## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF SEWAGE RATES

) ) ) Case No. 2022-00432 )

## DIRECT TESTIMONY

## OF

## **QUENTIN M. WATKINS**

## **ON BEHALF OF**

## **BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC**

FILED: February 27, 2023

## **DIRECT TESTIMONY**

## OF

## QUENTIN M. WATKINS

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2		OF
3		QUENTIN M. WATKINS
4		
5	I.	<b>INTRODUCTION</b>
6		A. <u>WITNESS IDENTIFICATION</u>
7	Q.	Please state your name and business address.
8	A.	My name is Quentin M. Watkins. My business address is 2626 Glenwood Ave., Suite 480,
9		Raleigh, NC 27608.
10	Q.	On whose behalf are you testifying in this proceeding?
11	A.	I am filing Direct Testimony on behalf of Bluegrass Water Utility Operating Company
12		("Bluegrass Water" or the "Company"), a Kentucky limited liability company, which is an
13		indirect, wholly-owned subsidiary of CSWR, LLC.
14	Q.	By whom are you employed and in what capacity?
15	A.	I am the Energy Benchmarking Manager at ScottMadden, Inc. ("ScottMadden").
16	Q.	Please describe ScottMadden's consulting practice and the services it provides.
17	A.	Founded in 1983, ScottMadden is a management consulting firm with three practice areas:
18		Energy; Rates & Regulation; and Corporate and Shared Services. Since 1983, they have
19		served hundreds of clients, including the top 20 energy utilities in the United States.
20		ScottMadden has performed projects across every energy utility business unit and every
21		function.

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## B. BACKGROUND AND QUALIFICATIONS

## 2 Q. Please summarize your professional experience and educational background.

A. I have more than 16 years of experience with ScottMadden, including more than 12 years
in my current role, and I have conducted or contributed to almost 100 different
benchmarking studies for regulated water, gas, and electric utilities across North America.
I am a graduate of the University of the South in Sewanee, Tennessee, where I
received a Bachelor of Arts degree in Economics and Religion. I have also received a

- 8 Master of Business Administration degree, with concentrations in Finance and Strategy
  9 from Vanderbilt University.
- 10 The details of my educational background, past benchmarking studies, and my past 11 contributions to regulatory testimony in other proceedings and their respective jurisdictions 12 are included in Appendix A.
- 13

## II. <u>PURPOSE OF TESTIMONY</u>

## 14 Q. What is the purpose of your Direct Testimony in this proceeding?

A. The purpose of my Direct Testimony is to present findings from a Wage and Benefit Study
that was conducted on behalf of Bluegrass Water in response to the Kentucky Public
Service Commission's ("KPSC") request for a formal study that provides wage and benefit
information for the positions which support Bluegrass Water's operations in Kentucky.

## 19 Q. Is the Wage and Benefit Study included in your submission?

A. Yes. The Wage and Benefit Study is included as <u>Exhibit A</u> hereto, which has been prepared
by me or under my direct supervision.

Case No. 2022-00432 Application Exhibit 12 Direct Testimony of Quentin M. Watkins Page 2 of 5 1 Q. Please explain how you performed the Wage and Benefit Study prepared for

2 Bluegrass Water to satisfy the KPSC directive.

A. ScottMadden and Bluegrass Water identified eight employee positions that were
determined to be relevant and in-scope for the Wage and Benefit Study. These positions
and their locations are shown in Table 1 below:

6 7

#	Position	Location
1	Accounting Manager	St. Louis, MO
2	Billing & Collections Specialist	St. Louis, MO
3	Customer Experience Specialist	St. Louis, MO
4	EH&S/Operations Compliance Mgr	St. Louis, MO
5	Senior Accountant	St. Louis, MO
6	State Operations Manager	St. Louis, MO
7	System Compliance Auditor	St. Louis, MO
8	System Compliance Inspector	St. Louis, MO

8 9

10 To determine the competitiveness of the base compensation and total employee 11 benefits for these positions, a variety of tools and data sources, both public and private, were used to establish an appropriate basis of comparison for each component of the 12 13 analysis. For the base compensation analysis, two private compensation analysis tools 14 were used as described below, supplemented with public data from the Department of 15 Labor and the Bureau of Labor Statistics ("BLS"). For the analysis of pay practices, health, 16 and retirement benefits, public data from the BLS was supplemented with private data from 17 a custom survey of regulated utilities and other companies with operations in Kentucky.

18 Q. Please describe the results of the Wage and Benefit Study.

A. As set forth in <u>Exhibit A</u>, based on the analysis of base compensation, using a weighted
average for all eight positions, Bluegrass Water's base pay is 0.3% above the market

Case No. 2022-00432 Application Exhibit 12 Direct Testimony of Quentin M. Watkins Page 3 of 5 midpoint. Bluegrass Water's total compensation, including salary, as well as health and
 retirement benefit costs, compares more favorably at 6.2% below the market midpoint,
 though still within a reasonable range to be considered competitive compared to peers.

Regarding pay practices and employee benefits, based on our analysis of Bluegrass
Water's offerings compared to peer companies, the Company's benefits are competitive
and in line with the benefits offered by other companies in the state and region that compete
for the same talent in the marketplace.

