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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

**MEMORANDUM**

**To:** Marie Prezioso, Chair  
Funding Committee  
Infrastructure and Jobs Development Council

**From:** Katheryn Emery, P. E.  
Sewer Technical Review Committee

**Date:** February 15, 2023

**Subject:** Huntington Sanitary Board  
Preliminary Application: IJDC No. 2022S-2302  
13<sup>th</sup> Street West Pump Station Upgrade Project

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:
  - a.  Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the wastewater needs in this area.
  - b.  Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.
  - c.  Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.
2. Our recommendation is that:
  - a.  The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.
  - b.  The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

- c. \_\_\_ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project funding should be tabled until technical comments have been resolved.
- d. \_\_\_ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project includes upgrades and rehabilitation of the existing 13th St. W. Pump Station.

The proposed total project cost is \$19,500,000, and the proposed funding scenario includes a CWSRF 40-year loan at 0.5% interest of \$11,000,000, a CWSRF Principal Forgiveness Loan of \$2,000,000, CWSRF Green Projects Reserve funds of \$500,000, an IJDC District 1 Grant of \$1,000,000, and a WDA Economic Enhancement Grant of \$5,000,000.

Attachments: Technical Comments

**Engineering Fees:**

Estimated construction cost =	\$ 17,165,000.00
Consultant's design fee =	\$ 975,000.00
Consultant's total fee =	\$ 2,020,000.00
Design fee percentage =	5.7 %
Design fee per ASCE curve =	6.0 %
Total fee percentage =	11.8 %
Total fee per ASCE curve =	14.0 %

**Preliminary Project Ratings:**

1. Public Health Benefits	10
3. Compliance with Standards	20
5. O & M Capabilities	3
6. Readiness to Proceed	0
8. Cost Effectiveness	0



STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

Bureau for Public Health  
Office of Environmental Health Service

Jeffrey H. Coben, MD  
Interim Cabinet Secretary

Matthew Q. Christiansen, MD, MPH  
Commissioner & State Health Officer

**MEMORANDUM**

**TO:** Jason Billups, P.E.  
DEP/Infrastructure Sewer Technical Review Committee

**FROM:** William S. Herold, Jr., P.E., Assistant Manager  
I/CD/Environmental Engineering Division

**DATE:** February 13, 2023

**SUBJECT:** Huntington Sanitary Board  
Preliminary Application **Project No.: 2022S-2302**  
13<sup>th</sup> Street Sanitary Pump Station  
Cabell County

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**RECOMMENDATION:**

We have reviewed this preliminary application and recommend it be forwarded to the Funding Committee for review.

**PROJECT SCOPE:**

This preliminary application is to renovate and upgrade the 13<sup>th</sup> Street Sanitary Pump Station. Major work will consist of the removal and replacement of the existing pumps, electrical service, grating, pump supports, hatches above the pumps, crane, and piping.

The cost per customer is \$937. Total estimated project cost is \$19,500,000 (CWSRF Loan: \$11,000,000@ 0.50% for 40 years; CWSRF Principal Forgiveness: \$2,000,000; CWSRF Green Funding Forgiveness Loan: \$500,000; IJDC Grant: \$1,000,000; and WDA Economic Enhancement Grant Fund: \$5,000,000).

**NEED FOR PROJECT:**

The Preliminary Engineering Report indicates the City of Huntington's existing 13<sup>th</sup> Street Sanitary Pump Station was constructed in 1956 and has not had a major equipment replaced or updated since installation. Many of the replacement parts are not readily available due to the age and make of the pumps. The existing piping is covered in asbestos insulation, the concrete pump supports are worn and could use rehabilitation. The heating, ventilation and air conditioning will be replaced with a system that meets current standards.

**CONCERNS:**

None.

**PERMITS:**

A permit **will not be** required from the WV Bureau for Public Health, since CWSRF funds are proposed.



