Draft Wastewater Rate Study



Prepared for: San Andreas Sanitary District

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Sign-off Sheet

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Table of Contents

1.0		UCTION AND PROJECT OVERVIEW	
1.1		UCTION	
1.2		SE OF THE STUDY	
1.3		RY OF FINDINGS	
1.4	ORGAN	IIZATION OF THE STUDY	4
2.0	DISTRIC	T OVERVIEW	
	2.1.1	District Location	
	2.1.2	San Andreas Residents	
	2.1.3	Customer Summary and Rate Structure	6
3.0	PROJEC	T SUMMARY AND COST OVERVIEW	9
	3.1.1	Annual Collection System Costs	9
	3.1.2	Current Capital Improvement Project Description	
	3.1.3	Estimated Project Cost & Funding Sources	15
	3.1.4	Financing Assumptions & Debt Service Calculations	15
4.0	REVENU	E REQUIREMENTS AND FINANCIAL PLAN	19
4.1	HISTORI	CAL REVENUE AND EXPENSES	19
4.2	PROJEC	CTED REVENUE REQUIREMENT	19
4.3	PROJEC	CTED CASH FLOWS	22
5.0	WASTEV	VATER CHARACTERISTICS AND RATES ANALYSIS	25
5.1		VATER CUSTOMER CHARACTERISTICS	
6.0	COSTO	F SERVICE ANALYSIS	30
•••	6.1.1	Cost Allocation to Collection and Treatment Categories	
	6.1.2	Cost Allocation to Flow and Strength & Unit Cost Determination	
	6.1.3	Cost Allocation by Customer Category	31
7.0	FINDING	SS AND RECOMMENDATIONS	35
7.0	7.1.1	Calculated Rates	
LIST	OF TABLES		
			_
		ary of Calculated Rates	5
Iable		al Improvement Project Schedule and Anticipated Annual Cost ninary)	10
Table	•	al Improvement Project Cost Allocations	
	•	ted Project Cost & Funding Source	
		al Improvement Project Financing Assumptions & Debt Service	
	Calcu	ılation	
		ary of Historical Revenue and Expenses	
Table	7 Summ	ary of Projected Annual Revenue Requirement through FY 2020-21	21



Table 8 Projected Cash Flow	23
Table 9 Projected CIP Cash Flow	
Table 10 Summary of Wastewater User Characteristics	
Table 11 Commercial Customer and Wastewater Characteristic Assumptions	
Summary	27
Table 12 Commercial Water Use Assumed in Rate Calculations	29
Table 13 Projected Costs and Distribution between Collection and Treatment	
System	32
Table 14 Unit Cost Determination	
Table 15 Allocation of Costs to Flow by Customer Category	34
Table 16 Detailed Sewer Rate Calculation	
LIST OF FIGURES	
Figure 1 Location	7
Figure 2 District Service Area Boundaries	
Figure 3 WWTP Project Components	



Introduction and Project Overview October 3, 2016

1.0 INTRODUCTION AND PROJECT OVERVIEW

1.1 INTRODUCTION

The San Andreas Sanitary District (District) has recently completed an update to their Wastewater Facilities Master Plan and developed a Collection System Master Plan. These plans identified a series of projects to improve the long-term reliability for the District to provide lawful sewer service to existing residences and businesses.

The District provides sewer service to approximately 939 customers, of which, approximately 80 percent are residential accounts and 20 percent are commercial business customers.

The District is currently planning improvements to the Wastewater Treatment Plant (WWTP) estimated to cost \$5.55 million. This rate analysis evaluates the revenue capacity of the wastewater fund to pay for the proposed Project as well as projected operating and maintenance costs going forward. Results of the analysis project sewer rates for a five-year period. Separate from this rate study, the District has developed, or is in the process of developing the technical reports necessary to support an application for assistance from the State Water Board.

The District is applying for a Clean Water State Revolving Fund (CWSRF) small communities grant to fund the proposed Project. Due to the District's size and financially "Disadvantaged Status" it is assumed that approximately 75% of Project costs will be grant funded by CWSRF (per 2016 Intended Use Plan). The District is currently working on a CWSRF application for design and construction funding. The proposed Project includes the following improvements include: replacement of the 60-year old anaerobic digester with a new aerobic digester; a new headworks (including electrical and control upgrades); irrigation pump station upgrades (including electrical and control upgrades); increase Pond D volume to 7.2 Mgal; modification to Ponds B and C; and aeration improvements.

The District is also applying for a United States Department of Agriculture (USDA) Rural Development (RD) loan and grant for further financial support of the proposed Project. If USDA RD confirms available funding for the proposed Project, the District may be eligible for an additional grant of approximately 12.5% of the proposed Project cost. The remaining costs would then be financed with a USDA loan to be repaid over 40 years.

As part of the SRF and USDA loan/grant applications, the District must submit financial documents and an analysis of its current revenues and expenses to determine if rates/charges need to be increased to repay the loan portion of the Project financing as well as existing, debt service and provide sufficient revenues to operate and maintain the District's infrastructure.



Introduction and Project Overview October 3, 2016

1.2 PURPOSE OF THE STUDY

The purpose of this study is to provide an explanation of and justification for the calculated sewer rates for the District. Rates have been calculated for the fiscal years 2017-18 through 2021-22. The rates have been calculated in accordance with the requirements of Article XIIID et. seq. of the California Constitution, commonly known as Proposition 218, which mandates that the fee or charge imposed be commensurate with the benefit received by those paying the fee.

1.3 SUMMARY OF FINDINGS

The following describes some of the major findings regarding the financial analysis.

- Increase in Rates Projected: The current monthly rate per equivalent dwelling unit (EDU) is \$69.00 for residential and commercial customers with commercial fee escalators based on potable water use. The District recently increased the rates to this level in 2015. Despite this adjustment, due to water conservation efforts, expected revenues from commercial users fell from the previous year when rates were \$62.00 per month. The financial review analysis shows that the District has had positive net revenues until 2010-11, but since 2011-12, net revenues have been negative. The District had a net revenue loss after deprecation for 2015-16 of \$360,865, which represents five consecutive years of negative net revenues or losses. Therefore, the District has determined it will need to change the commercial rate structure to fund existing operations as well as provide funding for the loan component of the proposed Project.
- Proposed Changes to Rate Structure to allow for both Wastewater Flow and Strength:

 Currently the rate structure employed by the District focuses only on wastewater flow and does not take into consideration strength (as measured by biochemical oxygen demand (BOD) and suspended solids (SS)). While this is not uncommon for small communities, rates are generally more equitable when both flow and influent strength are considered. Therefore, it is recommended that the District account for both flow and strength in allocating costs via rates. To simplify the methodology but still account for both flow and strength impacts on treatment and disposal, it is proposed that the District consolidate commercial categories into 7 groups (residential categories remain unchanged) as follows:

Group 1: Low Strength/Low Flow

Group 2: Medium Strength/Low Flow

Group 3: Medium Strength/Medium Flow

Group 4: Medium Strength/High Flow

Group 5: High Strength/Low Flow

Group 6: High Strength/High Flow

Group 7: Schools



Introduction and Project Overview October 3, 2016

Commercial accounts have been aggregated into groups based on similarity of wastewater characteristics. For example, Group 1, which is low strength and flow, is generally the type of business with little or no food preparation facilities, perhaps just a toilet or washing facility, such as retail stores and offices.

• Level of Annual CIP Costs and Set-Asides (aka Depreciation): Per the Districts audited financial statements, depreciation (which is the general financial mechanism that public agencies employ to set aside monies to replace capital infrastructure as it deteriorates) is estimated at approximately \$563,000 per year. However, the current rates do not provide sufficient revenues to fully fund depreciation.

This preliminary rate analysis does not include the full allocation of recommended (audited) depreciation in the cost estimates. To include depreciation, which is referred to as "General Operating Reserves and Equipment/Fleet/Capital Replacement" in this analysis, would require significantly higher rate increases.

This analysis assumes approximately \$56,000 in Equipment/Fleet/Capital Replacement in 2017-18 and is gradually reduced to zero by year 2021-22. The analysis also includes approximately \$20,000 in annual General Operating Reserves escalated at 1.5% and gradually increased to 3.0% in the final year. This rate projection funds depreciation (General Operating Reserves and Equipment/Fleet/Capital Replacement) by approximately \$52,000 a year normalized over the five-year period.

- Funding for the Wastewater Treatment Facility (WWTF) Capital Improvement Project: The Project will provide necessary upgrades to improve wastewater long-term reliability for existing wastewater customers. The project cost is currently estimated at \$5.55 million and is anticipated to be completed in FY 2019-20. The District plans to borrow monies from State and/or Federal lenders that offer low interest loans and grants for wastewater capital improvement projects.
- Specific Allowance for future Collection System Projects or other potential Master Planning Efforts: The preliminary rates analysis does include \$73,000 in Annual Collection System Replacement funds for projects resulting from the need to replace or repair the existing Collection System. This number has been selected as a result of the District's review of the recent master plan evaluation that included an assessment of system needs.
- **No Additional Costs assumed for Increased District Staffing:** This analysis also does not include any assumptions for increased staffing, other than the assumed 1.5 3.0% increase in general and administrative expenses annually.



Introduction and Project Overview October 3, 2016

1.4 ORGANIZATION OF THE STUDY

This study is divided into seven sections. Following this introduction, Section 2 provides an overview of the District including location and the current customer base. Section 3 provides a summary of the proposed Project and overview of project cost. Section 4 details the projected annual revenue requirements in a five-year financial plan, which serves as the basis for the rate calculations. Section 5 provides information on customer wastewater characteristics. Section 6 provides the rate analysis and rate calculations for the District. Section 7 includes the findings and recommendations of the analysis.