8 Q. Is the labor market in St. Louis comparable to the specific areas in Kentucky where
9 Bluegrass Water operates?

10 A. Bluegrass Water's operations in Kentucky are primarily located in or near the corridor that 11 connects Lexington and Louisville, and the labor markets in those areas are very similar to 12 the labor market in St. Louis. The Federal Reserve Bank of St. Louis publishes various 13 analyses comparing the St. Louis market to other surrounding Metropolitan Statistical Areas (MSAs), including a cost-of-living calculator.<sup>1</sup> According to that tool, the cost-of-14 15 living in St. Louis is almost exactly the same as the Lexington - Fayette and Louisville -16 Jefferson County MSAs, and there is less than a 1% difference in the cost-of-living among 17 the three areas. Accordingly, a review of information from the St. Louis market, where the 18 CSWR employees are located, not only provides an analysis for the purposes of 19 determining whether CSWR's wages and benefits are comparable to those entities with 20 whom it directly competes for high-quality employees in the St. Louis market, but it also

<sup>&</sup>lt;sup>1</sup> "Cost of Living," Cost of Living Calculator, Federal Reserve Bank of St. Louis, accessed February 20, 2023, https://research.stlouisfed.org/publications/cost-of-living/calculator

1		provides comparable wage and benefit information for employers in the Kentucky markets
2		where Bluegrass Water predominantly operates.
3	Q.	In your opinion, are Bluegrass Water's salaries, pay practices, and employee health
4		and retirement benefits reasonable, competitive, and comparable to local, state and
5		regional averages?
6	A.	Yes, Bluegrass Water's wages and benefits are competitive and comparable to local, state,
7		and regional averages.
8	Q.	Does this conclude your Direct Testimony?

9 A. Yes, it does.

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#### **BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC**

## IN THE MATTER OF: ELECTRONIC APPLICATION OF BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC FOR AN ADJUSTMENT OF SEWAGE RATES CASE NO. 2022-00432

#### **VERIFICATION**

I, Quentin M. Watkins, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that Direct Testimony is true and accurate to the best of my knowledge, information, and belief after a reasonable inquiry on this  $\mathcal{I}^{n}$  day of February, 2023.

Juentin M.

STATE OF COUNTY OF KLAKe

SUBSCRIBED AND SWORN TO before me on this the  $22\frac{\omega d}{\omega}$  day of February, 2023.

Ilin - M Mason

Notary Public, State of  $\underline{NC}$ My Commission Expires  $\underline{3}/\underline{3}o/\underline{3}\gamma$ 

William M Mason NOTARY PUBLIC Wake County North Carolina My Commission Expires 3

# EXHIBIT A

## Wage and Benefit Study

Bluegrass Water Utility Operating Company, LLC, a Kentucky Subsidiary of Central States Water Resources, Inc.

February 2023



scottmadden MANAGEMENT CONSULTANTS

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## **EXECUTIVE SUMMARY**

This Wage and Benefit Study was conducted on behalf of Bluegrass Water Operating Company, LLC, (Bluegrass), a Kentucky limited liability corporation, which is a wholly-owned subsidiary of Central States Water Resources, in response to the Kentucky Public Service Commission's request for a formal study that provides wage and benefit information for the positions which support Bluegrass's operations in Kentucky. Bluegrass's base compensation is competitive when compared to the market midpoints for all in-scope positions using a weighted average of all positions.

Bluegrass Base Comp. vs.	% of Mkt	Delta to the
Market Midpoint	Midpoint	Midpoint
Weighted Average	100.3%	-0.3%

## Table I – Bluegrass Market Position – Base Compensation

Figures in red are greater than 10% above the market average midpoint Figures in black are within +/- 10% of the market average midpoint Figures in blue are less than 90% of the market average midpoint

There was some variation among the eight positions in-scope for the study in terms of how the positions compared to the midpoints of the pay ranges from job title to job title, and the detailed list of positions can be found in Table III below. In aggregate, Bluegrass's base pay rates are approximately 100.3% of the average market midpoint using a weighted average for all positions.

- 1 position (13%) is more than 10% below market at the pay range midpoint
- 6 positions (75%) were within +/- 10% of the pay range midpoint
- 1 position (13%) was greater than 10% higher than the pay range midpoint

After combining health and retirement benefits in order to analyze total compensation, Bluegrass's position relative to the market compares more favorably, but still competitive with the market – and still within +/- 10% of the market midpoint in aggregate.

## Table II – Bluegrass Market Position – Total Compensation (Base Compensation + Benefits)

Bluegrass Total Comp. vs.	% of Mkt	Delta to the
Market Midpoint	Midpoint	Midpoint
Weighted Average	93.8%	6.6%

ScottMadden also found Bluegrass's pay practices and employee benefits to be competitive with offerings from other companies operating in the same or similar areas and competing for talent.



## STUDY METHODOLOGY

In establishing the scope for this analysis, ScottMadden and Bluegrass identified eight positions that were determined to be relevant and in-scope for study. Though Bluegrass does not have any employees located in Kentucky, the eight positions were determined to be in-scope for this study because they provide dedicated support to Bluegrass's operations in Kentucky from parent company Central States Water Resources' headquarters near St. Louis, Missouri. A detailed list of the in-scope positions with job responsibilities, minimum requirements, other detailed information can be found in Appendix A. To determine the competitiveness of the base compensation and total employee benefits, a variety of tools and data sources, both public and private, were used to establish an appropriate basis of comparison for each component of the analysis. For the base compensation and benefit cost analyses, two private compensation analysis tools were used as described below, supplemented with public data from the Department of Labor and the Bureau of Labor Statistics (BLS). For the analysis of pay practices, health, and retirement benefits, public data from the BLS was supplemented with private data from a custom survey of regulated utilities and other companies with operations in Kentucky conducted in 2022. Detailed lists of positions with compensation analysis for each Bluegrass position are included in Appendix A.

## Salary Assessor – Economic Research Institute (ERI)

ERI's Salary Assessor compiles pay data from hundreds of published data sources for thousands of job titles. The database is updated quarterly and provides salary information for nearly any geographic area in the United States. The information in this database reflects base salaries at the 25<sup>th</sup> percentile (low), average (or mean), and 75<sup>th</sup> percentile (high). St. Louis, Missouri was used as the geographic cut for all positions, as all eight positions are located in or near the St. Louis area, and the industry cut is based on water supply systems (NAICS 221310). All data is effective January 1, 2023, adjusted to February 7, 2023 using a prorated portion of the annualized salary trend for 2023 of 3.3% (0.27%). Additional details on ERI's methodology can be found in Appendix B.