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Harold D. Ward, Cabinet Secretary  
dep.wv.gov

## MEMORANDUM

**TO:** Katheryn Emery, P.E., Director, DWWM

**FROM:** Thomas Cazad, P.E., Engineer, DWWM

**DATE:** February 10, 2023

**SUBJECT:** Huntington Sanitary Board  
Preliminary Application: IJDC No. 2022S-2302  
13<sup>th</sup> Street West Pump Station Upgrade Project

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### RECOMMENDATION

The IJDC Application and Preliminary Engineering Report (PER), prepared by Potesta & Associates, Inc., for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

The Huntington Sanitary Board (HSB) serves approximately 20,836 customers in the City of Huntington and the surrounding area, including customers served by the Towns of Ceredo and Kenova, and the Northern Wayne, Spring Valley, and Pea Ridge Public Service Districts (PSDs). HSB operates a combined sewer system that conveys sewage to an activated sludge wastewater treatment plant (WWTP) rated for an average daily flow (ADF) of 17.0-million gallons per day (MGD). The combined sewer system contains 22 permitted combined sewer outfalls (CSOs) and is tied into the floodwall's pumping system as well.

The proposed project includes upgrades and rehabilitation of the existing 13th St. W. Pump Station (PS), including cleaning and coating the existing wet well; replacement of pumps, motor controls, variable frequency drives (VFDs), piping, valves, flow meter, railings, gratings, hatches, lighting, HVAC, electrical, conduit, generator, and automatic transfer switch; Removal of asbestos-insulated piping; installation of bypass pump vault and force main; bypass pumping during construction; installation of telemetry; demolition and/or rehabilitation of existing structures and concrete supports; restoration; and all necessary appurtenances.

The proposed total project cost is \$19,500,000, and the proposed funding scenario includes a CWSRF 40-year loan at 0.5% interest of \$11,000,000, a CWSRF Principal Forgiveness Loan of

\$2,000,000, CWSRF Green Projects Reserve funds of \$500,000, an IJDC District 1 Grant of \$1,000,000, and a WDA Economic Enhancement Grant of \$5,000,000. The current monthly rate for 3,400 gallons is \$28.29, but rates will be increased to \$65.15 as part of IJDC Project Nos. 2022S-2244 and 2022S-2245.

### **NEED FOR PROJECT**

The 13th St. W. PS was constructed in 1956 and has been in operation without a major upgrade since that time. Two of the PS's four (4) original 10,500 gallons per minute (GPM) pumps have since been retrofitted with VFDs, and are currently rated for 8,300 GPM. The IJDC Application indicates that this PS is responsible for conveying approximately 80% of the City's wastewater. As part of the WWTP Upgrade project (IJDC 2022S-2245), the WWTP's wet weather flow is anticipated to increase to 69 million gallons per day (MGD). The PER indicates that four other pump stations pump into the force main that conveys flow from the 13th St. W. PS to the WWTP. Each of the four (4) proposed pumps will be rated for 16,000 GPM, which have been sized for three pumps to pump wet weather flows up to 47 MGD with the fourth pump provided for redundancy.

The proposed project appears to be in accordance with HSB's Plan of Corrective Action, approved on 8/8/22, in response to Consent Order No. 8753.

### **DEFICIENCIES/COMMENTS**

- The Applicant will need to file an application for the WDA Economic Enhancement Grant following this submittal.
- Further discussion of the existing EDUs, existing and proposed O&M costs, proposed reduction in energy usage, I/I, and CSO events, including documentation of overflows, will be necessary in the facilities plan.
- A public meeting must be held to discuss the project, costs, and associated customer rates.
- Based on the project's schedule, a CWSRF Project Priority List application will need to be submitted for FY 2024.
- The PER will need to be developed into the facilities plan that meets CWSRF requirements.

#### **Engineering Fees:**

Estimated construction cost =	\$ 17,165,000.00
Consultant's design fee =	\$ 975,000.00
Consultant's total fee =	\$ 2,020,000.00
Design fee percentage =	5.7 %
Design fee per ASCE curve =	6.0 %
Total fee percentage =	11.8 %
Total fee per ASCE curve =	14.0 %

#### **Preliminary Project Ratings:**

Public Health Benefits	10
Compliance with Standards	20

# Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812  
Charleston, West Virginia 25323



Phone: (304) 340-0300  
Fax: (304) 340-0325

February 8, 2023

Ms. Kathy Emery, P. E.  
Office of Water Resources  
Department of Environmental Protection  
601 57<sup>th</sup> St.  
Charleston, West Virginia 25304

Re: Public Service Commission Staff Review Comments  
Application No. 2022S-2302  
Huntington Sanitary Board  
Infrastructure Preliminary Application

Dear Ms. Emery:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of the District's current financial condition, we are recommending the application be:

- forwarded to the Funding Committee  
 forwarded to the Consolidation Committee  
 return to the Applicant

Please advise if you have any questions.

Sincerely,

A handwritten signature in red ink, appearing to read "Jonathan M. Fowler".