Table 1 Rate Summary - Current vs. Calculated Monthly Rates



	Existing Rate Charge	2017-18	2018-19	Calculated 2019-20	2020-21	2021-22	
	Nate Charge	2017-10	2010-19	2019-20	2020-21	2021-22	
Residential							
Step 1: Baseline O&M		\$59.86	\$60.68	\$62.64	\$65.24		per unit
Step 2: Capital & Reserves		\$6.64	\$6.04	\$5.75	\$5.09		per unit
Step 3: WWTP Improvements Project		\$0.00	\$0.78	\$2.61	\$3.41		per unit
Subtotal	\$69.00	\$66.50	\$67.50	\$71.00	\$73.73	\$76.24	
Commercial [1]							
Group 1 - Fixed, Monthly Charge							
Step 1: Baseline O&M		\$64.33	\$65.21	\$67.31	\$70.10	\$73.68	per Account
Step 2: Capital & Reserves		\$7.16	\$6.52	\$6.20	\$5.48	\$4.56	per Account
Step 3: WWTP Improvements Project		\$0.00	\$0.84	\$2.81	\$3.68	\$3.71	per Account
Subtotal		\$71.49	\$72.57	\$76.32	\$79.27	\$81.95	
Variable Charge per 1000 Gal		\$4.44	\$4.50	\$4.74	\$4.92	\$5.09	per 1000 Gal
Group 2 - Fixed, Monthly Charge							
Step 1: Baseline O&M		\$81.77	\$82.89	\$85.54	\$89.07	\$93.59	per Account
Step 2: Capital & Reserves		\$9.39	\$8.54	\$8.13	\$7.19		per Account
Step 3: WWTP Improvements Project		\$0.00	\$1.10	\$3.69	\$4.82	\$4.87	per Account
Subtotal		\$91.16	\$92.53	\$97.36	\$101.08	\$104.44	•
Variable Charge per 1000 Gal		\$5.20	\$5.28	\$5.55	\$5.77	\$5.96	per 1000 Gal
Group 3 - Fixed, Monthly Charge							
Step 1: Baseline O&M		\$345.34	\$350.06	\$361.25	\$376.17	\$395.24	per Account
Step 2: Capital & Reserves		\$39.72	\$36.14	\$34.38	\$30.40		per Account
Step 3: WWTP Improvements Project		\$0.00	\$4.64	\$15.60	\$20.40		per Account
Subtotal		\$385.06	\$390.84	\$411.24	\$426.97	\$441.14	p
Variable Charge per 1000 Gal		\$5.25	\$5.33	\$5.60	\$5.82	\$6.01	per 1000 Gal
Group 4 - Fixed, Monthly Charge							
Step 1: Baseline O&M		\$1,167.76	\$1,183.69	\$1,221.53	\$1,271.93	¢1 336 38	per Account
Step 2: Capital & Reserves		\$1,107.70	\$122.60	\$116.62	\$103.14		per Account
Step 3: WWTP Improvements Project		\$0.00	\$15.74	\$52.94	\$69.21	\$69.87	•
Subtotal		\$1,302.51	\$1,322.02	\$1,391.08	\$1,444.28	\$1,492.08	poi 7toccunt
Variable Charge per 1000 Gal		\$5.34	\$5.42	\$5.71	\$5.93		per 1000 Gal
Group 5 - Fixed, Monthly Charge		,	, ,		,	•	
Step 1: Baseline O&M		\$177.24	\$179.65	\$185.36	\$192.96	\$202.69	per Account
Step 2: Capital & Reserves		\$21.14	\$19.24	\$18.30	\$16.18		per Account
Step 3: WWTP Improvements Project		\$0.00	\$2.47	\$8.31	\$10.86		per Account
Subtotal		\$198.39	\$201.35	\$211.96	\$220.00	\$227.11	per Account
Variable Charge per 1000 Gal		\$6.64	\$6.74	\$7.09	\$7.36		per 1000 Gal
Croup & Fixed Monthly Charge							
Group 6 - Fixed, Monthly Charge Step 1: Baseline O&M		\$3,786.28	\$3,837.78	\$3,960.07	\$4,122.95	¢/ 331 23	per Account
Step 1: Baseline Oalvi Step 2: Capital & Reserves		\$3,760.26 \$445.07	\$3,637.76 \$404.91	\$3,960.07 \$385.16	\$340.64		per Account
Step 2: Capital & Reserves Step 3: WWTP Improvements Project		\$0.00	\$51.98	\$174.84	\$228.59	\$230.77	
Subtotal		\$4,231.34	\$4,294.67	\$4,520.07	\$4,692.18	\$4,845.48	poi Account
Variable Charge per 1000 Gal		\$5.99	\$6.08	\$6.40	\$6.64		per 1000 Gal
Group 7 - Fixed, Monthly Charge							
Step 1: Baseline O&M		\$1,205.93	\$1,222.40	\$1,261.51	\$1,313.61	\$1,380,23	per Account
Step 2: Capital & Reserves		\$138.41	\$125.92	\$119.78	\$105.93		per Account
Step 3: WWTP Improvements Project		\$0.00	\$16.16	\$54.37	\$71.09		per Account
Subtotal		\$1,344.33	\$1,364.48	\$1,435.66	\$1,490.63	\$1,540.15	F 2. 7.000 dill
Variable Charge per 1000 Gal		\$5.18	\$5.26	\$5.53	\$5.75		per 1000 Gal
variable Orlarge per 1000 Gar		ψυ. 10	ψ5.20	ψυ.υυ	ψυ. τ υ	ψ3.54	poi 1000 Gai

[1] Groups are defined as follows:

Group 1: Low Strength/Low Flow (Retail, Offices, Beauty Shop, Churches, Parks)

(Gas Stations, Markets, Auto Repair, Dr. Offices, Community Centers, Group 2: Medium Strength/Low Flow Restaurants, Car Wash, Lt Industrial, Motel, Government Services)

(Hotel, Medical Office Building, Laundromat, Retirement Home, Continuation &

Group 3: Medium Strength/Medium Flow Charter School)

Group 4: Medium Strength/High Flow Group 5: High Strength/Low Flow (Mortuary)

Group 6: High Strength/High Flow

Group 7: Schools

(Mixed-Use, Government Centers)

(Hospitals) (Schools)

District Overview October 3, 2016

2.0 DISTRICT OVERVIEW

2.1.1 District Location

The District is located in Calaveras County, California, and provides wastewater collection, treatment and disposal services to the properties within the District boundaries in the community of San Andreas which is also the County seat. The proposed Project activities will be located at the District-owned properties located at 675 Gold Oak Road and 1275 Gold Strike Road. A vicinity map showing the location of the community of San Andreas is provided in **Figure 1**. **Figure 2** identifies the boundaries of the District, and the locations of the District WWTP.

2.1.2 San Andreas Residents

The total population for the greater San Andreas area per the 2010 US Census is 2,783 residents and 1,146 total households. According to the 2010-2014 American Community Survey (ACS) the median household income (MHI) was estimated at \$40,613 which is approximately 66% of the California state MHI of \$61,489. This meets the CA CWSRF criteria of a "Disadvantaged Community."

2.1.3 Customer Summary and Rate Structure

The District currently charges residential customers \$69.00 per unit per month. Based on current billing practices, there are approximately 675 single family residential accounts and 75 multifamily units for a total of 750 residential accounts. There are currently approximately 153 commercial accounts in the District. The commercial accounts pay a flat monthly sewer service and collection charge of \$69.00 per month for an average monthly water consumption of less than 5400 gallons per month. Commercial users whose average monthly water consumption is greater than 5400 gallons pay a base charge plus a proportionate charge using the following formula:

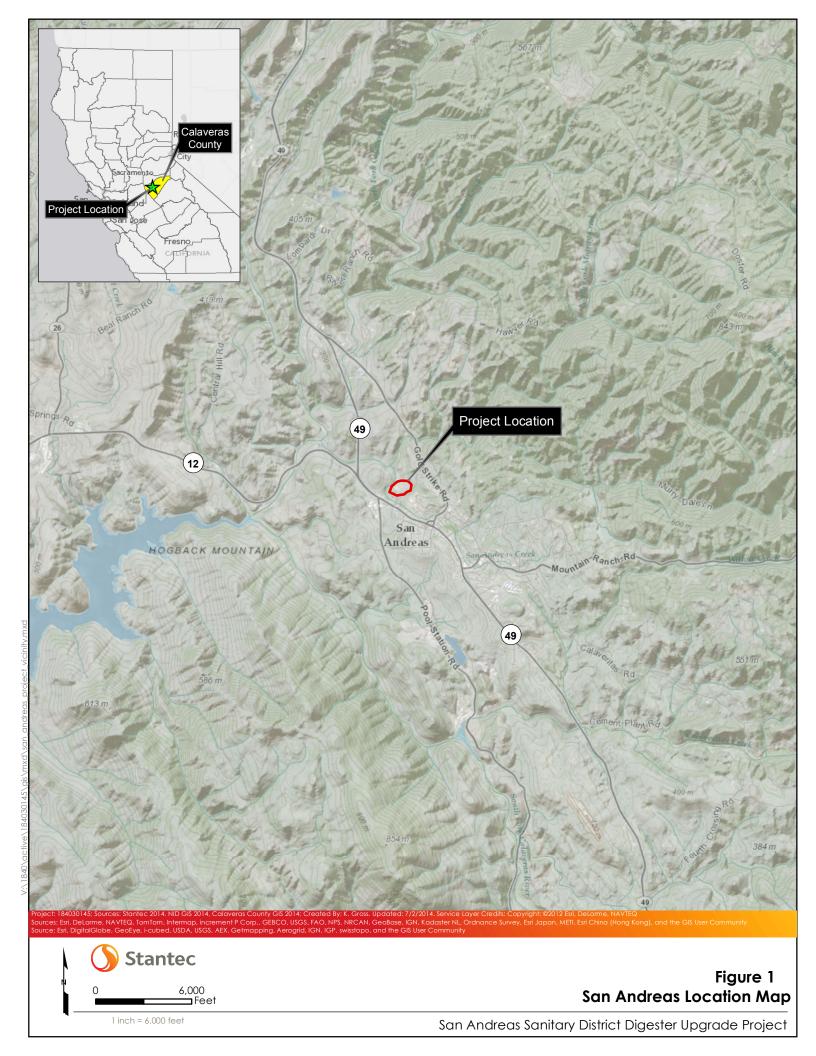
Basic Monthly Sewer		The Flat Rate		Average Monthly		Monthly
service and	=	Monthly	Х	water consumption	=	commercial
Collection charge		Commercial Charge		5400 gal per month		User charge

