HURLBERT CPA
regulatory audit services

Pineland Telephone Cooperative, Inc.

Agreed-Upon Procedures Applied to the Universal Access Fund Application for the period ending 6/30/2022

May 3, 2023

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Independent Accountant's Report on Applying Agreed-Upon Procedures

PINELAND TELEPHONE COOPERATIVE, INC.

To the Georgia Public Service Commission:

We have performed the procedures enumerated below on the application for funding from the Georgia Universal Access Fund provided to us by management of Pineland Telephone Cooperative, Inc. (or the "Cooperative." The responsible party Pineland Telephone Cooperative, Inc. is responsible for the application.

The engaging party, Georgia Public Service Commission ("GPSC") has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assessing the application's reasonableness prior to funds being distributed to Pineland Telephone Cooperative, Inc. as of June 30, 2022. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures are listed below with associated findings listed on the following pages.

AUP	Agreed-Upon Procedure
1	Obtain UAF Cooperative pre-filed information and schedules filed with the GPSC
2	Issue specific Contractor data requests to the UAF Companies and schedule field work
3	Audit the Cooperative's UAF model (printed version as well as spreadsheet testing)
4	Trace amounts on the Applicant's Form M back to Cooperative prepared schedules matching their General Ledger
5	Trace Form M data to the UAF Model column entitled Balance Per Books
6	Trace amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations
7	Trace amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.
8	Test the FCC Part 36 study and review allocation/traffic factors
9	Test and recalculate the Revenue Requirement Section on the UAF Model
10	Review each invoice over $250 and select those invoices that appear unreasonable
11	Review corporate allocations and the Cooperative's Cost Allocation Manual

12 Verify fixed asset amounts in the Cooperative's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determine whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes

13 Verify the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work

14 Verify that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates

15 Verify that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt

16 Review the outside auditor's report on the financial statements and report any adverse findings or qualified opinions

17 Review and test the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps

18 Review depreciation rates used for the UAF application and compare to the rates adopted by the GPSC

19 Review cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated

20 Incorporate revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model

21 Prepare exhibits of financial results and support mechanisms. Analyze as to why increases/decreases occurred

22 Identify Construction Work in Progress and Retirement amounts for the test year

23 Identify the Cooperative's affiliates and non-regulated services

24 Identify the total costs charged to the regulated Cooperative by the affiliate or parent Cooperative. Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. If the costs appear unreasonable, propose adjustments or informed GPSC staff and recommend an affiliated transactions engagement be performed

25 For ACAM UAF companies only, obtain the Cooperative spreadsheet depicting calculated amounts, review Cooperative prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment

26 Test and review the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model

27 Finalize work papers and prepare final report

28 Prepare testimony if requested.

We were engaged by the GPSC to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct and examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the application. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Pineland Telephone Cooperative, Inc. and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement. This report is intended solely for the information and use of the Georgia Public Service Commission and Pineland Telephone Cooperative, Inc. and is not intended to be, and should not be, used by anyone other than these specified parties.

Vic Hurlbert, CPA
Hurlbert CPA LLC
Liberty, Missouri
May 3, 2023

Current Request for UAF Disbursements – Summary of Findings

Pineland Telephone Cooperative, Inc.'s final revenue deficiency is $1,083,536. We propose one adjustment of $2,500 with a separated impact of $1,784.

Table 1
Pineland Telephone Cooperative, Inc.

Georgia UAF Summary	Amounts
Original Cooperative Requested Amount from Georgia Universal Access Fund	$1,085,320
REDACTED	$1,784
Total Adjustments	$1,784
Final Amount Recommended by Staff	$1,083,536

As presented in Table 1, we propose Pineland Telephone Cooperative, Inc. receive a UAF disbursement of $1,083,536 based upon the test year for the twelve months ending June 30, 2022.

Profile of Pineland Telephone Cooperative, Inc.

Pineland Telephone Cooperative, Inc. is a telephone cooperative headquartered in Metter, Georgia, serving approximately **REDACTED** access lines as of June 30, 2022. Pineland directly offers both regulated and deregulated products and services to its customers. The Cooperative as a regulated utility provides local telephone service to residential and business customers. Its primary sources of revenue are local services, access charges received from long-distance carriers for the switching of long-distance calls, and billing and collection fees paid by these long-distance carriers.

Agreed Upon Procedures

Procedure 1: Obtained UAF Cooperative pre-filed information and schedules filed with the GPSC.

Conclusion – We reviewed pre-filed files downloaded from the GPSC web site. There were no discrepancies noted.