Jonathan M. Fowler, P.E.  
Engineering Division

JMF:vb

**PUBLIC SERVICE COMMISSION STAFF  
TECHNICAL REVIEW**

**DATE:** February 7, 2023

**PROJECT SPONSOR:** HUNTINGTON SANITARY BOARD

**PROJECT SUMMARY:** 13th Street West Sewer Pump Station Upgrade: This Project will renovate and upgrade the 13th Street Pump Station which was constructed in the mid 1950's.

**PROPOSED FUNDING:**

WDA Economic Enhancement Grant	\$ 5,000,000
CWSRF Loan .25%, .25% AF, 40 yrs.	\$ 11,000,000
CWSRF Green Funding Grant	500,000
CWSRF Principal Forgiveness	2,000,000
IJDC Grant	1,000,000
Total	<u>\$ 19,500,000</u>

**CURRENT RATES:**

\$28.29	3,400 gallons
\$31.50	4,000 gallons

**PROPOSED RATES:**

\$65.15	3,400 gallons
\$72.50	4,000 gallons

Application No. 2022S-2302

**RECOMMENDATION:**  forward to the Funding Committee.  
 forward to the Consolidation Committee.  
 return to the Applicant.

**FINANCIAL: William Nelson**

1. Current rates (\$28.29 for 3,400 gallons) are below the rates attributable to 1.25% (\$34.39), 1.5% (\$41.27), 1.75% (\$48.14), and 2.0% (\$55.02) of the Median Household Income (MHI). Increasing current rates to 1.25%, 1.5%, 1.75%, and 2.0% of the MHI would provide additional revenues of \$7,333,052, \$15,604,157, \$23,875,263, and \$32,146,368 respectively.
2. Using Scenario 1, the preferred funding package consisting of a WDA Economic Enhancement Grant of \$5,000,000, a CWSRF Loan of

\$11,000,000 at .25%, .25% admin. fee, 40 years (paid back over 38 years), a CWSRF Green Funding Grant of \$500,000, a CWSRF Principal Forgiveness of \$2,000,000, and an IJDC District 3 Grant of \$1,000,000, proposed rates (\$65.15 for 3,400 gallons) will provide a cash flow surplus of \$3,928,860 and debt service coverage of 206.43%.

3. Using the Scenario 2 alternate loan package of \$19,500,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates (\$65.15 for 3,400 gallons) will provide a cash flow surplus of \$2,998,251 and debt service coverage of 182.46%.

#### 4. NOTES TO COMMENTS

- A. It should be noted that the project sponsor is pursuing four separate projects (2022S-2302, 2022S-2303, 2022S-2304, and 2022S-2305). This project is referred to as 13<sup>th</sup> Street Pump Station Project. NOTE: The City is proposing an increase in rates (\$65.15 for 3,400 gallons) applicable for all of the four (4) projects. The review of this project includes adjustments associated with 13<sup>th</sup> Street Pump Station.
- B. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).
- C. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2022, and the applicant's Rule 42 Exhibit submitted with the application.
- D. On December 12, 2022, the City adopted a 4 phase rate increase. Phase 1, effective February 1, 2023, rates will increase to \$37.00 (3,400 gallons). Phase 2, effective January 1, 2024, rates will increase to \$43.00 (3,400 gallons). Phase 3, effective January 1, 2025, rates will increase to \$51.45 (3,400 gallons). Phase 4, effective January 1, 2026, rates will increase to \$65.15 (3,400 gallons).
- E. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the



cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

- F. The City of Huntington should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Staff notes that the City is a political subdivision of the state and it has at least 4,500 customers and annual gross revenues of \$3 million or more. Therefore, in accordance with Senate Bill 234, effective June 12, 2015, the Commission has no jurisdiction regarding the City's rates pursuant to WV Code 24-2-4b. However, the Commission does have jurisdiction pursuant to WV Code 24-2-1 (b)(6) for the investigation and resolution of disputes involving political subdivisions of the state regarding inter-utility agreements, rates, fees and charges, service areas and contested utility combinations.

**ENGINEERING:** Brandon Crace

1. This project will not require a Certificate of Convenience and Necessity from the PSC (see financial comment above).
2. Scope: The Huntington Sanitary Board proposes to renovate and upgrade its 13<sup>th</sup> Street West Pumping Station with new equipment, controls, piping, etc. The station was constructed in 1956 and contains mostly original equipment. This large station accepts flows from the combined system's diversion chambers and provides a hydraulic lift to the interceptor sewer line. Construction will also include bypass pumping, grit removal, and a control building.

