288	44,993	**320,463**
10	Finance	1026	Business Applications	CSS from FIN Str Finance	30,280	21,891	21,337	7,281	1,166	1,429	1,691	12,131	**97,207**
11	Finance	1029	Strategic Finance Admin.	CSS from FIN Str Finance	146,600	105,985	103,302	35,250	5,648	6,918	8,189	58,734	**470,626**
12	Finance	1035	Property Records	CSS from FIN Str Finance	122,873	88,832	86,583	29,545	4,733	5,799	6,864	49,228	**394,457**
13	Finance	1036	Water/Wastewater Accounting	CSS from FIN Accounting	118,681	69,450	72,492	37,841	8,607	5,713	6,121	52,088	**370,994**
14	Finance	1040	Treasury Administration	CSS from FIN Treasury	371,611	230,459	197,398	95,425	9,339	22,434	25,440	121,294	**1,073,400**
15	Finance	1041	Insurance Costs	CSS from Prop & DO Insur	226,387	131,880	126,277	51,964	3,386	5,603	8,065	62,123	**615,684**
16	Finance	1042	Accounts Payable	CSS from FIN Treasury	93,011	57,682	49,407	23,884	2,337	5,615	6,367	30,359	**268,663**
17	Finance	1043	Insurance & Claims Administrati	CSS from FIN Treasury	21,271	13,191	11,299	5,462	535	1,284	1,456	6,943	**61,440**
18	Finance	1043	Insurance & Claims Administrati	CSS from Prop & DO Insur	100,705	58,665	56,172	23,115	1,506	2,492	3,588	27,634	**273,879**
19	Internal Audit	1080	Internal Audit	CSS from Internal Audit	232,018	135,244	129,496	53,314	3,474	5,875	8,528	63,737	**631,686**
20	Human Resources	1100	Human Resources Administratic	CSS from HR	376,363	286,332	121,292	78,483	3,380	8,919	11,359	52,666	**938,795**
21	Human Resources	1101	Human Resources Payroll	CSS from HR	43,613	33,180	14,055	9,095	392	1,033	1,316	6,103	**108,787**
22	Human Resources	1102	Human Resources Employment	CSS from HR	8,959	6,816	2,887	1,868	80	212	270	1,254	**22,346**
23	Human Resources	1103	Human Resources Benefits	CSS from HR	47,353	36,025	15,261	9,875	425	1,122	1,429	6,626	**118,116**
24	Human Resources	1104	Human Resources Records	CSS from HR	22	17	7	5	0	1	1	3	**56**
25	Human Resources	1105	Human Resources Employee R	CSS from HR	128,554	97,802	41,430	26,807	1,154	3,046	3,880	17,989	**320,664**
26	Human Resources	1106	Human Resources Compensati	CSS from HR	140,373	106,794	45,239	29,272	1,261	3,326	4,237	19,643	**350,144**
27	Human Resources	1107	Human Resources Health & We	CSS from HR	99,547	75,734	32,082	20,759	894	2,359	3,005	13,930	**248,310**
28	Human Resources	1109	Human Resources Training	CSS from HR	175,532	133,543	56,569	36,604	1,576	4,160	5,298	24,563	**437,844**
29	Customer Relationsh	1200	Customer Services Administrati	CSS from CR Cust Srvc	70,479	46,551	36,065	-	975	1,651	1,478	16	**157,215**
30	Customer Relationsh	1202	Contact Center Administration	CSS from CR Cust Srvc	111,400	73,579	57,005	-	1,541	2,609	2,336	25	**248,495**
31	Customer Relationsh	1204	Residential Contact Center Ope	CSS from CR Cust Srvc	2,469,381	1,631,014	1,263,609	-	34,152	57,837	51,778	551	**5,508,322**
32	Customer Relationsh	1205	Business Contact Center Opera	CSS from CR Cust Srvc	363,724	240,238	186,121	-	5,030	8,519	7,627	81	**811,340**
33	Customer Relationsh	1206	Contact Center Performance As	CSS from CR Cust Srvc	409,423	270,422	209,506	-	5,662	9,589	8,585	91	**913,280**
34	Customer Relationsh	1207	Energy Efficiency	CSS from CR Cust Srvc	80,092	52,900	40,984	-	1,108	1,876	1,679	18	**178,657**
35	Customer Relationsh	1208	Digital Experience Administratio	CSS from CR Cust Srvc	217,187	143,451	111,137	-	3,004	5,087	4,554	48	**484,467**
36	Information Technolo	1220	Information Services Administra	CSS from IT	228,541	145,377	112,299	44,260	3,061	6,298	7,181	41,553	**588,569**
37	Information Technolo	1221	Infrastructure	CSS from IT	813,509	517,478	399,736	157,548	10,894	22,417	25,560	147,911	**2,095,054**
38	Information Technolo	1222	Telephony/Network	CSS from IT	418,487	266,202	205,633	81,046	5,604	11,532	13,148	76,088	**1,077,741**
39	Information Technolo	1223	Administrative Services	CSS from IT	122,583	77,976	60,234	23,740	1,642	3,378	3,851	22,288	**315,693**
40	Information Technolo	1224	Support Center	CSS from IT	432,586	275,171	212,561	83,777	5,793	11,920	13,591	78,652	**1,114,051**
41	Information Technolo	1231	Customer Facing Applications	CSS from IT	549,604	349,607	270,060	106,439	7,360	15,145	17,268	99,928	**1,415,411**
42	Information Technolo	1232	Enterprise Applications	CSS from IT	895,902	569,889	440,222	173,505	11,998	24,687	28,148	162,891	**2,307,242**
43	Information Technolo	1235	Security/DR	CSS from IT	289,083	183,888	142,048	55,985	3,871	7,966	9,083	52,561	**744,485**
44	Information Technolo	1236	Solution Delivery Admin.	CSS from IT	117,483	74,732	57,728	22,752	1,573	3,237	3,691	21,361	**302,558**
45	Information Technolo	1237	Business Analysis	CSS from IT	231,609	147,328	113,806	44,855	3,102	6,382	7,277	42,111	**596,470**
46	Information Technolo	1239	Project Management	CSS from IT	68,716	43,711	33,765	13,308	920	1,894	2,159	12,494	**176,968**
47	Environmental Stewa	1260	Environmental Stewardship Adr	CSS from Enviro Steward	59,190	658,152	107,390	64,837	2,017	29,545	13,310	73,912	**1,008,353**
48	Environmental Stewa	1261	Laboratory Services	CSS from Enviro Steward	74,091	823,837	134,424	81,159	2,524	36,982	16,661	92,519	**1,262,198**
49	OHS & Security	1270	Occupational Health & Safety	CSS from OHS & Security	204,212	154,270	149,828	85,952	2,692	5,990	8,010	62,125	**673,080**
50	OHS & Security	1271	Security	CSS from OHS & Security	169,892	128,343	124,647	71,507	2,240	4,984	6,664	51,684	**559,960**
51	Supply Chain	1280	Supply Chain	CSS from Supply Chain	221,975	250,267	298,843	93,149	1,246	1,512	1,779	20,907	**889,678**
52	Supply Chain	1281	Storeroom Operations	CSS from Supply Chain	137,285	154,783	184,826	57,610	770	935	1,100	12,931	**550,242**

53	Quality	1290	Quality	CSS from Quality	159,553	92,978	89,026	36,653	2,389	4,039	5,819	43,818	**434,275**
54	Community Relations	1300	Corporate Affairs	CSS from Comm Relations	624,157	415,890	278,277	113,527	7,386	12,685	18,145	135,686	**1,605,754**
55	Legal & Auditing Fee:	1302	Legal & Auditing Fees	CSS from Legal & Audit	450,183	262,250	251,108	103,333	6,734	11,141	16,039	123,534	**1,224,322**
56	Community Relations	1303	Home/Trade/Community Events	CSS from Comm Relations	2,216	1,477	988	403	26	45	64	482	**5,702**
57	Community Relations	1304	Safety & Conservation Advertisi	CSS from Comm Relations	50,382	33,571	22,463	9,164	596	1,024	1,465	10,953	**129,618**
58	Regulatory Affairs	1320	Regulatory Affairs	CSS from Regulatory Affrs	315,076	254,536	242,404	193,996	48,529	24,871	75,099	58,720	**1,213,232**
59	Legal	1330	Legal Administration	CSS from Legal	404,297	235,666	225,649	92,901	6,054	10,237	14,860	111,063	**1,100,728**
60	Customer Relationsh	1400	Customer Relationships Admini	CSS from CR Sales	158,678	114,420	95,535	25,417	5,821	8,309	8,132	28,039	**444,351**
61	Customer Relationsh	1402	Sales Administration	CSS from CR Sales	227,042	163,717	136,696	36,367	8,329	11,889	11,635	40,119	**635,794**
62	Customer Relationsh	1450	Revenue Assurance Administra	CSS from CR Rev Assur	210,003	141,470	104,135	94	2,904	4,965	4,497	375	**468,442**
63	Customer Relationsh	1451	Operational/Strategic Analysis	CSS from CR Rev Assur	377,862	254,549	187,372	169	5,226	8,935	8,092	674	**842,878**
64	Customer Relationsh	1452	Field Services	CSS from CR Rev Assur	226,248	152,413	112,190	101	3,129	5,350	4,845	404	**504,680**
65	Customer Relationsh	1453	Billing	CSS from CR Rev Assur	1,308,677	881,598	648,938	584	18,099	30,944	28,024	2,335	**2,919,200**
66	CP&E	1600	Capital Program and Engineerir	CSS from CP&E Admin	(472)	(528)	(610)	(98)	(6)	(20)	(17)	(37)	**(1,787)**
67	CP&E	1601	Energy Distribution Engineering	CSS from CP&E Energy Dist	48,838	5,778	5,778	966	-	-	-	966	**62,325**
68	CP&E	1611	Energy Distribution Design	CSS from CP&E Energy Dist	204,003	24,134	24,134	4,035	-	-	-	4,035	**260,341**
69	CP&E	1612	Energy Distribution Constructior	CSS from CP&E Energy Dist	16,838	1,992	1,992	333	-	-	-	333	**21,488**
70	CP&E	1613	Wet Distribution Engineering Ac	CSS from CP&E Wet Distr	8	48,846	32,241	-	-	1,532	1,532	-	**84,159**
71	CP&E	1614	Distribution & Collection Design	CSS from CP&E Wet Distr	2	12,992	8,575	-	-	407	407	-	**22,384**
72	CP&E	1615	Distribution & Collection Constr	CSS from CP&E Wet Distr	2	13,931	9,195	-	-	437	437	-	**24,002**
73	CP&E	1616	Distribution & Collection STEP	CSS from CP&E Wet Distr	2	11,771	7,769	-	-	369	369	-	**20,281**
74	CP&E	1617	Westfield Distribution & Collecti	CSS from CP&E Wet Distr	0	1,902	1,256	-	-	60	60	-	**3,278**
75	CP&E	1630	Plant Engineering Admin.	CSS from CP&E Plant Eng	(1)	(9)	(7)	(40)	-	-	-	(5)	**(62)**
76	CP&E	1631	Plant Engineering - Energy	CSS from CP&E Plant Eng	5,048	37,365	30,161	161,052	-	-	-	20,040	**253,665**
77	CP&E	1632	Plant Engineering - Wet	CSS from CP&E Plant Eng	1,004	7,429	5,997	32,022	-	-	-	3,984	**50,436**
78	CP&E	1640	Special Projects Admin.	CSS from CP&E Spec Proj	-	61	16,107	-	-	-	-	-	**16,168**
79	CP&E	1642	Planning & Design	CSS from CP&E Spec Proj	-	(34)	(8,897)	-	-	-	-	-	**(8,931)**
80	CP&E	1643	Construction Management	CSS from CP&E Spec Proj	-	(15)	(3,934)	-	-	-	-	-	**(3,949)**
81	CP&E	1650	Program Management Admin.	CSS from CP&E Prog Mgmt	16,436	41,609	166,438	1,452	242	5,882	4,672	5,325	**242,056**
82	CP&E	1660	AM & Tech Services Admin.	CSS from CP&E Asst Mgmt	18,266	30,148	7,184	3,440	1,024	1,494	1,132	890	**63,577**
83	CP&E	1662	System Modeling	CSS from CP&E Asst Mgmt	62,464	103,099	24,568	11,762	3,500	5,109	3,870	3,044	**217,417**
84	CP&E	1663	Technical Standards & Measure	CSS from CP&E Asst Mgmt	132,569	218,811	52,142	24,963	7,429	10,844	8,213	6,460	**461,432**
85	CP&E	1664	Engineering Tech Support	CSS from CP&E Asst Mgmt	98,862	163,176	38,884	18,616	5,540	8,087	6,125	4,818	**344,107**
86	**Actual Costs January - September 2015 (using FY2015 allocation factors)**				23,304,741	17,593,528	12,763,310	4,057,505	535,295	727,002	802,181	4,803,563	**64,587,125**
87			Overall allocation %		36.08%	27.24%	19.76%	6.28%	0.83%	1.13%	1.24%	7.44%	**100.00%**

