



# Advisory Board Comments & Recommendations On MWRA PFY24 Budget



### Capital Improvement Program



### Capital Improvement Program

		FY24	FY25	FY26	FY27	FY28	FY24-28
	Projected Expenditures excl. Metro Tunnel	\$327.3	\$318.1	\$299.7	\$321.7	\$300.1	\$1,566.8
	Metropolitan Tunnel	\$15.6	\$15.3	\$19.2	\$18.4	\$73.0	\$141.3
ਰ	I/I Program	(41.7)	(36.7)	(26.5)	(27.3)	(34.1)	(166.3)
ose	Water Loan Program	(15.2)	(11.2)	(5.0)	(2.6)	8.6	(25.4)
Proposed	MWRA Spending	\$286.0	\$285.4	\$287.3	\$310.2	\$347.5	\$1,516.5
<u> </u>	Contingency	18.2	18.6	19.5	21.3	27.9	105.6
FY24	Inflation on Unawarded Construction	3.3	7.9	12.8	21.0	32.0	76.9
ш.	Chicopee Valley Aqueduct Projects	(0.3)	(0.3)	0.0	0.0	0.0	(0.6)
	Projected Spending before Adjustment	\$307.2	\$311.7	\$319.5	\$352.5	\$407.5	\$1,698.4
	Spend Rate Adjustment (25%)*	(76.8)	(77.9)	(79.9)	(88.1)	(101.9)	(424.6)
	FY24 Proposed FY24-28 Spending	\$230.4	\$233.8	\$239.7	\$264.3	\$305.6	\$1,273.8

<sup>\*</sup>Based on historical underspending FY04-FY22 excluding community loan programs



### Capital Improvement Program

#### **PFY24 Comments & Recommendations**

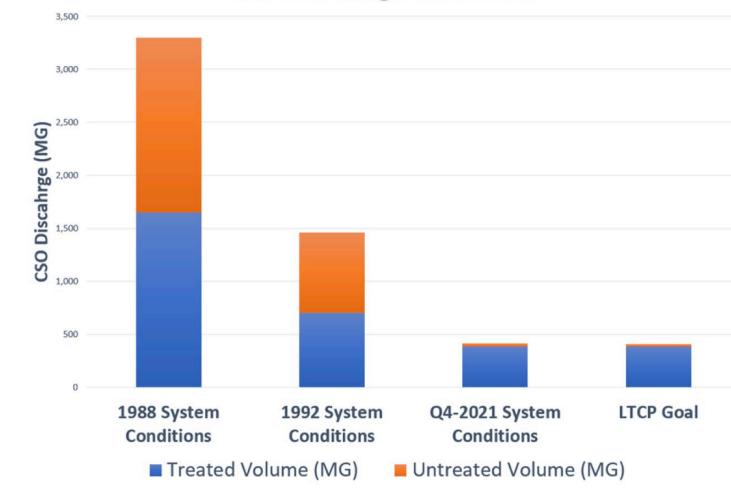
The Advisory Board remains committed to reducing the levels of CIP underspending and will work with the Authority to analyze, and respond to, trends following the implementation of the 25% Spend Rate Adjustment.



### CSOs









#### CSOs

#### **PFY24 Comments & Recommendations**

The Advisory Board, remains guided by its long-standing principle of "environmentally sound and ratepayer equitable," and cannot endorse a plan that can only produce environmental benefits through placing significant financial burdens on ratepayers.



### Policy



### NPDES



#### • Co-Permittees

- •New climate change planning requirements
- •Impacts on MWRA and communities
- Long-term capital project obligations
- Accelerated planning efforts
- •Ambiguities in permit terms
- Continuous planning cycle burden



#### NPDES

The Advisory Board remains steadfast in its commitment to minimize the adverse impacts of any language designating MWRA wastewater communities as co-permittees. It aims to prevent any modifications or irreparable harm to the valuable and delicate relationship between the MWRA and its member communities. The Advisory Board strongly encourages the MWRA to actively participate in all necessary efforts to safeguard this shared objective.