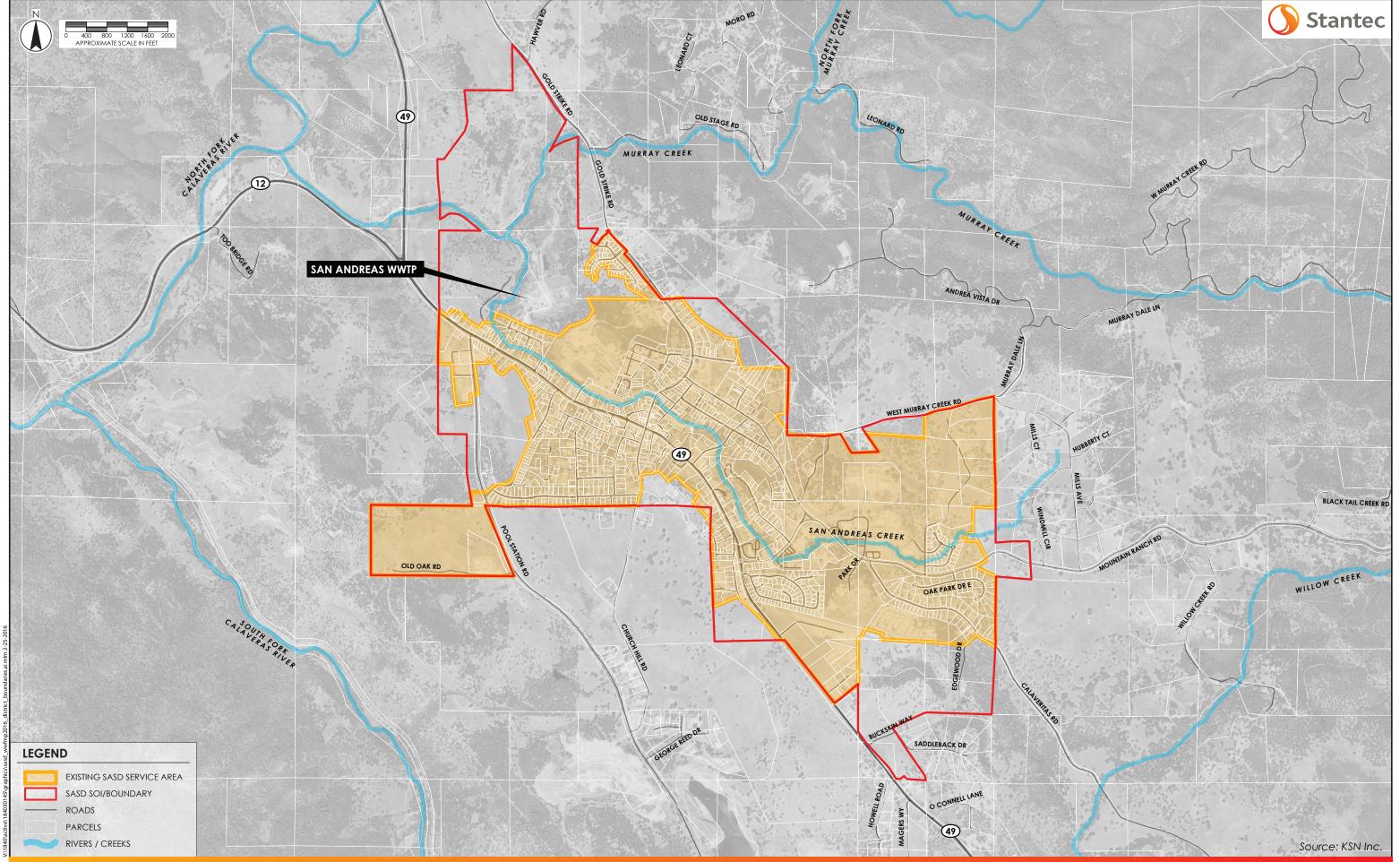
This is currently represented as:

\$69 * (1+ Monthly Water Use/5400 gal/month) = Monthly Commercial User Charge

Current commercial water use is determined based on winter water use for the months of November, December, January, for the prior year. The District calculates an average for the three-month period and then uses that to determine the fixed rate for each month (for each 12-month period beginning the following July).







Project Summary and Cost Overview October 3, 2016

3.0 PROJECT SUMMARY AND COST OVERVIEW

This section provides an overview of the proposed Project, including estimated project costs and financing assumptions. Table 2 provides the estimated cost for both annual Collection System costs and system wide one-time costs including proposed currently expected timing of these one-time costs.

3.1.1 Annual Collection System Costs

The District's Collection System Master Plan identifies annual costs to address collection system repair and replacement. The District's network of existing sewers serves all connections and conveys committed flows within the District boundary. This includes existing connections for unoccupied services and a single source flow agreement the District has to convey wastewater from Calaveras County Jail. As with all agencies, the District's assets are aging and must be replaced, ideally, before they exceed their useful life.

Additional studies/investigations are warranted in order to further isolate problem areas and maximize the benefit of existing users. This additional investigation will likely be accomplished through regular smoke testing and CCTV inspection.

3.1.2 Current Capital Improvement Project Description

Recommended projects related to modifying WWTP for the benefits of the existing users are summarized below; **Figure 3** shows the layout of existing treatment processes and those identified for upgrade on the WWTP site.

3.1.2.1 Replace the Existing Anaerobic Digester with a New Aerobic Digester

Project components include the construction of an aerobic digester to digest the sludge from the primary clarifier as well as the WAS from the new (2009/10) activated sludge, extended aeration process. The existing anaerobic digester would be decommissioned. The aerobic digester would consist of two concrete basins. A mixture of primary sludge and WAS would be continuously fed to the aerobic digester where sludge would be digested under aerobic conditions. Aeration blowers and diffusers would be provided to maintain oxygen needed for aerobic degradation of sludge.

It is proposed that this project provide the new aerobic digester described in the project Engineering Report for the San Andreas Sanitary District Digester Upgrade dated February 20, 2015 and previously submitted to the DFA and USDA RD, with an estimated cost of \$2.5 Million.



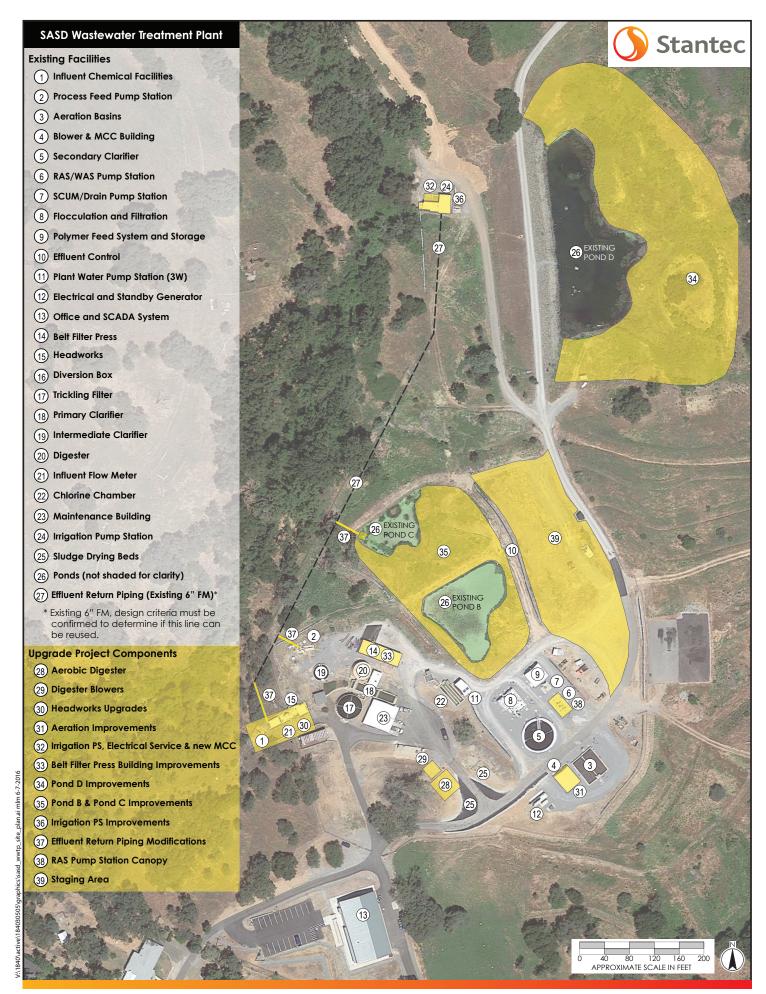
Table 2 Sewer Rate Study



	Fiscal Year												
	Duningt						0	1	2	3	4	5	
Ranking	Project	Droinet Dhane					16/17	17/10	10/10	19/20	20/21	24/22	Total
	Description System - Semi A	Project Phase					10/17	17/18	18/19	19/20	20/21	21/22	TOTAL
1	CCTV Inspection			Annual				\$18,000		\$18,000		\$18,000	
2	Smoke Testing	•		Annual				\$5,000		\$5,000		\$5,000	
3	Collection System	m Replacement		Annual				ψο,σσσ	\$150,000	ψ0,000	\$150,000	φο,σσσ	
-		ual Costs - Ongoing					\$0	\$23,000	\$150,000	\$23,000	\$150,000	\$23,000	\$369,00
							0	1	2	3	4	5	
Ranking	Project Description	Project Phase	Funding	Completion	Tota	al Project Cost*	16/17	17/18	18/19	19/20	20/21	21/22	
	ide - One-time Pro												
1	Aprobio Digoster		SRF/USDA			¢2 500 000							
1	Aerobic Digester	Engineering Report	SKF/USDA	complete	\$0	\$2,500,000	\$0						
		Environmental		complete	\$0 \$0		\$0 \$0						
		Design		2017-18	\$172,000		\$86,000	\$86,000					
		Construction		2017-10	\$2,328,000		Ψ00,000	\$582,000	\$1,164,000	\$582,000			
		Constituction		2010-19	\$2,500,000			ψ302,000	φ1,104,000	ψ302,000			
2	Headworks		SRF/USDA		\$2,000,000	\$1,170,000							
		Planning		complete	\$0		\$0						
		Design		2017-18	\$97,000		\$48,500	\$48,500					
		Construction		2018-19	\$1,073,000			\$268,250	\$536,500	\$268,250			
					\$1,170,000								
3	Pump Station Up	ograde (Irrigation)	SRF/USDA			\$1,200,000							
		Planning		complete	\$0		\$0						
		Design		2017-18	\$100,000		\$50,000	\$50,000					
		Construction		2018-19	\$1,100,000			\$275,000	\$550,000	\$275,000			
		15 15 (50 14 1)	005/11004		\$1,200,000	*							
4	Improve and Exp	pand Pond D (7.2 Mgal)	SRF/USDA	0040.47	000 000	\$370,000	400.000						
		Planning		2016-17	\$80,000		\$80,000	405.000					
		Design		2017-18	\$25,000			\$25,000	0400 500	***			
		Improvement Construction		2018-19	\$265,000			\$66,250	\$132,500	\$66,250			
5	Pond B&C Impro	ovements	SRF/USDA		\$370,000	\$190,000							
	r ond Bao impro	Planning	0111700271	complete	\$0	Ψ100,000	\$0						
		Design		2016-17	\$16,000		\$16,000						
		Construction		2018-19	\$174,000		, ,,,,,,,	\$43,500	\$87,000	\$43,500			
					\$190,000			, ,,,,,,,	, - ,	, ,,,,,,			
6	Aeration System	Improvements	SRF/USDA			\$120,000							
		Planning		complete	\$0								
		Design		2017-18	\$20,000		\$20,000						
		Construction		2018-19	\$100,000			\$25,000	\$50,000	\$25,000			
					\$120,000								
	Total One-time	Coete				\$5,550,000	\$300,500	\$1,469,500	\$2,520,000	\$1,260,000	\$0	\$0	\$5,550,00
	i otai One-time	CUSIS				 \$5,550,000	 \$300,500	φ1,409,500	Ψ∠, 5∠U,UUU	φ 1,∠0U,UUU	ψU	φU	ა ნ,ნნს,ს

^{*} Construction costs include Contingency and Engineering Services during construction

Total Annual and One-time Capital Improvement Costs	\$5,919,000
Total Semi-Annual Costs - Ongoing	\$369,000
Total Project Costs to be Funded	\$5.550.000



Figure

Project Summary and Cost Overview October 3, 2016

3.1.2.2 Replace the 60-Year Old Headworks

The existing Headworks is nearing the end of its useful life and needs to be replaced. This project was not included in the 2010 Phase A - WWTP upgrade project for economic reasons. Basic issues with the existing headworks are:

- 1. The 60-year-old concrete is deteriorating (hydrogen sulfide in raw sewage forms sulfuric acid, which attacks concrete).
- 2. The influent sewer pipe was up-sized years ago, and for economic reasons, the bottom of the new, larger pipe was placed below the floor of the headworks structure. This "step up" from the bottom of the sewer pipe into the bottom of the headworks accumulates debris and limits the capacity of the influent sewer.
- 3. The headworks was designed to be a "pass through" structure. However, as the WWTP has evolved over time, this "pass through" structure must, now, function as an influent flow splitting structure between the trickling filter, activated sludge process, and HFTS (High Flow Treatment System).