CSS Allocations Fiscal Year 2016 Budget wp 202

	Areas	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Total Pay										
Chief Officer	1000	1,078,042	578,251	641,479	268,720	15,807	23,854	33,913	233,944	**2,874,011**
Community Relations	130x, excl 1302	554,441	297,397	329,915	138,204	8,130	12,268	17,442	120,318	**1,478,114**
Corporate Development	1011	-	-	-	-	42,964	135,408	138,549	569,896	**886,818**
CP&E-Asset Management	166x	246,932	391,590	118,547	57,386	11,474	32,203	15,200	52,832	**926,164**
CP&E-CP&E Administration	1600, 1602	10,654	11,272	12,887	1,811	114	517	494	764	**38,512**
CP&E-Energy Distribution	1601, 1611-1612	411,862	46,001	46,001	7,667	-	-	-	7,667	**519,199**
CP&E-Plant Engineering	163x	6,274	34,547	21,640	141,740	-	263	1,314	12,829	**218,606**
CP&E-Program Management	165x	3,551	7,202	31,791	538	122	380	742	914	**45,241**
CP&E-Special Projects	164x	-	1,746	28,297	-	-	274	368	(0)	**30,685**
CP&E-Wet Distribution	1613-1616	-	68,473	50,173	-	-	1,230	1,348	(0)	**121,225**
Customer Relationships-Customer	120x	3,228,493	2,215,609	1,650,839	242	54,087	84,217	75,713	709	**7,309,909**
Customer Relationships-Revenue A	145x	975,756	666,847	491,967	454	14,042	23,678	21,054	219	**2,194,017**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	225,241	166,884	136,640	88,745	28,282	18,475	15,452	62,008	**741,727**
Environmental Stewardship	126x	114,956	999,717	184,274	130,825	2,377	69,853	25,221	132,793	**1,660,017**
Facilities	1004	117,998	129,752	31,640	1,967	-	2,950	2,950	1,967	**289,223**
Finance-Controllership	1020-1025, 1027, 1036	717,207	464,747	507,312	227,077	42,363	31,450	34,176	305,713	**2,330,046**
Finance-Treasury	104x	216,591	174,328	152,406	80,550	9,421	28,822	29,502	111,327	**802,948**
Human Resources	11xx	685,534	474,498	229,451	143,345	6,470	18,250	18,084	83,452	**1,659,085**
Information Technology	122x-124x	1,859,864	1,115,252	951,812	400,933	24,497	40,230	50,730	288,066	**4,731,384**
Internal Audit	1080	-	-	-	-	-	-	-	-	**-**
Legal	1330	306,651	164,484	182,470	76,438	4,496	6,785	9,647	66,546	**817,517**
OHS & Security	127x	263,576	201,638	149,893	130,249	3,284	6,463	8,553	69,667	**833,324**
Quality	1290	151,062	81,028	89,888	37,655	2,215	3,343	4,752	32,782	**402,725**
Regulatory Affairs	1320	426,144	250,890	220,238	205,858	59,563	25,051	72,520	109,894	**1,370,158**
Supply Chain	128x	293,347	383,134	452,584	111,414	1,777	6,456	4,152	31,450	**1,284,314**
		11,894,177	8,925,289	6,712,144	2,251,817	331,487	572,420	581,878	2,295,757	**33,564,969**
Benefits & P/R Taxes		6,067,330	4,551,787	3,423,963	1,148,571	168,785	292,817	297,181	1,171,738	**17,122,172**
Benefits & PR Taxes distributed to each department										
Chief Officer	1000	549,918.97	294,901	327,228	137,064	8,049	12,202	17,320	119,404	**1,466,087**
Community Relations	130x, excl 1302	282,825	151,669	168,295	70,493	4,139	6,276	8,908	61,410	**754,014**
Corporate Development	1011	-	-	-	-	21,876	69,267	70,761	290,871	**452,775**
CP&E-Asset Management	166x	125,962	199,706	60,473	29,271	5,842	16,473	7,763	26,965	**472,455**
CP&E-CP&E Administration	1600, 1602	5,435	5,748	6,574	924	58	264	252	390	**19,645**
CP&E-Energy Distribution	1601, 1611-1612	210,095	23,460	23,466	3,911	-	-	-	3,913	**264,845**
CP&E-Plant Engineering	163x	3,200	17,618	11,039	72,296	-	135	671	6,548	**111,507**
CP&E-Program Management	165x	1,812	3,673	16,217	275	62	194	379	466	**23,078**
CP&E-Special Projects	164x	-	890	14,435	-	-	140	188	(0)	**15,653**
CP&E-Wet Distribution	1613-1616	-	34,921	25,594	-	-	629	689	(0)	**61,833**
Customer Relationships-Customer	120x	1,646,884	1,129,933	842,117	123	27,540	43,080	38,669	362	**3,728,709**
Customer Relationships-Revenue A	145x	497,742	340,084	250,959	231	7,150	12,112	10,753	112	**1,119,144**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	114,898	85,109	69,702	45,266	14,401	9,451	7,892	31,649	**378,365**
Environmental Stewardship	126x	58,640	509,843	94,001	66,729	1,210	35,733	12,881	67,776	**846,815**
Facilities	1004	60,192	66,172	16,140	1,003	-	1,509	1,507	1,004	**147,526**

Finance-Controllership	1020-1025, 1027, 1036	365,854	237,015	258,787	115,824	21,570	16,088	17,455	156,034	**1,188,627**
Finance-Treasury	104x	110,485	88,905	77,745	41,085	4,797	14,744	15,068	56,821	**409,650**
Human Resources	11xx	349,697	241,988	117,047	73,115	3,295	9,336	9,236	42,593	**846,307**
Information Technology	122x-124x	948,734	568,765	485,533	204,501	12,474	20,579	25,909	147,027	**2,413,522**
Internal Audit	1080	-	-	-	-	-	-	-	-	**-**
Legal	1330	156,425	83,885	93,081	38,988	2,289	3,471	4,927	33,965	**417,031**
OHS & Security	127x	134,452	102,833	76,463	66,435	1,672	3,306	4,368	35,558	**425,088**
Quality	1290	77,058	41,323	45,853	19,206	1,128	1,710	2,427	16,732	**205,438**
Regulatory Affairs	1320	217,380	127,951	112,347	105,000	30,328	12,815	37,038	56,089	**698,948**
Supply Chain	128x	149,639	195,393	230,870	56,828	905	3,302	2,120	16,052	**655,110**
		6,067,330	4,551,787	3,423,963	1,148,571	168,785	292,817	297,181	1,171,738	**17,122,172**
Other expenses:										
Chief Officer	1000	66,790	35,826	39,743	16,649	979	1,478	2,101	14,494	**178,060**
Community Relations	130x, excl 1302	354,519	278,924	97,742	39,404	2,423	3,675	5,130	34,302	**816,120**
Corporate Development	1011	-	-	-	-	-	-	-	-	**-**
CP&E-Asset Management	166x	18,364	33,943	13,967	3,607	992	2,697	1,639	3,172	**78,380**
CP&E-CP&E Administration	1600, 1602	9,975	10,554	12,066	1,696	106	484	463	715	**36,060**
CP&E-Energy Distribution	1601, 1611-1612	9,048	282	282	47	-	-	-	47	**9,705**
CP&E-Plant Engineering	163x	1,929	12,114	12,196	7,420	-	90	359	1,817	**35,925**
CP&E-Program Management	165x	5,512	11,179	49,344	836	190	590	1,152	1,418	**70,220**
CP&E-Special Projects	164x	-	3,000	62,940	-	-	480	780	(0)	**67,200**
CP&E-Wet Distribution	1613-1616	-	49,335	39,116	-	-	2,988	3,051	(0)	**94,490**
Customer Relationships-Customer	120x	481,092	328,118	242,687	110	7,209	11,864	10,577	107	**1,081,765**
Customer Relationships-Revenue A	145x	1,478,263	1,010,219	745,281	997	21,275	35,901	31,912	332	**3,324,180**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	45,839	34,885	21,740	12,471	5,696	2,831	2,427	8,932	**134,820**
Environmental Stewardship	126x	14,546	505,759	28,840	17,039	308	24,966	3,105	21,663	**616,225**
Facilities	1004	931,283	499,531	554,152	232,138	13,655	20,607	29,297	202,097	**2,482,760**
Finance-Controllership	1020-1025, 1027, 1036	23,781	12,756	14,151	5,928	349	526	748	5,161	**63,400**
Finance-Treasury	104x	180,326	96,725	107,301	44,949	2,644	3,990	5,673	39,132	**480,740**
Human Resources	11xx	522,487	361,644	174,879	109,252	4,932	13,909	13,783	63,604	**1,264,490**
Information Technology	122x-124x	2,917,641	1,835,262	1,479,859	596,934	38,723	65,213	78,675	406,418	**7,418,725**
Internal Audit	1080	187,550	100,600	111,600	46,750	2,750	4,150	5,900	40,700	**500,000**
Legal	1330	45,200	24,245	26,896	11,267	663	1,000	1,422	9,809	**120,500**
OHS & Security	127x	153,627	91,619	110,849	46,018	2,188	3,522	4,915	34,807	**447,545**
Quality	1290	44,599	23,923	26,538	11,117	654	987	1,403	9,678	**118,900**
Regulatory Affairs	1320	71,988	39,348	41,738	21,225	2,811	2,107	4,211	16,196	**199,625**
Supply Chain	128x	41,193	51,257	50,731	15,516	199	724	465	3,525	**163,610**
Legal & Audit Fees	1302	501,743	269,130	298,558	125,068	7,357	11,102	15,784	108,883	**1,337,625**
Depreciation	1003	4,235,787	3,119,264	2,355,918	774,537	100,151	175,666	179,388	730,289	**11,671,000**
Property Taxes	1003	284,902	209,804	158,461	52,096	6,736	11,815	12,066	49,120	**785,000**
Insurance	1003	297,529	219,102	165,483	54,405	7,035	12,339	12,601	51,297	**819,790**
Bank Fees	1003	480,516	353,855	267,260	87,865	11,361	19,928	20,350	82,845	**1,323,980**
Capitalized Interest	1003	-	-	-	-	-	-	-	-	**-**
Directors Fees	1003	18,147	13,363	10,093	3,318	429	753	769	3,129	**50,000**
		13,424,175	9,635,566	7,320,411	2,338,657	241,815	436,383	450,145	1,943,688	**35,790,840**
Total		31,385,681	23,112,642	17,456,518	5,739,045	742,087	1,301,620	1,329,204	5,411,183	**86,477,981**

Total by Functional Area	Areas	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Chief Officer	1000	1,694,751	908,978	1,008,450	422,433	24,835	37,535	53,335	367,842	**4,518,158**
Community Relations	130x, excl 1302	1,191,785	727,989	595,952	248,100	14,692	22,219	31,480	216,030	**3,048,248**
Corporate Development	1011	-	-	-	-	64,841	204,675	209,311	860,767	**1,339,593**
CP&E-Asset Management	166x	391,258	625,240	192,986	90,264	18,308	51,372	24,603	82,968	**1,476,999**
CP&E-CP&E Administration	1600, 1602	26,063	27,574	31,527	4,431	278	1,266	1,210	1,869	**94,217**
CP&E-Energy Distribution	1601, 1611-1612	631,005	69,743	69,749	11,624	-	-	-	11,627	**793,749**
CP&E-Plant Engineering	163x	11,404	64,279	44,874	221,456	-	487	2,344	21,194	**366,038**
CP&E-Program Management	165x	10,875	22,055	97,351	1,649	374	1,164	2,272	2,799	**138,539**
CP&E-Special Projects	164x	-	5,636	105,672	-	-	895	1,336	(0)	**113,538**
CP&E-Wet Distribution	1613-1616	-	152,729	114,883	-	-	4,848	5,087	(0)	**277,548**
Customer Relationships-Customer	120x	5,356,470	3,673,661	2,735,644	476	88,836	139,160	124,959	1,177	**12,120,383**
Customer Relationships-Revenue A	145x	2,951,762	2,017,150	1,488,207	1,683	42,466	71,691	63,719	664	**6,637,341**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	385,978	286,878	228,081	146,482	48,379	30,757	25,770	102,589	**1,254,912**
Environmental Stewardship	126x	188,143	2,015,319	307,115	214,593	3,896	130,552	41,207	222,232	**3,123,057**
Facilities	1004	1,109,473	695,456	601,931	235,108	13,655	25,066	33,753	205,067	**2,919,509**
Finance-Controllership	1020-1025, 1027, 1036	1,106,843	714,519	780,250	348,829	64,282	48,064	52,379	466,907	**3,582,073**
Finance-Treasury	104x	507,402	359,958	337,452	166,584	16,862	47,556	50,243	207,280	**1,693,338**
Human Resources	11xx	1,557,718	1,078,131	521,377	325,712	14,697	41,495	41,103	189,649	**3,769,882**
Information Technology	122x-124x	5,726,238	3,519,279	2,917,205	1,202,368	75,694	126,022	155,315	841,510	**14,563,631**
Internal Audit	1080	187,550	100,600	111,600	46,750	2,750	4,150	5,900	40,700	**500,000**
Legal	1330	508,276	272,614	302,446	126,693	7,449	11,257	15,995	110,319	**1,355,048**
OHS & Security	127x	551,655	396,090	337,204	242,703	7,144	13,292	17,836	140,033	**1,705,957**
Quality	1290	272,720	146,274	162,280	67,978	3,997	6,039	8,582	59,192	**727,063**
Regulatory Affairs	1320	715,512	418,189	374,323	332,083	92,702	39,973	113,770	182,179	**2,268,731**
Supply Chain	128x	484,179	629,784	734,184	183,759	2,881	10,482	6,737	51,027	**2,103,034**
Legal & Audit Fees	1302	501,743	269,130	298,558	125,068	7,357	11,102	15,784	108,883	**1,337,625**
Depreciation	1003-403010	4,235,787	3,119,264	2,355,918	774,537	100,151	175,666	179,388	730,289	**11,671,000**
Property Taxes	1003-408180	284,902	209,804	158,461	52,096	6,736	11,815	12,066	49,120	**785,000**
Insurance	1003-924xxx	297,529	219,102	165,483	54,405	7,035	12,339	12,601	51,297	**819,790**
Bank Fees	1003-921110	480,516	353,855	267,260	87,865	11,361	19,928	20,350	82,845	**1,323,980**
Capitalized Interest	1003-432010	-	-	-	-	-	-	-	-	-
Directors Fees	1003	18,147	13,363	10,093	3,318	429	753	769	3,129	**50,000**
Total		**31,385,681**	**23,112,642**	**17,456,518**	**5,739,045**	**742,087**	**1,301,620**	**1,329,204**	**5,411,183**	**86,477,981**
Allocation % before redistribution		36.29%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**

Functional Area	Allocation Category	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Chief Officer	CSS from Sr Executive	37.51%	20.12%	22.32%	9.35%	0.55%	0.83%	1.18%	8.14%	**100.00%**
Community Relations	CSS from Comm Relati	39.10%	23.88%	19.55%	8.14%	0.48%	0.73%	1.03%	7.09%	**100.00%**
Corporate Development	CSS from S&CD Corp D	0.00%	0.00%	0.00%	0.00%	4.84%	15.28%	15.63%	64.25%	**100.00%**
CP&E-Asset Management	CSS from CP&E Asst M	26.49%	42.33%	13.07%	6.11%	1.24%	3.48%	1.67%	5.61%	**100.00%**
CP&E-CP&E Administration	CSS from CP&E Admin	27.66%	29.27%	33.46%	4.70%	0.29%	1.34%	1.28%	2.00%	**100.00%**
CP&E-Energy Distribution	CSS from CP&E Energy	79.50%	8.79%	8.79%	1.46%	0.00%	0.00%	0.00%	1.46%	**100.00%**
CP&E-Plant Engineering	CSS from CP&E Plant E	3.12%	17.56%	12.26%	60.50%	0.00%	0.13%	0.64%	5.79%	**100.00%**
CP&E-Program Management	CSS from CP&E Prog M	7.85%	15.92%	70.27%	1.19%	0.27%	0.84%	1.64%	2.02%	**100.00%**
CP&E-Special Projects	CSS from CP&E Spec F	0.00%	4.96%	93.07%	0.00%	0.00%	0.79%	1.18%	0.00%	**100.00%**
CP&E-Wet Distribution	CSS from CP&E Wet Di	0.00%	55.03%	41.39%	0.00%	0.00%	1.75%	1.83%	0.00%	**100.00%**
Customer Relationships-Customer	CSS from CR Cust Srvc	44.20%	30.31%	22.57%	0.00%	0.73%	1.15%	1.03%	0.01%	**100.00%**
Customer Relationships-Revenue A	CSS from CR Rev Assu	44.47%	30.39%	22.42%	0.03%	0.64%	1.08%	0.96%	0.01%	**100.00%**

