HURLBERT CPA
regulatory audit services

Plant Telephone Company, Inc.

Agreed-Upon Procedures Applied to the Universal Access Fund Application for the period ending 6/30/2023

June 20, 2024

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Independent Accountant's Report on Applying Agreed-Upon Procedures

PLANT TELEPHONE COMPANY, 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 Plant Telephone Company, Inc. (or the "Company"). The responsible party Plant Telephone Company 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 Plant Telephone Company as of June 30, 2023. 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 company 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 Company's UAF model (printed version as well as spreadsheet testing)
4	Trace amounts on the Applicant's Form M back to Company 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 Company's Cost Allocation Manual

12 Verify fixed asset amounts in the Company'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 Company's affiliates and non-regulated services

24 Identify the total costs charged to the regulated company by the affiliate or parent company. 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 Company spreadsheet depicting calculated amounts, review Company 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 Plant Telephone Company 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 Plant Telephone Company 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
June 20, 2024

Current Request for UAF Disbursements – Summary of Findings

In 2022, TruVista purchased 100% of the stock of Plant Telephone. Plant Telephone's original revenue deficiency was $4,020,523 using the "fair value of assets" approach. However, to comply with the Georgia PSC UAF Rule 515-12-1-.39, TruVista refiled their UAF model adopting actual costs. The subsequent request for funding dropped to $3,047,683.

Table 1
Plant Telephone Company, Inc.

Georgia UAF Summary	Amounts
Original Company Requested Amount from Georgia Universal Access Fund	$4,020,523
Georgia PSC UAF Rule 515-12-1-.39	-$972,840
Total Adjustments	`$972,840
Revised Deficiency for the Company	$3,047,683
Final Amount Recommended by Staff	$3,047,683

As presented in Table 1, we propose Plant Telephone Company, Inc. receive a UAF disbursement of $3,047,683 based upon the test year for the twelve months ending June 30, 2023.

Profile of Plant Telephone Company

Plant Telephone Company is a regulated telephone company with business and maintenance offices located in Tifton, Georgia. The Company serves REDACTED access lines as of 12/31/2022 in Tift County.

Agreed-Upon Procedures

Procedure 1: Obtained UAF company 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 Company and the Company responded to all data requests.

Procedure 3: Audited the Company'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 Company prepared schedules matching their General Ledger.

Conclusion – We were not provided the General Ledger. We were provided alternative schedules.

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

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 – There were no discrepancies noted.

Procedure 9: Tested and recalculated 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 invoices, we requested further information on Marketing & Customer Service expenses.

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

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

Procedure 12 Verified fixed asset amounts in the Company'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. No Broadband grants existed.

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 – Plant Telephone Company, Inc. used the Revenue Offset Method for determining AFUDC.

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 Company's outside auditor's 2022 report provided a "review report" that did not have an Opinion on the financial statements included in conformity with AICPA requirements.

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 Company was not above the GPSC Executive Compensation Expense Cap or the Corporate Operations Cap.

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

Plant's depreciation expense was comparable to the prior year totaling $1,688,601.

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

Conclusion – The Company does not employ a cost allocation manual.

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 Company's actual debt/equity ratio and actual cost of debt, the Company's weighted average cost of capital ("WACC") is **REDACTED** Because the Company's WACC did exceed the GPSC's 8% cap, the allowed return on rate base was the 8%.

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

Financial Results: 2023

Description	2023
Net telecom plant	**REDACTED**
Operating Revenues	**REDACTED**
Operating Expenses	**REDACTED**
Net operating margins	**REDACTED**
Total access lines	**REDACTED**

Receipt of Federal Universal Service Support 2023

Description	2023
High-Cost Loop Support	$0
Interstate Common Line Support	0
Local Switching Support	0
Safety Net Additive Support	0
Safety Valve Support	0
ACAM	$2,863,525
Lifeline & Link-up programs	$2,839
Total	$2,866,364

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

Conclusion – The Company had Construction Work in Progress and Plant Retirements at 6/30/2023 of **REDACTED** and **REDACTED** respectively.

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

REDACTED

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

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

REDACTED

Conclusion – Total costs charged to the regulated company by the affiliate(s) or parent company was **REDACTED** for the year ending 6/30/2023. TruVista allocated marketing services to Plant Telephone for the year ending 6/30/2023 resulting in **REDACTED** being charged to Plant.

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.

For the year 6/30/2023, Plant Telephone Company, Inc.'s average cost per access line for Account 6711 – Executive Expense and for Account – General & Administrative Expense were the lowest among all UAF companies.

