FARRIS MATHEWS BOBANGO, PRECEIVED

ATTORNEYS AT LAW

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October 26, 2012

Via Electronic and Hand-Delivery

David Foster Chief, Utility Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

> **RE:** Additional Response to Data Request Docket No. 11-00081

Dear Mr. Foster:

Please find the complete 10 year build out in Excel format that was inadvertently omitted in Exhibit B in the data request response dated October 22, 2012. Also included is a final plat for Genesis Villages Estates- Phase 1 that was requested by TRA staff.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

FARRIS MATHEWS BOBANGO PLC

IRM UTILITY CCN APPLICATION TO PROVIDE SERVICE TO GENESIS VILLAGE ESTATES EXHIBIT IRM-E CALCULATION OF PRO FORMA RATES AND COST OF SERVICE

	5 Year		5 Year
	Billing	Proposed	Revenue
	Determinants	Rates	Projection
Pro Forma Five Year Revenues:			
Customer Charges (Bills)	678 A /	\$51.50	\$34,917.00
Less Escrow Requirements @ 29%	678 A /	-\$14.94	-\$10,125.93
Access Fees	101 A/	300.00	30,300.00
Total Five Year Pro Forma Revenues			\$55,091.07

-\$15,205.65

Genesis Village Estates will need a monthly billing rate of \$51.5 and an annual access charge of \$300 in order to cover its projected five year cost of service.

Five Year Net Operating Income Surplus (Deficiency)

NOTE: The above Pro Forma calculations are the Company's best "guesstimate" based upon the current economic conditions that may change during the course of this project.

A/ Şchedule 2.

IRM UTILITY Pro Forma Rate Calculation for Genesis Village Estates Proposed Rates			Exhibit IRM-E Schedule 1
	10 Year Billing Determinants	Proposed Rates	10 Year Revenue Projection
Pro Forma Ten Year Revenues:			
Customer Charges (Bills)	2,526 A/	\$51.50	\$130,089.00
Less Escrow Requirements @ 29%	2,526 A/	-\$14.94	-\$37,725.81
Access Fees	107 A/	300.00	32,100.00
Total Ten Year Pro Forma Revenues			\$124,463.19
Ten Year Cost of Service			\$150,124.69 A/
Ten Year Net Operating Income Surplus (Deficiency)		-\$25,661.50

Genesis Village Estates will need a monthly billing rate of \$51.5 and an annual access charge of \$300 in order to cover its projected ten year cost of service.

NOTE: The above Pro Forma calculations are the Company's best "guesstimate" based upon the current economic conditions that may change during the course of this project.

A/ Schedule 2.

Exhibit IRM-E Schedule 2

Lots Available for Sale	:	32	**				
	Billing Rate	2013	2014	2015	2016	2017	5 Year Total
Projected Customer Count		5	8	11	13	22	
Projected Bill Count		30	96	132	156	264	678
Unsold Lots		27	24	21	19	10	101
Pro Forma Revenue:							
Customer Charge Revenue	\$51.50 A/	\$1,545.00	\$4,944.00	\$6,798.00	\$8,034.00	\$13,596.00	\$34,917.00
Less Escrow Requirements	-29%	-448. <u>05</u>	-1,433.7 <u>6</u>	-1,971.42	-2,329.86	-3,942.84	-10,125.93
Net Customer Charge Revenue		\$1,096.95	\$3,510.24	\$4,826.58	\$5,704.14	\$9,653.16	\$24,791.07
Access Fee Revenue	\$300.00 A/	\$4,050.00	\$7,200.00	\$6,300.00	\$5,700.00	\$3,000.00	\$26,250.00
Total Net Pro Forma Revenue		\$5,146.95	\$10,710.24	\$11,126.58	\$11,404.14	\$12,653.16	\$51,041.07
Expenses	B/	\$13,362.46	\$13,700.60	\$14,048.89	\$14,407.63	\$1 <u>4,777.13</u>	\$70,296.72
Net Income/(Loss)		-\$8,215.51	-\$2,990.36	-\$2,922.31	-\$3,003.49	-\$2,123.97	-\$19,255.65

Assumptions:

The customer projections for years one through five were made by the developer.

NOTE: The above Pro Forma calculations are the Company's best "guesstimate" based upon the current economic conditions that may change during the course of this project.

A/ Schedule 1.

B/ Schedule 3.

The complete total of 100 Lots are not established at this time.

Only Phase I is represented by this Pro Forma Calculation and Phase II for the remaining Lots may happen if the economy improves.