### System Expansion



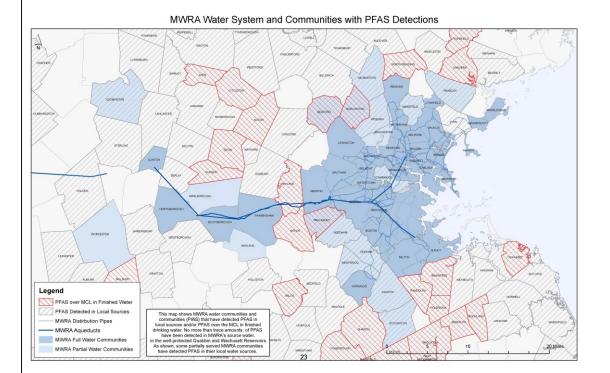
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### System Expansion

The Advisory Board recommends that the MWRA work collaboratively with the Advisory Board to identify additional funding from each of the stakeholders in the system expansion process – the federal government, the Commonwealth of Massachusetts, and the communities seeking to join the MWRA waterworks system.



### Current Expense Budget



### Targeted Advisory Board RRR

**FY23 Approved** 

**FY24 Proposed** 

Rate Revenue

814,648,000 842,545,600

3.42%

Year	Proposed	Approved
FY19	3.91%	3.07%
FY20	3.74%	3.07%
FY21	3.62%	1.00%
FY22	3.59%	2.94%
FY23	3.42%	2.85%
FY24	3.42%	2.42%



### Dunphy Sheet

#### 2.42% Combined

Amount	
\$ 814,648,000	
\$ 842,545,600	
3.42%	
\$ (8,188,819)	
\$ (8,188,819) 834,356,781	
2.42%	
\$	

3.84% Water

1.64% Sewer

IMPACTS ON EXPENDITURES	Amount	Description					
MWRA ADVISORY BOARD RECOMMENDATIONS FOR FY24 CEB							
Water	\$ (4,100,000)						
Sewer	\$ (2,050,000)						
Debt Service Assistance	\$ (1,187,297)						
Subtotal AB Recommendations	\$ (7,337,297)						
	ANTICIPATED ADJUSTMENTS TO PROPOSED FY24 CEB						
	Direct &	Indirect Cost Changes					
Water Spring Revisits	\$ 3,613,906						
Sewer Spring Revisits	\$ (5,040,340)						
Subtotal of Changes to Operating Costs	\$ (1,426,434)						
	OPERATING RESER	VE REQUIREMENT ADJUSTMENT					
Operating Reserve Requirement	\$ 574,912	Updated based on applicable adjustments; applies only to direct and indirect costs (revenue not included)					
NET CHANGES TO PROPOSED FY24 CEB	\$ (8,188,819)						



### Draft Final Budget Adjustments

Budget	Water	Sewer	Combined
Original PFY24	3.90%	3.10%	3.42%
Draft Final FY24	5.34%	2.30%	3.38%
Advisory Board C&R	3.84%	1.64%	2.42%



### Spring Revisits

Water	
Wages & Salaries	\$ 1,964,098
Senior Debt	\$ 1,433,709
Maintenance	\$ 1,373,324
Watershed	\$ 1,172,733
Subordinate Debt	\$ 792,864
Fringe Benefits	\$ 167,663
Chemicals	\$ 146,410
Overtime	\$ 52,701
Professional Services	\$ 21,644
Other Services	\$ 9,817
Other Materials	\$ (30,152)
Optional Debt Prepayment	\$ (39,758)
Insurance	\$ (68,242)
Utilities	\$ (1,221,539)
SRF	\$ (2,161,366)
Subtotal of Changes	\$ 3,613,906

Sewer						
Wages & Salaries	\$	3,018,719				
Maintenance	\$	679,845				
Other Services	\$	583,852				
Subordinate Debt	\$	374,616				
Fringe Benefits	\$	289,874				
Professional Services	\$	236,005				
Overtime	\$	99,304				
HEEC	\$	55,209				
Other Materials	\$	(112,141)				
Insurance	\$	(131,758)				
Chemicals	\$	(217,693)				
Utilities	\$	(812,262)				
Optional Debt Prepayment	\$	(1,960,242)				
SRF	\$	(2,161,367)				
Senior Debt	\$	(4,982,301)				
Subtotal of Changes	\$	(5,040,340)				



### Spring Revisits

#### **PFY24 Comments & Recommendations**

Anticipated Spring Revisit item totals of: Water: \$3,613,906 Sewer: \$-5,040,340

(totals exclude Debt Service Assistance and adjustments to Operating Reserve)



#### Debt Service Assistance

\$1,187,297 in Debt Service Assistance
 \$115,168 Water
 \$1,072,129 Sewer





#### Debt Service Assistance

#### **PFY24 Comments & Recommendations**

Continuation of the Advisory Board's "Pay it Forward" Principle, applying FY23 Debt Service Assistance towards FY24 Budget. Water: \$115,168 Sewer: \$1,072,129