Customer Relationships-Sales	CSS from CR Sales	30.76%	22.86%	18.18%	11.67%	3.86%	2.45%	2.05%	8.17%	**100.00%**
Environmental Stewardship	CSS from Enviro Stewa	6.04%	64.53%	9.83%	6.87%	0.12%	4.18%	1.32%	7.11%	**100.00%**
Facilities	CSS from Facilities	37.99%	23.82%	20.62%	8.05%	0.47%	0.86%	1.16%	7.03%	**100.00%**
Finance-Controllership	CSS from FIN Controlle	30.89%	19.95%	21.78%	9.74%	1.79%	1.34%	1.46%	13.05%	**100.00%**
Finance-Treasury	CSS from FIN Treasury	29.95%	21.25%	19.93%	9.84%	1.00%	2.81%	2.97%	12.25%	**100.00%**
Human Resources	CSS from HR	41.32%	28.60%	13.83%	8.64%	0.39%	1.10%	1.09%	5.03%	**100.00%**
Information Technology	CSS from IT	39.32%	24.16%	20.03%	8.26%	0.52%	0.87%	1.07%	5.77%	**100.00%**
Internal Audit	CSS from Internal Audit	37.51%	20.12%	22.32%	9.35%	0.55%	0.83%	1.18%	8.14%	**100.00%**
Legal	CSS from Legal	37.51%	20.12%	22.32%	9.35%	0.55%	0.82%	1.16%	8.17%	**100.00%**
OHS & Security	CSS from OHS & Secur	32.32%	23.22%	19.77%	14.23%	0.42%	0.78%	1.05%	8.21%	**100.00%**
Quality	CSS from Quality	37.51%	20.12%	22.32%	9.35%	0.55%	0.83%	1.18%	8.14%	**100.00%**
Regulatory Affairs	CSS from Regulatory Af	31.54%	18.43%	16.50%	14.64%	4.09%	1.76%	5.01%	8.03%	**100.00%**
Supply Chain	CSS from Supply Chain	23.01%	29.95%	34.91%	8.74%	0.14%	0.50%	0.32%	2.43%	**100.00%**
Legal & Audit Fees	CSS from Legal & Audit	37.51%	20.12%	22.32%	9.35%	0.55%	0.83%	1.18%	8.14%	**100.00%**
Trust Admin	CSS from Trust Admin	36.27%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**
Insurance	CSS from Prop & DO In	36.27%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**
Property Taxes	CSS from Property Taxe	36.27%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**
Bank Fees	CSS from Bank Fees	36.27%	26.73%	20.19%	6.64%	0.86%	1.51%	1.54%	6.26%	**100.00%**
Benefits	CSS from Benefits	35.43%	26.58%	20.00%	6.71%	0.99%	1.71%	1.74%	6.84%	**100.00%**

CSS Allocations Fiscal Year 2015 Budget wp 203

	Areas	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Wages										
Chief Officer	1000	1,024,295	596,693	571,343	235,111	15,321	1,147	1,651	340,120	**2,785,681**
Community Relations	130x, excl 1302	419,047	244,112	233,741	96,186	6,268	10,371	14,929	114,990	**1,139,645**
Corporate Development	1011	-	-	-	-	69,313	-	-	836,662	**905,975**
CP&E-Asset Management	166x	281,159	462,219	103,844	54,358	15,885	22,324	16,890	13,945	**970,624**
CP&E-CP&E Administration	1600, 1602	5,484	6,141	7,092	1,137	66	231	190	429	**20,769**
CP&E-Energy Distribution	1601, 1611-1612	344,798	41,293	41,293	6,882	-	-	-	6,882	**441,148**
CP&E-Plant Engineering	163x	3,810	24,268	16,660	132,238	-	-	-	14,703	**191,680**
CP&E-Program Management	165x	3,337	8,441	33,766	294	49	1,178	932	1,080	**49,078**
CP&E-Special Projects	164x	-	253	68,377	-	-	-	-	-	**68,630**
CP&E-Wet Distribution	1613-1616	-	49,155	30,052	-	-	590	590	-	**80,386**
Customer Relationships-Custo	120x	2,809,607	1,851,302	1,444,309	167	38,831	64,141	57,422	611	**6,266,390**
Customer Relationships-Reve	145x	1,035,142	697,299	513,254	448	14,304	24,221	21,695	3,110	**2,309,472**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	293,867	213,890	181,731	55,176	11,822	16,453	16,054	60,789	**849,782**
Environmental Stewardship	126x	105,258	949,216	188,072	114,820	3,557	45,201	22,892	128,726	**1,557,740**
Facilities	1004	116,721	131,065	28,919	1,810	-	2,715	2,715	1,810	**285,755**
Finance-Accounting	1020-1025, 1027, 1036	411,692	240,942	252,080	132,306	30,539	19,649	20,730	182,718	**1,290,657**
Finance-Strategic Finance	1026, 1028, 1029, 1035	287,490	207,886	202,576	69,141	11,104	13,204	15,538	116,261	**923,200**
Finance-Treasury	104x	247,597	163,898	124,322	71,015	8,996	24,068	25,002	95,132	**760,031**
Human Resources	11xx	597,104	454,192	192,336	124,453	5,359	13,993	17,715	83,514	**1,488,667**
Information Technology	122x-124x	1,628,238	1,019,515	796,501	317,414	21,604	43,321	50,175	303,982	**4,180,750**
Internal Audit	1080	236,155	137,570	131,725	54,206	3,532	5,844	8,413	64,803	**642,248**
Legal	1330	288,030	167,789	160,661	66,113	4,308	7,128	10,262	79,038	**783,328**
OHS & Security	127x	232,970	187,573	183,622	112,588	2,940	6,990	9,127	73,161	**808,971**
Quality	1290	142,645	83,097	79,566	32,742	2,134	3,530	5,082	39,143	**387,939**
Regulatory Affairs	1320	255,871	206,665	196,824	157,459	39,365	19,682	59,047	49,206	**984,118**
Supply Chain	128x	290,500	328,501	400,743	122,262	1,632	1,975	2,356	28,034	**1,176,003**
		11,060,818	8,472,973	6,183,407	1,958,327	306,930	347,958	379,407	2,638,848	**31,348,667**
		35.28%	27.03%	19.72%	6.25%	0.98%	1.11%	1.21%	8.42%	**100.00%**
Benefits & P/R Taxes		5,955,038	4,562,785	3,330,262	1,054,991	165,347	200,945	223,427	1,390,640	**16,883,435**
Benefits & PR Taxes allocated to each department										
Chief Officer	1000	551,471	321,325	307,714	126,659	8,254	662	972	179,239	**1,496,297**
Community Relations	130x, excl 1302	225,611	131,457	125,888	51,817	3,377	5,989	8,792	60,598	**613,530**
Corporate Development	1011	-	-	-	-	37,340	-	-	440,910	**478,250**
CP&E-Asset Management	166x	151,373	248,910	55,928	29,284	8,557	12,892	9,946	7,349	**524,240**
CP&E-CP&E Administration	1600, 1602	2,953	3,307	3,820	612	36	133	112	226	**11,198**
CP&E-Energy Distribution	1601, 1611-1612	185,636	22,237	22,240	3,708	-	-	-	3,627	**237,446**
CP&E-Plant Engineering	163x	2,051	13,069	8,973	71,239	-	-	-	7,748	**103,081**
CP&E-Program Management	165x	1,797	4,546	18,186	159	26	680	549	569	**26,512**
CP&E-Special Projects	164x	-	136	36,827	-	-	-	-	-	**36,963**
CP&E-Wet Distribution	1613-1616	-	26,470	16,185	-	-	340	347	-	**43,343**
Customer Relationships-Custo	120x	1,512,666	996,946	777,877	90	20,919	37,042	33,815	322	**3,379,675**
Customer Relationships-Reve	145x	557,311	375,503	276,428	241	7,706	13,987	12,776	1,639	**1,245,591**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	158,215	115,182	97,877	29,724	6,369	9,502	9,454	32,035	**458,358**
Environmental Stewardship	126x	56,670	511,163	101,292	61,856	1,916	26,103	13,481	67,837	**840,317**
Facilities	1004	62,842	70,580	15,575	975	-	1,568	1,599	954	**154,092**
Finance-Accounting	1020-1025, 1027, 1036	221,651	129,750	135,765	71,276	16,452	11,348	12,208	96,290	**694,739**
Finance-Strategic Finance	1026, 1028, 1029, 1035	154,782	111,949	109,104	37,247	5,982	7,625	9,150	61,268	**497,107**
Finance-Treasury	104x	133,304	88,261	66,958	38,257	4,846	13,899	14,723	50,134	**410,382**
Human Resources	11xx	321,475	244,587	103,588	67,045	2,887	8,081	10,432	44,011	**802,107**

Information Technology	122x-124x	876,627	549,020	428,980	170,998	11,639	25,018	29,547	160,195	**2,252,023**
Internal Audit	1080	127,143	74,083	70,945	29,202	1,903	3,375	4,955	34,150	**345,755**
Legal	1330	155,072	90,356	86,529	35,616	2,321	4,117	6,043	41,652	**421,706**
OHS & Security	127x	125,429	101,010	98,895	60,654	1,584	4,036	5,375	38,555	**435,538**
Quality	1290	76,799	44,748	42,853	17,639	1,149	2,039	2,993	20,628	**208,848**
Regulatory Affairs	1320	137,758	111,291	106,005	84,826	21,206	11,367	34,772	25,931	**533,157**
Supply Chain	128x	156,402	176,901	215,832	65,865	879	1,141	1,387	14,773	**633,182**
		5,955,038	4,562,785	3,330,262	1,054,991	165,347	200,945	223,427	1,390,640	**16,883,435**
Short-Term Incentive Pay		1,493,882	1,144,621	835,431	264,655	41,479	50,409	56,049	348,856	**4,235,383**
Other expenses:										
Chief Officer	1000	72,937	42,489	40,684	16,742	1,091	-	-	24,418	**198,360**
Community Relations	130x, excl 1302	347,991	286,106	83,130	32,706	2,233	3,699	5,230	39,095	**800,190**
CP&E-Asset Management	166x	37,242	64,120	25,019	4,752	1,824	3,170	2,198	1,405	**139,730**
CP&E-CP&E Administration	1600, 1602	10,182	11,401	13,167	2,110	122	428	352	796	**38,560**
CP&E-Energy Distribution	1601, 1611-1612	9,216	297	297	50	-	-	-	50	**9,910**
CP&E-Plant Engineering	163x	848	12,498	14,590	11,294	-	-	-	4,110	**43,340**
CP&E-Program Management	165x	5,496	13,901	55,604	485	81	1,940	1,536	1,778	**80,820**
CP&E-Special Projects	164x	-	335	83,365	-	-	-	-	-	**83,700**
CP&E-Wet Distribution	1613-1616	-	55,144	40,069	-	-	3,174	3,174	-	**101,560**
Customer Relationships-Custo	120x	711,970	476,799	354,422	107	9,837	16,556	14,821	158	**1,584,670**
Customer Relationships-Reve	145x	1,451,522	977,605	720,095	971	20,057	33,967	30,409	385	**3,235,010**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	116,930	80,979	62,808	6,156	2,611	3,813	3,569	6,934	**283,800**
Environmental Stewardship	126x	13,631	487,694	28,395	15,339	469	16,228	2,908	20,437	**585,100**
Facilities	1004	832,017	484,683	464,092	190,977	12,445	20,591	29,642	228,312	**2,262,760**
Finance-Accounting	1020-1025, 1027, 1036	18,900	11,010	10,542	4,338	283	468	673	5,186	**51,400**
Finance-Treasury	104x	417,700	243,327	232,989	95,877	6,248	10,337	14,881	114,620	**1,135,980**
Human Resources	11xx	557,401	423,991	179,547	116,177	5,003	13,063	16,537	77,961	**1,389,680**
Information Technology	122x-124x	2,931,100	1,890,061	1,445,794	564,353	39,308	81,890	90,977	519,947	**7,563,430**
Internal Audit	1080	58,523	34,092	32,644	13,433	875	1,448	2,085	16,059	**159,160**
Legal	1330	78,430	45,689	43,748	18,003	1,173	1,941	2,794	21,522	**213,300**
OHS & Security	127x	167,933	108,998	103,610	48,229	2,430	4,431	6,198	47,590	**489,420**
Quality	1290	44,455	25,897	24,797	10,204	665	1,100	1,584	12,199	**120,900**
Regulatory Affairs	1320	10,010	8,085	7,700	6,160	1,540	770	2,310	1,925	**38,500**
Supply Chain	128x	51,856	57,062	54,906	21,268	224	271	323	3,841	**189,750**
Depreciation	1003-403010	4,658,580	3,503,577	2,549,558	792,708	108,486	143,357	157,156	981,578	**12,895,000**
Property Taxes	1003-408180	69,256	52,085	37,902	11,785	1,613	2,131	2,336	14,592	**191,700**
Insurance	1043	264,950	154,344	147,787	60,815	3,963	6,557	9,439	72,705	**720,560**
Legal & Audit Fees	1302	477,495	278,160	266,343	109,602	7,142	11,817	17,012	131,029	**1,298,600**
Miscellaneous	1003-432010	18,064	13,585	9,886	3,074	421	556	609	3,806	**50,000**
		13,434,633	9,844,016	7,133,489	2,157,712	230,144	383,704	418,754	2,352,438	**35,954,890**
Total		**31,944,371**	**24,024,395**	**17,482,589**	**5,435,686**	**743,901**	**983,015**	**1,077,636**	**6,730,782**	**88,422,375**