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

Conclusion – Plant Telephone Company, Inc.'s ACAM adjustment totaled $2,863,525. 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.

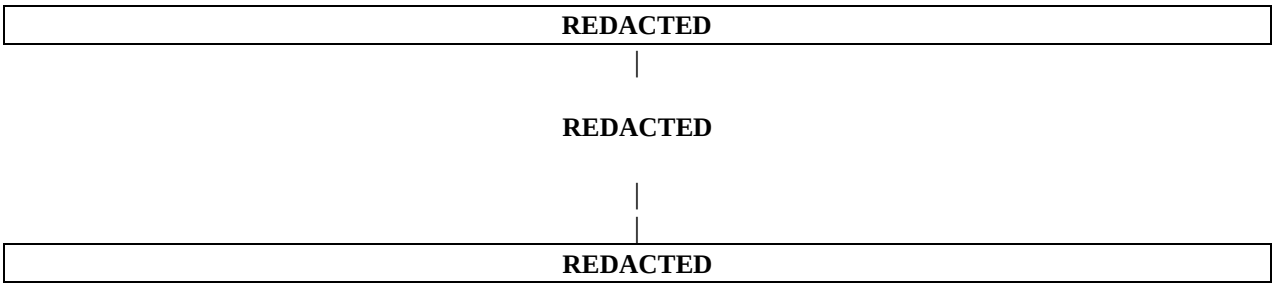
Procedure 27 Finalized work papers and prepared final report.

Procedure 28 Prepare testimony if requested.

Exhibit Nos. 1 – 3

1. Plant Telephone Company Organization Chart
2. Plant Telephone Company UAF Net Operating Income and Rate of Return on Rate Base Calculation
3. Plant Telephone Company UAF Cost of Capital Structure and Return on Equity Calculation