Procedure 2: Issued specific Contractor data requests to the UAF Companies and scheduled field work.

Conclusion – Data requests were sent to the Cooperative and the Cooperative responded to all data requests.

Procedure 3: Audited the Cooperative's UAF model (printed version as well as spreadsheet testing).

Conclusion – There were no discrepancies noted.

Procedure 4: Traced amounts on the Applicant's Form M back to Cooperative prepared schedules matching their General Ledger.

Conclusion – There were no discrepancies noted.

Procedure 5: Traced Form M data to the UAF Model column entitled Balance Per Books

Conclusion – There were no discrepancies noted.

Procedure 6: Traced amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations.

Conclusion – There were no discrepancies noted.

Procedure 7: Traced amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.

Conclusion – There were no discrepancies noted.

Procedure 8 Tested the FCC Part 36 study and review allocation/traffic factors.

Conclusion – The factors appeared reasonable.

Procedure 9: Tested and recalculate the Revenue Requirement Section on the UAF Model.

Conclusion – There were no discrepancies noted.

Procedure 10: Reviewed each invoice over $250 and select those invoices that appear unreasonable.

Conclusion – Of the selected corporate account invoices, we found invoices that were unreasonable to us totaling $2,500 having a separated impact of $1,784.

Account	Invoice Description	Amount
6613	**REDACTED**	$2,500
Total		$2,500

Procedure 11: Reviewed corporate allocations and the Cooperative's Cost Allocation Manual

Conclusion – The Cooperative does not employ a cost allocation manual. The Cooperative directly assigns costs to cost functions.

Procedure 12 Verified fixed asset amounts in the Cooperative's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determined whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes.

Conclusion – There were no discrepancies noted.

Procedure 13 Verified the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work.

Conclusion – There were no discrepancies noted.

Procedure 14: Verified that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates.

Conclusion – Not applicable.

Procedure 15: Verified that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt.

Conclusion – Not applicable.

Procedure 16: Reviewed the outside auditor's report on the financial statements and report any adverse findings or qualified opinions.

Conclusion – The Cooperative's outside auditor's 2022 report provided an unqualified opinion.

Procedure 17: Reviewed and tested the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps.

Conclusion – The Cooperative was not above the GPSC Corporate Operations Cap.

Procedure 18: Reviewed depreciation rates used for the UAF application and compared to the rates adopted by the GPSC.

Conclusion – The Cooperative's depreciation rates matched or were less than the rates prescribed by the GPSC.

Regulated Depreciation Expense was **REDACTED** in the UAF application. Per the UAF model, Total Plant in Service was **REDACTED**. Composite depreciation rate equals depreciation per year divided by total historical cost. The composite rate is shown below.

Depreciation Expense	**REDACTED**
Total Plant in Service	**REDACTED**
Composite Rate	**REDACTED**

Procedure 19: Reviewed cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated.

Conclusion – The Cooperative does not employ a cost allocation manual. The Cooperative directly assigns costs to cost functions.

Procedure 20: Incorporated revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model.

Conclusion - The current cost of equity approved by the GPSC is 9.25%. Using the Cooperative's actual debt/equity ratio and actual cost of debt, the Cooperative's weighted average cost of capital ("WACC") is **REDACTED**. Because the Cooperative's WACC did not exceed the GPSC's 8% cap, the allowed return on rate base was the **REDACTED** %.

Procedure 21: Prepared exhibits of financial results and support mechanisms. Analyzed as to why increases/decreases occurred.

Receipt of Federal Universal Service Support 2018 – 2022

Support	**2018**	**2019**	**2020**	**2021**	**2022**
HCLS	-$311	$0	$0	0	
ICLS	-121,524	-56,790	36,352	0	
LSS	0	0	0	0	
SNA	0	0	0	0	
SVS	0	0	0	0	
ACAM	4,317,809	3,973,597	3,629,384	3,285,172	2,940,960
Lifeline	6,208	5,537	4,449	3,407	5,009

Financial Results: 2018 – 2022

Description	**2018**	**2019**	**2020**	**2021**	**2022**
Net telecom plant	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Operating Revenues	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Operating Expenses	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Net operating margins	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Total access lines	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**

Conclusion – Net plant decreased due to depreciation expense and retirements. Revenues decreased and expenses increased, as well, further impacting net income, negatively.

Procedure 22: Identified Construction Work in Progress and Retirement amounts for the test year.

Conclusion – The Cooperative had Construction Work in Progress and Plant Retirements at 6/30/2022 of **REDACTED** and **REDACTED**, respectively.

Procedure 23 Identified the Cooperative's affiliates and non-regulated services.