Organization	**Areas**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
Chief Officer	1000	1,648,702	960,507	919,741	378,512	24,666	1,809	2,623	543,777	**4,480,338**
Community Relations	130x, excl 1302	992,650	661,675	442,760	180,709	11,878	20,058	28,951	214,684	**2,553,365**
Corporate Development	1011	-	-	-	-	106,653	-	-	1,277,572	**1,384,225**
CP&E-Asset Management	166x	469,775	775,248	184,791	88,394	26,266	38,387	29,034	22,699	**1,634,594**
CP&E-CP&E Administration	1600, 1602	18,620	20,849	24,078	3,860	224	792	654	1,450	**70,527**
CP&E-Energy Distribution	1601, 1611-1612	539,650	63,827	63,830	10,639	-	-	-	10,559	**688,504**
CP&E-Plant Engineering	163x	6,710	49,835	40,222	214,772	-	-	-	26,562	**338,101**
CP&E-Program Management	165x	10,630	26,888	107,555	938	156	3,798	3,017	3,427	**156,410**

CP&E-Special Projects	164x	-	724	188,569	-	-	-	-	-	**189,293**
CP&E-Wet Distribution	1613-1616	-	130,769	86,306	-	-	4,104	4,110	-	**225,289**
Customer Relationships-Custo	120x	5,034,243	3,325,047	2,576,607	364	69,587	117,739	106,058	1,090	**11,230,735**
Customer Relationships-Reve	145x	3,043,975	2,050,407	1,509,778	1,660	42,067	72,175	64,879	5,133	**6,790,073**
Customer Relationships-Sales	140x, excl 1404, 141x, 1	569,012	410,051	342,415	91,056	20,802	29,768	29,076	99,759	**1,591,940**
Environmental Stewardship	126x	175,558	1,948,072	317,758	192,015	5,942	87,532	39,280	217,000	**2,983,157**
Facilities	1004	1,011,580	686,328	508,586	193,762	12,445	24,874	33,956	231,076	**2,702,607**
Finance-Accounting	1020-1025, 1027, 1036	652,243	381,702	398,387	207,920	47,274	31,465	33,612	284,194	**2,036,796**
Finance-Strategic Finance	1026, 1028, 1029, 1035	442,271	319,834	311,680	106,388	17,086	20,830	24,688	177,530	**1,420,307**
Finance-Treasury	1040-1042	798,601	495,486	424,269	205,148	20,090	48,305	54,606	259,886	**2,306,393**
Human Resources	11xx	1,475,980	1,122,771	475,471	307,675	13,249	35,138	44,685	205,486	**3,680,454**
Information Technology	122x-124x	5,435,965	3,458,596	2,671,275	1,052,765	72,551	150,229	170,699	984,124	**13,996,203**
Internal Audit	1080	421,821	245,744	235,313	96,841	6,311	10,668	15,453	115,012	**1,147,163**
Legal	1330	521,533	303,834	290,937	119,732	7,802	13,186	19,099	142,212	**1,418,334**
OHS & Security	127x	526,332	397,581	386,127	221,472	6,953	15,457	20,701	159,306	**1,733,929**
Quality	1290	263,899	153,742	147,216	60,585	3,948	6,669	9,659	71,970	**717,687**
Regulatory Affairs	1320	403,639	326,041	310,529	248,445	62,111	31,819	96,129	77,062	**1,555,775**
Supply Chain	128x	498,758	562,465	671,481	209,395	2,735	3,386	4,066	46,648	**1,998,935**
Short-Term Incentive Pay	1002-exp type 0181	1,493,882	1,144,621	835,431	264,655	41,479	50,409	56,049	348,856	**4,235,383**
Depreciation	1003-403010	4,658,580	3,503,577	2,549,558	792,708	108,486	143,357	157,156	981,578	**12,895,000**
Property Taxes	1003-408180	69,256	52,085	37,902	11,785	1,613	2,131	2,336	14,592	**191,700**
Insurance	1043	264,950	154,344	147,787	60,815	3,963	6,557	9,439	72,705	**720,560**
Legal & Audit Fees	1302	477,495	278,160	266,343	109,602	7,142	11,817	17,012	131,029	**1,298,600**
Miscellaneous	1003	18,064	13,585	9,886	3,074	421	556	609	3,806	**50,000**
Preliminary Distribution		**31,944,371**	**24,024,395**	**17,482,589**	**5,435,686**	**743,901**	**983,015**	**1,077,636**	**6,730,782**	**88,422,375**
Allocation % before redistribution		36.13%	27.17%	19.77%	6.15%	0.84%	1.11%	1.22%	7.61%	**100.00%**

Organization	**Allocation Category**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
Chief Officer	CSS from Sr Executive	36.78%	21.44%	20.53%	8.45%	0.55%	0.04%	0.06%	12.15%	**100.00%**
Community Relations	CSS from Comm Relati	38.87%	25.90%	17.33%	7.07%	0.46%	0.79%	1.13%	8.45%	**100.00%**
Corporate Development	CSS from S&CD Corp D	0.00%	0.00%	0.00%	0.00%	7.78%	0.00%	0.00%	92.22%	**100.00%**
CP&E-Asset Management	CSS from CP&E Asst M	28.73%	47.42%	11.30%	5.41%	1.61%	2.35%	1.78%	1.40%	**100.00%**
CP&E-CP&E Administration	CSS from CP&E Admin	26.40%	29.56%	34.14%	5.47%	0.32%	1.12%	0.93%	2.06%	**100.00%**
CP&E-Energy Distribution	CSS from CP&E Energy	78.36%	9.27%	9.27%	1.55%	0.00%	0.00%	0.00%	1.55%	**100.00%**
CP&E-Plant Engineering	CSS from CP&E Plant E	1.99%	14.73%	11.89%	63.49%	0.00%	0.00%	0.00%	7.90%	**100.00%**
CP&E-Program Management	CSS from CP&E Prog M	6.79%	17.19%	68.76%	0.60%	0.10%	2.43%	1.93%	2.20%	**100.00%**
CP&E-Special Projects	CSS from CP&E Spec F	0.00%	0.38%	99.62%	0.00%	0.00%	0.00%	0.00%	0.00%	**100.00%**
CP&E-Wet Distribution	CSS from CP&E Wet Di	0.01%	58.04%	38.31%	0.00%	0.00%	1.82%	1.82%	0.00%	**100.00%**
Customer Relationships-Custo	CSS from CR Cust Srvc	44.83%	29.61%	22.94%	0.00%	0.62%	1.05%	0.94%	0.01%	**100.00%**
Customer Relationships-Reve	CSS from CR Rev Assu	44.83%	30.20%	22.23%	0.02%	0.62%	1.06%	0.96%	0.08%	**100.00%**
Customer Relationships-Sales	CSS from CR Sales	35.71%	25.75%	21.50%	5.72%	1.31%	1.87%	1.83%	6.31%	**100.00%**
Environmental Stewardship	CSS from Enviro Stewa	5.87%	65.27%	10.65%	6.43%	0.20%	2.93%	1.32%	7.33%	**100.00%**
Facilities	CSS from Facilities	37.43%	25.39%	18.82%	7.17%	0.46%	0.92%	1.26%	8.55%	**100.00%**
Finance-Accounting	CSS from FIN Accounti	31.99%	18.72%	19.54%	10.20%	2.32%	1.54%	1.65%	14.04%	**100.00%**
Finance-Strategic Finance	CSS from FIN Str Finan	31.15%	22.52%	21.95%	7.49%	1.20%	1.47%	1.74%	12.48%	**100.00%**
Finance-Treasury	CSS from FIN Treasury	34.62%	21.47%	18.39%	8.89%	0.87%	2.09%	2.37%	11.30%	**100.00%**
Human Resources	CSS from HR	40.09%	30.50%	12.92%	8.36%	0.36%	0.95%	1.21%	5.61%	**100.00%**
Information Technology	CSS from IT	38.83%	24.70%	19.08%	7.52%	0.52%	1.07%	1.22%	7.06%	**100.00%**
Internal Audit	CSS from Internal Audit	36.73%	21.41%	20.50%	8.44%	0.55%	0.93%	1.35%	10.09%	**100.00%**
Legal	CSS from Legal	36.73%	21.41%	20.50%	8.44%	0.55%	0.93%	1.35%	10.09%	**100.00%**
OHS & Security	CSS from OHS & Secur	30.34%	22.92%	22.26%	12.77%	0.40%	0.89%	1.19%	9.23%	**100.00%**
Quality	CSS from Quality	36.74%	21.41%	20.50%	8.44%	0.55%	0.93%	1.34%	10.09%	**100.00%**
Regulatory Affairs	CSS from Regulatory Af	25.97%	20.98%	19.98%	15.99%	4.00%	2.05%	6.19%	4.84%	**100.00%**
Supply Chain	CSS from Supply Chain	24.95%	28.13%	33.59%	10.47%	0.14%	0.17%	0.20%	2.35%	**100.00%**

Short-Term Incentive Pay	CSS from STIP & Benef	35.27%	27.03%	19.73%	6.25%	0.98%	1.19%	1.32%	8.23%	**100.00%**
Depreciation	CSS from Trust Admin	36.13%	27.17%	19.77%	6.15%	0.84%	1.15%	1.27%	7.52%	**100.00%**
Property Taxes	CSS from Property Taxe	36.13%	27.17%	19.77%	6.15%	0.84%	1.15%	1.27%	7.52%	**100.00%**
Insurance	CSS from Prop & DO In	36.77%	21.42%	20.51%	8.44%	0.55%	0.91%	1.31%	10.09%	**100.00%**
Legal & Audit Fees	CSS from Legal & Audit	36.77%	21.42%	20.51%	8.44%	0.55%	0.91%	1.31%	10.09%	**100.00%**

Determination of SFS Expense Allocation % wp 251

Line	A Organization	B Gas	C Water	D CWA	E Steam	F WF Gas	G WF Water	H WF WW	I Other	J Total
1	Customer Field Services	6,759,255	2,582,527	98,909	(9,583)	42,368	80,980	71,448	(3,994)	**9,621,909**
2	Depreciation	155,864	93,500	30,872	3,121	1,237	2,450	2,094	954	**290,093**
3	Administration	970,306	498,113	197,752	1,493	9,306	9,121	8,153	389	**1,694,632**
4	Fleet	1,492,836	1,551,684	241,670	207,970	5,513	59,742	46,094	66,813	**3,672,323**
5	Real Estate	-	31,305	31,305	-	-	3,478	3,478	-	**69,567**
6	SFS Executive	271,586	171,809	87,633	524	2,781	2,759	2,451	69	**539,612**
7	Dispatch	799,233	540,338	398,186	-	11,158	18,878	16,869	-	**1,784,662**
8	Meter Reading	2,168,854	1,698,214	1,195,272	4,978	28,355	6,511	5,860	-	**5,108,043**
9	**Total Test Year Actual Costs**	$ 12,617,934	$ 7,167,490	$ 2,281,600	$ 208,503	$ 100,717	$ 183,920	$ 156,447	$ 64,231	**$ 22,780,841**
10	Overall allocation %	55.39%	31.46%	10.02%	0.92%	0.44%	0.81%	0.69%	0.28%	**100.00%**
	Test Year Oct-Dec 2015, fiscal year 2016 allocation %									
11	Total SFS Costs	3,237,839	1,629,438	584,148	32,481	30,503	32,998	29,202	13,000	**5,589,610**
12	Overall allocation %	57.93%	29.15%	10.45%	0.58%	0.55%	0.59%	0.52%	0.23%	**100.00%**
	Test Year Jan-Sep 2015, fiscal year 2015 allocation %									
13	Total SFS Costs	9,380,095	5,538,051	1,697,452	176,023	70,214	150,921	127,244	51,231	**17,191,231**
14	Overall allocation %	54.56%	32.21%	9.87%	1.02%	0.41%	0.88%	0.74%	0.30%	**100.00%**
	Fiscal Year 2016 budget									
15	Total SFS Costs	13,185,498	7,140,257	2,618,762	221,887	122,863	165,324	145,826	90,023	**23,690,441**
16	Overall allocation %	55.66%	30.14%	11.05%	0.94%	0.52%	0.70%	0.62%	0.38%	**100.00%**

SFS Allocation Oct 2015 to Dec 2015 wp 251-S1

	A	B	C	D	E	F	G	H	I	J	K	L	M
Line	**Organization**	**Area #**	**Area Description**	**Allocation Category**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
1	Customer Field Services	1700	Shared Field Services Admin.	SFS from CFS-Admin	(630,283)	(341,361)	(125,151)	(10,646)	(5,889)	(7,928)	(7,022)	(4,304)	**(1,132,584)**
2	Depreciation	1700	Depreciation - account 403010	SFS from Depreciation	24,215	13,115	4,808	409	226	305	270	165	**43,514**
3	Administration	1700	Benefits - accounts 926xxx, excl. 92699	SFS from Benefits	725,405	356,462	146,030	1,248	7,239	5,991	5,367	374	**1,248,117**
4	Fleet	1701	Fleet	SFS from Fleet	304,699	289,453	65,075	40,160	1,413	14,056	12,123	16,734	**743,713**
5	Real Estate	1703	Real Estate	SFS from Real Estate	-	7,196	7,196	-	-	800	800	-	**15,992**
6	Customer Field Services	1704	Field Operations Administration	SFS from CFS-Field Ops	183,921	63,801	4,878	-	1,507	690	613	-	**255,410**
7	Customer Field Services	1705	Customer Field Services	SFS from CFS-Utilization	1,798,063	623,741	47,692	-	14,732	6,742	5,993	-	**2,496,963**
8	SFS Executive	1706	SFS Executive	SFS from SFS Executive	78,348	46,273	25,272	137	885	824	747	31	**152,516**
9	Dispatch	1707	Dispatch	SFS from Dispatch	206,316	141,054	104,039	-	2,969	5,009	4,453	-	**463,840**
10	Meter Reading	1708	Meter Reading	SFS from Meter Reading	547,155	429,703	304,308	1,172	7,422	6,511	5,860	-	**1,302,130**
11	**Actual Costs Oct 2015 to Dec 2015 (using FY2016 allocation factors)**				3,237,839	1,629,438	584,148	32,481	30,503	32,998	29,202	13,000	**5,589,610**
12			Overall allocation %		57.93%	29.15%	10.45%	0.58%	0.55%	0.59%	0.52%	0.23%	**100.00%**

