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THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

by
Kansas Corporation Commission
Kansas

In the Matter of the Application of Suburban)
Water, Inc. d/b/a Suburban Water Company,) Docket No. 13-SUBW-700-RTS
for Approval of the Commission to Make)
Certain Changes in Its Rates for Water Service.)

**RESPONSE OF THE CITIZENS' UTILITY RATEPAYER BOARD TO
STAFF'S REPORT AND RECOMMENDATION AND SUBURBAN WATER'S
RESPONSE TO STAFF'S REPORT AND RECOMMENDATION**

The Citizens' Utility Ratepayer Board ("CURB") submits its comments in response to the Kansas Corporation Commission's Staff ("Staff") *Report and Recommendation* filed on August 13, 2013, and to the *Response of Suburban Water Company to the Staff's Report and Recommendation*, filed on August 27, 2013, as follows:

1. On May 17, 2013, Suburban Water, Inc. d/b/a Suburban Water Company ("Suburban") filed an abbreviated rate case requesting an increase in annual revenue of \$35,030, due to the increased cost of water purchased from the Board of Public Utilities ("BPU"). This rate increase application is the third of three rate cases, as established in an agreement between Suburban and Staff as a result of the Commission's order in Docket No. 10-SUBW-602-TAR. Per the agreement between Suburban and Staff, the third of three planned rate cases would make adjustments to revenue to reflect the rate approved in the previous rate case, the cost of purchased water from the BPU and rate case expense.

2. CURB's analyst Stacey Harden has reviewed Suburban's rate case application, data request responses provided by Suburban, and Staff's report and recommendation, and accompanying exhibits. At this time, she agrees with Staff's recommendations and adjustments. Additionally, she recommended that CURB support the rate design proposed by Staff on page 6

of its Report and Recommendation.

3. On August 27, 2013, Suburban filed its response to Staff's Report and Recommendation. Suburban's response included copies of invoices which support an additional \$6,689 in rate case expense. These expenses were incurred during the months of June, July and August of 2013 and were not captured in Staff's initial report and recommendation. Ms. Harden has reviewed these invoices and agrees with Suburban that they are appropriate rate case expenses and should be included in the company's revenue requirement.

4. Therefore, CURB recommends the Commission approve a revenue requirement increase of \$23,628 for Suburban. If approved by the Commission, the new commodity rate for Suburban's customer would increase from \$7.74 per 1,000 gallons of water consumed to \$8.00 per 1,000 gallons of water consumed.

5. Suburban also requested permission to discontinue the filing of monthly reports in the compliance docket 13-SUBW-175-CPL. CURB agrees with Suburban's request and recommends the Commission allow Suburban to cease the monthly compliance filings as required in 13-SUBW-175-CPL.

Respectfully submitted,



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CERTIFICATE OF SERVICE

13-SUBW-700-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 29th day of August, 2013, to the following:

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