Conclusion – Affiliated and non-regulated services were reviewed and found reasonable.

Pineland PCS, Inc. d/b/a Pineland Long Distance
Pineland Telephone Cooperative, Inc. provides billing and collection as well as accounting services to Pineland PCS, Inc.

Pineland Cellular, Inc.
Pineland Telephone Cooperative, Inc. provides management and accounting services to Pineland Cellular, Inc.

Pineland Telephone Communications, Inc.
Pineland Telephone Cooperative, Inc. provides the following services to Pineland Telephone Communications, Inc. Customer Service Services Management Services Billing & Collection Services Accounting Services Fiber Lease.

Procedure 24 Identified the total costs charged to the regulated company by the affiliate or parent company.

Conclusion - We reviewed billing reports showing a total of **REDACTED** in 6/30/2022 for transactions for the year between Pineland and affiliates. The costs were reasonable.

Cost per Access Line

Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. If the costs appeared unreasonable, proposed adjustments or informed GPSC staff and recommended an affiliated transactions engagement be performed.

The Cooperative had the highest average cost per access line of all UAF applicants in Account 6510 – Other Property & Equipment Expense and Account 6110 – Network Support Expense. For Account Cable & Wire Facilities, the Cooperative had the lowest cost average per access line among UAF applicants.

Procedure 25 For ACAM UAF companies only, obtained the Cooperative spreadsheet depicting calculated amounts, Reviewed Cooperative prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment.

Conclusion – Pineland used the ACAM method and received $2,940,960 in support revenues in the UAF model. There were no discrepancies noted.

Procedure 26 Tested and Reviewed the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model.

Conclusion – There were no discrepancies noted.

Procedure 27 Finalize work papers and prepare final report.

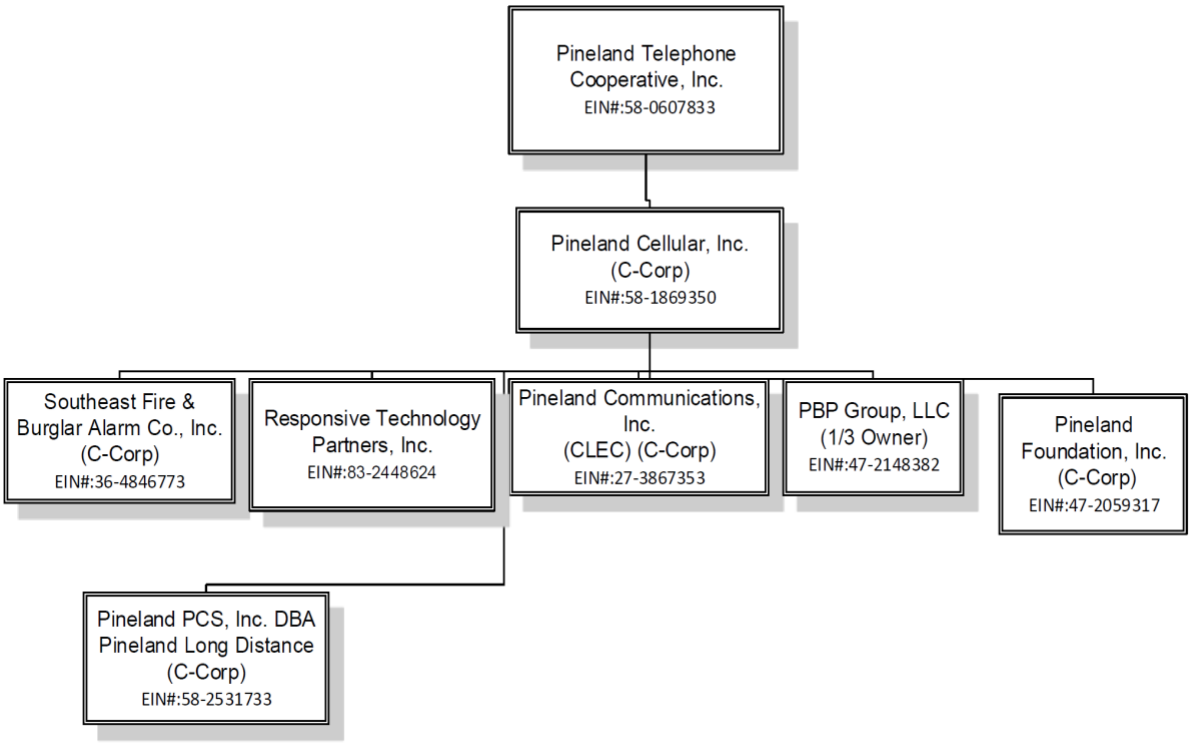
Procedure 28 Prepare testimony if requested.