IRM UTILITY Pro Forma Rate Calculation for Genesis Village Estates Ten Year Income Proiection

lon	le 32 **	10 Year Billing 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 Total	5 8 11 13 22 28 30 32 32 32	30 96 132 156 264 336 360 384 384 2,526	27 24 21 19 10 4 2 0 0 0 107		\$51.50 A / \$1,545.00 \$4,944.00 \$6,798.00 \$8,034.00 \$13,596.00 \$17,304.00 \$18,540.00 \$19,776.00 \$19,776.00 \$19,776.00 \$	-29% 448.05 -1,433.76 -1,971.42 -2,329.86 -3,942.84 -5,018.16 -5,376.60 -5,735.04 -5,735.04 -5,735.04	st,096.95 \$3,510.24 \$4,826.58 \$5,704.14 \$9,653.16 \$12,285.84 \$13,163.40 \$14,040.96 \$14,040.96 \$14,040.96 \$92,363.19	10e \$300.00 A/ \$4,050.00 \$7,200.00 \$6,300.00 \$5,700.00 \$3,000.00 \$1,200.00 \$600.00 \$0.00 \$0.00 \$0.00 \$28,050.00		B/ \$13,362.46 \$13,700.60 \$14,048.89 \$14,407.63 \$14,777.13 \$15,157.71 \$15,549.72 \$15,953.48 \$16,369.35 \$16,797.70 \$150,124.69	-\$8,215.51 -\$2,990.36 -\$2,922.31 -\$3,003.49 -\$2,123.97 -\$1,671.87 -\$1,786.32 -\$1,912.52 -\$2,328.39 -\$2,756.74 -\$29,711.50		
Ten Year Income Projection	Lots Available for Sale		Projected Customer Count	Projected Bill Count	Unsold Lots	Pro Forma Revenue:	Customer Charge Revenue	Less Escrow Requirements	Net Customer Charge Revenue	Access Fee Revenue	Total Net Pro Forma Revenue	Expenses	Net Income/(Loss)		

Assumptions:
The customer projections for years one through five were made by the developer. In years six through ten we expect the subdivision to add 2 customers per year.

** The complete total of 100 Lots are not established at this time. Only Phase Lis represented by this Pro Forma Calculation and Phase II for the remaining Lots may happen if the economy improves.

NOTE: The above Pro Forma calculations are the Company's best "guesstimate" based upon the current economic conditions that may change during the course of this project.

A/ Schedule 1. B/ Schedule 3.

Exhibit IRM-E Schedule 3

IRM UTILITY Pro Forma Rate Calculation for Genesis Village Estates Estimated Annual Cost of Service

					2013	2014	2015	2016	2017
	Cost	Monthly	Annual	Inflation	Year 1	Year 2	Year 3	Year 4	Year 5
Budget Item	Classification	Cost	Cost	Rate	Cost	Cost	Cost	Cost	Cost
Telephone / Telemetry	Variable	\$57.92	\$694.98	0.00%	\$694.98	\$694.98	\$694.98	\$694.98	\$694.98
Electric	Variable	55.00	00.099	3.00%	00.099	679.80	700.19	721.20	742.84
Quarterly Monitoring - Analysis	Variable	48.21	578.50	3.00%	578.50	595.86	613.73	632.14	651.11
Quarterly Monitoring - Sampling	Variable	61.82	741.80	3.00%	741.80	764.05	786.98	810.58	834.90
Monthly OnSite Inspection to 8/13/13	Variable	310.14	3,721.68	3.00%	3,721.68	3,833.33	3,948.33	4,066.78	4,188.78
The state of the s					TDEC is wri	DEC is writing new permits with these requirements.	nits with these	requirements	. IRM is
Monthly OnSite Inspection after 8/13/13	Variable	535.14	6,421.68 *	3.00%	emplo	employing an O&M Plan that reduces these costs	Plan that red	oces these co	sts.
Billing	Variable	69.53	834.40	3.00%	834.40	859.43	885.21	911.77	939.12
STEP Inspections	Variable	132.93	1,595.10	3.00%	1,595.10	1,642.95	1,692.24	1,743.01	1,795.30
Permit Fee	Fixed	29.17	350.00	0.00%	350.00	350.00	350.00	350.00	350.00
Office Administration	Fixed	100.00	1,200.00	3.00%	1,200.00	1,236.00	1,273.08	1,311.27	1,350.61
Office Rental	Fixed	20.00	00.009	0.00%	600.00	600.00	600.00	00.009	600.00
Regulatory	Fixed	10.00	120.00	0.00%	120.00	120.00	120.00	120.00	120.00
Accounting	Fixed	41.67	200.00	3.00%	500.00	515.00	530.45	546.36	562.75
Attorney Fees	Fixed	120.00	1,440.00	3.00%	1,440.00	1,483.20	1,527.70	1,573.53	1,620.73
Insurance	Fixed	12.17	146.00	0.00%	146.00	146.00	146.00	146.00	146.00
Ad Valorem Taxes	Fixed	15.00	180.00	%00:0	180.00	180.00	180.00	180.00	180.00
Total		\$1,648.68	\$19,784.14		\$13,362.46	\$13,700.60	\$14,048.89	\$14,407.63	\$14,777.13
	•								