The existing headworks should be replaced to address the problems identified, and to automate the influent flow splitting function of the headworks. An opinion of probable cost to replace the headworks is approximately \$1.17 million. The new headworks would include the following specific features and functions:

- Hydraulic improvements to improve flow characteristics (align influent trunk sewer invert with headworks structure invert)
- Automation of influent flow splitting functions
- New mechanical influent screen
- New electrical service and motor control center (MCC)

3.1.2.3 Irrigation Pump Station

The irrigation pump provides a critical effluent disposal function and is in need of upgrades to continue this function effectively and reliably.

Upgrading the pumps in the existing pump station would improve irrigation pumping capabilities to the Dedicated Land Disposal Area (DLDA) and provide additional capacity for expansion of the DLDA area. Pump upgrades will also improve pumping capabilities to return secondary effluent to the WWTP headworks from Pond D. This would provide increased operational flexibility for the facility overall, providing the ability to retreat stored effluent at the WWTP if necessary.



Project Summary and Cost Overview October 3, 2016

The cost to upgrade the pumping capacity to return effluent from pond D to the WWTP headworks is estimated to be approximately \$420,000. The cost to improve the pumping capacity to the DLDA is estimated to be approximately \$550,000. The cost to improve the electrical instrumentation and controls, including the existing MCC is \$230,000. The total combined cost of these irrigation pump station improvements is estimated at approximately \$1,200,000.

3.1.2.4 Increase Pond D to a Volume of 7.2 Mgal

Based on the District Engineer's revised water balances, the capacity of Pond D needs to be increased from its current capacity of 4.3 Mgal to 7.2 Mgal to serve the needs of the District's existing constituency through 100-year rainfall conditions, and thereby avoid a repeat of the overtopping event that occurred in December 2014. This increase in storage volume capacity will be achieved through a four-step process:

- Improving drainage around Pond D to divert storm water away from Pond D
 A portion of the slope above Pond D to the north currently drains into the pond.
 Improvements upslope of Pond D could be made to capture and route surface storm water runoff from this area abound Pond D. Such improvements could include construction of a drainage ditch or installation of a portable drainage pumping system to divert drainage around Pond D to San Andreas Creek.
- 2. Increasing the spillway level to the two feet of permitted freeboard elevation, thereby increasing the storage volume
 - The existing overflow structure weir is located approximately three feet below the lowest elevation of the top of the dam (spillway crest). The current permit requires the District to maintain at least two feet of freeboard from the lowest point of overflow (spillway crest). Based on this, the maximum permitted water surface elevation could be increased by one foot. This is based on maintaining a minimum elevation difference from the overflow structure weir to the lowest elevation point on the top of the dam of at least two feet.
- 3. Negotiating revised permit conditions to allow freeboard to be less than two feet

 The District Engineer proposes to revise the 2014 permit (Order No. R5-2014-0104) to allow operation of Pond D with only one foot of freeboard (the 2014 permit requires two feet of freeboard). Along with minor modification of the dam spillway, this revision will increase the effective storage volume of Pond D from 4.3 Mgal to 6.1 Mgal. This revision requires various submittals to regulatory agencies, and is estimated to have a total planning cost of approximately \$80,000. This project has no significant annual cost, thereafter, associated with it. This should be a "one time" expense.



Project Summary and Cost Overview October 3, 2016

4. Excavate Within Pond D

Pond D is underlain by soil and soil/rock as characterized by Crawford & Associates, Inc. in their April 13, 2015 Geotechnical Report. The depth of the excavatable soil is from 1.5 to 3 feet below the land surface. Based on seismic refraction surveys, as correlated to test pit surveys, Crawford & Associates estimates that excavation of the soil and underlying weathered rock with typical grading equipment would be limited to 2 ½ to 6 feet below the existing ground surface. Assuming that an average depth of about 3 feet could be excavated within Pond D, the estimated volume increase from this activity could be approximately 1.1 Mgal.

If the Pond D overflow weir structure elevation (and reduction of minimum permitted freeboard) can be implemented as described above, the combined total permitted volume of Pond D with the excavation work can result in a total volume of 7.2 Mgal.

3.1.2.5 Modify Ponds B and C

Ponds B and C were part of the pre-2010 WWTP and have limited usefulness as currently configured and permitted for use in the 2014 permit. These ponds receive stormwater runoff, and therefore can overflow to San Andreas Creek. Because they can overflow, they cannot be used in any way that may leave significant contaminants, solids, or pathogens of wastewater origins in these ponds.

The plant currently does not have an emergency storage basin. Re-purposing ponds B and C for maintenance purposes (to receive plant drains or emergency overflow) would greatly improve the plant operational flexibility. Possible modifications to Ponds B and C include:

- 1. Route stormwater runoff around these ponds
- 2. Install return pumping and piping to allow ponds to be drained after use

An opinion of probable project cost to complete these modifications is approximately \$190,000. Having these ponds available to receive effluent or partially treated wastewater would simplify maintenance operations and is expected to reduce annual O&M costs.

3.1.2.6 Aeration Improvements

Based on 5 years of experience with the Phase A - WWTP trickling filter/activated sludge process under a wide range of climate and wastewater conditions, it is apparent that the there is a broad range of air requirements for the activated sludge system.



Project Summary and Cost Overview October 3, 2016

There are three existing positive displacement (PD) blowers; one blower dedicated to each of the two aeration basins and the third blower providing redundancy. This practice wastes aeration energy and incurs unnecessary wear on the blowers by delivering more air than required. The proposed Project will construct piping modifications to allow one blower to supply air to both aeration basins, halving the air flow to each.

An opinion of probable cost to complete these modifications is approximately \$120,000.

3.1.3 Estimated Project Cost & Funding Sources

The District is considering upgrades to the WWTP to replace critical aging facilities and equipment, improve efficiencies and operational flexibility. The combined estimated cost of the proposed Project is approximately \$5.55 million. Because of the District's status as a "disadvantaged community" under the State Water Board DFA financial assistance program policy, the District is likely to qualify for approximately \$4.16 million in "principal forgiveness" or grant funding. The grant assumptions are based on the existing sewer rates being above the CWSRF threshold 1.5% of community median household income (MHI) (which they currently are). In addition, due to the District's existing sewer residential rate being above 2%, the District may qualify for up to 100% principal forgiveness/grant funding as determined by the State Water Board.

It is estimated that after accounting for 75% grant funding the District would need to finance approximately \$1.09 million in project costs with the CWSRF Program, or USDA-RD program.

The District is also pursuing an additional 12.5% in grant funds from USDA-RD. This amount could potentially be more or less depending on available grant funds.

Table 3 and 4shows the Capital Improvement Project cost allocations using a conservative breakdown of the potential funding sources (CWSRF only) for the District to construct the proposed Project cost estimated at approximately \$5.55 million.

3.1.4 Financing Assumptions & Debt Service Calculations

Table 5 shows a summary of the financing assumptions for the estimated \$1.09 million CWSRF construction loan for the proposed Project. CWSRF's current interest rate is 1.70%, however, due to construction starting in 2017/18 a more conservative 1.90% interest rate was assumed with a 30-year duration. The estimated debt service for a CWSRF loan for the Project is approximately \$48,000 per year, based on the foregoing assumptions.

It is anticipated that the District will finance the project through either the CWSRF program or a combination of CWSRF and USDA RD financing. During conversations and research with the two funding agencies it was determined to be of greater benefit to work with conservative grant and loan assumptions until USDA-RD can provide a letter confirming their funding intent. If the USDA-RD 2.25% interest rate and a longer 40-year term were assumed, this would result in a lower loan and debt service.



Table 3
San Andreas Sanitary District
Capital Improvement Project Cost Allocations

Item	
Total Capital Improvement Costs to be Funded	\$5,550,000
Planning/Design/Construction	\$5,550,000
Grant Assumptions (CWSRF) Grant Assumptions (USDA) Applicant's (SASD) Share Costs to be Financed	\$4,162,500 \$0 \$300,000 \$1,087,500



Table 4
WWTP Improvements Project
Estimated Project Cost & Funding Source



	Plannin	ıg (2012-16)			Constructio	on (2017-18 and afte	r)	
	Loan	Grant	Loan	CWSRF Grant	Applicant's	USDA	Total, \$	Total, \$
	Share, \$	Share, \$	Share, \$	Share, \$	Share, \$	Grants, \$		Financed
A. Facilities Construction	\$0	\$0	\$617,500	\$2,752,500	\$300,000	\$ -	\$3,670,000	\$617,500
B. Facilities Planning	\$0	\$500,000	\$20,000	\$60,000	\$0		\$80,000	\$20,000
C. Facilities Design	\$0	\$0	\$107,500	\$322,500	\$0		\$430,000	\$107,500
D. Administrative and Legal	\$0	\$0	\$0	\$0	\$0		\$0	\$0
E. Land and Right-of-Way	\$0	\$0	\$0	\$0	\$0		\$0	\$0
F. Prime Engineering	\$0	\$0	\$0	\$0	\$0		\$0	\$0
G. Contingencies	\$0	\$0	\$235,000	\$705,000	\$0		\$940,000	\$235,000
H. Relocation Payments	\$0	\$0	\$0	\$0	\$0		\$0	\$0
I. Engineering Services During Construction	\$0	\$0	\$107,500	\$322,500	\$0		\$430,000	\$107,500
J. Other Costs	\$0	\$0	\$0	\$0	\$0		\$0	\$0
I. Other Costs	\$0	\$0	\$0	\$0	\$0		\$0	\$0
L. Total Capital Costs M. Additional Cash Flow Needs	\$0	\$500,000	\$1,087,500	\$4,162,500	\$300,000	\$0	\$5,550,000	\$1,087,500
N. Total Funding Requirements	\$0	\$500,000	\$1,087,500	\$4,162,500	\$300,000	\$0	\$5,550,000	\$1,087,500

Table 5
San Andreas Sanitary District
WWTP Improvements Project Financing
Assumptions & Debt Service Calculation

Item	Construction, Financed
Project Cost	\$5,550,000
Net Amount Financed	\$1,087,500
Issuance Costs Capitalized Interest Debt Service Reserve Fund	\$0 \$0 \$0
Rounding Amount	\$0
Total Bond/Loan Amount	\$1,087,500
Calculated Debt Service Annual Debt Service - Rounded	\$47,892 \$48,000
Assumptions	
Interest Rate Term Bond/Loan Factor	1.90% 30 years 1.000



Revenue Requirements and Financial Plan October 3, 2016

4.0 REVENUE REQUIREMENTS AND FINANCIAL PLAN

A review of District revenue requirements is a key step in the rate analysis process. The review involves an analysis of current and historical operating revenues and expenses. This section of the report also provides a discussion of projected revenues and expenses.