TruVista



PLANT TELEPHONE COMPANY, INC.
RATE OF RETURN DEVELOPMENT
YEAR ENDING 06/30/23

NET OPERATING INCOME AND RATE OF RETURN ON RATE BASE CALCULATION

NET OPERATING INCOME DEVELOPMENT	**Source**	**(1) Subject To Separations**	**(2) Total Interstate**	**(3) Total Intrastate**
OPERATING REVENUES				
Local Service	Net Operating Income, Ln 1	$2,406,100		$2,406,100
Access Charges	Net Operating Income, Ln 2, 3	$4,780,020	$4,436,225	$343,795
LD Messages	Net Operating Income, Ln 5	$0		$0
Billing & Collection	Net Operating Income, Ln 6, 7	$25,721	$8,733	$16,988
Other Miscellaneous Revenue	Net Operating Income, Ln 8	$783,464		$783,464
Less: Uncollectibles	Net Operating Income, Ln 11	$38,164	$0	$38,164
Total Regulated Operating Revenue	**Ln 1+Ln 2+Ln 3+Ln 4+Ln 5-Ln 6**	$7,957,141	$4,444,958	$3,512,183
OPERATING EXPENSES				
Plant Specific	Net Operating Income, Ln 20	$2,034,989	$878,027	$1,156,962
Plant Non-Specific	Net Operating Income, Ln 21,22,23	$835,965	$346,701	$489,264
Depreciation & Amortization	Net Operating Income, Ln 29	$1,688,601	$558,908	$1,129,693
Customer Operations	Net Operating Income, Ln 33	$1,831,775	$574,998	$1,256,777
Corporate Operations	Net Operating Income, Ln 36	$696,673	$305,104	$391,569
Total Operating Expenses	**Ln 8+Ln 9+Ln 10+Ln 11+Ln 12**	$7,088,003	$2,663,738	$4,424,265
OPERATING TAXES				
Federal Income Tax -Booked	Net Operating Income, Ln 38,39,40	($491,196)	($2,241,206)	$1,750,010
Adjustment to Booked FIT	If Taxes are Imputed, Ln 16-Ln 14	$547,454	$2,556,829	($2,009,375)
Imputed FIT @ %	(Ln 7-Ln 14-Ln24-Ln21-(Op Inc Ln48))* Rate	$56,258	$315,623	($259,365)
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	($141,109)	($659,035)	$517,926
Adjustment to Booked SIT	If Taxes are Imputed, Ln 21-Ln 19	$160,969	$751,787	($590,819)
Imputed SIT @ %	(Ln 7-Ln 14-Ln24-(Op Inc. Ln48))* Rate	$19,860	$92,752	($72,892)
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	$481,048	$155,778	$325,270
Total Booked Operating Taxes	Ln 14+Ln 15+Ln 19+Ln 20+ Ln 24	$557,166	$564,153	($6,987)
Total Imputed Operating Taxes	Ln 14+Ln 15+Ln 19+Ln 20+ Ln 24	$557,166	$564,153	($6,987)
NET OPERATING INCOME				
Net Operating Income (NOI)	**Ln 7 - Ln 13 - Ln 25**	**$311,972**	**$1,217,067**	**($905,095)**
N.O.I. Adjustment	**Net Operating Income, Ln 56,57**	**$0**	**$0**	**$0**
Adjusted Net Operating Income (NOI)	**Ln 27 + Ln 28**	**$311,972**	**$1,217,067**	**($905,095)**
RATE OF RETURN ON RATE BASE CALCULATION		**As of End of Period**		
RATE BASE				
Land & Support	Rate Base Development, Ln 3	$6,599,114	$2,070,426	$4,528,688
Central Office Equipment	Rate Base Development, Ln 14	$11,695,155	$6,369,064	$5,326,091
Info. Orig. & Term. Equip.	Rate Base Development, Ln 20	$0	$0	$0
Cable & Wire Facilities	Rate Base Development, Ln 31	$48,172,426	$13,166,728	$35,005,698
Other Investment	Rate Base Development, Ln 34, 35	$2,000	$0	$2,000
Total Plant in Service	Ln 30 - Ln 34	$66,468,695	$21,606,218	$44,862,477
Accumulated Depreciation	Rate Base Development, Ln 46	$46,440,613	$15,551,986	$30,888,627
Net Plant in Service	Ln 35 - Ln 36	$20,028,082	$6,054,232	$13,973,850
Plant Held for Future Use	Rate Base Development, Ln 47	$0	$0	$0
Plant Under Construction	Rate Base Development, Ln 48	$2,010,936	$630,917	$1,380,019
RTB Class B Stock	Rate Base Development, Ln 49	$0	$0	$0
Prepayments	Rate Base Development, Ln 50	$110,970	$34,816	$76,154
Materials & Supplies	Rate Base Development, Ln 51	$7,291,508	$1,992,951	$5,298,557
Cash Working Capital	Cash Working Capital Develop Ln 3	$217,930	($25,628)	$243,559
Deferred Income taxes	Rate Base Development, Ln 54	$5,514,267	$1,660,974	$3,853,293
Customer Deposits	Rate Base Development, Ln 55	$97,886	$30,711	$67,175
Rate Base	**Ln 37 + Ln 38-43, - Ln 44 - Ln 45**	**$24,047,273**	**$6,995,603**	**$17,051,670**
Rate of Return on Rate Base	**Ln 29 / Ln 46**	**1.29733%**	**17.39760%**	**-5.30795%**

PLANT TELEPHONE COMPANY, INC.
RATE OF RETURN DEVELOPMENT
YEAR ENDING 06/30/23

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	$0	0.00000%	2.83050%	0.00000%
Other	Rate Base, Ln 53	$97,886	0.10062%	7.00000%	0.00704%
Equity	Rate Base, Ln 64	$97,188,159	99.89938%	1.29158%	1.29028%
Total Capital		$97,286,045	100.00000%		1.29733%

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	$0	0.00000%	2.83050%	0.00000%
Other	Rate Base, Ln 53	$97,886	0.10062%	7.00000%	0.00704%
Equity	Rate Base, Ln 64	$97,188,159	99.89938%	-5.32035%	-5.31500%
Total Capital		$97,286,045	100.00000%		-5.30795%

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	$0	0.00000%	2.83050%	0.00000%
Other	Rate Base, Ln 53	$97,886	0.10062%	7.00000%	0.00704%
Equity	Rate Base, Ln 64	$97,188,159	99.89938%	9.25000%	9.24069%
Total Capital		$97,286,045	100.00000%		9.24774%

REVENUE REQUIREMENT CALCULATION

Rate Base (Adjusted Rate Base)	Earnings Report, Ln 46		$17,051,670
Allowed Rate of Return on Rate Base	Per GA PSC	Capped	8.00000%
Net Operating Income Requirement	Line 1 x Ln 2		$1,364,134
Net Operating Income Available (Imputed Adjusted NOI)	Earnings Report, Ln 29		($905,095)
Operating Income Excess (Deficiency)	Ln 4 - Ln 3		($2,269,228)
Income Expansion Factor	1-SIT-FIT+FITxSIT		74.458%
Revenue Excess (Deficiency)	Ln 5 / Ln 6		($3,047,683)