NOTE: The detailed assumptions on Schedule 4 are an integral component of this estimated cost of service.
• For illustration purposes only.

IRM UTILITY Pro Forma Rate Calculation for Genesis Village Estates Estimated Annual Cost of Service

					2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	Cost	Monthly	Annual	Inflation	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Budget Item	Classification	Cost	Cost	Rate	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost
Telephone / Telemetry	Variable	\$57.92	\$694.98	%00.0	\$694.98	\$694.98	\$694 98	\$694.98	\$694.98	\$694.98	\$694.98	\$694.98	\$694.98	\$694.98
Electric	Variable	92.00	960.00	3.00%	00.099	679.80	700.19	721.20	742.84	765.12	788.07	811.72	836.07	861.15
Quarterly Monitoring - Analysis	Variable	48.21	578.50	3.00%	578.50	595.86	613.73	632.14	651.11	670.64	92.069	711.48	732.83	754.81
Quarterly Monitoring - Sampling	Variable	61.82	741.80	3.00%	741.80	764.05	786.98	810.58	834.90	859.95	885.75	912.32	939.69	967.88
Monthly OnSite Inspection to 8/13/13	Variable	310.14	3,721.68	3.00%	3,721.68	3,833.33	3,948.33	4,066.78	4 188 78	4,314.45	4,443.88	4,577.20	4,714.51	4,855.95
Monthly OnSite Inspection after 8/13/13	Variable	535.14	6,421.68	3.00%										
Billing	Variable	69 53	834.40	3.00%	834.40	859.43	885.21	911.77	939.12	967.30	996.32	1,026.21	1,056.99	1,088.70
STEP inspections	Variable	132 93	1,595.10	3.00%	1,595.10	1,642.95	1,692.24	1,743.01	1,795 30	1,849.16	1,904.63	1,96177	2,020.62	2,081.24
Permit Fee	Fixed	29.17	350.00	0.00%	350.00	350.00	350.00	350.00	350.00	350.00	350.00	350.00	350.00	350.00
Office Administration	Fixed	100.00	1,200.00	3.00%	1,200.00	1,236.00	1,273 08	1,311.27	1,350.61	1,391.13	1,432.86	1,475.85	1,520.12	1,565.73
Office Rental	Fixed	20 00	00:009	0.00%	00.009	00 009	00.009	600.00	600.00	00.009	00.009	00.009	00.009	00.009
Regulatory	Fixed	10 00	120.00	0.00%	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00
Accounting	Fixed	41.67	200:00	3.00%	500.00	515.00	530.45	546.36	562.75	579.64	597.03	61494	633.39	652 39
Attorney Fees	Fixed	120.00	1,440.00	3.00%	1,440.00	1,483.20	1,527 70	1,573,53	1,620.73	1,669.35	1,719.44	1,771 02	1,824,15	1,878.87
Federal Tax Preparation	Fixed	12 17	146.00	%00.0	146.00	146.00	146.00	146.00	146.00	146.00	146.00	146.00	146.00	146.00
Ad Valorem Taxes	Fixed	15 00	180.00	%00.0	180.00	180.00	180 00	180.00	180.00	180.00	180.00	180.00	180.00	180.00
Total		\$1,648.68	\$19,784.14	•	\$13,362.46	13,700.60 \$	14,048.89	14,407.63	14,777.13	15,157.71	\$15,549.72	\$15,953.48	16,369.35	\$16,797.70

NOTE: The detailed assumptions on Schedule 4 are an integral component of this estimated cost of service.

Pro Forma Rate Calculation for Genesis Village Estates Assumption Basis for Cost Estimates

Exhibit IRM-E Schedule 4 Page 1 of 2

1 Telephone/Telemetry

Current monthly cost for telemetry service for each subdivision. Genesis Village Estates has a lift station and a treatment system that needs monitored. IRM will need two telemetry systems that are web based that is presently being billed at \$347.49 per year for one unit. Genesis will require two units. One for the lift station and one for the treatment system for a current cost of \$694.98 per year.