4.1 Historical Revenue and Expenses

Table 6 provides a summary of the District's historical and budgeted revenues and expenses. Revenues include sewer sales, property tax, interest income and miscellaneous revenues. Operating expenses include operation and maintenance (O&M) costs, capital costs including debt service, depreciation and transfers.

4.2 Projected Revenue Requirement

Table 7 shows the projected revenue requirement from sewer account charges for fiscal years (FY) 2017/18 through 2021-22. The revenue requirement adjusts projected expenses for other non-sewer account charges related revenues (other revenue sources), such as property tax, income and interest. The annual revenue requirement for all Steps (as defined in the following discussion) in FY 2017-18 is approximately \$1.57 million and is projected to increase to \$1.71 million by FY 2021-22.

The analysis is broken into three steps to show the relative impact of needed increases in general operations and maintenance of the District or current costs (Step 1), general reserves and annual sanitary sewer cost including replacement (Step 2), and costs related to the currently proposed WWTP Project (Step 3).

The projected expenses are broken out into the following categories:

- o **Step 1- Baseline O&M**: Step 1 is intended to reflect the existing operations and maintenance expenses and debt service obligations of the sewer fund. The fiscal year 20115-16 draft financials serve as the basis for the expense projections for FY 17-16 through FY 2021-22. For FY 17-18, these costs total approximately \$1.42 million.
- o **Step 2 -Reserves & Replacement**: Step 2 sanitary sewer annual costs are shown in Table 2. These costs are intended to reflect annual costs that may be necessary for repair and replacement of the District's equipment and collections system. The Equipment/ Fleet/Capital replacement would be applied toward depreciation, when specific annual expenditures for this expense category are not identified. This step also includes approximately \$20,300 to \$22,188in an allowance for general operating reserve. This would be the net revenue expected to be earned each year.
- o **Step 3- Construction Project:** Step 3 costs are those costs associated with the currently proposed WWTP Improvement Project. Table 2 shows the engineer's preliminary project cost estimate (\$5.55 million, including contingency). Step 3 costs also include additional operation and maintenance costs due to the project, which are estimated at approximately \$24,000 in FY 2019-20. A ten percent debt service reserve is also included in Step 3 typically required by the funding agencies. This ten percent reserve is a requirement of the State Water Board DFA to secure financial assistance.



Table 6 Sewer Rate Study Summary of Historical Revenue and Expenses [1]



		Audit	ed			Draft
	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
Operating Revenue						
Sewer service charges	\$1,405,017	\$1,385,760	\$1,517,871	\$1,503,232	\$1,502,269	\$1,502,269
Connection Fees	\$327,631	\$12,644	\$0	\$1,000	\$0	\$3,000
Total Operating Revenues	\$1,732,648	\$1,398,404	\$1,517,871	\$1,504,232	\$1,502,269	\$1,505,269
Non-Operating Revenues						
Interest income	\$16,462	\$11,602	\$15,362	\$9,519	\$9,566	\$15,569
Rents and leases	\$1,640	\$1,640	\$1,640	\$1,640	\$1,640	\$1,640
In lieu taxes	\$577	\$557	\$508	\$527	\$560	\$476
Other	\$19	\$0	\$0	\$3,051	\$3,521	\$0 [2]
Jail Contract				\$8,559	\$9,522	\$9,522
Property tax	\$50,715	\$48,351	\$46,426	\$46,975	\$51,568	\$49,959
Total Non-Operating Revenues	\$69,413	\$62,150	\$63,936	\$70,271	\$76,377	\$77,166
Total Revenues	\$1,802,061	\$1,460,554	\$1,581,807	\$1,574,503	\$1,578,646	\$1,582,435
Expenses						
Plant, treatment and disposal						
Special Engineer Sewer Sys (43197)	\$50,000				\$0	\$0
Other Plant, treatment and disposal	\$843,924	\$1,385,760	\$592,120	\$487,748	\$765,710	\$755,642
Subtotal Plant, treatment and disposal	\$893,924	\$1,385,760	\$592,120	\$433,770	\$765,710	\$755,642
General and administrative	\$259,655	\$206,379	\$678,351	\$704,932	\$356,785	\$431,115
Annual Sanitary Sewer	\$0	\$0	\$40,599	\$1,860	\$0	\$0
Equipment/Fleet/Capital Replacement	\$0	\$0	\$0	\$0	\$0	\$0
Debt Service - Interest	\$74,808	\$80,744	\$72,688	\$71,202	\$69,558	\$68,721
Debt Service - Principal	\$6,347	\$120,745	\$120,449	\$121,950	\$123,563	\$125,187
Total Expenses	\$1,234,734	\$1,793,628	\$1,504,207	\$1,387,692	\$1,315,616	\$1,380,665
Net Revenues (Loss) before Depreciation	\$567,327	(\$333,074)	\$77,600	\$186,811	\$263,030	\$201,770
Depreciation	\$182,579	\$545,131	\$551,388	\$559,663	\$559,261	\$562,635
Net Revenues (Loss) after Deprecation	\$384,748	(\$878,205)	(\$473,788)	(\$372,852)	(\$296,231)	(\$360,865)
Grant reimbursement	\$0	\$0	\$0	\$53,978	\$98,462	\$282,363

^[1] Based on Audited Financial Statements for fiscal years ending in 2011, 2012, 2013, 2014, 2015, and 2016.

^[2] Actual other operating income for 2015-16 was \$17,322. Based on previous years this amount was not used in future projections

Table 7 San Andreas Sanitary District Summary of Projected Annual Revenue Requirement through FY 2020-21



		Projected			
-	2017-18	2018-19	2019-20	2020-21	2021-22
	1	2	3	4	5
Revenue Requirement					
STEP 1					
Expenses					
Plant, treatment and disposal					
Special Engineer Sewer Sys (43197)	\$0	\$0	\$0	\$0	\$0
Other Plant, treatment and disposal	\$778,481	\$790,158	\$817,931	\$854,940	\$902,276
Subtotal Plant, treatment and disposal	\$778,481	\$790,158	\$817,931	\$854,940	\$902,276
General and administrative	\$444,145	\$450,808	\$466,653	\$487,767	\$514,774
Other	\$0	\$0	\$0	\$0	\$0
Existing Debt Service (USDA & SRF)	\$194,718	\$194,749	\$194,754	\$194,733	\$194,686
Subtotal	\$638,864	\$645,557	\$661,407	\$682,500	\$709,460
Subtotal Step 1 Revenue Req.	\$1,417,345	\$1,435,715	\$1,479,338	\$1,537,440	\$1,611,736
STEP 2					
General Reserve Set Aside	\$20,300	\$20,605	\$21,017	\$21,542	\$22,188
Annual Sanitary Sewer	\$73,800	\$73,800	\$73,800	\$73,800	\$73,800
Equipment/Fleet/Capital Replacement	\$56,600	\$42,700	\$35,600	\$25,000	\$0
Subtotal	\$150,700	\$137,105	\$130,417	\$120,342	\$95,988
STEP 3					
New Debt Service	\$0	\$16,000	\$32,000	\$48,000	\$48,000
Debt Service Coverage	\$0	\$1,600	\$3,200	\$4,800	\$4,800
Additional Cost Related to Project	\$0	\$0	\$24,000	\$24,600	\$25,338
Subtotal	\$0	\$17,600	\$59,200	\$77,400	\$78,138
Subtotal Revenue Requirement	\$1,568,045	\$1,590,420	\$1,668,955	\$1,735,182	\$1,785,862
Less Other Revenue Sources					
Non-Operating Revenue	(\$77,166)	(\$77,166)	(\$77,166)	(\$77,166)	(\$77,166)
Revenue Requirement from Rate	\$1,490,879	\$1,513,254	\$1,591,789	\$1,658,016	\$1,708,696

Revenue Requirements and Financial Plan October 3, 2016

4.3 Projected Cash Flows

Table 8 shows the five-year projected cash flow for the District. The existing revenue from sewer charges (per the FY 2015-16 draft financials) is shown and then the additional revenue required (based on Table 7) that is needed for each subsequent fiscal year. The projected annual revenue requirements and corresponding rate calculations are directly related to the projected expenses of the District. Table 8 shows the projected expenses for fiscal years 2017-18 through 2021-22. The annual cost adjustment factors are also shown to range between 1.5 to 3.0 % for each cost category. This range accounts for the recent reduction in the US inflation rates by gradually increasing the cost adjustment to a standard 3.0% by 2021/22. Annual net revenues in FY 2017-18 are projected to be \$20,300 and increase to 22,188 in FY 2021-22. These funds will allow the District to maintain an operating fund balance over time. Table 9 shows five-year projected cash flows related to the CIP projects including annual costs as outlined in Table 2. The revenues are based on the revenue requirement shown in Table 7. The expenses are based on the CIP, Table 2. The revenue requirement, while taking into account the Table 2 need, has been normalized (averaged) over the five years in order to keep rates steady from 2017-18 through 2021-22.