SFS Allocation Jan 2015 to Sep 2015 **wp 251-S2**

	A	B	C	D	E	F	G	H	I	J	K	L	M
Line	**Organization**	**Area #**	**Area Description**	**Allocation Category**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
1	Customer Field Services	1700	Shared Field Services Admin	SFS from CFS-Admin	51,614	31,515	10,218	1,063	396	841	715	309	**96,673**
2	Depreciation	1700	Depreciation - account 4030	SFS from Depreciation	131,648	80,385	26,063	2,712	1,011	2,145	1,825	789	**246,579**
3	Administration	1700	Variable pay - etype 0180	SFS from CFS-Admin	(13,299)	(8,120)	(2,633)	(274)	(102)	(217)	(184)	(80)	**(24,909)**
4	Administration	1700	Variable pay - etype 0181	SFS from STIP	258,199	149,771	54,355	519	2,169	3,347	2,970	94	**471,424**
5	Fleet	1701	Fleet	SFS from Fleet	1,188,137	1,262,231	176,595	167,809	4,100	45,686	33,972	50,079	**2,928,611**
6	Real Estate	1703	Real Estate	SFS from Real Estate	-	24,109	24,109	-	-	2,679	2,679	-	**53,575**
7	Customer Field Services	1704	Field Operations Administrati	SFS from CFS-Field Ops	572,878	235,831	17,250	-	3,382	8,625	7,610	-	**845,577**
8	Customer Field Services	1705	Customer Field Services	SFS from CFS-Utilization	4,783,062	1,968,998	144,021	-	28,239	72,011	63,539	-	**7,059,871**
9	SFS Executive	1706	SFS Executive	SFS from SFS Executive	193,238	125,535	62,361	387	1,897	1,935	1,703	39	**387,096**
10	Dispatch	1707	Dispatch	SFS from Dispatch	592,917	399,284	294,147	-	8,189	13,869	12,416	-	**1,320,822**
11	Meter Reading	1708	Meter Reading	SFS from Meter Reading	1,621,700	1,268,511	890,964	3,806	20,933	-	-	-	**3,805,913**
12	**Actual Costs Jan 2015 to Sep 2015 (using FY2015 allocation factors)**				9,380,095	5,538,051	1,697,452	176,023	70,214	150,921	127,244	51,231	**17,191,231**
13			Overall allocation %		54.56%	32.21%	9.87%	1.02%	0.41%	0.88%	0.74%	0.30%	**100.00%**

SFS Allocations Fiscal Year 2016 Budget wp 252

	Areas	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Wages										
Fleet	1701	62,437	59,313	13,335	8,229	290	2,880	2,484	3,429	**152,396**
Real Estate	1702	-	21,717	21,717	-	-	2,413	2,413	-	**48,261**
Customer Field Services-Field Opera	1703	509,742	176,827	13,520	-	4,176	1,911	1,699	-	**707,876**
Customer Field Services-Utilization	1704	3,940,749	1,367,031	104,525	-	32,288	14,776	13,134	-	**5,472,502**
SFS Executive	1705	200,068	118,157	64,549	366	2,244	2,096	1,891	71	**389,443**
Dispatch	1706	554,311	378,970	279,523	-	7,976	13,459	11,964	-	**1,246,202**
Meter Reading	1707	1,588,471	1,247,490	883,450	3,402	21,548	18,901	17,011	-	**3,780,274**
		6,855,776	3,369,506	1,380,619	11,998	68,521	56,437	50,596	3,500	**11,796,954**
Benefits & P/R Taxes		3,748,622	1,842,062	754,626	6,450	37,409	30,959	27,734	1,935	**6,449,797**
Benefits & PR Taxes allocated to each department										
Fleet	1701	34,139	32,425	7,289	4,424	158	1,580	1,362	1,896	**83,273**
Real Estate	1702	-	11,873	11,870	-	-	1,324	1,323	-	**26,389**
Customer Field Services-Field Opera	1703	278,718	96,669	7,390	-	2,280	1,048	931	-	**387,037**
Customer Field Services-Utilization	1704	2,154,734	747,337	57,132	-	17,627	8,105	7,199	-	**2,992,135**
SFS Executive	1705	109,394	64,595	35,281	197	1,225	1,150	1,037	39	**212,918**
Dispatch	1706	303,088	207,178	152,783	-	4,354	7,383	6,558	-	**681,344**
Meter Reading	1707	868,549	681,986	482,881	1,829	11,764	10,368	9,325	-	**2,066,701**
		3,748,622	1,842,062	754,626	6,450	37,409	30,959	27,734	1,935	**6,449,797**
Other expenses:										
Fleet	1701	1,525,764	1,449,420	325,859	201,101	7,076	70,385	60,703	83,792	**3,724,100**
Real Estate	1702	-	6,075	6,075	-	-	675	675	-	**13,500**
Customer Field Services-Field Opera	1703	29,488	10,229	782	-	242	111	98	-	**40,950**
Customer Field Services-Utilization	1704	710,515	246,475	18,846	-	5,821	2,664	2,368	-	**986,690**
SFS Executive	1705	2,743	1,620	885	5	31	29	26	1	**5,340**
Dispatch	1706	21,840	14,931	11,013	-	314	530	471	-	**49,100**
Meter Reading	1707	174,270	136,861	96,922	373	2,364	2,074	1,866	-	**414,730**
Insurance	1700	12,957	7,017	2,573	218	121	162	143	88	**23,280**
Depreciation	1700	99,070	53,649	19,676	1,667	923	1,242	1,096	676	**178,000**
Property Taxes	1700	4,453	2,411	884	75	41	56	49	30	**8,000**
		2,581,100	1,928,688	483,516	203,440	16,933	77,928	67,496	84,588	**5,443,690**
Total		13,185,498	7,140,257	2,618,762	221,887	122,863	165,324	145,826	90,023	**23,690,441**

Total by functional area	**Areas**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
Fleet	1701	1,622,340	1,541,158	346,482	213,755	7,523	74,846	64,549	89,117	**3,959,769**
Real Estate	1703	-	39,665	39,663	-	-	4,412	4,411	-	**88,150**
Customer Field Services-Field Opera	1704	817,948	283,726	21,693	-	6,698	3,070	2,728	-	**1,135,863**
Customer Field Services-Utilization	1705	6,805,999	2,360,843	180,502	-	55,737	25,545	22,701	-	**9,451,327**
SFS Executive	1706	312,205	184,373	100,715	568	3,500	3,275	2,954	111	**607,701**
Dispatch	1707	879,238	601,079	443,319	-	12,644	21,372	18,993	-	**1,976,646**
Meter Reading	1708	2,631,290	2,066,337	1,463,253	5,605	35,675	31,344	28,202	-	**6,261,705**
Insurance	1700	12,957	7,017	2,573	218	121	162	143	88	**23,280**

Depreciation	1700	99,070	53,649	19,676	1,667	923	1,242	1,096	676	**178,000**
Property Taxes	1700	4,453	2,411	884	75	41	56	49	30	**8,000**
Total		**13,185,498**	**7,140,257**	**2,618,762**	**221,887**	**122,863**	**165,324**	**145,826**	**90,023**	**23,690,441**
Overall Allocation %		55.66%	30.14%	11.05%	0.94%	0.52%	0.70%	0.62%	0.38%	**100.00%**

Functional Area	**Allocation Category**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
Administration	SFS from CFS-Admin	55.65%	30.14%	11.05%	0.94%	0.52%	0.70%	0.62%	0.38%	**100.00%**
Customer Field Services-FOA	SFS from CFS-Field Ops	72.01%	24.98%	1.91%	0.00%	0.59%	0.27%	0.24%	0.00%	**100.00%**
Customer Field Services-Util	SFS from CFS-Utilization	72.01%	24.98%	1.91%	0.00%	0.59%	0.27%	0.24%	0.00%	**100.00%**
Depreciation	SFS from Depreciation	55.65%	30.14%	11.05%	0.94%	0.52%	0.70%	0.62%	0.38%	**100.00%**
Dispatch	SFS from Dispatch	44.48%	30.41%	22.43%	0.00%	0.64%	1.08%	0.96%	0.00%	**100.00%**
Fleet	SFS from Fleet	40.97%	38.92%	8.75%	5.40%	0.19%	1.89%	1.63%	2.25%	**100.00%**
Meter Reading	SFS from Meter Reading	42.02%	33.00%	23.37%	0.09%	0.57%	0.50%	0.45%	0.00%	**100.00%**
Real Estate	SFS from Real Estate	0.00%	45.00%	45.00%	0.00%	0.00%	5.00%	5.00%	0.00%	**100.00%**
SFS Executive	SFS from SFS Executive	51.37%	30.34%	16.57%	0.09%	0.58%	0.54%	0.49%	0.02%	**100.00%**
Benefits	SFS from Benefits	58.12%	28.56%	11.70%	0.10%	0.58%	0.48%	0.43%	0.03%	**100.00%**

SFS Allocations Fiscal Year 2015 Budget wp 253

	Areas	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
Wages										
Fleet	1701	61,427	298,375	9,135	8,678	208	2,367	1,758	2,602	**384,550**
Real Estate	1703	-	42,524	42,524	-	-	4,725	4,725	-	**94,498**
Customer Field Services-FOA	1704	355,610	146,390	10,708	-	2,100	5,354	4,724	-	**524,885**
Customer Field Services-Util	1705	3,637,821	1,497,547	109,537	-	21,478	54,769	48,325	-	**5,369,478**
SFS Executive	1706	133,272	86,579	43,013	276	1,318	1,324	1,179	40	**267,001**
Dispatch	1707	513,836	346,030	254,915	-	7,097	12,019	10,760	-	**1,144,656**
Meter Reading	1708	1,533,279	1,199,347	842,386	3,598	19,791	-	-	-	**3,598,402**
		6,235,246	3,616,792	1,312,218	12,553	51,991	80,557	71,471	2,642	**11,383,470**
Benefits & P/R Taxes		3,362,177	1,950,272	707,795	6,753	28,238	43,585	38,674	1,228	**6,138,721**
Benefits & PR Taxes allocated to each department										
Fleet	1701	33,123	160,892	4,927	4,668	113	1,281	951	1,209	**207,164**
Real Estate	1703	-	22,930	22,937	-	-	2,556	2,557	-	**50,980**
Customer Field Services-FOA	1704	191,752	78,938	5,776	-	1,140	2,897	2,556	-	**283,059**
Customer Field Services-Util	1705	1,961,591	807,518	59,083	-	11,665	29,632	26,149	-	**2,895,639**
SFS Executive	1706	71,863	46,686	23,201	148	716	716	638	18	**143,987**
Dispatch	1707	277,071	186,588	137,498	-	3,855	6,503	5,822	-	**617,337**
Meter Reading	1708	826,777	646,720	454,373	1,936	10,749	-	-	-	**1,940,555**
		3,362,177	1,950,272	707,795	6,753	28,238	43,585	38,674	1,228	**6,138,721**
Short-Term Incentive Pay		412,955	239,540	86,934	829	3,468	5,353	4,750	151	**753,981**
Other expenses:										
Fleet	1701	1,689,582	1,436,792	251,267	238,704	5,711	65,101	48,350	71,573	**3,807,080**
Facilities	1702	-	-	-	-	-	-	-	-	**-**
Real Estate	1703	-	6,075	6,075	-	-	675	675	-	**13,500**
Customer Field Services-FOA	1704	19,614	8,074	591	-	116	295	261	-	**28,950**
Customer Field Services-Util	1705	670,623	276,069	20,193	-	3,959	10,096	8,909	-	**989,850**
SFS Executive	1706	2,665	1,732	860	6	26	26	24	1	**5,340**
Dispatch	1707	16,654	11,215	8,262	-	230	390	349	-	**37,100**
Meter Reading	1708	176,120	137,763	96,761	413	2,273	-	-	-	**413,330**
Depreciation	1700	46,987	28,688	9,300	968	358	769	648	282	**88,000**
Miscellaneous	1700	18,207	11,117	3,604	375	139	298	251	109	**34,100**
		2,640,453	1,917,525	396,912	240,466	12,813	77,651	59,465	71,965	**5,417,250**
Total		12,650,831	7,724,129	2,503,859	260,600	96,510	207,146	174,360	75,986	**23,693,422**
Total by functional area	**Areas**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
Fleet	1701	1,784,132	1,896,058	265,330	252,051	6,031	68,748	51,059	75,385	**4,398,794**
Real Estate	1703	-	71,529	71,536	-	-	7,956	7,957	-	**158,978**
Customer Field Services-FOA	1704	566,975	233,402	17,074	-	3,356	8,546	7,541	-	**836,894**
Customer Field Services-Util	1705	6,270,036	2,581,134	188,813	-	37,103	94,497	83,383	-	**9,254,967**
SFS Executive	1706	207,801	134,996	67,074	430	2,060	2,067	1,841	59	**416,328**
Dispatch	1707	807,562	543,833	400,675	-	11,181	18,911	16,931	-	**1,799,093**

Meter Reading	1708	2,536,176	1,983,831	1,393,519	5,947	32,814	-	-	-	**5,952,287**
Short-Term Incentive Pay	1700	412,955	239,540	86,934	829	3,468	5,353	4,750	151	**753,981**
Depreciation	1700	46,987	28,688	9,300	968	358	769	648	282	**88,000**
Miscellaneous	1700	18,207	11,117	3,604	375	139	298	251	109	**34,100**
Total		**12,650,831**	**7,724,129**	**2,503,859**	**260,600**	**96,510**	**207,146**	**174,360**	**75,986**	**23,693,422**
Overall Allocation %		53.39%	32.60%	10.57%	1.10%	0.41%	0.87%	0.74%	0.32%	**100.00%**

Functional Area	**Allocation Category**	**Gas**	**Water**	**CWA**	**Steam**	**WF Gas**	**WF Water**	**WF WW**	**Other**	**Total**
SFS Admin	SFS from CFS-Admin	53.39%	32.60%	10.57%	1.10%	0.41%	0.87%	0.74%	0.32%	**100.00%**
Customer Field Services-FOA	SFS from CFS-Field Op	67.75%	27.89%	2.04%	0.00%	0.40%	1.02%	0.90%	0.00%	**100.00%**
Customer Field Services-Util	SFS from CFS-Utilizatio	67.75%	27.89%	2.04%	0.00%	0.40%	1.02%	0.90%	0.00%	**100.00%**
Depreciation & Capitalized Interest	SFS from Depreciation	53.39%	32.60%	10.57%	1.10%	0.41%	0.87%	0.74%	0.32%	**100.00%**
Dispatch	SFS from Dispatch	44.89%	30.23%	22.27%	0.00%	0.62%	1.05%	0.94%	0.00%	**100.00%**
Fleet	SFS from Fleet	40.57%	43.10%	6.03%	5.73%	0.14%	1.56%	1.16%	1.71%	**100.00%**
Meter Reading	SFS from Meter Readin	42.61%	33.33%	23.41%	0.10%	0.55%	0.00%	0.00%	0.00%	**100.00%**
Real Estate	SFS from Real Estate	0.00%	45.00%	45.00%	0.00%	0.00%	5.00%	5.00%	0.00%	**100.00%**
SFS Executive	SFS from SFS Executiv	49.92%	32.43%	16.11%	0.10%	0.49%	0.50%	0.44%	0.01%	**100.00%**
Variable Pay	SFS from STIP	54.77%	31.77%	11.53%	0.11%	0.46%	0.71%	0.63%	0.02%	**100.00%**