## CompAnalyst – Salary.com, previously IBM

CompAnalyst Market Data is the world's largest compensation database with 600 million data points and growing. CompAnalyst data is collected from hundreds of professionally conducted surveys run by corporate HR departments every year. St. Louis, Missouri was used as the geographic cut for all positions, as all eight positions are located in or near the St. Louis area, and the industry cut is based on the utility subindustry for "water, sewage, and other systems" (which includes organizations that operate water treatment plants and water supply systems, sewer systems and sewage treatment facilities, and related facilities. All data is effective February 1, 2023 unless noted otherwise. Additional details on the CompAnalyst Market Data methodology can be found in Appendix C.



## FINDINGS - PAY RANGES - BASE PAY

There was some variation among the eight positions in-scope for the study in terms of how the positions compared to the midpoints of the pay ranges from job title to job title, and the detailed list of positions can be found in Table III below. In aggregate, Bluegrass's base pay rates are approximately 100.3% of the average market midpoint using a weighted average for all positions.

- 1 position (13%) is more than 10% below market at the pay range midpoint;
- 6 positions (75%) were within +/- 10% of the pay range midpoint; and
- 1 position (13%) was greater than 10% higher than the pay range midpoint.

#	Position	Location		Current Market Salary Midpoint		% of Mkt Midpoint	Delta to the Midpoint	
1	Accounting Manager	St. Louis, MO	\$	150,000	\$	132,615	113.1%	-13.1%
2	Billing & Collections Specialist	St. Louis, MO	\$	54,080	\$	57,447	94.1%	5.9%
3	Customer Experience Specialist	St. Louis, MO	\$	70,500	\$	68,023	103.6%	-3.6%
4	EH&S/Operations Compliance Mgr	St. Louis, MO	\$	88,000	\$	99,388	88.5%	11.5%
5	Senior Accountant	St. Louis, MO	\$	90,000	\$	90,913	99.0%	1.0%
6	State Operations Manager	St. Louis, MO	\$	110,000	\$	110,321	99.7%	0.3%
7	System Compliance Auditor	St. Louis, MO	\$	55,000	\$	59,163	93.0%	7.0%
8	System Compliance Inspector	St. Louis, MO	\$	73,000	\$	74,846	97.5%	2.5%
			Weighted Average			Average	100.3%	-0.3%

## Table III – Bluegrass Market Position – Base Compensation

Figures in red are greater than 10% above the market average midpoint Figures in black are within +/- 10% of the market average midpoint Figures in blue are less than 90% of the market average midpoint



## FINDINGS - PAY RANGES - TOTAL COMPENSATION, INCLUDING HEALTH AND RETIREMENT

In order to provide a comparison for total compensation, including employer costs for health and retirement benefits, ScottMadden examined the following categories of cost:

- Annual pay range midpoint;
- The annual health plan annual employer costs, including medical, dental, prescription, and vision benefits; and
- Retirement plan employer contributions, including defined benefit, deferred compensation, and social security contributions.

There was some variation among the eight positions in-scope for the study in terms of how the positions compared to the midpoints of the pay ranges from job title to job title, and the detailed list of positions can be found in Table IV below. Compared with the base pay-only analysis, Bluegrass's position relative to the market is slightly lower, but still competitive within +/- 10% of the market midpoint in aggregate, as depicted in Table VIII below. Bluegrass's total compensation rates are approximately 93.8% of the average market midpoint using a weighted average for all positions.

- 3 positions (38%) are more than 10% below market at the pay range midpoint;
- **5** positions (63%) were within +/- 10% of the pay range midpoint; and
- 0 positions were greater than 10% higher than the pay range midpoint.

## Table IV – Bluegrass Market Position – Total Compensation (Base Comp. + Health + Retirement)

#	Position	Current Base Salary (A)	E	Health Benefit Cost (B)	 etirmnt Benefit Cost (C)	uegrass Total Comp A+B+C)	% of	Retirem ent % of Total Comp		Total omp Mkt ⁄lidpoint	% of Mkt Midpoint	Delta to the Midpoint
1	Accounting Manager	\$ 150,000	\$	2,620	\$ 7,500	\$ 160,120	1.6%	4.7%	\$	152,377	105.1%	-5.1%
2	Billing & Collections Specialist	\$ 54,080	\$	2,620	\$ 2,704	\$ 59,404	4.4%	4.6%	\$	66,008	90.0%	10.0%
3	Customer Experience Specialist	\$ 70,500	\$	873	\$ 3,525	\$ 74,898	1.2%	4.7%	\$	78,159	95.8%	4.2%
4	EH&S/Operations Compliance Mgr	\$ 88,000	\$	2,620	\$ 4,400	\$ 95,020	2.8%	4.6%	\$	114,198	83.2%	16.8%
5	Senior Accountant	\$ 90,000	\$	2,620	\$ 4,500	\$ 97,120	2.7%	4.6%	\$	104,460	93.0%	7.0%
6	State Operations Manager	\$ 110,000	\$	2,620	\$ 5,500	\$ 118,120	2.2%	4.7%	\$	126,760	93.2%	6.8%
7	System Compliance Auditor	\$ 55,000	\$	873	\$ 2,750	\$ 58,623	1.5%	4.7%	\$	67,979	86.2%	13.8%
8	System Compliance Inspector	\$ 73,000	\$	2,620	\$ 3,650	\$ 79,270	3.3%	4.6%	\$	85,999	92.2%	7.8%
								Weight	ed	Average	93.8%	6.2%



## **FINDINGS – PAY PRACTICES**

Findings from the custom survey are presented in this section by topic and question asked in the custom survey. All peers company names are blinded to protect confidentiality, but Bluegrass's responses are specifically cited in all cases below.

**Types of Pay Plans** 

*Q*: *Please indicate the type(s) of pay plan(s) applicable to each in-scope position.* 

- a. Grades, no steps (i.e., range mins and maxes only)
- b. Grade and step
- c. No ranges (i.e., flat rates only)

As shown in Figure I below, the majority of positions captured in the custom survey (53%) reported using grades, no steps (i.e., range minimums and maximums only), and the second most common pay plan was no ranges (i.e., flat rates only). Bluegrass reported using no ranges.