### Personnel

	Proposed Fiscal Year 2024	ı.						
Personnel Expenses Summary (\$s)								
Line Item/Description Final FY23 Proposed FY24 $\Delta$ (\$s) $\Delta$ (%)								
Regular Pay	\$117,057,267	\$121,095,606	\$4,038,339	3.4%				
		Regular wages and salarie	es for full- and part-tim	e employees.				
Other Pay	1,923,422	1,999,823	76,401	4.0%				
Inc	cludes shift differential, holida	ay pay, temporary employees	, interns/co-ops, and	stand by pay.				
Wages and Salaries Subtotal	118,980,689	4,114,740	3.5%					
Fringe Benefits	23,961,641	25,365,846	1,404,205	5.9%				
Includes health insurance, dental insurance, Medicare, and all	other fringe benefits.							
Overtime	5,337,896	5,575,588	237,692	4.5%				
For planned maintenance, emergency, and coverage.								
Workers' Compensation	2,519,751	2,144,395	-375,356	-14.9%				
Includes compensation payments, medical payments, and other related costs.								
TOTAL PERSONNEL EXPENSES \$150,799,977 \$156,181,258 \$5,381,281 3.6%								



#### Personnel

- 111 fewer FTE's through April 2023 (1,056 versus 1,167)
- \$10.1 million wages & salaries underspending (April 2023)
- Advisory Board staffing study recommendation from FY23
- PFY24 funded with vacancy rate of \$2.7 million



#### Personnel

#### **PFY24 Comments & Recommendations**

Adjustment of proposed vacancy rate:

Water: \$750,000 Sewer: \$500,000



### Watershed

Watershed Reimbursement							
Categories	FY23 Budget	FY24 Proposed Draft	Δ (\$s)	Δ (%)			
Operating Expenses	\$19,987,471	\$20,432,594	\$445,123	2.2%			
Debt Service	0	0	\$0	-			
Payment in Lieu of Taxes (PILOT)	8,903,291	8,900,000	(3,291)	0.0%			
SUBTOTAL (Expenses)	\$28,890,762	\$29,332,594	\$441,832	1.5%			
Revenue	1,210,000	1,020,000	-190,000	-15.7%			
TOTAL (Revenue Deducted)	\$27,680,762	\$28,312,594	\$631,832	2.3%			
Proposed Watershed Capital Budget							
Capital Projects	1,020,000	1,010,000	(10,000)	-1.0%			
TOTAL	\$28,700,762	\$29,322,594	\$621,832	2.2%			



#### Watershed

#### **PFY24 Comments & Recommendations**

Therefore, the Advisory Board recommends reducing the Watershed Reimbursement line item by \$500,000 to account for the assumption of the carryover of surplus from FY23 to FY24.



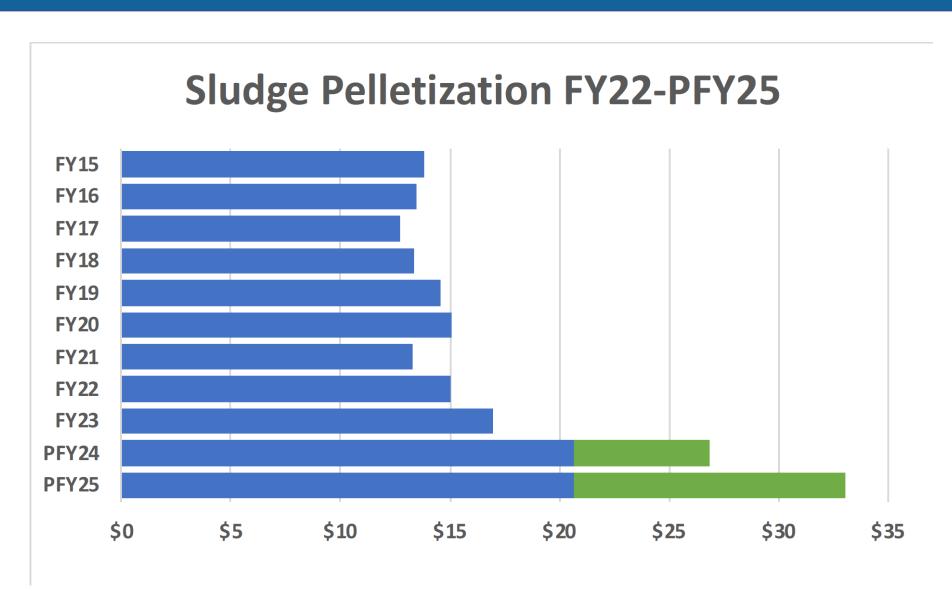
### Watershed

#### **PFY24 Comments & Recommendations**

The Advisory Board recommends that the MWRA take any and all actions needed to ensure that the Division of Water Supply Protection's active forestry management program is restarted and is exempted from the statewide forestry moratorium.