Statistical Drivers Used in Shared Services Allocations wp 270

2016 CSS allocations

Driver	Trust Admin	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	Total
TrustAdmin	0.00%	37.51%	20.12%	22.32%	9.35%	0.55%	0.83%	1.18%	8.14%	100.00%
Invoices	39.51%	24.33%	17.80%	4.98%	5.17%	0.88%	1.40%	1.37%	4.56%	100.00%
Employees	0.00%	41.32%	28.60%	13.83%	8.64%	0.39%	1.10%	1.09%	5.03%	100.00%
% Customers (all)	0.00%	44.47%	30.39%	22.42%	0.03%	0.64%	1.08%	0.96%	0.01%	100.00%
% Customers (excl Steam)	0.00%	44.48%	30.40%	22.43%	0.00%	0.64%	1.08%	0.96%	0.01%	100.00%
% Purchasing Dollars	9.09%	7.11%	20.31%	56.54%	2.25%	0.18%	0.76%	0.43%	3.33%	100.00%
Computers	0.00%	39.03%	26.48%	17.24%	9.72%	0.46%	0.85%	1.00%	5.22%	100.00%

2016 SFS allocations

Driver	Gas	Water	CWA	Steam	WF Gas	WF Water	WF WW	Other	TOTAL
% Vehicles (all)	40.97%	38.92%	8.75%	5.40%	0.19%	1.89%	1.63%	2.25%	100.00%
% Customers (excl Thermal)	44.48%	30.41%	22.43%	0.00%	0.64%	1.08%	0.96%	0.00%	100.00%
% Utilization Labor (all)	72.01%	24.98%	1.91%	0.00%	0.59%	0.27%	0.24%	0.00%	100.00%
% Meters Read (all)	42.02%	33.00%	23.37%	0.09%	0.57%	0.50%	0.45%	0.00%	100.00%

2016 CSS Driver Determination **wp 270**
Trust Administration

Source: FY14 Revenue (CEG 2014 Annual Report)
CY13 Revenue (2013 Annual Financial Report prepared by O.W.Krohn & Associates)
Budgeted 2016
27-Jul-15
Amounts are net of intercompany eliminations

	Before Kinetrex Allocation			After Kinetrex Allocation		
	2014 Revenue	2014 %	Rounded 2 decimals	2014 Revenue	2014 %	Rounded 2 decimals
Citizens Gas	313,562	38.5%	38.54%	313,562	37.5%	37.51%
Water	168,157	20.7%	20.67%	168,157	20.1%	20.12%
Wastewater	186,576	22.9%	22.94%	186,576	22.3%	22.32%
Steam	78,138	9.6%	9.61%	78,138	9.3%	9.35%
WSCW	38,077	4.7%	4.68%	38,077	4.6%	4.55%
CSM	199	0.0%	0.02%	199	0.0%	0.02%
Westfield Gas	4,618	0.6%	0.57%	4,618	0.6%	0.55%
Westfield Water	6,905	0.8%	0.85%	6,905	0.8%	0.83%
Westfield Wastewater	9,872	1.2%	1.21%	9,872	1.2%	1.18%
KEEP - Plummer	6,646	0.8%	0.82%	6,646	0.8%	0.80%
KEEP - NonOp Oil	708	0.1%	0.09%	708	0.1%	0.08%
Kinetrex	-	0.0%	0.00%	22,487	2.7%	2.69%
Total	813,458	100.0%	100.00%	835,945	100.0%	100.00%

Trust Admin Revision
27-Jul-15

				Revised Kinetrex Trust Admin %		
	Revenue	%	Rounded 2 decimals	Revenue	%	Rounded 2 decimals
Total Revenue excl Kinetrex	813,458	96.6%	96.63%	813,458	97.3%	97.31%
Kinetrex	28,342	3.4%	3.37%	22,487	2.7%	2.69%
Total	841,800	100.0%	100.00%	835,945	100.0%	100.00%

Area	Trust Admin Costs (applicable to Kinetrex)	Cost
1000	Chief Officer	4,518,136
1003	Depreciation	11,671,000
1003	Property Taxes	785,000
1003	Property & DO Insurance	819,790
1004	Facilities	2,919,507
1302	Legal & Audit Fees	1,337,625
1330	Legal	1,355,042
		23,406,100

Total Trust Admin Costs	29,263,509
Revised Kinetrex Trust Admin %	2.69%
Estimated Kinetrex Trust Admin Cost	787,188

2016 CSS Driver Determination **wp 270**
% of Invoices

Source: AP query via Discoverer (Monthly Invoice Count)
Excludes business units which are no longer active
Excludes "NULL" business unit representing canceled invoice

Date range: FYTD 5/31/15

BU	Business Unit	PO Related Count N	PO Related Count Y	Total By BU	%	Rounded 2 decimals	
01	CSS	12,175	4,686	**16,861**	35.1%	35.06%	
03	Trust Holdings	153	91	**244**	0.5%	0.51%	39.51%
17	SFS	1,386	507	**1,893**	3.9%	3.94%	
02	Citizens Gas	8,597	3,104	**11,701**	24.3%	24.33%	
20	Water	1,912	6,649	**8,561**	17.8%	17.80%	
92	Wastewater	868	1,528	**2,396**	5.0%	4.98%	
06	Steam	472	2,016	**2,488**	5.2%	5.17%	
07	WSCW	273	975	**1,248**	2.6%	2.60%	
04	Disc Ops	65	190	**255**	0.5%	0.53%	
47	CSM	61	37	**98**	0.2%	0.20%	
40	Westfield Gas	333	89	**422**	0.9%	0.88%	
48	Westfield Water	311	364	**675**	1.4%	1.40%	
49	Westfield Wastewater	412	249	**661**	1.4%	1.37%	
51	KEEP - Plummer	105	350	**455**	0.9%	0.95%	
51	KEEP - NonOp Oil	29	64	**94**	0.2%	0.19%	
97	Heartland Gas	34	7	**41**	0.1%	0.09%	
Total Invoices		27,187	20,905	**48,092**	100.0%	100.00%	

Other Resources:

30	Citizens Resources	53	23	**76**	0.2%	0.16%
38	Westfield Utilities	10	3	**13**	0.0%	0.03%
91	WHWH	-	24	**24**	0.0%	0.05%
		63	50	**113**		

Before BU30, BU38 & BU91 allocation

BU	Business Unit	PO Related Count N	PO Related Count Y	Total By BU
47	CSM	58	35	**93**
40	Westfield Gas	317	85	**402**
48	Westfield Water	296	348	**644**
49	Westfield Wastewater	392	238	**630**
51	KEEP	42	121	**163**
05	Oil	79	274	**353**
37	CRP	7	1	**8**
97	Heartland Gas	32	7	**39**
		1,223	1,109	**2,332**

After BU30, BU38 & BU91 allocation

BU	Business Unit	PO Related Count N	PO Related Count Y	Total By BU
47	CSM	61	37	**98**
40	Westfield Gas	333	89	**422**
48	Westfield Water	311	364	**675**
49	Westfield Wastewater	412	249	**661**
51	KEEP - Plummer	105	350	**455**
51	KEEP - NonOp Oil	29	64	**94**
97	Heartland Gas	34	7	**41**
		1,286	1,159	**2,445**

2016 CSS Driver Determination **wp 270**
% employee

Source: Budgeted employee count as of July 29, 2015

A	B	C	D	E	F	G	H	I
	FT, PT, TBH Employees	% of Total	Trust Admin Allocation	Allocation of CSS 46.7% (D*CSS%)	SFS Labor Allocation	Allocation of SFS 21.5% (F*SFS%)	% Employee (C+E+G)	Rounded 2 decimals
CSS	543	46.7%						
SFS	250	21.5%						
Citizens Gas	126	10.8%	38.5%	18.0%	58.1%	12.5%	41.3%	41.32%
Water	149	12.8%	20.7%	9.7%	28.6%	6.1%	28.6%	28.60%
Wastewater	7	0.6%	22.9%	10.7%	11.7%	2.5%	13.8%	13.83%
Steam	48	4.1%	9.6%	4.5%	0.1%	0.0%	8.6%	8.64%
WSCW	22	1.9%	4.7%	2.2%	0.0%	0.0%	4.1%	4.08%
CSM	1	0.1%	0.0%	0.0%			0.1%	0.10%
Westfield Gas	-	0.0%	0.6%	0.3%	0.6%	0.1%	0.4%	0.39%
Westfield Water	7	0.6%	0.9%	0.4%	0.5%	0.1%	1.1%	1.10%
Westfield Wastewater	5	0.4%	1.2%	0.6%	0.4%	0.1%	1.1%	1.09%
KEEP - Plummer	5	0.4%	0.8%	0.4%			0.8%	0.81%
KEEP - NonOp Oil	-	0.0%	0.1%	0.0%			0.0%	0.04%
Total	**1,163**	**100.0%**	**100.0%**	**46.7%**	**100.0%**	**21.5%**	**100.0%**	**100.00%**

2016 CSS Driver Determination
Customers

wp 270

A % of Customers (all)

	Customer Count		Rounded, 2 decimals	Source	Customers Excl. WW	% Customers	Wet Allocation	Redistributed Allocation	Rounded, 2 decimals
Citizens Gas	266,497	31.6%	31.58%	6/30/2015 12mtd average	266,497	44.46%		44.46%	44.47%
Water	316,555	37.5%	37.52%	6/30/2015 12mtd average	316,555	52.82%	57.55%	30.39%	30.39%
Wastewater	233,515	27.7%	27.68%	6/30/2015 12mtd average			42.45%	22.42%	22.42%
Steam	168	0.0%	0.02%	6/30/2015 12mtd average	168	0.03%		0.03%	0.03%
WSCW	61	0.0%	0.01%	6/30/2015 12mtd average	61	0.01%		0.01%	0.01%
CSM	27	0.0%	0.00%	6/30/2015 12mtd average	27	0.00%		0.00%	0.00%
Westfield Gas	3,816	0.5%	0.45%	6/30/2015 12mtd average	3,816	0.64%		0.64%	0.64%
Westfield Water	12,232	1.4%	1.45%	6/30/2015 12mtd average	12,232	2.04%	52.89%	1.08%	1.08%
Westfield Wastewater	10,896	1.3%	1.29%	6/30/2015 12mtd average			47.11%	0.96%	0.96%
	843,767	100.0%	100.00%		599,356	100.00%	100.00%	100.00%	100.00%

B % of Customers (all excl Steam)

	Customer Count		Rounded, 2 decimals	Source	Customers Excl. WW	% Customers	Wet Allocation	Redistributed Allocation	Rounded, 2 decimals
Citizens Gas	266,497	31.6%	31.60%	6/30/2015 12mtd average	266,497	44.48%		44.48%	44.48%
Water	316,555	37.5%	37.52%	6/30/2015 12mtd average	316,555	52.83%	57.55%	30.40%	30.40%
Wastewater	233,515	27.7%	27.68%	6/30/2015 12mtd average			42.45%	22.43%	22.43%
WSCW	61	0.0%	0.01%	6/30/2015 12mtd average	61	0.01%		0.01%	0.01%
CSM	27	0.0%	0.00%	6/30/2015 12mtd average	27	0.00%		0.00%	0.00%
Westfield Gas	3,816	0.5%	0.45%	6/30/2015 12mtd average	3,816	0.64%		0.64%	0.64%
Westfield Water	12,232	1.4%	1.45%	6/30/2015 12mtd average	12,232	2.04%	52.89%	1.08%	1.08%
Westfield Wastewater	10,896	1.3%	1.29%	6/30/2015 12mtd average			47.11%	0.96%	0.96%
	843,599	100.0%	100.00%		599,188	100.00%	100.00%	100.00%	100.00%

C % of Customers (Wet)

	Customer Count		Rounded, 2 decimals	Source
Water	316,555	55.2%	55.23%	6/30/2015 12mtd average
Wastewater	233,515	40.7%	40.74%	6/30/2015 12mtd average
CSM	27	0.0%	0.00%	6/30/2015 12mtd average
Westfield Water	12,232	2.1%	2.13%	6/30/2015 12mtd average
Westfield Wastewater	10,896	1.9%	1.90%	6/30/2015 12mtd average
	573,225	100.0%	100.00%	

D % of Customers (Energy)

	Customer Count		Rounded, 2 decimals	Source
Citizens Gas	266,497	98.5%	98.51%	6/30/2015 12mtd average
Steam	168	0.1%	0.06%	6/30/2015 12mtd average
WSCW	61	0.0%	0.02%	6/30/2015 12mtd average
Westfield Gas	3,816	1.4%	1.41%	6/30/2015 12mtd average
	270,542	100.0%	100.00%	

E % of Customers (Natural Gas)

	Customer Count		Rounded, 2 decimals	Source
Citizens Gas	266,497	98.6%	98.59%	6/30/2015 12mtd average
Westfield Gas	3,816	1.4%	1.41%	6/30/2015 12mtd average
	270,313	100.0%	100.00%	

2016 CSS Driver Determination **wp 270**
% Purchasing Dollars

based on 12m spend

BU	BU Descreption	Total Spend	Exempt	Addressable	% of Addressable Spend	Category	Sum %
02	Gas Holdings	$275,789,958	$245,801,161	$29,988,797	7.11%	Cit Gas	**7.11%**
47	Citizens of South Madison	$726,331	$231,645	$494,686	0.12%	CSM	**0.12%**
04	Discontinued Operations	$3,515,563	$933,746	$2,581,817	0.61%	Disc Ops	**0.61%**
97	Heartland Gas Pipeline LLC	$1,021,656	$868,736	$152,920	0.04%	HGP	**0.04%**
05	Oil Division	$4,854,375	$605,188	$4,249,187	1.01%	Keep Plummer	
51	Kinetrix Energy Exploration & Production	$461,484	$140,303	$321,181	0.08%	Keep Plummer	**1.08%**
50	Kinetrix Energy LLC	$5,377	$5,377	$0	0.00%	Kinetrix	**0.00%**
06	Steam Division	$69,697,715	$60,205,322	$9,492,393	2.25%	Steam	**2.25%**
08	Indianapolis Campus Energy	$100,683	$4,370	$96,314	0.02%	WSWC	
90	Citizens ICON	$83,082	$83,082	$0	0.00%	CR Parent	
91	Warm Heart Warm Home	$42,380	$17,054	$25,327	0.01%	CR Parent	
01	Corporate Support Services	$70,249,485	$44,171,164	$26,078,322	6.18%	Trust Admin	**9.09%**
03	Trust Holdings	$2,956,863	$2,264,911	$691,952	0.16%	Trust Admin	
17	Shared Field Services	$21,492,919	$9,927,142	$11,565,777	2.74%	Trust Admin	
30	Citizens By-Products Coal Co	$877,836	$75,664	$802,172	0.19%	CR Parent	**0.20%**
37	Citizens Resources Production (CRP, LLC)	$483,642	$476,401	$7,240	0.00%	Keep NonOp Oil	**0.00%**
92	CWA Authority	$534,486,362	$295,963,999	$238,522,363	56.54%	Wastewater	**56.54%**
20	Water production & Distribution	$207,418,314	$121,741,098	$85,677,216	20.31%	Water	**20.31%**
40	Citizens Gas of Westfield	$3,508,332	$2,759,619	$748,713	0.18%	WF Gas	**0.18%**
49	Citizens wastewater of Westfield	$3,663,984	$1,849,521	$1,814,464	0.43%	WF Wastewater	**0.43%**
38	Citizens Westfield Utilities	$3,872,626	$3,094,459	$778,168	0.18%	WF Water	
48	Citizens Water of Westfield	$4,134,748	$1,687,616	$2,447,132	0.58%	WF Water	**0.76%**
07	West Street Chilled Water	$26,601,680	$21,265,996	$5,335,685	1.26%	WSWC	**1.29%**
		$1,236,045,396	$814,173,573	$421,871,822	100.00%		**100.00%**