## Figure I – Pay Plan Prevalence by Type

Salary Schedule Design

Q: How do employees progress through the pay range for their current job? (select all that apply).

- a. Longevity or time in job increases
- b. Market data adjustments
- c. Budget process / financial ability

All five respondents cited market data adjustments, and two respondents each replied longevity or time in the job and budget process and/or financial ability. Bluegrass noted that it uses both market data adjustments and longevity or time in job increases.



Adjustments to Pay Ranges/Schedules

Q: Which of the following do you use to adjust pay ranges/schedules? (select all that apply).

- d. Market data
- e. Budget process / financial ability
- f. Collective bargaining agreement

All five peer respondents cited market data, and two respondents cited the budget process and/or financial ability. Bluegrass noted that it uses market data to periodically adjust pay ranges.

Base Pay Increases (Previous Three Years, 2020-2022)

Q: Please indicate the pay range increases (% increase) scheduled for each year from 2020-2022.

As outlined in the table below, there was some variation in the recent and planned pay increases, and Bluegrass is at the high end among the other peers in the study, particularly in 2022.

	Pay Range Increases								
Company	2020	2021	2022						
А	2.0%	2.0%	2.0%						
В	3.0%	3.5%	3.5%						
С	0.0%	2.0%	2.0%						
D	5.0%	3.0%	7.0%						
E	0.0%	0.0%	2.0%						
Bluegrass	6.0%	3.0%	8.0%						

## Table V – Pay Range Increases from 2020-2022

## FINDINGS – PAID LEAVE

Findings from the custom survey are presented in this section by topic and question asked in the survey. All peers company names are blinded to protect confidentiality, but Bluegrass's responses are specifically cited in all cases below.

**Holidays and Personal Days** 

Q: How many holidays and personal days or floating holidays do employees receive each year?

As outlined in the table below, the number of holidays and personal days provided to employees each year ranges from 11 to 13 holidays per year, and Bluegrass is at the high end of the range.



		# Personal/	
Company	# Holidays	<b>Floating Holidays</b>	Total
А	9	2	11
В	9	3	12
С	8	2	10
D	13	-	13
E	10	1	11
Bluegrass	13	-	13

## Table VI – Number of Holidays and Personal Days per Year

Paid Time Off (PTO) and Vacation/Sick Leave

Q: Do you have a PTO policy or a vacation/sick leave policy? How many days are provided to employees by year of tenure?

As detailed below, two each of the peer companies have PTO and vacation/sick leave policies, and the number of days provided to employees varies by year of tenure. Bluegrass has an unlimited PTO program in place for all employees, subject to schedule constraints.

## Table VII – Number of PTO/Vacation Days per Year by Tenure

Company	PTO or		PTO / Vacation Days by Years of Service							
	Vacation/Sick Plan?	1	2	3	4	5	10	15	20	25+
A	РТО	15	15	15	15	20	25	25	30	30
В	РТО	18	20	20	20	20	27	30	30	32
С	PTO	NA	NA	NA	NA	NA	NA	NA	NA	NA
D	Vacation/Sick*	10	10	10	10	15	15	20	20	25
E	Vacation/Sick*	12	12	13	13	15	20	20	25	25
Bluegrass	РТО	Unlimited	Inlimited PTO program for all employees, subject to schedule constraints							

\*Company E provides an additional 20 days of sick leave and Company D provides 10 days.

Q: Can employees carry over PTO or vacation days? What is the maximum number of bankable days?

As depicted below, three of the five peer companies allow for employees to carry over unused PTO/vacation days, but this approach does not apply to Bluegrass's unlimited PTO program.

## Table VIII – PTO/Vacation Carryover and Maximum Days

Company	Can Employees Carry Over?	Maximum Number of Days		
А	Yes	5		
В	No	NA		
С	No	NA		
D	Yes	10		
E	Yes	6		
Bluegrass	No	NA		



## FINDINGS – HEALTH BENEFITS

Findings from the custom survey are presented in this section by topic and question asked in the survey. All peer company names are blinded to protect confidentiality, but Bluegrass's responses are cited in all cases below.

## **Medical Plans and Costs**

## Q: What types of medical plans do you offer? Select all that apply.

As outlined in the table below, like Bluegrass, four of five peer companies offer Preferred Provider Organization (PPO). Health Maintenance Organization (HMO) plans are the second most prevalent, and none of the peer companies provide High Deductible Health Plan (HDHP) plans. Bluegrass and the three respondents that provided details on their medical plans also confirmed that their medical plans include coverage for prescription drugs.

	Types of Health Insurance Plans Offered						
Company	Preferred Provider	High Deductible					
	Organization (PPO)	Organization (HMO)	Health Plan (HDHP)				
А	Yes	No	Yes				
В	Yes	No	Yes				
С	NA	NA	NA				
D	Yes	No	Yes				
E	Yes	No	Yes				
Bluegrass	Yes	No	No				

## Table IX – Types of Health Plans Offered

Q: What are the employer and employee costs for the PPO plan by coverage type?

As depicted in the table below, the employer and employee costs are very similar for Bluegrass compared to peers by coverage type, reinforcing the observation that Bluegrass's offerings are in line with peers. The employer component of the total cost is tightly grouped among Bluegrass and peers by coverage type, too, ranging only from 79% to 99%, with Bluegrass covering 99% of the total costs.

Table X - Employer and Employee Costs for PPO P	lans by Covorago Typo
Table X – Employer and Employee Costs for PPO P	ialis by Coverage Type

	Employer and Employee Cost for PPO Plans by Coverage Type									
Compony	Employee Only		Employee + Spouse		Employee + Children		Family			
Company	Employer	Employee	Employer	Employee	Employer	Employee	Employer	Employee		
	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost		
А	\$595	\$140	\$1,428	\$338	\$1,253	\$293	\$2 <i>,</i> 088	\$488		
В	\$630	\$157	\$1,483	\$406	\$1,248	\$341	\$2,163	\$591		
С	NA	NA	NA	NA	NA	NA	NA	NA		
D	NA	NA	NA	NA	NA	NA	NA	NA		
E	\$588	\$105	\$1,304	\$233	\$1,351	\$242	\$1,855	\$277		
Bluegrass	\$816	\$8	\$1,679	\$17	\$1,577	\$16	\$2,446	\$25		



Note: Questions were also included about participants' costs related to HMO and HDHP programs, but Bluegrass does not offer those types of plans to its employees.