Customer Density: N/A

Cost per Customer: \$928 based on a project cost estimate of \$19,500,000 spread over 21,000 existing customers).

3. Project Feasibility: The project is technically feasible. The cost per customer is reasonable. The project will provide needed renovations and

modernization to an aged pumping station, increase the flow to the wastewater treatment plant, and reduce combined sewage overflows.

4. **Project Alternatives:** The proposed renovations were determined to be less expensive and more feasible than building a new facility.
5. **Consolidation:** No consolidation opportunities are presented by the project.
6. **Inconsistencies:** None were noted.
7. **Operation and Maintenance (O & M) Expenses:** The PER does not quantify anticipated O & M expenses, but explains that the new pumps will have approximately the same energy usage at the old pumps, maintenance costs will be reduced due to the new equipment, and power costs will increase after the planned capacity upgrade of the wastewater treatment plant.
8. **Engineering Agreement:** The application includes information to determine compliance with West Virginia Code §§5G-1-1, et seq. Total technical services (engineering) costs for the project are \$2.02 million which is equal to 11.8% of the construction cost of \$17.165 million (including contingency).

<b><i>Preliminary Project Ranking</i></b>		
<b>O &amp; M Capabilities</b>		
Performance Measures:	1	<i>Pt.</i>
Asset Management:	1	<i>Pt.</i>
Environmental Management:	1	<i>Pt.</i>
Readiness to Proceed:	0	<i>Pt.</i>
Cost Effectiveness:	0	<i>Pt.</i>
Compliance with PSC Orders:	0	<i>Pt.</i>

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2302  
 February 7, 2023

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

	Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b><u>AVAILABLE CASH</u></b>				
Operating Revenues	14,773,535	27,053,287	(1,732,981) (1)	25,320,306
Other Operating Revenue	691,446	691,446	-	691,446
SB 234 Annual Working Cash Collections			1,732,981 (2)	1,732,981
Interest Income & Other Misc.	16,488	16,488	-	16,488
<b>Total Cash Available</b>	<b>15,481,469</b>	<b>27,761,221</b>	<b>-</b>	<b>27,761,221</b>
<b><u>OPERATING DEDUCTIONS</u></b>				
Operating Expenses	12,744,618	13,863,847	348 (3)	13,864,195
Taxes	491,840	558,788	-	558,788
<b>Total Cash Requirements Before Debt Service</b>	<b>13,236,458</b>	<b>14,422,635</b>	<b>348</b>	<b>14,422,983</b>
<b>Cash Available for Debt Service (A)</b>	<b>2,245,011</b>	<b>13,338,586</b>	<b>(348)</b>	<b>13,338,238</b>
<b><u>DEBT SERVICE REQUIREMENTS</u></b>				
Principal & Interest (B)	1,537,069	6,461,107	357 (4)	6,461,464
Other Debt	-	-	-	-
Reserve Account @ 10%		564,606	33 (5)	564,639
Renewal & Replacement Fund (2.5%)	387,037	694,031	(43,737) (6)	650,294
<b>Total Debt Service Requirement</b>	<b>1,924,106</b>	<b>7,719,744</b>	<b>(43,347)</b>	<b>7,676,397</b>
<b>SB 234 Cash Working Capital</b>	<b>1,593,077</b>	<b>1,732,981</b>	<b>-</b>	<b>1,732,981</b>
<b>Remaining Cash</b>	<b>(1,272,172)</b>	<b>3,885,861</b>	<b>42,999</b>	<b>3,928,860</b>
<b>Percent Coverage (A) / (B)</b>	<b>146.06%</b>	<b>206.44%</b>		<b>206.43%</b>
Average rate for 3,400 gallons	\$ 28.29	\$ 65.15	\$ -	\$ 65.15
Average rate for 4,000 gallons	\$ 31.50	\$ 72.50	\$ -	\$ 72.50

