

RSA Accounting Policy Resolution

Date of this Brief	August 6, 2010		
Supersedes	None		
Key Contacts		Phone	Short Title
	Phil Leiber	4-4649	CFO
	Fernando Estudillo	4-3832	General Actg Manager
Council Action Required?	Yes	If YES, within the next 3 months?	
			Yes
Presenters (if applicable)	Phil Leiber, Chief Financial Officer, Seattle City Light		

Summary Statement

The proposed resolution will affirm Seattle City Light's (SCL) use of certain standard accounting practices in administering the Rate Stabilization Account (RSA). These practices are in accordance with generally accepted accounting principles of the United States of America. SCL's independent auditors are looking for affirmation of these practices by Resolution.

Background

The Rate Stabilization Account (RSA), implemented on May 1, 2010, was established under Ordinance 121637 and expanded with additional parameters under Ordinance 123260. City Light is required by Generally Accepted Accounting Principles of the United States of America to get the approval of its regulator – the City Council – for the accounting treatment of deposits to and withdrawals from the RSA.

The proposed Resolution authorizes the use of two accounting standards for revenue associated with the RSA account. ASC 980-405-25-25-1 may be used to defer or recognize revenues for past and current RSA cash deposits and withdrawals and ASC 980-605-25-25-1-4 may be used for recognition of future retail revenues. The Resolution limits the future revenues that may be recognized for this purpose to one complete billing cycle unless otherwise approved by City Council. The accounting standards would be used in those circumstances where doing so was necessary for City Light to meet its debt service coverage policy established by the City Council. The proposed Resolution also directs City Light to send an annual affirmation letter to City Council, specifying the amount of revenue deferred or recognized for the fiscal year ended and the related recording amount of the regulatory asset or liability.

Key Issues

- The RSA was established to reduce the need for rapid and substantial rate increases to comply with bond covenants.
- Revenue fluctuations have the potential to impact SCL debt coverage requirements and compliance with bond covenants. The ability to defer or recognize revenue associated with RSA cash deposits and withdrawals will allow SCL to manage the impact of revenue fluctuations such that SCL may achieve a debt service coverage ratio in accordance with its financial policies.
- There are no changes in revenues as a result of the legislation. The legislation will only change the timing of when the RSA revenue will be recognized as earned revenue for financial accounting and reporting purposes.
- If the legislation is not implemented, it would increase the possibility that SCL would be unable to meet bond coverage and debt service coverage ratio requirements in a given year. If SCL could not meet its required bond coverage and debt service coverage ratios, it is possible that SCL's bond credit ratings would be lowered which would result in potential higher financing costs.
- Annually, SCL will send an affirmation letter to City Council specifying the amount of revenue deferred or recognized for the fiscal year ended and the related recording amount for the regulatory asset or liability.

Next Steps

1. Brief the Energy, Technology, and Civil Rights Committee on the recommended RSA Resolution.
2. Seek City Council approval of the RSA Resolution in September 2010.
3. Implement ASC 980-405-25-25-1 for fiscal year 2010 and beyond.
4. Implement ASC 980-605-25-25-1-4 as needed.
5. Send affirmation to City Council specifying the amount of revenue deferred or recognized for fiscal year ended 2010.



City of Seattle
Office of the Mayor

August 31, 2010

Honorable Richard Conlin
President
Seattle City Council
City Hall, 2nd Floor

Dear Council President Conlin:

I am transmitting the attached proposed Resolution which authorizes Seattle City Light's use of certain standard accounting practices in administering the Rate Stabilization Account (RSA). Seattle City Light's independent auditors are looking for affirmation of these practices by Resolution. This legislation allows for the deferral or recognition of revenue associated with the RSA in accordance with generally accepted accounting principles in the United States of America.

The Rate Stabilization Account (RSA) was established to reduce the need for rapid and substantial Seattle City Light rate increases to comply with previously authorized bond covenants. Revenue fluctuations have the potential to impact Seattle City Light debt coverage requirements and compliance with the bond covenants. The ability to defer or recognize revenue associated with the RSA cash deposits and withdrawals will allow Seattle City Light to manage the impact of these fluctuations such that Seattle City Light may achieve a debt service coverage ratio in accordance with its financial policies. Each year, Seattle City Light will send an affirmation letter to City Council specifying the amount of revenue deferred or recognized for the fiscal year ended and the related recording of the regulatory asset or liability.