**Dental and Vision** 

Q: What are the employer and employee costs for the dental plan by coverage type?

As detailed below, the employer costs for Bluegrass's dental plan are slightly higher than other participants, and the employee costs are lower compared to other participants.

		Employer and Employee Cost for Dental Plans by Coverage Type									
Compony	Employee Only		Employee + Spouse		Employee + Children		Family				
Company	Employer	Employee	Employer	Employee	Employer	Employee	Employer	Employee			
	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost			
A	\$30	\$7	\$60	\$15	\$60	\$15	\$90	\$22			
В	\$23	\$9	\$46	\$17	\$56	\$21	\$87	\$33			
С	\$20	\$9	\$41	\$18	\$49	\$21	\$75	\$32			
D	NA	NA	NA	NA	NA	NA	NA	NA			
E	\$20	\$9	\$41	\$18	\$49	\$21	\$75	\$32			
Bluegrass	\$99	\$1	\$99	\$1	\$99	\$1	\$99	\$1			

Table XI - Employer and Employee Costs for Dental Plans by Coverage Type

Q: What are the employer and employee costs for the vision plan by coverage type?

As depicted below, only three companies were able to provide details on their vision plans, and Bluegrass was unable to provide a breakout of the costs related to its vision plan. One peer provides a plan entirely funded by employees, and one company provides a plan with a nominal, but non-zero, cost to employees.

## Table XII - Employer and Employee Costs for Vision Plans by Coverage Type

	Employer and Employee Cost for Vision Plans by Coverage Type									
Company	Employee Only		Employee + Spouse		Employee + Children		Family			
Company	Employer Cost	Employee Cost	Employer Cost	Employee Cost	Employer Cost	Employee Cost	Employer Cost	Employee Cost		
А	\$0	\$7	\$0	\$15	\$0	\$11	\$0	\$21		
В	\$7	\$0	\$11	\$0	\$11	\$0	\$19	\$0		
С	NA	NA	NA	NA	NA	NA	NA	NA		
D	NA	NA	NA	NA	NA	NA	NA	NA		
E	\$4	\$1	\$9	\$2	\$9	\$2	\$15	\$4		
Bluegrass	NA	NA	NA	NA	NA	NA	NA	NA		



## **FINDINGS – RETIREMENT**

Findings from the custom survey are presented in this section by topic and question asked in the survey. All peer company names are blinded to protect confidentiality, but Bluegrass's responses are cited in all cases below.

## **Types of Retirement Plans Offered**

## Q: What types of medical plans do you offer? Select all that apply.

As noted below, only two peer companies provided detailed responses to the retirement plan questions, and those companies both responded that they both provide defined contribution plans to employees, the only type of program offered by Bluegrass to its employees.

	Types of Retirement Plans Offered						
Company	<b>Defined Benefit</b>	Defined	Deferred				
	(Pension)	Contribution	Compensation				
A	Yes	Yes	Yes				
В	No	Yes	Yes				
С	Yes	Yes	Yes				
D	Yes	Yes	Yes				
E	Yes	Yes	No				
Bluegrass	No	Yes	No				

## Table XIII – Types of Retirement Plans Offered

## **Employer Contributions**

Q: Please indicate the total employer contributions based on percentage of pay and the maximum match of employer contribution to the plan based on percentage of pay.

As outlined below, Bluegrass's employer contributions to its defined contribution plan are in line with the other peer respondent that provided details on their plans.

Table XIV – Employer Contributions to Defined (	Contribution Plans (% of Pay)
---	-------------------------------

	Defined Contribution					
Company	Total Employer Contribution (% of Pay)	Maximum Match (% of Pay)				
А	4%	4%				
	7% total (3% non-elective, up to	4% (1-for-1 match first 3%, \$0.50				
В	4% match)	for \$1 match on the next 2%)				
С	NA	NA				
D	NA	NA				
E	NA	NA				
Bluegrass	5%	5%				



## CONCLUSIONS

In summary, Bluegrass's base pay, total compensation, pay practices and employee benefits are competitive with the market. Bluegrass's base pay and total compensation are particularly competitive, both falling within +/- 10% of the market midpoints in aggregate, and the Company's pay practices and benefits are also in line with the offerings provided by other regulated utilities and other companies operating in the same or similar areas competing for talent.



## APPENDIX A - DETAILED MARKET DATA FOR ALL IN-SCOPE POSITIONS

Accounting Manager								
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High			
Published Proprietary D	ata Sources							
CompAnalyst	Accounting Manager	40.0	\$106,568	\$124,574	\$140,780			
ERI Salary Assessor	Accounting Manager	40.0	\$127,849	\$140,656	\$153,102			
Bluegrass		40.0		\$150,000				
Published Market Midpoint				\$132,615				
Bluegrass as % of Published M		113%						
Adjustment to Reach Market Av	/erage			-13%				

#### **Notes and Assumptions**

Bluegrass position location: St. Louis, MO Years of experience: No stated requirement Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

#### Legend

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

The Accounting Manager will play a key role in maintaining the accounting records and transactions for multiple operating units; will be a key contributor to the financial closing processes; and will be involved in the preparation of the company's income statement and balance sheet, account analysis/reconciliations of general ledger accounts, and monthly journal entries.

