

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

JUN 26 2013

In the Matter of the Application of Howison Heights, Inc., for Approval of the Commission to Make Certain Changes in its Rates for Water Service.)

by
State Corporation Commission
of Kansas
Docket No. 13-HHIW-570-RTS

In the Matter of the Investigation of Howison Heights Inc.'s Ability to Provide Sufficient and Efficient Service.)

Docket No. 13-HHIW-460-GIV

CURB'S RESPONSE TO ORDER CONSOLIDATING DOCKETS AND COMPELLING STAFF AND CURB TO DISCLOSE RATE CASE EXPENSES

The Citizens' Utility Ratepayer Board (CURB) responds below to the Kansas Corporation Commission's *Order Consolidating Dockets and Compelling Staff and Curb to Disclose Rate Case Expenses*, which was issued in both of the above-captioned dockets on June 19, 2013.

The order requested information on CURB's expenses for the Howison Heights rate case docket and the investigation into Howison's financial condition and how that condition might affect Howison's ability to serve customers.

1. CURB's actual expenses

In response to the Commission's order, CURB has attached spreadsheets that itemize the time spent by CURB employees on these two dockets. These spreadsheets, which were initially provided informally to Commission Staff on June 18, 2013, have been updated through June 21, 2013.

2. Projected assessments from CURB to Howison Heights for FY 2013 and FY 2014

CURB cautions the Commission that K.S.A. 66-1502 limits the amount of regulatory fees that CURB or Staff can assess to Howison Heights, as follows:

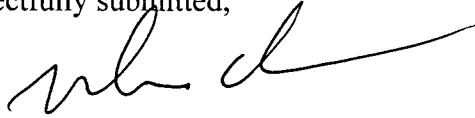
The total amount, in any one state fiscal year for which any public utility or common carrier shall be assessed under the provisions of this section shall not exceed the following ... for any other public utility or common carrier under the jurisdiction of the commission, 0.6% of the public utility's or common carrier's gross operating revenues derived from intrastate operations as reflected in the last annual report...

According to Staff's Chief of Accounting and Financial Analysis, Justin Grady, Howison Heights, Inc.'s assessments are based on \$41,094 gross operating revenues reported in Howison's most recent annual report, which was based on the year 2010 and filed with the Commission in 2012. Gross operating revenues include revenues from rates as well as other sources of revenue, such as connection and disconnection fees.

Therefore, pursuant to K.S.A. 66-1502, until and unless Howison Heights submits another annual report to the Commission reflecting higher or lower gross operating revenues than reported for 2010, the maximum amount that CURB (or the Commission, for that matter) can assess to Howison in each fiscal year will remain \$246.56, which is .6% of Howison's gross operating revenues for 2010.

Given that fiscal year 2013 is coming to an end on June 30, 2013, and assuming both of these dockets are likely to be closed by the end of fiscal year 2014, **the maximum amount that CURB could assess to Howison for CURB's expenses of working on these dockets is a total of \$493.12.**

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'N. Christopher', written over a horizontal line.

David Springe #15619
Niki Christopher #19311
C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
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Employee	Job Title	Week End Date	Docket_No	Activity Code	Hours	Rate	Total
D Springe	Attorney C	06/08/13	13-HHIW-570-RTS	REG	2	\$ 85.00	\$ 170.00
D Springe	Attorney C	06/22/13	13-HHIW-570-RTS	REG	1	\$ 85.00	\$ 85.00
N Christopher	Attorney A	03/23/13	13-HHIW-570-RTS	REG	3	\$ 72.00	\$ 216.00
N Christopher	Attorney A	03/30/13	13-HHIW-570-RTS	REG	24	\$ 72.00	\$ 1,728.00
N Christopher	Attorney A	04/20/13	13-HHIW-570-RTS	REG	0.5	\$ 72.00	\$ 36.00
N Christopher	Attorney A	05/04/13	13-HHIW-570-RTS	REG	3	\$ 72.00	\$ 216.00
N Christopher	Attorney A	05/11/13	13-HHIW-570-RTS	REG	5	\$ 72.00	\$ 360.00
N Christopher	Attorney A	05/18/13	13-HHIW-570-RTS	REG	9	\$ 72.00	\$ 648.00
N Christopher	Attorney A	06/01/13	13-HHIW-570-RTS	REG	2	\$ 72.00	\$ 144.00
N Christopher	Attorney A	06/08/13	13-HHIW-570-RTS	REG	6	\$ 72.00	\$ 432.00
N Christopher	Attorney A	06/22/13	13-HHIW-570-RTS	REG	40	\$ 72.00	\$ 2,880.00
S Harden	Regulatory Acct/Economist	03/23/13	13-HHIW-570-RTS	REG	3.5	\$ 56.00	\$ 196.00
S Harden	Regulatory Acct/Economist	03/30/13	13-HHIW-570-RTS	REG	3	\$ 56.00	\$ 168.00
S Harden	Regulatory Acct/Economist	04/06/13	13-HHIW-570-RTS	REG	1	\$ 56.00	\$ 56.00
S Harden	Regulatory Acct/Economist	05/04/13	13-HHIW-570-RTS	REG	3	\$ 56.00	\$ 168.00
S Harden	Regulatory Acct/Economist	05/11/13	13-HHIW-570-RTS	REG	5	\$ 56.00	\$ 280.00
S Harden	Regulatory Acct/Economist	05/18/13	13-HHIW-570-RTS	REG	35	\$ 56.00	\$ 1,960.00
S Harden	Regulatory Acct/Economist	05/25/13	13-HHIW-570-RTS	REG	6	\$ 56.00	\$ 336.00
S Harden	Regulatory Acct/Economist	06/22/13	13-HHIW-570-RTS	REG	11.5	\$ 56.00	\$ 644.00
Sd Smith	Office Manager	05/25/13	13-HHIW-570-RTS	REG	0.75	\$ 44.00	\$ 33.00
					164.25		\$ 10,756.00

Employee	Job Title	Week End Date	Docket_No	Activity Code	Hours	Rate	Cost	
N Christopher	Attorney A	02/02/13	13-HHIW-460-GIV	REG	1	\$ 72.00	\$ 72.00	billed 5/15/13 reimbursable assessment
N Christopher	Attorney A	06/01/13	13-HHIW-460-GIV	REG	2	\$ 72.00	\$ 144.00	billed 8/15/13 reimbursable assessment
S Harden	Regulatory Acct/Economist	02/23/13	13-HHIW-460-GIV	REG	2	\$ 56.00	\$ 112.00	billed 5/15/13 reimbursable assessment
					5		\$ 328.00	

CERTIFICATE OF SERVICE

13-HHIW-570-RTS/13-HHIW-460-GIV

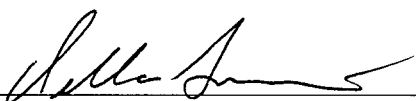
I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 26th day of June, 2013, to the following parties who have waived receipt of follow-up hard copies:

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Della Smith
Administrative Specialist