Table 8 San Andreas Sanitary District Projected Cash Flow



	Cost	Draft		Projected			
	Factor	2015-16 [1]	2017-18	2018-19	2019-20	2021-21	2020-22
			1	2	3	4	5
Revenues							
Current Budgeted Sewer Service Charges		\$1,502,269	\$1,502,269	\$1,502,269	\$1,502,269	\$1,502,269	\$1,502,269
Additional Revenue Required:							
Year			(040.044)	(0.40, 0.4.4)	(040.044)	(040.044)	(040.044)
2016-17			(\$16,314)	(\$16,314)	(\$16,314)	(\$16,314)	(\$16,314)
2017-18			\$4,924	\$4,924	\$4,924	\$4,924	\$4,924
2018-19				\$22,375	\$22,375	\$22,375	\$22,375
2019-20					\$78,535	\$78,535	\$78,535
2020-21						\$66,227.09	\$66,227
2021-22 Subtotal		\$1,502,269	\$1,490,879	\$1,513,254	\$1,591,789	\$1,658,016	\$50,681 \$1,708,696
Cubicial		Ų 1,00 <u>2,20</u> 0	\$1,400,010	\$1,010,20 4	\$1,001,100	\$1,000,010	ψ1,100,000
Non-Operating Revenues							
Interest income		\$15,569	\$15,569	\$15,569	\$15,569	\$15,569	\$15,569
Rents and leases		\$1,640	\$1,640	\$1,640	\$1,640	\$1,640	\$1,640
In lieu taxes		\$476	\$476	\$476	\$476	\$476	\$476
Other		\$0	\$0	\$0	\$0	\$0	\$0
Jail Contract		\$9,522	\$9,522	\$9,522	\$9,522	\$9,522	\$9,522
Property tax		\$49,959	\$49,959	\$49,959	\$49,959	\$49,959	\$49,959
Total Non-Operating Revenues		\$77,166	\$77,166	\$77,166	\$77,166	\$77,166	\$77,166
Total Revenues		\$1,579,435	\$1,568,045	\$1,590,420	\$1,668,955	\$1,735,182	\$1,785,862
STEP 1							
Expenses							
Plant, treatment and disposal							
Special Engineer Sewer Sys (43197)		\$0	\$0	\$0	\$0	\$0	\$0
Other Plant, treatment and disposal	1.5% - 3.0%	\$755,642	\$778,481	\$790,158	\$817,931	\$854,940	\$902,276
Subtotal Plant, treatment and disposal		\$755,642	\$778,481	\$790,158	\$817,931	\$854,940	\$902,276
General and administrative	1.5% - 3.0%	\$431,115	\$444,145	\$450,808	\$466,653	\$487,767	\$514,774
Other		\$0	\$0	\$0	\$0	\$0	\$0
Existing Debt Service (USDA & SRF)		\$193,908	\$194,718	\$194,749	\$194,754	\$194,733	\$194,686
Subtotal Step 1		\$1,380,665	\$1,417,345	\$1,435,715	\$1,479,338	\$1,537,440	\$1,611,736
STEP 2 (Capitol Set-Asides)							
General Operating Reserve [2]		0	\$0	\$0	\$0	\$0	\$0
Annual Sanitary Sewer Costs		\$0	\$73,800	\$73,800	\$73,800	\$73,800	\$73,800
Equipment/Fleet/Capital Replacement		\$0	\$56,600	\$42,700	\$35,600	\$25,000	\$0
Subtotal Step 2		\$0	\$130,400	\$116,500	\$109,400	\$98,800	\$73,800
STEP 3 (New Project)							
WWTP Improvements: New Debt Service	2	\$0	\$0	\$16,000	\$32,000	\$48,000	\$48,000
New Debt Service Coverage	•	\$0	\$0	\$1,600	\$3,200	\$4,800	\$4,800
Additional Costs Related to Project	2.0% - 3.0%	\$0	\$0	\$0	\$24,000	\$24,600	\$25,338
Subtotal Step 3	2.070 0.070	\$0	\$0	\$17,600	\$59,200	\$77,400	\$78,138
Total Expense		\$1,380,665	\$1,547,745	\$1,569,815	\$1,647,938	\$1,713,640	\$1,763,674
Long							
Less Net Revenues		\$198,770	\$20,300	\$20,605	\$21,017	\$21,542	\$22,188
		,	,	,	. ,	. ,-	. ,
Total Debt Service		\$193,908	\$194,718	\$210,749	\$226,754	\$242,733	\$242,686
Net Revenues Before D/S and Capital Set-	Asides	\$198,770	\$345,418	\$349,454	\$384,371	\$392,475	\$368,812
Debt Service Coverage			1.77	1.66	1.70	1.62	1.52
Beginning Fund Balance		\$1,059,657	\$1,278,427	\$998,727	\$1,019,332	\$1,040,348	\$1,061,890
Net Revenues	1.5% - 3.0%	\$198,770	\$20,300	\$20,605	\$21,017	\$21,542	\$22,188
Project Contribution [3]			(\$300,000)				
Ending Fund Balance		\$1,258,427	\$998,727	\$1,019,332	\$1,040,348	\$1,061,890	\$1,084,078
Target Fund Balance [4]		\$345,166	\$386,936	\$392,454	\$411,984	\$428,410	\$440,918

^[1] Excludes depreciation

^[2] General Operating Reserve are the Net Revenues
[3] San Andreas Sanitary District contribution towards project financing, see table 4

^[4] Assumes 3 months of operating expenses before debt service and reserve funding.

Table 9
San Andreas Sanitary District
Projected CIP Cash Flow



	2017-18	2018-19	2019-20	2020-21	2021-22
	1	2	3	4	5
Revenues Transfer From Operating Fund					
Annual Sanitary Sewer Allocation Equipment/Fleet/Capital Replacement Debt Proceeds	\$73,800 \$56,600	\$73,800 \$42,700 \$1,087,500	\$73,800 \$35,600	\$73,800 \$25,000	\$73,800 \$0
Subtotal Revenues	\$130,400	\$1,204,000	\$109,400	\$98,800	\$73,800
Expenses					
Annual Repair & Replacement Major CIP Repair & Replacement [1]	\$0	\$23,000 \$1,087,500	\$150,000	\$23,000	\$150,000
Subtotal Expenses	\$0	\$1,110,500	\$150,000	\$23,000	\$150,000
Net Income/(Loss)	\$130,400	\$93,500	(\$40,600)	\$75,800	(\$76,200)
Beginning Balance [1]	\$530,687	\$661,087	\$754,587	\$713,987	\$789,787
Net Income/(Loss)	\$130,400	\$93,500	(\$40,600)	\$75,800	(\$76,200)
Ending Balance	\$661,087	\$754,587	\$713,987	\$789,787	\$713,587

^[1] Restricted cash and investments 2014-2015 audited financials

Wastewater Characteristics and Rates Analysis October 3, 2016

5.0 WASTEWATER CHARACTERISTICS AND RATES ANALYSIS

This section of the report describes the development of sewer rate calculations for the District based on new user classifications as described below.

5.1 Wastewater Customer Characteristics

Historically, the District rate structure has not accounted for strength as it was focused primarily on flow, which is not uncommon in small communities. However, strength is a significant component in the treatment of wastewater. Therefore, it is recommended that the District include both flow and strength in the rate structure. This will also tend to stabilize revenues from commercial charges over time, creating more fiscal certainty for the District.

Table 10 summarizes the wastewater customers, the number of units or accounts in each category, and their respective assumed wastewater characteristics in terms of flow and strength (BOD and SS). These characteristics are translated into estimated daily wastewater flow and strength contributions and then annual wastewater flow and strength contributions. This capacity is reflective of existing average flows and loadings. Total annual flow is estimated at approximately 96.13 million gallons.

Residential customers are all assumed to have wastewater flow and strength characteristics which are similar. Commercial users are defined in the District's ordinance, "as each separate business or commercial enterprise..." Commercial customers have been separated into seven groups as listed below and are further detailed, by group, in Table 11:

Group 1: Low Strength/Low Flow (Retail, Offices, Beauty Shop, Churches, Parks)

Group 2: Medium Strength/Low Flow (Gas Stations, Markets, Auto Repair, Dr. Offices, Community Centers,

Restaurants, Car Wash, Lt Industrial, Motel, Government Services),
Group 3: Medium Strength/High Flow (Hotel, Medical Office
Building, Laundromat, Retirement Home, Government Center,

Continuation & Charter School)

Group 4: Low Flow/High Strength (Mixed Use, and Government Centers)

Group 5: Low Flow/High Strength (Mortuary)
Group 6: High Strength/High Flow (Hospitals)
Group 7: Schools (Schools)

These groups reflect groups of customers with similar sewer flows and loads (based on District water data and industry averages for wastewater strength). Commercial users will continue to be charged a fixed rate, but this fixed charge will be based on the group into which they are categorized. The commercial user charge will also include a variable component with the rates varying by group. It is assumed that the variable rate will be charged based on annual water use by each account for the previous year. Ultimately, this should provide greater rate equity. For example, restaurants, with their heavy influent concentrations, are more costly to treat than business/retail, which typically have wastewater characteristics similar to single-family units.



Table 10 Summary of Wastewater User Characteristics



				Wastewater C	haracter	istics [1]	Existing Trea	atment Flow 8	& Loading	Ann	ual Flow & Lo	oading
Customer	Basis of	Accounts/	Units/	ADWF/EDU	BOD	SS	Flow	BOD	SS	Flow	BOD	SS
Category	Charge	Business	EDUs	GPD	MG/L	MG/L	MGD	Lbs/Day	Lbs/Day	MG	Lbs/Year	Lbs/Year
			(A)	(B)	(C)	(D)	(E)=(A)x(B)	(F)= (C)x(E)x8.34	(G)=(D)x(E)x8.34	(K)=(E)x365	(L)=(F)x(K)x8.34	(M)=(G)x(K)x8.34
Residential												
Single Family	per Unit	675	675	150	200	200	0.1013	169	169	36.96	61,643	61,643
Multi-Family	per Unit	75	481	150	200	200	0.0722	120	120	26.33	43,926	43,926
Capacity Maintenance	per Connection	2	13	150	200	200	0.0020	3	3	0.71	1,187	1,187
Subtotal	·	752	1,169				0.1754	292	292	64.00	106,757	106,757
Commercial [1]												
Group 1	per Business	100		227	210	210	0.0227	40	40	8.29	14,511	14,511
Group 2	per Business	69		247	328	328	0.0170	47	47	6.22	17,005	17,005
Group 3	per Business	10		1,034	335	335	0.0103	29	29	3.77	10,544	10,544
Group 4	per Business	3		3,434	350	350	0.0103	30	30	3.76	10,976	10,976
Group 5	per Business	1		421	550	550	0.0004	2	2	0.15	705	705
Group 6	per Business	2		9,950	450	450	0.0199	75	75	7.26	27,260	27,260
Group 7	per Business	2		3,655	325	325	0.0073	20	20	2.67	7,232	7,232
Subtotal		187					0.0880	242	242	32.13	88,234	88,234
Infiltration/Inflow												
TOTAL		939	1,169				0.2634	534	534	96.13	194,990	194,990

"user_characteristics"

[1] Groups are defined as follows:

Group 1: Low Strength/Low Flow Group 2: Medium Strength/Low Flow Group 3: Medium Strength/Medium Flow Group 4: Medium Strength/High Flow Group 5: High Strength/Low Flow Group 6: High Strength/High Flow

Group 7: Schools

Table 11 Commercial Customer and Wastewater Characteristic Assumptions Summary



	0	-	Average Annual Water Flow [1] [2]	Stren	gth [2]
	Sewer Code	Accounts	GPD	BOD - MG/L	SS - MG/L
Group 1 - Low Strength/Low Flow					
Retail	1.1	34	101	200	200
Offices	1.2	52	123	200	200
Beauty/Barber Shop	1.3	3	85	200	200
Churches	1.4	7	699	250	250
Parks [3]	1.7	4	-	200	200
Average			252	210	210
Total		100			
Group 2 - Medium Strength/Low Flow					
Gas Stations & Mini Marts	2.1	7	366	350	350
Auto Repair	2.2	6	51	325	325
Doctor and Dentist Offices	2.3	3	62	300	300
Community Center & Lodges	2.4	6	301	325	325
Motel/ Bed & Breakfast	2.5	2	544	350	350
Restaurants & Bars	2.6	13	190	350	350
Car Wash	2.7	1	340	300	300
Lt. Industrial/Warehouse/Storage	2.8	11	102	300	300
Government Services	2.9	20	654	350	350
Average			290	328	328
Total		69			
Group 3 - Medium Strength/Medium Flow					
Medical Office Buildings	3.1	4	1027	350	350
Laundromat	3.2	1	785	300	300
Retirement Home	3.3	2	1066	350	350
Continuation/Charter Schools	3.4	2	1533	325	325
Grocery Store and Butcher	3.5	1	1668	350	350
Average Total		10	1216	335	335
Total		10			
Group 4 - Medium Strength/High Flow					
Mixed Use	4.1	1	3465	350	350
Government Centers	4.2	2	4616	350	350
Average Total		3	4040	350	350
Group 5 - High Strength/Low Flow Mortuary	5.1	1	496	550	550
	5.1	'	496 496		550 550
Average Total		1	430	550	330
Group 6 - High Strength/High Flow					
Hospitals	6.1	2	16583	450	450
Average	0.1	2	16583	450	450 450
Total		2	10000	400	400
Group 7					
Schools	7.1	2	6646	325	325
Average	7.1	2	6646	325	325
Total		2	0040	020	323

^[1] Based on water use during years 2013, 2014 and 2015 $\,$

^[2] Based on industry standards where available and past rate study experience of Stantec/G Aronow Consulting.
[3] Average water use not used for parks due to majority irrigation use

Wastewater Characteristics and Rates Analysis October 3, 2016

As part of this rate analysis the District audited their commercial accounts per the ordinance definition of a commercial user. Previous billing practices had not accounted for separate business entities or residences on one commercial account. This resulted in an increase to approximately 752 residential customers and approximately 187 commercial businesses served by the District (See above section 2.1.3 for current customer summary).