#### **Minimum Requirements**

Bachelors Degree in accounting



Billing & Collections Specialist							
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High		
Published Proprietary Da	ta Sources						
CompAnalyst	Customer Billing/Collections Analyst II	40.0	\$52,359	\$62,976	\$72,921		
ERI Salary Assessor	Billing Specialist	40.0	\$47,955	\$51,918	\$55,521		
Bluegrass		40.0		\$54,080			
Published Market Midpoint				\$57,447			
Bluegrass as % of Published Ma	94%						
Adjustment to Reach Market Ave	rage			6%			

Bluegrass position location: St. Louis, MO Years of experience: 3+ years in a billing role Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

#### Legend

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

The Billing Specialist will ensure the timely billing of services to all Bluegrass customers. The specialist will also initiate the collections process on delinquent accounts and work with operations team to complete processes related to shutoff's.

#### **Minimum Requirements**

High School Graduate with 3+ years in a billing role



Customer Experience Specialist						
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High	
Published Proprietary Da	ta Sources					
CompAnalyst	Customer Service Specialist II	40.0	\$52,764	\$61,230	\$69,241	
ERI Salary Assessor	Customer Experience Analyst	40.0	\$68,767	\$74,815	\$80,441	
Bluegrass		40.0		\$70,500		
Published Market Midpoint				\$68,023		
Bluegrass as % of Published Market Average				104%		
Adjustment to Reach Market Ave	rage			-4%		

Legend

Bluegrass position location: St. Louis, MO Years of experience: 3+ years in customer service Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

### Job Summary

The Customer Experience Specialist will ensure that we provide exceptional customer service to the communities receiving water services from Bluegrass. This position is a key employee to the utility operation of Bluegrass and is integral to the company achieving its goal of being a best-in-class water utility in the U.S.

#### **Minimum Requirements**

High School Graduate with 3+ years in customer service



EH&S/Operations Compliance Manager						
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High	
Published Proprietary Da	ta Sources					
CompAnalyst	Environmental Planner II	40.0	\$77,684	\$94,763	\$106,637	
ERI Salary Assessor	Compliance Manager	40.0	\$94,214	\$104,012	\$113,772	
Bluegrass		40.0		\$88,000		
Published Market Midpoint				\$99,388		
Bluegrass as % of Published Market Average			<b>89%</b>			
Adjustment to Reach Market Ave	rage			11%		

Bluegrass position location: St. Louis, MO Years of experience: 5+ years water/wastewater experience Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

#### Legend

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

Under the general supervision of higher-level leadership, supervises, develops, and implements laboratory, monitoring, testing, and administrative duties to ensure Bluegrass's compliance with applicable federal, state, and local regulatory agency requirements pertaining to water and wastewater.

#### **Minimum Requirements**

Bachelor's degree in Environmental studies or a similar discipline plus 5 years water/wastewater experience



	Senior Account	tant			
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High
Published Proprietary Da	ta Sources				
CompAnalyst	Senior Accountant	40.0	\$77,312	\$87,377	\$96,512
ERI Salary Assessor	Accountant Certified Public III	40.0	\$85,902	\$94,448	\$102,871
Bluegrass		40.0		\$90,000	
Published Market Midpoint				\$90,913	
Bluegrass as % of Published Ma	rket Average			99%	
Adjustment to Reach Market Ave	erage			1%	

Bluegrass position location: St. Louis, MO Years of experience: No stated requirement Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

#### Legend

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

The Senior Accountant will play a key role in maintaining the accounting records and transactions for multiple operating units; will be a key contributor to the financial closing processes; and will be involved in the preparation of the company's income statement and balance sheet, account analysis/reconciliations of general ledger accounts, and monthly journal entries.

#### **Minimum Requirements**

Bacelor's degree in accounting, CPA helpful



State Operations Manager							
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High		
Published Proprietary Da	ta Sources						
CompAnalyst	Water/Wastewater Processing Plnt. Mgr	r. 40.0	\$99,321	\$106,593	\$120,505		
ERI Salary Assessor	Water Superintendent	40.0	\$103,526	\$114,048	\$124,658		
Bluegrass	·	40.0		\$110,000			
Published Market Midpoint				\$110,321			
Bluegrass as % of Published Market Average				100%			
Adjustment to Reach Market Ave	rage			0%			

Bluegrass position location: St. Louis, MO Years of experience: No stated requirement Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

Legend Figures in red are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

The Regional Manager assigned to the position is a key member of the management team and oversees all aspects of their assigned region of operation.

#### **Minimum Requirements**

Bachelor's Degree in civil Engineering or Business, experience in the water/wastewater industry



System Compliance Auditor						
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High	
Published Proprietary Da	ata Sources					
CompAnalyst	Compliance Specialist I	40.0	\$54,013	\$62,380	\$70,043	
ERI Salary Assessor	Compliance Auditor	40.0	\$51,085	\$55,945	\$60,628	
Bluegrass		40.0		\$55,000		
Published Market Midpoint				\$59,163		
Bluegrass as % of Published Ma	arket Average			93%		
Adjustment to Reach Market Ave	erage			7%		

Bluegrass position location: St. Louis, MO Years of experience: No stated requirement Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue

#### Legend

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

Under the general supervision of higher-level staff, develops and implements laboratory, monitoring, testing, and administrative duties to ensure Bluegrass's compliance with applicable federal, state, and local regulatory agency requirements pertaining to water and wastewater.

#### **Minimum Requirements**

Bachelor's degree in Environmental studies or a similar discipline



System Compliance Inspector						
Source	Matching Job Title	Workweek	Pay Range Low	Pay Range Midpoint	Pay Range High	
Published Proprietary Da	ta Sources					
CompAnalyst	Environmental Planner I	40.0	\$63,181	\$75,006	\$86,015	
ERI Salary Assessor	Env. Health & Safety Specialist	40.0	\$67,417	\$74,685	\$81,826	
Bluegrass		40.0		\$73,000		
Published Market Midpoint				\$74,846		
Bluegrass as % of Published Market Average			98%			
Adjustment to Reach Market Ave	rage			2%		

Bluegrass position location: St. Louis, MO Years of experience: 5+ years water/wastewater experience Industry: Water, Sewage, and Other Systems (NAICS 221310) Company scale: \$5-10M in revenue <u>Legend</u>

Figures in **red** are greater than 10% above the market average midpoint Figures in **black** are within +/- 10% of the market average midpoint Figures in **blue** are less than 90% of the market average midpoint

#### Job Summary

Under the general supervision of higher-level staff, develops and implements laboratory, monitoring, testing, and administrative duties to ensure Bluegrass's compliance with applicable federal, state, and local regulatory agency requirements pertaining to water and wastewater.