2016 CSS Driver Determination
% Computers

wp 270

Source: Help Desk, 6/24/15

Notes: Count of distribution of computers, laptops, and toughbooks

A	B	C	D	E	F	G	H	I
	Computers	% of Total	Trust Admin Allocation	Allocation of CSS 67.4% (D*CSS%)	SFS Labor Allocation	Allocation of SFS 15.4% (D*SFS%)	% Computers (C+E+F)	Rounded 2 decimals
CSS	794	67.4%						
SFS	182	15.4%						
Citizens Gas	54	4.6%	38.5%	26.0%	54.8%	8.5%	39.0%	39.03%
Water	90	7.6%	20.7%	13.9%	31.8%	4.9%	26.5%	26.48%
Wastewater	-	0.0%	22.9%	15.5%	11.5%	1.8%	17.2%	17.24%
Steam	38	3.2%	9.6%	6.5%	0.1%	0.0%	9.7%	9.72%
WSCW	17	1.4%	4.7%	3.2%	0.0%	0.0%	4.6%	4.60%
Oil	-	0.0%	0.8%	0.6%			0.6%	0.55%
CSM	-	0.0%	0.0%	0.0%			0.0%	0.01%
Westfield Gas	-	0.0%	0.6%	0.4%	0.5%	0.1%	0.5%	0.46%
Westfield Water	2	0.2%	0.9%	0.6%	0.7%	0.1%	0.9%	0.85%
Westfield Wastewater	1	0.1%	1.2%	0.8%	0.6%	0.1%	1.0%	1.00%
Citizens Resources Production	-	0.0%	0.1%	0.1%			0.1%	0.06%
Total	**1,178**	**100.0%**	**100.0%**	**67.4%**	**100.0%**	**15.4%**	**100.0%**	**100.00%**

2016 SFS Driver Determination
Customers

wp 270

A % of Customers (all)

	Customer Count		Rounded 2 decimals	Source	Customers Excl. WW	% Customers	Wet Allocation	Redistributed Allocation	Rounded, 2 Decimals
Citizens Gas	266,497	31.6%	31.58%	6/30/2015 12mtd average	266,497	44.46%		44.46%	44.47%
Water	316,555	37.5%	37.52%	6/30/2015 12mtd average	316,555	52.82%	57.55%	30.39%	30.39%
Wastewater	233,515	27.7%	27.68%	6/30/2015 12mtd average			42.45%	22.42%	22.42%
Steam	168	0.0%	0.02%	6/30/2015 12mtd average	168	0.03%		0.03%	0.03%
WSCW	61	0.0%	0.01%	6/30/2015 12mtd average	61	0.01%		0.01%	0.01%
CSM	27	0.0%	0.00%	6/30/2015 12mtd average	27	0.00%		0.00%	0.00%
Westfield Gas	3,816	0.5%	0.45%	6/30/2015 12mtd average	3,816	0.64%		0.64%	0.64%
Westfield Water	12,232	1.4%	1.45%	6/30/2015 12mtd average	12,232	2.04%	52.89%	1.08%	1.08%
Westfield Wastewater	10,896	1.3%	1.29%	6/30/2015 12mtd average			47.11%	0.96%	0.96%
	843,767	100.0%	100.00%		599,356	100.00%	100.00%	100.00%	100.00%

B % of Customers (excl Thermal)

	Customer Count		Rounded 2 decimals	Source	Customers Excl. WW	% Customers	Wet Allocation	Redistributed Allocation	Rounded, 2 Decimals
Citizens Gas	266,497	31.6%	31.60%	6/30/2015 12mtd average	266,497	44.48%		44.48%	44.48%
Water	316,555	37.5%	37.53%	6/30/2015 12mtd average	316,555	52.84%	57.55%	30.41%	30.41%
Wastewater	233,515	27.7%	27.68%	6/30/2015 12mtd average			42.45%	22.43%	22.43%
CSM	27	0.0%	0.00%	6/30/2015 12mtd average	27	0.00%		0.00%	0.00%
Westfield Gas	3,816	0.5%	0.45%	6/30/2015 12mtd average	3,816	0.64%		0.64%	0.64%
Westfield Water	12,232	1.4%	1.45%	6/30/2015 12mtd average	12,232	2.04%	52.89%	1.08%	1.08%
Westfield Wastewater	10,896	1.3%	1.29%	6/30/2015 12mtd average			47.11%	0.96%	0.96%
	843,538	100.0%	100.00%		599,127	100.00%	100.00%	100.00%	100.00%

C % of Customers (Gas)

	Customer Count		Rounded 2 decimals	Source
Citizens Gas	266,497	98.6%	98.59%	6/30/2015 12mtd average
Westfield Gas	3,816	1.4%	1.41%	6/30/2015 12mtd average
	270,313	100.0%	100.00%	

D % of Customers (Westfield Water & Wastewater)

	Customer Count		Rounded 2 decimals	Source
Westfield Water	12,232	52.9%	52.89%	6/30/2015 12mtd average
Westfield Wastewater	10,896	47.1%	47.11%	6/30/2015 12mtd average
	23,128	100.0%	100.00%	

2016 SFS Driver Determination
Fleet / Vehicles

Source:

Vehicle count 6/25/15.
Vehicle count does not include backhoes, trailers or any non-rolling stock.
UGS vehicles not maintained by SFS.
Most Wastewater vehicles are maintained by United employees.
CSS Vehicles in Revenue Assurance allocated based on draft CSS allocation total for Field Collectors and Revenue Assurance Reps.

A - % Vehicles (all)

Division	Fleet Units	Percent	CSS Revenue Assurance/SFS Allocation	Allocation of CSS/SFS 28.99%	% Vehicles	Rounded 2 decimals
CSS Rev Assurance	20	4.49%				
SFS	109	24.49%				
Citizens Gas	125	28.09%	44.47%	12.89%	40.98%	40.97%
Water	134	30.11%	30.39%	8.81%	38.92%	38.92%
Wastewater	10	2.25%	22.42%	6.50%	8.75%	8.75%
Steam	24	5.39%	0.03%	0.01%	5.40%	5.40%
WSCW	10	2.25%	0.01%	0.00%	2.25%	2.25%
CSM	-	0.00%	0.00%	0.00%	0.00%	0.00%
Westfield Gas			0.64%	0.19%	0.19%	0.19%
Westfield Water	7	1.57%	1.08%	0.31%	1.89%	1.89%
Westfield Wastewater	6	1.35%	0.96%	0.28%	1.63%	1.63%
Total	445	100.00%	100.00%	28.99%	100.00%	100.00%

B - % Vehicles (excl Thermal)

Division	Fleet Units	Percent	CSS Revenue Assurance/SFS Allocation	Allocation of CSS/SFS 31.39%	% Vehicles	Rounded 2 decimals
CSS Rev Assurance	20	4.87%				
SFS	109	26.52%				
Citizens Gas	125	30.41%	44.48%	13.96%	44.37%	44.38%
Water	134	32.60%	30.41%	9.54%	42.15%	42.15%
Wastewater	10	2.43%	22.43%	7.04%	9.47%	9.47%
CSM	-	0.00%	0.00%	0.00%	0.00%	0.00%
Westfield Gas			0.64%	0.20%	0.20%	0.20%
Westfield Water	7	1.70%	1.08%	0.34%	2.04%	2.04%
Westfield Wastewater	6	1.46%	0.96%	0.30%	1.76%	1.76%
Total	411	100.00%	100.00%	31.39%	100.00%	100.00%

C - % Vehicles (Gas & Thermal)

Division	Fleet Units	Percent	Gas Allocation	Allocation of Gas 78.62%	% Vehicles	Rounded 2 decimals
Citizens Gas	125	78.62%	98.59%	77.51%	77.51%	77.51%
Steam	24	15.09%			15.09%	15.09%
WSCW	10	6.29%			6.29%	6.29%
Westfield Gas			1.41%	1.11%	1.11%	1.11%
Total	159	100.00%	100.00%	78.62%	100.00%	100.00%

Vehicle count:

	CSS	SFS	Citizens Gas	Water	Wastewater	Steam	WSCW	CSM	WF Water	WF Wastewater	Total
Vehicles	20	109	125	134	10	24	10	-	7	6	445

2016 SFS Driver Determination **wp 270**
Utilization Labor

A	% Util Labor (all)	Projected 2015					
Task	**Division**	**Amount**	**Percent**	**WF W&WW Allocation**	**Allocation of WF W&WW 0.51%**	**% Labor**	**Rounded 2 decimals**
1705a	Citizens Gas	3,724,961	72.01%			72.01%	72.01%
1705w	Water	1,291,853	24.98%			24.98%	24.98%
S&WW (51)	Wastewater	98,601	1.91%			1.91%	1.91%
	CSM	-	0.00%			0.00%	0.00%
1705b	Westfield Gas	30,420	0.59%			0.59%	0.59%
	Westfield Water	26,132	0.51%	52.89%	0.27%	0.27%	0.27%
	Westfield Wastewater			47.11%	0.24%	0.24%	0.24%
	Total	5,171,967	100.00%	100.00%	0.51%	100.00%	100.00%

2016 SFS Driver Determination
% Meters Read

A % Meters (all)

	# Customers	Source
Citizens Gas	266,497	6/30/2015 12mtd average
Water	316,555	6/30/2015 12mtd average
Wastewater	233,515	6/30/2015 12mtd average
Steam	168	6/30/2015 12mtd average
WSCW	n/a	
CSM	27	6/30/2015 12mtd average
Westfield Gas	3,816	6/30/2015 12mtd average
Westfield Water	12,057	6/30/2015 12mtd average
Westfield Wastewater	10,807	6/30/2015 12mtd average
	843,442	

	# Meters	# Reads per year	Read Rate	Total Reads	% of Reads	Wet Allocation	Redistributed Allocation	Rounded, 2 decimals	
Citizens Gas	288,227	12	1.00	3,458,724	42.03%		42.0%	42.02%	
Water Special Routes	2,526	12	4.25	128,826	1.57%		1.6%	1.57%	33.00%
Water (excl. Special Routes)	326,798	12	1.15	4,509,812	54.80%	57.4%	31.4%	31.43%	
Wastewater				n/a		42.6%	23.4%	23.37%	
Steam	182	12	3.50	7,644	0.09%		0.09%	0.09%	
WSCW	n/a								
CSM	27	12	1.15	373	0.00%		0.0%	0.00%	
Westfield Gas	3,898	12	1.00	46,776	0.57%		0.6%	0.57%	
Westfield Water	13,000	12	0.50	78,000	0.95%	52.7%	0.5%	0.50%	
Westfield Wastewater				n/a		47.3%	0.4%	0.45%	
	634,658			**8,230,155**	**100.00%**		**100.0%**	**100.00%**	

WSCW does not use meter reads.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(18) The monthly amounts of injury and damage for the test year, including the following:

(A) Claims paid by the utility.

(B) Expense accrued.

Westfield Wastewater **wp 141**
170 IAC 1-5-8 (18)
Monthly amounts of injury and damages for the test year
Including claims paid and expenses accrued
(12 months ended December 31, 2015)

Period	Westfield	CSS	SFS	Total
		at Westfield share		
Jan-15	2,508.54	618.82	177.08	3,304.44
Feb-15	2,250.00	1,053.95	222.02	3,525.97
Mar-15	2,333.08	1,363.91	337.86	4,034.85
Apr-15	2,333.08	1,250.80	234.06	3,817.94
May-15	2,333.08	1,627.01	249.20	4,209.29
Jun-15	2,333.08	1,192.24	244.54	3,769.86
Jul-15	2,333.08	1,139.46	188.73	3,661.27
Aug-15	2,333.08	1,100.55	198.40	3,632.03
Sep-15	3,450.51	1,313.29	235.13	4,998.93
Oct-15	3,724.51	1,389.20	267.70	5,381.41
Nov-15	4,073.91	1,315.04	241.39	5,630.34
Dec-15	2,841.91	1,327.13	239.98	4,409.02
Total	32,847.86	14,691.40	2,836.09	50,375.35

All amounts are booked to the following accounts:

757081	General Liability
758081	Workman's Compensation
759081	Other

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(19) If applicable, test year data applicable to each DSM program of the utility, including the following:

(A) A description of the DSM program conducted.

(B) Costs related to the program.

(C) The accounting treatment of the costs.

(D) Reference to the applicable commission orders, if any, regarding each DSM program.

Not applicable. Citizens Wastewater of Westfield does not offer DSM programs.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(20) Expenditures incurred by the utility during the test year and amounting to more than ten thousand dollars ($10,000) to an individual payee for:

(A) outside services;

(B) consulting services; or

(C) legal services.