For purposes of the rate model and calculating rates, some adjustments were assumed for commercial water flows that should be noted and which are detailed in Table 12. Fiscal Year 2015 annual water use (January through November) as provided by the Calaveras Public Utility District CPUD) was used as the basis for the wastewater use assumptions. However, the amount of wastewater flow assumed varies for each group. In the case of groups where there is lower strength or flow (Groups 1 and 4), all of it was generally assumed as 90-85 percent wastewater flow. In the case of high water volume users, 60 percent of the water use was assumed for hospitals and 55 percent for schools as wastewater flow, shown in Table 12.





Table 12 Commercial Water Use Assumed in Rate Calculations

	_	Average Annual	Water Use	% Assumed	Water Use Assum	ned in Model
	Accounts	GPD per Account	Total - MG/Y	in Model [1]	GPD per Account	Total - MG/Y
Commercial						
Group 1	100	252.0	9.20	90%	227.00	8.29
Group 2	69	290.2	7.31	85%	247.00	6.22
Group 3	10	1215.9	4.44	85%	1,034.00	3.77
Group 4	3	4040.4	4.42	85%	3,434.00	3.76
Group 5	1	495.7	0.18	85%	421.00	0.15
Group 6	2	16582.7	12.11	60%	9,950.00	7.26
Group 7	2	6646.3	4.85	55%	3,655.00	2.67
Subtotal	187.0		42.51			32.13

^[1] Water Use is adjusted by a fixed percent to estimate for wastewater generation (not all water use translates to wastewater, e.g. irrigation)

Cost of Service Analysis October 3, 2016

6.0 COST OF SERVICE ANALYSIS

The revenue requirements reviewed and finalized through the operating cash flow analysis discussed in Section 4 of the report provide the basis for performing the cost of service analysis and rate calculations, discussed in this Section.

Cost allocation is the method by which the annual sewer charge revenue requirement is recovered from each customer class based on the cost of providing sewer service. The total revenue requirements, net of revenue credits from other sources, shown in Table 7, is by definition the cost of providing service. These costs must then be allocated to each customer class. This is done in a three step process as follows:

- Allocate the Annual O&M Costs to Either Treatment or Collection The operating and maintenance costs are first allocated to either treatment or collection. Capital costs continue to be classified as capital costs.
- 2. Determine the Unit Cost per Flow, BOD, or SS Once the costs are allocated to collection, treatment, or capital expenditures they are then distributed to either flow or strength categories. The flow category is simply referred to as flow. There are two strength categories biochemical oxygen demand (BOD) and suspended solids (SS). The annual revenue requirement is distributed to flow, BOD and SS depending on a percentage distribution of O&M operations (or project capital expenditures) attributed to flow, BOD, and SS. The unit cost is then determined by dividing the allocated cost per flow or strength category by the total system demand for that category.
- 3. **Determine the Annual Cost per Customer Type** The unit costs (for flow, BOD, and SS by cost category) are then multiplied by the number of units/accounts to determine the annual cost per customer category.

Once the costs are allocated to each customer category, the sewer rates can be calculated. By determining a unit cost to allocate customer costs, it ensures that each user is paying the same "unit cost" only then to vary by the use or impact of each user on the system and therefore meets the requirements of Proposition 218.

The tables used to illustrate the sewer rate calculations in the discussion below are for FY 2017-18. These same calculations are performed for each year of the rate study projection period.



Cost of Service Analysis October 3, 2016

6.1.1 Cost Allocation to Collection and Treatment Categories

The operating and maintenance costs are allocated to collection and treatment function categories based on percentage allocation or distribution factors as shown in Table 13. These percentage allocation factors are based on the estimated distribution of District costs between the two system functions and based on Stantec and G Aronow Consulting experience with other sewer rate studies. Capital costs remain segregated as capital costs.

The costs shown in Table 13 correspond to the projected costs in Table 10, prior to any offsetting revenue adjustments.

6.1.2 Cost Allocation to Flow and Strength & Unit Cost Determination

Once the costs are allocated to a functional category, the costs are then further allocated to flow, BOD, and SS, as shown in Table 14. The costs are allocated to flow, BOD, and SS based on percent allocation factors. Collection costs are strictly related to flow and therefore, 100 percent of the collection costs are allocated to flow. For all other costs it is assumed that the distribution is 60% to flow, 20% to BOD, and 20% to SS. These distribution factors were determined based on discussions with the District Manager, Engineer and consulting engineers.

The allocated costs are then divided by the influent total to determine the unit cost per flow, BOD, and SS. These unit costs are then used to determine the cost allocated to each customer type and ultimately the calculated rates for each customer.

6.1.3 Cost Allocation by Customer Category

Table 15 shows the cost allocated to flow, BOD, and SS by customer category for 2017-18. The unit costs determined in Table 14 are multiplied by the flow, BOD, or SS for each customer type. These costs are then summed to determine the total cost allocation by customer type.



Table 13
San Andreas Sanitary District
Projected Costs and Distribution between Collection and Treatment System

2017-18 Baseline Analysis



	Inflation		Projected	Alloca	ation	Colle	ction System	ı	Treat	ment System	
	Adjustment	2015-16	2017-18	Collection	Treatment	Cost	Fixed	Variable	Cost	Fixed	Variable
		V	0								
Evmonditures		Years Inflated:	2								
Expenditures STEP 1											
Plant, treatment and disposal											
Special Engineer Sewer Sys (43197)	1.5%	\$0	\$0	5%	95%	\$0	\$0		\$0	\$0	
Other Plant, treatment and disposal	1.5%	\$755,642	\$778,481	20%	80%	\$155,696	\$155,696		\$622,785	\$622,785	
Subtotal Plant, treatment and disposal		\$755,642	\$778,481			\$155,696	\$155,696		\$622,785	\$622,785	
General and administrative	1.5%	\$431,115	\$444,145	20%	80%	\$88,829	\$88,829		\$355,316	\$355,316	
Other	1.5%	\$0	\$0	0%	100%	\$0	\$0		\$0	\$0	
Existing Debt Service (USDA & SRF)	0.00%	\$193,908	\$194,718	0%	100%	\$0	\$0		\$194,718	\$194,718	
Less Other Revenue Sources		(\$77,166)	(\$77,166)	20%	80%	(\$15,433)	(\$15,433)		(\$61,733)	(\$61,733)	
Subtotal Step 1		\$1,303,499	\$1,340,179			\$229,092	\$229,092		\$1,111,087	\$1,111,087	
STEP 2											
General Operating Reserve	1.5%	\$0	\$20,300	20%	80%	\$4,060	\$4,060		\$16,240	\$16,240	
Annual Sanitary Sewer	0.0%	\$0	\$73,800	86%	14%	\$63,468	\$63,468		\$10,332	\$10,332	
Capital Projects Set-Aside	0.0%	\$0	\$56,600	20%	80%	\$11,320	\$11,320		\$45,280	\$45,280	
Subtotal Step 2		\$0	\$150,700			\$78,848	\$78,848		\$71,852	\$71,852	
STEP 3											
New Debt Service	0.00%	\$0	\$0	0%	100%	\$0	\$0		\$0	\$0	
Debt Service Coverage	0.00%	\$0	\$0	0%	100%	\$0	\$0		\$0	\$0	
Additional O&M Cost Related to Project	1.5%	\$0	\$0	0%	100%	\$0	\$0		\$0	\$0	
Subtotal Step 3		\$0	\$0			\$0	\$0		\$0	\$0	
Total		\$1,303,499	\$1,490,879			\$307,940	\$307,940	\$0	\$1,182,939	\$1,182,939	\$0

[1] Depreciation is estimated \$559,261. It is not assumed to be fully funded due to constraints on rate economics

"proj_costs"

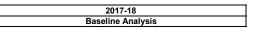
Table 14 San Andreas Sanitary District Unit Cost Determination

2017-18 Baseline Analysis



	Allocated	Percent	Alloca	tion		Cost		To	tal Influer	nt		Unit Cost Per:	
Cost Category	Operating Costs	Flow	BOD	SS	Flow	BOD	SS	Flow MG	BOD Klbs	SS Klbs	Mgal of Flow (\$/Mgal)	Klb of BOD (\$/Klb)	Klb of SS (\$/Klb)
STEP 1													
Collection System O&M Costs													
Fixed	\$229,092	100%			\$229,092			96.13	194.99	194.99	\$2,383.18		
Variable	\$0	100%			\$0			96.13	194.99	194.99	\$0.00		
Total Collection	\$229,092				\$229,092						\$2,383.18		
Treatment O&M Costs													
Fixed	\$1,111,087	60%	20%	20%	\$666,652	\$222,217	\$222,217	96.13	194.99	194.99	\$6,935.00	\$1,139.63	\$1,139.63
Variable	\$0	60%	20%	20%	\$0	\$0	\$0	96.13	194.99	194.99	\$0.00	\$0.00	\$0.00
Total Treatment	\$1,111,087				\$666,652	\$222,217	\$222,217				\$6,935.00	\$1,139.63	\$1,139.63
Subtotal Step 1	\$1,340,179				\$895,744	\$222,217	\$222,217				\$9,318.19	\$1,139.63	\$1,139.63
Step 2: General Reserve, CIP, Depreciation	\$150,700	60%	20%	20%	\$90,420.00	\$30,140.00	\$30,140.00	96.13	194.99	194.99	\$940.62	\$154.57	\$154.57
Step 3: New Project Debt Service, Coverage, O&M	\$0	60%	20%	20%	\$0	\$0	\$0	96.13	194.99	194.99	\$0.00	\$0.00	\$0.0
TOTAL	\$1,490,879				\$986,164	\$252,357	\$252,357				\$10,258.80	\$1,294.20	\$1,294.20