Exhibit Nos. 1 – 3

1. Pineland Telephone Cooperative, Inc. Organization Chart
2. Pineland Telephone Cooperative, Inc. UAF Net Operating Income and Rate of Return on Rate Base Calculation
3. Pineland Telephone Cooperative, Inc. UAF Cost of Capital Structure and Return on Equity Calculation

Exhibit 1

Pineland Telephone Cooperative, Inc.



Pineland Telephone Cooperative, Inc.
RATE OF RETURN DEVELOPMENT
YEAR ENDING 06/30/22

NET OPERATING INCOME AND RATE OF RETURN ON RATE BASE CALCULATION

		(1)	(2)	(3)
NET OPERATING INCOME DEVELOPMENT		**Subject To**	**Total**	**Total**
	Source	**Separations**	**Interstate**	**Intrastate**
OPERATING REVENUES				
Local Service	Net Operating Income, Ln 1	$3,481,839		$3,481,839
Access Charges	Net Operating Income, Ln 2, 3	$2,780,677	$2,260,153	$520,524
LD Messages	Net Operating Income, Ln 5	$3,512		$3,512
Billing & Collection	Net Operating Income, Ln 6, 7	$142,035	$83,348	$58,687
Other Miscellaneous Revenue	Net Operating Income, Ln 8	$170,059		$170,059
Less: Uncollectibles	Net Operating Income, Ln 11	$29,014	$0	$29,014
Total Regulated Operating Revenue	**Ln 1+Ln 2+Ln 3+Ln 4+Ln 5-Ln 6**	$6,549,108	$2,343,501	$4,205,607
OPERATING EXPENSES				
Plant Specific	Net Operating Income, Ln 20	$2,372,931	$1,505,869	$867,062
Plant Non-Specific	Net Operating Income, Ln 21,22,23	$892,757	$542,194	$350,563
Depreciation & Amortization	Net Operating Income, Ln 29	$4,438,580	$2,821,579	$1,617,001
Customer Operations	Net Operating Income, Ln 33	$903,623	$260,533	$643,090
Corporate Operations	Net Operating Income, Ln 36	$1,368,424	$757,744	$610,680
Total Operating Expenses	**Ln 8+Ln 9+Ln 10+Ln 11+Ln 12**	$9,976,316	$5,887,919	$4,088,397
OPERATING TAXES				
Federal Income Tax -Booked	Net Operating Income, Ln 38,39,40	($0)	$0	($0)
Adjustment to Booked FIT	If Taxes are Imputed, Ln 16-Ln 14	$0	$0	$0
Imputed FIT @ %	(Ln 7-Ln 14-Ln24-Ln21-(Op Inc Ln48))* Rate	$0	$0	$0
Adjustment to Imputed FIT	If Taxes are per book, Ln 14-Ln 16	$0	$0	$0
Booked - Imputed FIT (Net of Adj)		$0	$0	$0
State Income Tax -Booked	Net Operating Income, Ln 41,42	$0	$0	$0
Adjustment to Booked SIT	If Taxes are Imputed, Ln 21-Ln 19	$0	$0	$0
Imputed SIT @ %	(Ln 7-Ln 14-Ln24-(Op Inc. Ln48))* Rate	$0	$0	$0
Adjustment to Imputed SIT	If Taxes are per book, Ln 14-Ln 16	$0	$0	$0
Booked - Imputed SIT (Net of Adj)		$0	$0	$0
Other Taxes	Net Operating Income, Ln 43,44,45	$377,744	$231,849	$145,895
Total Booked Operating Taxes	Ln 14+Ln 15+Ln 19+Ln 20+ Ln 24	$377,744	$231,849	$145,895
Total Imputed Operating Taxes	Ln 14+Ln 15+Ln 19+Ln 20+ Ln 24	$377,744	$231,849	$145,895
NET OPERATING INCOME				
Net Operating Income (NOI)	**Ln 7 - Ln 13 - Ln 25**	**($3,804,951)**	**($3,776,267)**	**($28,685)**
N.O.I. Adjustment	**Net Operating Income, Ln 56,57**	**$0**	**$0**	**$0**
Adjusted Net Operating Income (NOI)	**Ln 27 + Ln 28**	**($3,804,951)**	**($3,776,267)**	**($28,685)**
RATE OF RETURN ON RATE BASE CALCULATION		**Average of End of Period with End of Prior Period**		
RATE BASE				
Land & Support	Rate Base Development, Ln 3	$9,053,312	$5,556,679	$3,496,633
Central Office Equipment	Rate Base Development, Ln 14	$26,438,245	$18,306,607	$8,131,638
Info. Orig. & Term. Equip.	Rate Base Development, Ln 20	$0	$0	$0
Cable & Wire Facilities	Rate Base Development, Ln 31	$44,047,951	$25,055,620	$18,992,331
Other Investment	Rate Base Development, Ln 34, 35	$0	$0	$0
Total Plant in Service	Ln 30 - Ln 34	$79,539,508	$48,918,906	$30,620,602
Accumulated Depreciation	Rate Base Development, Ln 46	$43,006,100	$27,492,682	$15,513,419
Net Plant in Service	Ln 35 - Ln 36	$36,533,408	$21,426,224	$15,107,183
Plant Held for Future Use	Rate Base Development, Ln 47	$0	$0	$0
Plant Under Construction	Rate Base Development, Ln 48	$142,518	$87,474	$55,044
RTB Class B Stock	Rate Base Development, Ln 49	$0	$0	$0
Prepayments	Rate Base Development, Ln 50	$2,246,940	$1,379,111	$867,829
Materials & Supplies	Rate Base Development, Ln 51	$95,117	$54,105	$41,012
Cash Working Capital	Cash Working Capital Develop Ln 3	$252,035	$140,796	$111,239
Deferred Income taxes	Rate Base Development, Ln 54	$0	$0	$0
Customer Deposits	Rate Base Development, Ln 55	$170,216	$104,474	$65,742
Rate Base	**Ln 37 + Ln 38-43, - Ln 44 - Ln 45**	**$39,099,802**	**$22,983,236**	**$16,116,566**
Rate of Return on Rate Base	**Ln 29 / Ln 46**	**-9.73138%**	**-16.43053%**	**-0.17798%**