#### **Minimum Requirements**

Bachelor's degree in Environmental studies or a similar discipline plus 5 years water/wastewater experience



## APPENDIX B – ECONOMIC RESEARCH INSTITUTE SALARY ASSESSOR TOOL METHODOLOGY

The methodology for the Salary Assessor & Survey application and databases, as found below is further defined in the help menus. All figures are reported in local currencies.

The Salary Assessor (SA) application and databases provide detailed pay analysis for the US, Canada, UK, Europe, and other areas around the globe. These data help users to market price jobs and assess an organization's wage/salary competitiveness and internal equity. The Salary Assessor & Survey application database assists with precise up-to-date evaluations of market pay.

ERI's data are primarily derived from in-house salary surveys. Data are also extracted from publicly filed tax returns leased from other survey vendors or gained from Freedom of Information Act requests. Data that are collected from third-party sources are then matched to ERI's internal job descriptions. First, multiple independent raters go through the job descriptions in the surveys and match the jobs in the surveys to ERI's internal job descriptions. Factors such as level, education, industry and 98 additional hard metrics are considered for each job.

Job data is matched and reported according to the position description. Data is adjusted for geographic area, industry (matched to SIC or NACE), organization size (revenue, assets, or number of employees), and salary planning date (data is trended forwards and backwards through time series analysis).

Jobs found within the Salary Assessor & Survey application database are those for which multiple salary survey sources are available and for which reported data has been condensed, modified, and compiled.

## **Survey Means and Medians**

## Mean

The salary calculations available from the Salary Assessor & Survey application and databases are the result of salary surveys collected and analyzed by ERI. ERI has over 25 years of experience in this field. National average data is carefully constructed. It is noted that individual salary surveys may or may not represent a true weighted average or mean. However, ERI's overall results drawn from multiple salary surveys should represent more accurately a true weighted average or mean. ERI defines mean as the weighted average salary resulting from ERI's analysis of all survey data available for the particular job, industry, company size, and geographic area. Since salary surveys have different effective dates, ERI selects the first day of the data update, released twice each quarter, as a common benchmark and updates all salary survey data to that date, so that "apples are compared to apples."

## Median

ERI defines the median as the value at which half of all incumbents earn more and half of all incumbents earn less than the calculated salary. Until 1997, ERI had chosen to collect, calculate, and report median salary levels (only) rather than weighted averages or other measures of central tendency. The median value tends to be less influenced by extremes than a survey mean. As wage and salary distributions are skewed for most jobs, the mean generally falls close to, but slightly higher than, the median. For this reason, some view a median value as a better target for market pricing and competitive pay. Based upon subscriber requests, ERI reports both survey mean and median wages/salaries and defaults initial analyses to the survey mean.

## Salaries by Experience/Size Tables

The Salaries by Experience/Size Table provides detailed pay range data for a single job, matched by Survey Description. Subscribers may view pay data by percentile, median, and mean. These jobs may



be cross referenced by years of experience for non-executive jobs and by revenue/size for executive jobs. Pay may be further refined by subscriber specification of geographic area, industry, organization size, and salary planning date.

## **Base Salaries**

The Base Salary Table and Graph illustrate how a salary continuously changes by organization size and years of experience.

## **Total Compensation**

The Total Compensation Table and Graph illustrate how the total salary (base salary + incentive) continuously changes as the organization size and years of experience change. Please note: Incentive data represents an average of all employees in the job, including organization data where no incentive or cash bonus was paid.

## Incentive

The Incentive Table and Graph illustrate average incentives paid according to organization size and years of experience. This average includes all survey data where no incentive or cash bonus is reported paid. It therefore represents an average of all employees in the job, rather than the norms for organizations that pay incentives.

## Salaries by Level Table

While ERI has been gathering salary data since the 1980's, our original data was gathered by years of experience and all incumbent market values. In the late 1990's we also began to gather data by levels within a job, and the Salaries by Level tab was added to the Salary Assessor in 2003.

The data sources used for reporting by level differ from those sources used for salaries by years of experience. The Salary Assessor's Salaries by Level tab is based on matching ERI Survey Descriptions with job/survey descriptions of available salary survey sources. (Please also see the Definition of Levels topic. These definitions are printed at the bottom of the Salaries by Level report in the Salary Assessor Descriptions section.)

## **Benchmark List Table**

To assist with planning or auditing pay for multiple jobs in one location, the Benchmark List table enables users to enter and view the salaries for multiple jobs in one location. This allows users to view a list of benchmark or key jobs with ERI-calculated salaries and compare current pay practices to local market pricing calculations. In addition, the Benchmark List allows users to view selected jobs within a selected industry. These are jobs that have been found to exist with each industry and may assist users in creating benchmark lists of jobs within the organization.

## Geographic List Table

To assist with planning or auditing pay for one job in multiple (branch) locations, the multiple locations Geographic List Table enables you to enter and view up to 99 areas' salaries for one job. On one table (or one printout report), you may view a listing of branch offices with ERI-calculated salaries and compare your current pay practice to local market pricing.

## **Statistical Methodology**

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The Salary Assessor and Executive Compensation Assessor & Survey utilize polynomial regression analyses techniques.



## **Geography and Industry**

ERI's analysis of salary survey data for unique locations and industries is dependent on the occupation being analyzed. This is because industry and location have different amounts of influence over an occupation's salary depending on the occupation. These differences generally exist between executive and non-executive occupations.

Non-executive occupations are frequently influenced by geography more than industry. This is because organizations will frequently have to compete for labor across industries. An accountant may search for work in multiple industries as their skills are transferrable. ERI is able to provide local data for these occupations by expanding analyses to other industries that would be competing for the same labor. The analyses capture any differences that may exist between the industries by examining the differences between those industries within other local labor markets.