Table 15 San Andreas Sanitary District Allocation of Costs to Flow by Customer Category





		Step 1: Operating Costs						Step 2					Step 3				
				Collection		Treatment			Gen. Res., CIP, Depreciation			New Proj.	D/S, Cover	age, O&M			
Unit Cost/Customer	Flow	BOD	SS	Flow	Flow	BOD	SS	SUBTOTAL	Flow	BOD	SS	SUBTOTAL	Flow	BOD	SS	SUBTOTAL	
Category	MG/Yr	Klb/Yr	Klb/Yr	(\$/Mgal)	(\$/Mgal)	(\$/KIb)	(\$/KIb)	Step 1	(\$/Mgal)	(\$/KIb)	(\$/KIb)	Step 2	(\$/Mgal)	(\$/KIb)	(\$/KIb)	Step 3	TOTAL
Unit Cost				\$2,383.18	\$6,935.00	\$1,139.63	\$1,139.63	\$11,597	\$940.62	\$154.57	\$154.57	\$1,250	\$0.00	\$0.00	\$0.00	\$0	\$25,694
Residential																	
Single Family	36.96	61.64	61.64	\$88,074	\$256,292	\$70,250	\$70,250	\$484,866	\$34,762	\$9,528	\$9,528	\$53,818	\$0	\$0	\$0	\$0	\$538,684
Multi-Family	26.33	43.93	43.93	\$62,761	\$182,632	\$50,060	\$50,060	\$345,512	\$24,771	\$6,790	\$6,790	\$38,350	\$0	\$0	\$0	\$0	\$383,862
Capacity Maintenance	0.71	1.19	1.19	\$1,696	\$4,936	\$1,353	\$1,353	\$9,338	\$669	\$184	\$184	\$1,036	\$0	\$0	\$0	\$0	\$10,375
Subtotal	64.00	106.76	106.76	152,530.35	443,859.23	121,663.19	121,663.19	\$839,716	60,201.95	16,501.54	16,501.54	\$93,205	0.00	0.00	0.00	\$0	\$932,921
Commercial [1]																	
Group 1	8.29	14.51	14.51	\$19,746	\$57,460	\$16,537	\$16,537	\$110,281	\$7,793	\$2,243	\$2,243	\$12,280	\$0	\$0	\$0	\$0	\$122,560
Group 2	6.22	17.01	17.01	\$14,825	\$43,141	\$19,380	\$19,380	\$96,725	\$5,851	\$2,629	\$2,629	\$11,108	\$0	\$0	\$0	\$0	\$107,834
Group 3	3.77	10.54	10.54	\$8,994	\$26,173	\$12,017	\$12,017	\$59,201	\$3,550	\$1,630	\$1,630	\$6,810	\$0	\$0	\$0	\$0	\$66,011
Group 4	3.76	10.98	10.98	\$8,961	\$26,077	\$12,509	\$12,509	\$60,056	\$3,537	\$1,697	\$1,697	\$6,930	\$0	\$0	\$0	\$0	\$66,986
Group 5	0.15	0.70	0.70	\$366	\$1,066	\$803	\$803	\$3,038	\$145	\$109	\$109	\$362	\$0	\$0	\$0	\$0	\$3,401
Group 6	7.26	27.26	27.26	\$17,310	\$50,372	\$31,066	\$31,066	\$129,815	\$6,832	\$4,214	\$4,214	\$15,259	\$0	\$0	\$0	\$0	\$145,075
Group 7	2.67	7.23	7.23	\$6,359	\$18,504	\$8,242	\$8,242	\$41,346	\$2,510	\$1,118	\$1,118	\$4,745	\$0	\$0	\$0	\$0	\$46,091
Subtotal	32.13	88.23	88.23	\$76,562	\$222,793	\$100,554	\$100,554	\$500,463	\$30,218	\$13,638	\$13,638	\$57,495	\$0	\$0	\$0	\$0	\$557,958
TOTAL	96.13	194.99	194.99	\$229,092	\$666,652	\$222,217	\$222,217	\$1,340,179	\$90,420	\$30,140	\$30,140	\$150,700	\$0	\$0	\$0	\$0	\$1,490,879

Findings and Recommendations October 3, 2016

7.0 FINDINGS AND RECOMMENDATIONS

Through this rate analysis it was determined that current sewer rates are insufficient to fund the on-going operating and maintenance expenses as well as provide funding for the District's proposed WWTP Upgrade Project.

It is recommended that the District change the commercial rate structure to provide revenues that are equitable and adequate to fund on-going operating and maintenance expenses, and to support existing and future debt service from the proposed Project (See Table 1).

7.1.1 Calculated Rates

Based on the costs allocated to each customer type, rates are calculated. Table 16 shows the calculated rates for FY 2017-18 for residential and commercial customers. The rates for residential customers are charged on a per unit basis.

The commercial users are charged both a fixed monthly rate plus a flow charge that would be based on actual annual water consumption for the previous year (May through April). The cost allocated to commercial users is split between the fixed cost at 70% and the variable cost at 30%. This allows the District some reliability in the collection of sewer charges, i.e., that 70% of the charges are not based upon potentially fluctuating water use. The majority of the wastewater expenses are fixed expenses and do not vary by water use.

The variable portion of the commercial rate calculation assumes annual water flow as described in Table 12 above.



Table 16
Detailed Sewer Rate Calculation

2017-18 Baseline Analysis



	Accounts/		Allocated	Annual (Allocate					ly Cost Imption Ch	arge	Basis of	
Customer Category	Customers	Units	Cost	Flat Rate	Fixed Rate Metered	Flat Mo. Charge	Metered Base Charge	Ann.Flow- Water [1]	Cost/ Gallons	Cost/1000 Gallons	Charge	
Customer Category	Customers	Office	Cost	i lat ivate	Wetered	Charge	Onlarge	water [1]	Galloris	Galloris	Charge	
Step 1: Baseline O&M Residential												
Single Family	675	675	\$484,866	\$718.32		\$59.86					per Unit	
Multi-Family	75	481	\$345,512	\$718.32		\$59.86					per Unit	
Capacity Maintenance	2	13	\$9,338	\$718.32		\$59.86					per connection	
Residential Total	750		\$839,716									
Commercial					(at 70%)							
Group 1	100		\$110,281		\$771.97		\$64.33	8.29	\$0.0040	\$3.99	per Account	
Group 2	69		\$96,725		\$981.27		\$81.77	6.22	\$0.0047	\$4.66	per Account	
Group 3	10		\$59,201		\$4,144.10		\$345.34	3.77	\$0.0047		per Account	
Group 4	3		\$60,056		\$14,013.06		\$1,167.76	3.76	\$0.0048		per Account	
Group 5 Group 6	1 2		\$3,038 \$129,815		\$2,126.91 \$45,435.31		\$177.24 \$3,786.28	0.15 7.26	\$0.0059 \$0.0054		per Account per Account	
Group 7	2		\$41,346		\$14,471.10		\$1,205.93	2.67	\$0.0034		per Account	
Commercial Total	187		\$500,463		ψ,		ψ., <u>=</u> σσ.σσ	2.0.	ψ0.00.0	V	po. 7 toodat	
Subtotal Step 1			\$1,340,179									
Step 2: Capital & Reserves Residential												
Single Family	675	675	\$53,818	\$79.73		\$6.64					per Unit	
Multi-Family	75	481	\$38,350	\$79.73		\$6.64					per Unit	
Capacity Maintenance	2	13	\$1,036	\$79.73		\$6.64						
Residential Total	750		\$93,205									
Commercial					(at 70%)							
Group 1	100		\$12,280		\$85.96		\$7.16	8.29	\$0.0004	\$0.44	per Account	
Group 2	69		\$11,108		\$112.69		\$9.39	6.22	\$0.0005		per Account	
Group 3	10		\$6,810		\$476.68		\$39.72	3.77	\$0.0005		per Account	
Group 4	3		\$6,930		\$1,617.03		\$134.75	3.76	\$0.0006		per Account	
Group 5	1		\$362		\$253.71		\$21.14	0.15	\$0.0007		per Account	
Group 6 Group 7	2 2		\$15,259 \$4,745		\$5,340.78 \$1,660.90		\$445.07 \$138.41	7.26 2.67	\$0.0006 \$0.0005		per Account per Account	
Commercial Total	187		\$57,495		ψ1,000.50		ψ130.41	2.07	ψ0.0003	ψ0.55	per Account	
Subtotal Step 2			\$150,700									
Otan O. MANTO Incompany												
Step 3: WWTP Improvements Project												
Residential												
Single Family	675	675	\$0	\$0.00		\$0.00					per Unit	
Multi-Family	75	481	\$0	\$0.00		\$0.00					per Unit	
Capacity Maintenance	2	13	\$0	\$0.00		\$0.00						
Residential Total	750		\$0									
Commercial					(at 70%)							
Group 1	100		\$0		\$0.00		\$0.00	8.29	\$0.0000	\$0.00	per Account	
Group 2	69		\$0		\$0.00		\$0.00	6.22	\$0.0000		per Account	
Group 3	10		\$0		\$0.00		\$0.00	3.77	\$0.0000		per Account	
Group 4	3		\$0 \$0		\$0.00		\$0.00	3.76	\$0.0000		per Account	
Group 5 Group 6	1 2		\$0 \$0		\$0.00 \$0.00		\$0.00 \$0.00	0.15 7.26	\$0.0000 \$0.0000		per Account per Account	
Group 7	2		\$0		\$0.00		\$0.00	2.67	\$0.0000		per Account	
Commercial Total	187		\$0		·		·		·			
Subtotal Step 3			\$0									
TOTAL												
Residential												
Single Family	675	675	\$538,684	\$798.05		\$66.50					per Unit	
Multi-Family	75	481	\$383,862	\$798.05		\$66.50					per Unit	
Capacity Maintenance Residential Total	2 750	13	\$10,375 \$932,921	\$798.05		\$66.50						
Residential 10tal	/50		⊅ 33∠,3∠1									
Commercial					(at 70%)							
Group 1	100		\$122,560		\$857.92		\$71.49	8.29	\$0.0044		per Account	
Group 2	69		\$107,834		\$1,093.96		\$91.16	6.22	\$0.0052		per Account	
Group 3	10		\$66,011		\$4,620.78		\$385.06	3.77	\$0.0052		per Account	
Group 4	3		\$66,986 \$3,401		\$15,630.09 \$2,380.62		\$1,302.51	3.76	\$0.0053		per Account	
Group 5 Group 6			\$3,401 \$145,075		\$2,380.62 \$50,776.09		\$198.39 \$4,231.34	0.15 7.26	\$0.0066 \$0.0060		per Account per Account	
Group 7	2 2		\$145,075 \$46,091		\$16,132.00		\$4,231.34 \$1,344.33	7.26 2.67	\$0.0050		per Account	
Commercial Total	187		\$557,958		ψ10,102.00		Ψ1,044.00	2.07	ψ3.000Z	ψ0.10	, , , , , , , , , , , , , , , , , , ,	
Total all Steps			\$1,490,879									

^[1] See Table 12.