Pineland Telephone Cooperative, Inc.
RATE OF RETURN DEVELOPMENT
YEAR ENDING 06/30/22

COST OF CAPITAL STRUCTURE & RETURN ON EQUITY CALCULATION

ACTUAL COST OF CAPITAL - TOTAL COMPANY

		Amount	% Total	Rate	Weighted Cost Rate
Short Term Debt	Rate Base, Ln 56	$0	0.00000%	0.00000%	0.00000%
Long Term Debt	Rate Base, Ln 59	$18,781,800	39.37373%	2.40068%	0.94524%
Other	Rate Base, Ln 53	$170,216	0.35684%	7.00000%	0.02498%
Equity	Rate Base, Ln 64	$28,749,336	60.26944%	-17.75626%	-10.70160%
Total Capital		$47,701,353	100.00000%		-9.73138%

ACTUAL COST OF CAPITAL - INTRASTATE ONLY

		Amount	% Total	Rate	Weighted Cost Rate
Short Term Debt	Rate Base, Ln 56	$0	0.00000%	0.00000%	0.00000%
Long Term Debt	Rate Base, Ln 59	$18,781,800	39.37373%	2.40068%	0.94524%
Other	Rate Base, Ln 53	$170,216	0.35684%	7.00000%	0.02498%
Equity	Rate Base, Ln 64	$28,749,336	60.26944%	-1.90511%	-1.14820%
Total Capital		$47,701,353	100.00000%		-0.17798%

ALLOWED CAPITAL STRUCTURE - INTRASTATE

		Amount	% Total	Rate	Weighted Cost Rate
Short Term Debt	Rate Base, Ln 56	$0	0.00000%	0.00000%	0.00000%
Long Term Debt	Rate Base, Ln 59	$18,781,800	39.37373%	2.40068%	0.94524%
Other	Rate Base, Ln 53	$170,216	0.35684%	7.00000%	0.02498%
Equity	Rate Base, Ln 64	$28,749,336	60.26944%	9.25000%	5.57492%
Total Capital		$47,701,353	100.00000%		6.54514%

REVENUE REQUIREMENT CALCULATION

Rate Base (Adjusted Rate Base)	Earnings Report, Ln 46		$16,116,566
Allowed Rate of Return on Rate Base	Per GA PSC	Not Capped	6.54514%
Net Operating Income Requirement	Line 1 x Ln 2		$1,054,852
Net Operating Income Available (Imputed Adjusted NOI)	Earnings Report, Ln 29		($28,685)
Operating Income Excess (Deficiency)	Ln 4 - Ln 3		($1,083,536)
Income Expansion Factor	1-SIT-FIT+FITxSIT		100.000%
Revenue Excess (Deficiency)	Ln 5 / Ln 6		($1,083,536)