Executive occupations are frequently influenced by industry more than geography. This is because competition for executive labor frequently exists on a national level and also because industry knowledge is more frequently critical to success in these occupations. ERI accurately captures the market rate for these occupations by expanding the analysis to other comparable organizations within the same industry. Geographic differences are captured by examining relative value patterns within an industry to other, related industries.

These methods provide a clear picture of how an occupation exists within a labor market, while accounting for differences which may exist between the industries. Over the years, the accuracy of these methods has been found to be quite accurate. The accuracy has been demonstrated by later salary surveys which have included the occupation, industry, and location in question and from company/customer feedback.



## APPENDIX C – COMPANALYST TOOL METHODOLOGY

The methodology behind Salary.com's CompAnalyst Market Data is a state-of-the-art process for benchmarking and analyzing jobs that builds on the professional industry standards employed by compensation analysts. When adding jobs to the CompAnalyst Market Data database, Salary.com's team of compensation consultants selects and validates surveys, benchmarks jobs to multiple surveys, aggregates data, and reviews and adjusts results, as necessary, to produce accurate results for every job, every time. To determine the true market rate for each job reported in CompAnalyst, the Salary.com team reviews all available market pay data on a monthly basis, ensuring that CompAnalyst users have access to up-to-date, accurate market data.

With this unique methodology, Salary.com is able to publish an up-to-date estimated salary range for any position in any market, even when individual surveys do not have sufficient data for that job or market. Using the new CompAnalyst architecture, which defines relationships between job family, function, and focus, Salary.com is able to fill in the gaps left by traditional compensation surveys, producing accurate estimated salaries for jobs that other data sources do not cover.

The summary below briefly highlights the key steps in the methodology behind CompAnalyst Market Data.

- 1. The Salary.com compensation team creates a job description that summarizes the key aspects of each job in the CompAnalyst data set. Each job is categorized into a family, function, and focus to group related jobs together in the CompAnalyst architecture.
- 2. Salary.com identifies and purchases the most current compensation surveys available, selecting only those surveys published by leading compensation data firms that adhere to the standards set by WorldatWork.
- 3. Salary.corn's compensation consultants match job descriptions to the most comparable jobs from each available data source. Each job must be matched to multiple survey sources to be published in CompAnalyst.
- 4. Expert compensation consultants create a composite view for each job with each set of scopes, taking into account the statistical reliability and the effective date of the data. The team further analyzes the data for any industry, geography, or company size biases that could be inherent in a given survey report. This ensures a comprehensive analysis of the compensation market for each job for which the data is sufficient to report.
- 5. The Salary.com team identifies those scopes for which data is insufficient. Com bi nations that do (or may reasonably be assumed to) exist, but for which specific data is not available, are identified manually. For these jobs, the team uses information on similar jobs or similar scopes to interpolate or extrapolate a best estimate of a reasonable market salary ranges. For each individual job title, the compensation consultants create a series of adjustment factors that reflect the relative impact that industry, geography, and company size have on the market pay for that job. During this process, if the team identifies irregularities (e.g., dentist in the media industry), salaries are reported as "not applicable." More information about this process can be found in the Data Analysis section of this report (page 06).
- 6. The Salary.com compensation team consistently updates the data every month to incorporate the most current information available and to reflect salary movement. As Salary.com identifies and incorporates new surveys, the team replaces extrapolated market information with data based on the new market information. Job titles are updated and new jobs are added to the database during these reviews.



## **Data Sources**

## Survey Selection

We select surveys based on the breadth and depth of the data they provide, the methodology they use, and the industry reputation of the data provider. These surveys include large national surveys covering a broad collection of jobs, as well as more niche reports that provide deep information cuts on specific job families, industries, and geographies. Salary.com compensation consultants review each survey to make sure it reports data that is complete and reasonable for the scopes represented.

## Job Selection

To ensure jobs are appropriately matched, Salary.com analysts benchmark jobs based on job description content, not simply on job title. A job is considered a match if the responsibilities, education, experience, reporting relationship, and degree of discretion and latitude are proximal. When mapping survey data to our job descriptions, Salary.com's compensation consultants take into account how closely the participating employers reported their incumbents matched to the benchmark descriptions.

## Job Classification

The new CompAnalyst architecture defines relationships between job family, function, and focus to clearly group related jobs in the database. This allows for easy searching within the database, as well as enhanced visual career pathing and job relationship identification.

## Data Analysis

## Interpolation and Extrapolation

CompAnalyst effectively creates and applies a multi-dimensional contour map of scope adjustment factors for each job. This mapping, based on regression analysis, comparative research, and compensation experience creates a smooth and consistent perspective of the overall pay practices for each given job.

Sometimes it is not possible to derive a clear and conclusive opinion from perfect matches. This generally occurs for one of three reasons: data insufficiency, geographic implausibility, or functional implausibility. Salary.com consistently applies methods of interpolation or extrapolation appropriate to each of these cases.

## Data Insufficiency

Where available published data is insufficient to establish a clear and conclusive opinion, Salary.corn's compensation consultants apply mathematical algorithms to interpolate missing or insufficient values. One technique for filling these gaps involves the application of regression formulas to interpolate data for organizations of different sizes from those for which the original data is more robust. The data is validated based on relevant, related, and/or similar businesses - for example, data for a medium-sized high-tech firm can be interpolated by examining data for small and large high-tech companies. Regressions can also be developed based on a sufficient number of known compensation amounts for similar or related jobs. These regressions provide a strong indicator of the effect a given scope factor has on the market pay rate for a given job. By reporting these estimates CompAnalyst is providing the user with a reliable number without requiring the user to do extensive research to estimate the amounts.

If CompAnalyst has estimated compensation information based on data that partially matches the user's selections, the number of organizations and incumbents will reflect the low end of the range of total organizations and incumbents considered. This number is footnoted with a dagger (t) to indicate the match is not perfect.