Westfield Wastewater **wp 151**
170 IAC 1-5-8 (20)
Schedule of outside services (expense type 30xx)
(12 months ended December 31, 2015)

Line	Expense Type	Description of service	Vendor	Westfield	*at Westfield share* CSS	SFS	Total
1	3001 - OS - Auditing	Financial audit	DELOITTE & TOUCHE		9,870		9,870
2	3002 - OS - Consulting	Various	Under $10,000 per vendor and/or accruals		11,086	66	11,152
3	3003 - OS - Legal	legal services	ICE MILLER LLP	9,339			9,339
4	3003 - OS - Legal	Legal Services	Under $10,000 per vendor and/or accruals		8,307	90	8,396
5	3004 - OS - Collection Expense	Collection Services	Under $10,000 per vendor and/or accruals		1,165		1,165
6	3005 - OS - Contracted Services	repairs and maintenance - flow monitors	ADS ENVIRONMENTAL SERVICES, INC.	34,075			34,075
7	3005 - OS - Contracted Services	repairs and maintenance	AMERICAN PUMP REPAIR & SERVICE, INC.	17,321			17,321
8	3005 - OS - Contracted Services	repairs and maintenance	BBC PUMP & EQUIPMENT CO INC	2,772			2,772
9	3005 - OS - Contracted Services	repairs and maintenance - generators	BUCKEYE POWER SALES CO., INC.	6,075			6,075
10	3005 - OS - Contracted Services	wastewater treatment services	CARMEL UTILITIES	669,592			669,592
11	3005 - OS - Contracted Services	testing - CBOD levels	CLAY TOWNSHIP REGIONAL WASTE DISTRI	9,920			9,920
12	3005 - OS - Contracted Services	engineering and appraisal services	CRIPE ARCHITECTS AND ENGINEERING	7,888			7,888
13	3005 - OS - Contracted Services	televising services	FLUID WASTE SERVICES, INC.	1,333			1,333
14	3005 - OS - Contracted Services	repairs and maintenance - instruments	GEORGE E. BOOTH CO., INC.	15,916			15,916
15	3005 - OS - Contracted Services	fire extinguisher services	GEYER FIRE PROTECTION, LLC	2,549			2,549
16	3005 - OS - Contracted Services	Fleet maintenance and repairs	GREENES AUTO & TRUCK SERVICES			26,583	26,583
17	3005 - OS - Contracted Services	engineering services	HNTB CORPORATION	24,126			24,126
18	3005 - OS - Contracted Services	remittance processing	HUNTINGTON NATIONAL BANK5647	25,891			25,891
19	3005 - OS - Contracted Services	line locating services	IUPPS	6,194			6,194
20	3005 - OS - Contracted Services	security services	LOOMIS, FARGO & CO	3,820			3,820
21	3005 - OS - Contracted Services	repairs and maintenance - instruments	MIDLAND ELECTRIC SUPPLY INC	2,728			2,728
22	3005 - OS - Contracted Services	capital project cancelled	MORTON BUILDINGS, INC.	53,472			53,472
23	3005 - OS - Contracted Services	appraisal services	NEWGEN STRATEGIES AND SOLUTIONS, LL	6,502			6,502
24	3005 - OS - Contracted Services	repairs and maintenance - HVAC	PEINE ENGINEERING COMPANY INC	3,430			3,430
25	3005 - OS - Contracted Services	trash removal services	RAY'S TRASH SERVICE, INC.	6,429			6,429
26	3005 - OS - Contracted Services	line locating services	SAMCO	179,836			179,836
27	3005 - OS - Contracted Services	Various	Under $10,000 per vendor and/or accruals	(23,914)	73,085	4,435	53,607
28	3005 - OS - Contracted Services	repairs and maintenance	XYLEM WATER SOLUTIONS USA, INC.	1,707			1,707
29	3006 - OS - Temporary Clerical	Various	Under $10,000 per vendor and/or accruals		8,833		8,833
30	3007 - OS - Training	Training	Under $10,000 per vendor and/or accruals	345	6,298	89	6,733
31	3008 - OS - Security	Security	Under $10,000 per vendor and/or accruals		4,208		4,208
32	3010 - OS - Janitorial	Janitorial	NISHIDA SERVICES, INC.		4,187		4,187
33	3011 - OS - Landscaping/Mowing	Various	Under $10,000 per vendor and/or accruals		4,068		4,068
34	**Total**			**1,067,345**	**131,107**	**31,264**	**1,229,716**

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(21) A schedule of all charitable and civic contributions recorded to utility operations during the test year.

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Westfield Wastewater **wp 432**
170 IAC 1-5-8 (21)
Schedule of charitable and civic contributions during the test year

	A	B	C	D
Line	**Description**	**Month**	**Reference**	**Amount**
1	Indianapolis Zoo	Apr-15	49.7085.775081.1008.00	$ 950

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(22) A schedule of all research and development expenditures incurred during the test year and recorded to utility operations.

Not applicable. Citizens Wastewater of Westfield did not incur research and development expenditures during the test year.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(23) A schedule of:

(A) trade;

(B) social; and

(C) service;

organization memberships paid during the test year and recorded to utility operations.

Westfield Wastewater **wp 152**
170 IAC 1-5-8 (23)
Schedule of dues and memberships (expense typ 1011)
(12 months ended December 31, 2015)

Line	Description	Westfield	at Westfield share CSS	SFS	Total
1	100 Black Men of Indianapolis		1		1
2	Air and Waste Management Association		3		3
3	American Bar Association		4		4
4	American Institute of Certified Public Accountants		4		4
5	American Institute of Chemical Engineers		3		3
6	American Institute of Graphic Arts		6		6
7	American Productivity & Quality Council		225		225
8	American Society for Quality		245		245
9	American Society for Training & Development		6		6
10	American Society of Civil Engineers		12		12
11	American Society of Safety Engineers		5		5
12	American Water Works Association		13		13
13	Association for Finance Professionals		14		14
14	Association of Certified Fraud Examiners		2		2
15	Center for Energy Workforce Development		15		15
16	Certified Information Systems Security Professionals		1		1
17	Construction Management Association of America		7		7
18	Disaster Recovery Institute		0		0
19	Diversity Roundtable of Central Indiana		2		2
20	Energy Solutions Center		366		366
21	Governmental Affairs Society of Indiana		2		2
22	Greater Indianapolis Chamber of Commerce		590		590
23	Human Resource Executive		1		1
24	Independent Oracle Users Group		6		6
25	Indiana CPA Society		54		54
26	Indiana Environmental Health Association		0		0
27	Indiana Geographic Information Council		7		7
28	Indiana Manufacturers Association		2		2
29	Indiana Professional Licensing Agency (CPA licenses)		10		10
30	Indiana Section American Water Works Association			2	2
31	Indiana State Bar Association		13		13
32	Indiana Supreme Court		7		7
33	Indiana Water Environment Association	140	0		140
34	Indianapolis Bar Association		4		4
35	Information Systems Audit and Control Association		2		2
36	Information Systems Security Association		3		3
37	Institute of Certified Management Accountants		14		14
38	International Association of Administrative Professionals		2		2
39	International Right of Way Association			27	27
40	IU Alumni Association		1		1
41	Metro Indianapolis Coalition for Construction Safety		12		12
42	Metropolitan Indianapolis Board of Realtors			100	100
43	Mid-States Minority Supplier Development Council		6		6
44	Midwest Contingency Planners		1		1
45	Midwest Ozone Group		79		79
46	National Association of County Engineers		4		4
47	National Association of Power Engineers		2		2
48	National Association of Women Business Owners		10		10
49	National Council of Examiners for Engineering and Surveying		6		6
50	National Fire Protection Association		2		2
51	National Safety Council		19		19
52	Prism International Diversity Council Association		3		3
53	Project Management Institute		4	1	5
54	Public Relations Society of America		4		4
55	Risk and Insurance Management Society		18		18
56	Society for Human Resource Management		15		15
57	Society for Maintenance & Reliability Professionals Foundation		6		6
58	Society of Corporate Secretaries & Governance Professionals		1		1
59	Society of Metallurgical Engineers		2		2
60	Society of Women Engineers		2		2
61	The Partnership for Excellence		67		67
62	United Way of Central Indiana		1		1
63	Vibration Institute		4		4
64	Water Environment Federation		11		11

65	Wellness Council of Indiana		23		23
66	WorldatWork Society of Certified Professionals		3		3
67	**Total**	**140**	**1,957**	**130**	**2,227**

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(24) A schedule of estimated rate case expenses, including supporting detail, for the following:

(A) Outside services to be rendered.

(B) The expected costs of those services.

Citizens Wastewater of Westfield, LLC
2016 Citizens Wastewater of Westfield
Pro Forma Rate Case Expense Adjustment

w/p WS800

Line No.					Reference
1	Test Year Amortization of rate case expense			$0	
2	Consultant Fees	70,000			w/p 800/1, ln 8
3	Outside Legal Fees	120,500			w/p 800/1, ln 9
4	Subtotal Rate Case Fees	$190,500			(lns 2 + 3)
5	3-year amortization	3			
6	3-year amortization of Rate Case fees		$63,500		(ln 4 / ln 5)
7	Total Pro Forma Rate Case Expense			$63,500	(ln 6)
8	Pro Forma Rate Case Expense adjustment			$63,500	(ln 8 - 1)

Citizens Wastewater of Westfield, LLC
2016 Citizens Wastewater of Westfield
Calculation of Pro Forma Consultant/Legal Rate Case Expenses

w/p WS 800/1

A	B	C	D
Line No.	Description	Cost	Reference
1	Cost of Equity Consultant	$70,000	
2	Consultant	$0	
3	Consultant	$0	
4	Consultant	$0	
5	Consultant	$0	
6	Consultant	$0	
7	Consultant	$0	
8	Total Consultant Fees	$70,000	
9	Outside Legal Fees	$120,500	
10	Total Pro Forma Consultant/Legal Fees	$190,500	(lns 8 + 9)

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(25) Regarding advertising recorded to utility operations during the test year, the following:

(A) A schedule of expenditures by the utility.

(B) Representative samples of the advertising by major media category, including, but not limited to, the following:

(i) Television.
(ii) Radio.
(iii) Newspaper.

Westfield Wastewater **wp 171**
170 IAC 1-5-8 (25)(A) and (26)
Test Year Charges to Advertising Expenses
(12 months ended December 31, 2015)

Line	Description	Westfield	CSS	SFS	Total
			at Westfield share		
	Conservation Messaging				
1	Indianapolis Indians		$ 175		$ 175
2	Indianapolis Colts messaging		1,294		$ 1,294
3	Indianapolis Motor Speedway messaging		357		$ 357
4	Be WinterWise		407		$ 407
5	Earth Day Indiana		64		$ 64
6	Total Conservation Messaging	$ -	$ 2,298	$ -	$ 2,298
7	Safety Campaign		796		$ 796
8	**Total Allowed Advertising**	**$ -**	**$ 3,094**	**$ -**	**$ 3,094**

HOME SAFE HOME.

Detectors save lives. Check the batteries.
More safety tips at **CitizensEnergyGroup.com**

citizens energy group™

LESS IS MORE

Find out what you can do to make a big splash at CitizensEnergyGroup.com.

BeWaterWise

Conservation Partner of Your Indianapolis Colts.

citizens energy group™

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(26) The schedule required by subdivision (25) shall identify expenditures by the following subject matters:

(A) Public health and safety.

(B) Conservation.

(C) An explanation of rates, billing practices, and other administrative matters.

(D) Other advertising programs.

Westfield Wastewater **wp 171**
170 IAC 1-5-8 (25)(A) and (26)
Test Year Charges to Advertising Expenses
(12 months ended December 31, 2015)

Line	Description	Westfield	CSS	SFS	Total
			at Westfield share		
	Conservation Messaging				
1	Indianapolis Indians		$ 175		$ 175
2	Indianapolis Colts messaging		1,294		$ 1,294
3	Indianapolis Motor Speedway messaging		357		$ 357
4	Be WinterWise		407		$ 407
5	Earth Day Indiana		64		$ 64
6	Total Conservation Messaging	$ -	$ 2,298	$ -	$ 2,298
7	Safety Campaign		796		$ 796
8	**Total Allowed Advertising**	**$ -**	**$ 3,094**	**$ -**	**$ 3,094**

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(27) A description of the utility's methodology for capitalizing construction overheads during the test year.

Overhead is applied to capital projects on a monthly basis and becomes part of the capitalized cost of that respective project. Charges posted to the overhead account are spread out over various types of projects. Engineering overheads are captured in separate projects and are prorated within the business units over projects based on monthly project activity, excluding shop orders, IT projects, fleet, and other overhead projects.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(28) A description of the allocation methodology of multiutility common expenses that are allocated to the utility in the rate proceeding covered by this rule.

See the attachments to the testimony of Sabine E. Karner.

I\10498816.1

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(29) A schedule of amounts of taxes other than income taxes recorded to utility operations during the test year for the following categories:

(A) Social Security.

(B) Unemployment.

(C) Public utility fee.

(D) Property.

(E) Utility receipts tax.

(F) Other revenue related.

(G) Other.

Westfield Wastewater **wp 153**
170 IAC 1-5-8 (29)
Schedule of taxes recorded during the test year
(12 months ended December 31, 2015)

	Westfield	CSS	SFS	Total
		at Westfield share		
Medicare Taxes	3,613.72	7,281.02	927.30	11,822.04
Social Security Taxes	15,571.91	26,822.13	4,193.61	46,587.65
State Unemployment Taxes	553.74	650.26	142.53	1,346.53
Property Tax	584,996.10	4,377.18	50.43	589,423.71
Indiana Utility Receipts Tax	131,055.73			131,055.73
Other, including misc. accruals	(14.92)	(113.01)	(24.10)	(152.03)
Total	735,776.28	39,017.58	5,289.77	780,083.63

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(30) A schedule of book value and taxing authority assessed value for the determination of real and personal property tax for the following:

(A) The test year.

(B) To the extent reasonably available, the latest information subsequent to the test year.

Not applicable.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(31) A schedule of the following:

(A) Deferred tax balances of the utility at the:

(i) beginning; and
(ii) end;

of the test year.

(B) Net provisions and paybacks during the test year.

Not applicable.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(32) Computations showing the deferred income taxes of the utility derived by using accelerated tax depreciation with separate computations provided for the following:

(A) State income taxes.

(B) Federal income taxes.

Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(33) A reconciliation of any difference between:

(A) the deferred tax balance, as shown as:

(i) a reduction to rate base; or
(ii) cost-free capital; and

(B) the deferred tax balance of the utility as shown on the balance sheet.

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Citizens Wastewater of Westfield does not pay income tax.

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170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(34) A schedule showing the breakdown of accumulated investment tax credits of the utility, including a description of the methodology used to write off the unamortized balances.

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Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(35) Supporting working papers for the development of the state and federal composite income tax rate used by the utility during the test year to defer income tax expense.

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Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (a) An electing utility shall submit the following information:

(36) The calculation of the interest deduction used by the utility to compute income taxes.

Citizens Wastewater of Westfield does not pay income tax.

170 IAC 1-5-8 Working Papers and Data: Revenues, Expenses, and Taxes

Sec. 8. (b) In addition to the information listed in subsection (a), an electric utility shall submit the following information related to electric generating facility maintenance by station:

(1) Actual and budgeted maintenance costs during the test year.

(2) Budgeted maintenance schedule for the test year and any future period or periods as available.

Not applicable. Citizens Wastewater of Westfield is not an electric utility.