Thank you for your consideration of this legislation. Should you have questions, please contact Philip Leiber at 206-684-4649.

Sincerely,

Michael McGinn
Mayor of Seattle

cc: Honorable Members of the Seattle City Council

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RESOLUTION 31244

1
2 A RESOLUTION relating to the City Light Department; authorizing the deferral or recognition
3 of revenue associated with the additional parameters created by Ordinance 123260 on the
4 funding, operation and expenditures of amounts in the Rate Stabilization Account in
5 accordance with Accounting Standards Codifications (ASC) 980-405-25-25-1 *Regulated*
6 *Operations-Liabilities-Recognition-Regulator Imposed Liabilities* and ASC 980-605-25-
7 *25-1-4 Regulated Operations – Revenue Recognition – Recognition – Alternative*
8 *Revenue Programs* and subsequent amendments.

9 WHEREAS, Ordinance 121637 created the Rate Stabilization Account to reduce the need for
10 rapid and substantial increases in City Light rates to comply with certain previously
11 authorized bond covenants; and

12 WHEREAS, Ordinance 123260 expanded the parameters of the Rate Stabilization Account and
13 provided a funding mechanism for the Rate Stabilization Account; and

14 WHEREAS, deposits to the Rate Stabilization Account will come from a variety of sources such
15 as cash from operations in excess of operations and debt service, savings from refunding
16 bonds, sale of surplus property, etc., and other sources of revenues as determined by City
17 Council; and

18 WHEREAS, deposits into and withdrawals from the Rate Stabilization Account, and the revenue
19 associated with the deposits and withdrawals, also affect the calculation of “Net
20 Revenue” and can therefore serve to absorb other fluctuations in “Net Revenue” as that
21 term is defined in prior City Light bond ordinances; and

22 WHEREAS, the deferral or recognition of revenue associated with the deposits and withdrawals
23 in the Rate Stabilization Account may be subject to ASC 980-450-25-25-1 and ASC 980-
24 605-25-25-1-4; and

25 WHEREAS, the deferral or recognition of revenue, and the related recording of the regulatory
26 asset or liability using either ASC 980-405-25-25-1 or ASC 980-605-25-25-1-4 will help
27 absorb fluctuations in City Light’s annual revenue; NOW, THEREFORE,

28 **BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEATTLE, THE
MAYOR CONCURRING, THAT:**

Section 1. When accounting for deposits to, or withdrawals from, the Rate Stabilization
Account, the City Light Department may defer or recognize revenue in the Statement of
Revenues, Expenses and Changes in Equity, in accordance with ASC 980-405-25-25-1. As



1 needed, the City Light Department may also recognize future revenues in accordance with ASC
2 980-605-25-25-1-4. However, under no circumstances shall future revenues beyond City Light's
3 next complete billing cycle be recognized under ASC 980-605-25-25-1-4 unless otherwise
4 approved by City Council.

5 Section 2. The Superintendent of City Light shall provide an annual affirmation letter to
6 City Council, specifying the amount of revenue deferred or recognized for the fiscal year ended,
7 and the related recording of the regulatory asset or liability, utilizing ASC 980-405-25-25-1, ASC
8 980-605-25-25-1-4, and subsequent amendments.

9 Adopted by the City Council the ____ day of _____, 2010, and
10 signed by me in open session in authentication of its adoption this ____ day
11 of _____, 2010.