2 Electric

Our experience has been that electric costs are approximately \$55 per month for each subdivision. Electric Utilities costs and increases are based on many factors including coal prices, source prices, the value of the dollar against foreign markets, NASDAQ and Futures Indexes, and many other variable inputs. This price is from existing systems and IRM's best estimated cost with an annual inflation increase of 3%.

3 Quarterly Monitoring - Analysis

According to the State Operating Permit of TDEC, the required analysis of Genesis Village Estates is BOD₅, Ammonia-Nitrogen and Nitrate-Nitrogen. The cost of the analyses are \$42.00, \$37.75, and \$31.50 respectively, for a total of \$111.25 per quarter or \$445.00 per year. A management multiplier of 1.3 yields an annual cost of \$578.50 pr year or \$48.20 per month. This is in line with most other systems as this may required in the future has additional bacterial analysis for Escherichia coli which is not included in this estimate. This price is from existing systems and IRM's best estimated cost with an annual inflation increase of 3% AIR and CLI etc. to the best of our knowledge is proposed.

3 Quarterly Monitoring - Sampling

5 hours per Quarter @ \$30.00 per hour <u>plus</u> travel of 255 miles round trip to site and laboratory @ \$0.505 (allowed by the federal government per mile), <u>plus</u> \$20.00 Reporting Fee. This price is from existing systems and IRM's best estimated cost with an annual increase of 3% AIR and CLI etc.

Monthly OnSite Inspection to 8/13/2013

Monthly: 6 hours per trip @ \$30.00 per hour <u>plus</u> travel of 228 miles round trip @ **\$0.505** (allowed by the federal government per mile) <u>plus</u> .5 hours making notes. This price is from existing systems and IRM's best estimated cost with an annual inflation increase of 3%.

Bi-Monthly OnSite Inspection after 8/13/2013

This is being required on all TDEC, SOP Permit Renewals not included in previous CCN Petitions. IRM is anticipating this cost due to past renewals from TDEC, SOP Permits: This will require two trips per month to the site at 6 hours per trip @ \$30.00 per hour <u>plus</u> travel of 228 miles round trip @ \$0.505 (allowed by the federal government per mile), <u>plus</u> 2 hours filling out TDEC Reports. This price is fbased on the experience of existing systems and IRM's best estimated cost with an annual inflation increase of 3%. IRM is employing an Operation and Maintenance Schedule that reduces these costs.

4 Billing

Billing includes the time needed to write letters to late paying customers, communication with address changes, owner changes, adding customers calls to customers, etc. Associated with billing is going to the Post Office box each day, logging in the billing program to credit accounts, prepare deposits, calculate escrow, and making deposits at the bank. The time necessary to complete billing is 16 hours per month @ \$12.50 per hour. In addition, there are 16 trips per month to the bank and post office per month of 16 round trip miles @ \$0.505 (allowed by the federal goverment per mile) with an additional 2 hours of clerical work @ \$12.50 per hour. In addition to these amounts, billing also includes the following: office phone @ \$113.25 per month, fax phone @ \$24.00 per month, billing program maintenance @ \$84.47 per month, postage @ \$33 per month, postcard stock @ \$16.80 per month. This totals to \$625.80 per month. IRM currently has 90 customers, so this cost would equal \$6.95 per customer per month. Genesis Estates is expected to have approximately 10 customers over the next five years which would bring their subdivision cost to \$69.53 per month.

IRM UTILITY

Pro Forma Rate Calculation for Genesis Village Estates **Assumption Basis for Cost Estimates**

Exhibit IRM-E Schedule 4 Page 2 of 2

STEP Inspections

3 hours per Month @ \$30.00 per hour plus travel of 85 miles round trip @ \$0.505 per mile * 1 occurances per Month.

5 Permit Fee

TDEC Annual Permit Fee of \$350 per subdivision.

Office Administration

Annual cost = \$12,000. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$1,200. Information

Office Rental

Annual cost = \$6,000. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$600.

Regulatory

Supporting

Annual cost = \$1,200. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$120.

6 Accounting

Annual cost = \$5,000. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$500.

7 Legal

Annual cost = \$14,400. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$1,440.

8 Federal Tax Preparation

Annual cost = \$1,460. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$146.

9 Ad Valorem Taxes

Annual cost = \$1,800. IRM currently has 90 customers. Genesis Estates is expected to have approximately 10 customers over the next 5 years bringing this total to 100. Therefore, cost allocation to Genesis Estates will be 10% (10/100) or \$180.

10 Federal Mileage Information