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2302

Attachment A  
 PREFERRED FUNDING PACKAGE  
 SCENARIO 1

Staff Adjustments

<u>Adjustment Description</u>		\$	Increase <Decrease>
(1) <b>Operating Revenues</b>	Per Staff Analysis	25,320,306	(1,732,981)
	Per Application with Project	27,053,287	
Adjust revenues in accordance with PSC General Order 183.11.			
(2) <b>SB 234 Annual Working Cash Collections</b>	Per Staff Analysis	1,732,981	1,732,981
	Per Application with Project	-	
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3) <b>Operating Expenses</b>	Per Staff Analysis	13,864,195	348
	Per Application with Project	13,863,847	
To adjust for a .25% administrative fee associated with a \$11,000,000 CWSRF Loan for 40 yrs (paid back over 38 yrs.).			
(4) <b>Principal &amp; Interest</b>	Per Staff Analysis	6,461,464	357
	Per Application with Project	6,461,107	
The difference in P&I is related to Staff's calculation of a CWSRF Loan of \$11,000,000 for 40 years (paid back over 38 yrs.) at .25%.			
(5) <b>Reserve Account @ 10%</b>	Per Staff Analysis	564,639	33
	Per Application with Project	564,606	
Staff assumed a 10% reserve on the new debt.			
(6) <b>Renewal &amp; Replacement Fund (2.5%)</b>	Per Staff Analysis	650,294	(43,737)
	Per Application with Project	694,031	
Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2302  
 February 7, 2023

**LOAN PACKAGE  
 SCENARIO 2**

	Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b><u>AVAILABLE CASH</u></b>				
Operating Revenues	14,773,535	27,053,287	(1,732,259) (1)	25,321,028
Other Operating Revenue	691,446	691,446	-	691,446
SB 234 Annual Working Cash Collections			1,732,259 (2)	1,732,259
Interest Income & Other Misc.	16,488	16,488	-	16,488
<b>Total Cash Available</b>	<b>15,481,469</b>	<b>27,761,221</b>	<b>-</b>	<b>27,761,221</b>
<b><u>OPERATING DEDUCTIONS</u></b>				
Operating Expenses	12,744,618	13,858,069	-	13,858,069
Taxes	491,840	558,788	-	558,788
<b>Total Cash Requirements Before Debt Service</b>	<b>13,236,458</b>	<b>14,416,857</b>	<b>-</b>	<b>14,416,857</b>
<b>Cash Available for Debt Service (A)</b>	<b>2,245,011</b>	<b>13,344,364</b>	<b>-</b>	<b>13,344,364</b>
<b><u>DEBT SERVICE REQUIREMENTS</u></b>				
Principal & Interest (B)	1,537,069	7,285,976	27,702 (3)	7,313,678
Other Debt	-	-	-	-
Reserve Account @ 10%		647,093	2,770 (4)	649,863
Renewal & Replacement Fund (2.5%)	387,037	694,031	(43,719) (5)	650,312
<b>Total Debt Service Requirement</b>	<b>1,924,106</b>	<b>8,627,100</b>	<b>(13,246)</b>	<b>8,613,854</b>
<b>SB 234 Cash Working Capital</b>	<b>1,593,077</b>	<b>1,732,259</b>	<b>-</b>	<b>1,732,259</b>
<b>Remaining Cash</b>	<b>(1,272,172)</b>	<b>2,985,005</b>	<b>13,246</b>	<b>2,998,251</b>
<b>Percent Coverage (A) / (B)</b>	<b>146.06%</b>	<b>183.15%</b>		<b>182.46%</b>
Average rate for 3,400 gallons	\$ 28.29	\$ 65.15	\$ -	\$ 65.15
Average rate for 4,000 gallons	\$ 31.50	\$ 72.50	\$ -	\$ 72.50

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2302

Attachment B  
 LOAN PACKAGE  
 SCENARIO 2

Staff Adjustments

<u>Adjustment Description</u>			\$	Increase <Decrease>
(1)	<b>Operating Revenues</b>	Per Staff Analysis Per Application with Project	25,321,028 27,053,287	(1,732,259)
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	<b>SB 234 Annual Working Cash Collections</b>	Per Staff Analysis Per Application with Project	1,732,259 -	1,732,259
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	<b>Principal &amp; Interest</b>	Per Staff Analysis Per Application with Project	7,313,678 7,285,976	27,702
	The difference in P&I is related to Staff's calculation of a Loan of \$19,500,000 for 40 years (paid back over 38 yrs.) at 5%.			
(4)	<b>Reserve Account @ 10%</b>	Per Staff Analysis Per Application with Project	649,863 647,093	2,770
	Staff assumed a 10% reserve on the new debt.			
(5)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	Per Staff Analysis Per Application with Project	650,312 694,031	(43,719)
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			