12 _____
13 President _____ of the City Council

14 THE MAYOR CONCURRING:
15

16 _____
17 Michael McGinn, Mayor

18 Filed by me this ____ day of _____, 2010.

19 _____
20 City Clerk

21 (Seal)
22



FISCAL NOTE FOR NON-CAPITAL PROJECTS

Department:	Contact Person/Phone:	CBO Analyst/Phone:
Seattle City Light	Fernando Estudillo 206-684-3832	Calvin Chow/x4-4652

Legislation Title:

A RESOLUTION relating to the City Light Department; authorizing the deferral or recognition of revenue associated with the additional parameters created by Ordinance 123260 on the funding, operation and expenditures of amounts in the Rate Stabilization Account in accordance with Accounting Standards Codifications (ASC) 980-405-25-25-1 *Regulated Operations-Liabilities-Recognition-Regulator Imposed Liabilities* and ASC 980-605-25-25-1-4 *Regulated Operations – Revenue Recognition – Recognition – Alternative Revenue Programs* and subsequent amendments.

Summary of the Legislation:

This legislation affirms SCL’s use of certain standard accounting practices in administering the Rate Stabilization Account. SCL’s independent auditors are looking for affirmation of these practices by Resolution.

Background:

The Rate Stabilization Account (RSA), implemented on May 1, 2010, was established under Ordinance 121637 and expanded with additional parameters under Ordinance 123260. There are different options for the accounting treatment of deposits to, and withdrawals from, the RSA and City Light is required by Generally Accepted Accounting Principles of the United States of America to get the approval of its regulator – the City Council – for the use of a particular approach.

The proposed Resolution authorizes the use of two accounting standards for revenue associated with the RSA account. ASC 980-405-25-25-1 may be used to defer or recognize revenues for past and current RSA cash deposits and withdrawals and ASC 980-605-25-25-1-4 may be used for recognition of future retail revenues. The Resolution limits the future revenues that may be recognized for this purpose to one complete billing cycle unless otherwise approved by City Council. The accounting standards would be used in those circumstances where doing so was necessary for City Light to meet its debt service coverage policy established by the City Council. The proposed Resolution also directs City Light to send an annual affirmation letter to City Council, specifying the amount of revenue deferred or recognized for the fiscal year ended and the related recording amount of the regulatory asset or liability.



Please check one of the following:

This legislation does not have any financial implications.

This legislation has financial implications.

The SCL – Rate Stabilization Account Accounting Policy Resolution has financial implications in that the deferral or recognition of revenue utilizing ASC 980-405-25-25-1 or ASC 980-605-25-25-1-4 will assist in the reduction of the need for rapid and substantial increases in City Light's rates solely to address bond coverage and debt service coverage ratio requirements.

Any deferral or recognition of revenue associated with the RSA cash deposits and withdrawals, and according to the specifications of the ASC pronouncements, will be recognized as earned revenue in a different fiscal period than when the RSA transactions were originally billed or incurred. SCL's required debt service coverage ratio will be more consistently achieved by utilizing this treatment of revenue, whereby the RSA revenue is deferred to a different fiscal period when operating revenues exceed the revenue required for the current debt service coverage ratio, or RSA revenue is recognized from a different fiscal period when operating revenues are below the revenue required to meet the current debt service ratio.

The recognition of earned revenue in a fiscal period other than the fiscal period billed or transactions incurred will be reflected in SCL's Annual Report, the City's Comprehensive Annual Financial Report, and other financial reports, and will be subject to audit in accordance with auditing standards generally accepted in the United States of America by SCL's independent auditors.

Appropriations: None

Anticipated Revenue/Reimbursement: Resulting from this Legislation:

There are no changes in revenues as a result of the legislation. The legislation will only change the timing of when the RSA revenue will be recognized as earned revenue for financial accounting and reporting purposes.

Total Regular Positions Created, Modified, or Abrogated through this Legislation, Including FTE Impact: None

Do positions sunset in the future? Not Applicable

Spending/Cash Flow: Not Applicable

What is the financial cost of not implementing the legislation?

If the legislation is not implemented, it would increase the possibility that SCL would be unable to meet bond coverage and debt service coverage ratio requirements in a given year which would result in a potential regulatory conflict. If SCL could not meet its required bond coverage and debt service coverage ratios, it is possible that SCL's bond credit ratings would be lowered which would result in potential higher financing costs.

Does this legislation affect any departments besides the originating department? No

What are the possible alternatives to the legislation that could achieve the same or similar objectives? No known alternatives

Is the legislation subject to public hearing requirements? No

Other Issues: None

List attachments to the fiscal note below: None