### Sludge Pelletization





### Sludge Pelletization

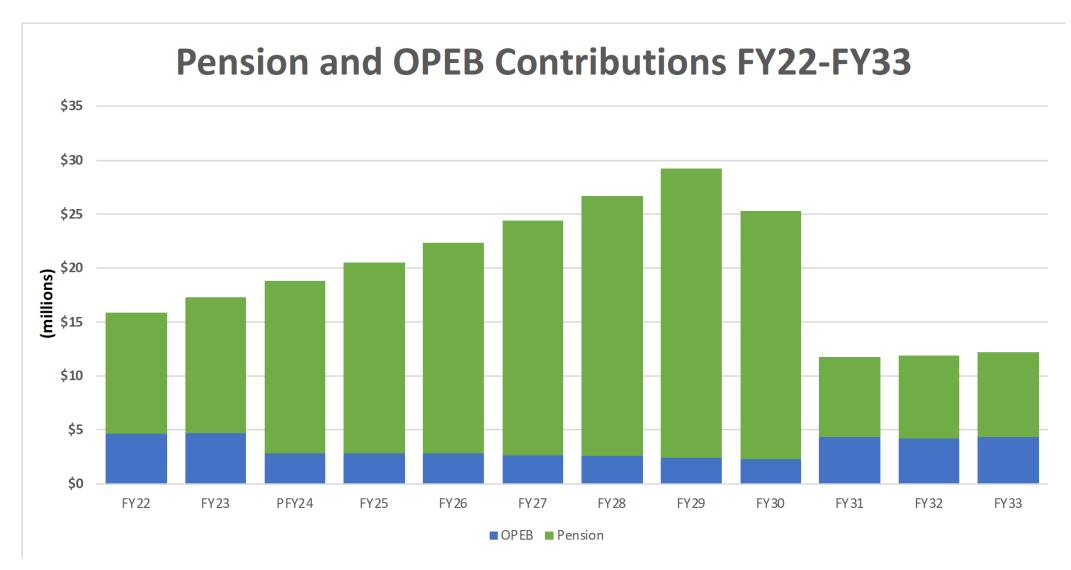
#### **PFY24 Comments & Recommendations**

With no new bans on the application in biosolids in effect yet, the Advisory Board recommends a reduction of \$1,550,000 to the Sludge Pelletization line item.



Proposed Fiscal Year 2024								
Indirect Expenses Summary								
(\$s)								
Line Item/Description	Final FY23	Proposed FY24	Δ (\$s)	Δ (%)				
Pension	\$12 <i>,</i> 555,203	\$15,972,805	\$3,417,602	27.2%				
Scheduled updated contribution to retirement fund.								
Post-Employment Benefits/Additional Pension Deposit	4,754,061	2,849,365	-1,904,696	-40.1%				
All other benefits for retirees (e.g. health insurance).								
Insurance	3,916,002	4,265,380	349,378	8.9%				
Insurance and payments/claims.								
Mitigation Payments	1,735,694	1,779,086	43,392	2.5%				
Mitigation payments to Quincy and Winthrop.								
HEEC Payments	6,225,566	7,445,441	1,219,875	19.6%				
Cross harbor cable to Deer Island (includes both debt service and O&M com	ponents).							
Watershed Reimbursements	28,890,762	29,332,594	441,832	1.5%				
Supports the operations and related costs of the state's Department of Conse	rvation and Recreation, Offic	ce of Watershed Managemer	nt.					
Additions to Reserves	2,418,453	6,884,074	4,465,621	184.6%				
1/6th of all planned Operating Expenses.								
TOTAL INDIRECT EXPENSES	\$60,495,741	\$68,528,745	\$8,033,004	13.3%				







January 1, 2022 unfunded actuarial accrued liability:

\$82.0 million

January 1, 2023 unfunded actuarial accrued liability: (before assumption and/or plan changes)

\$88.4 million



#### Funding Schedule Adopted May 10, 2023

Appropriations increase 14.20% per year, fully funded by June 30, 2030

(1) Fiscal Year Ended June 30	(2) Employer Normal Cost	(3) Amortization of Unfunded Liability	(4) Actuarially Determined Contribution (ADC): (2) + (3)	(5) Total Unfunded Actuarial Accrued Liability at Beginning of Fiscal Year	(6) Percent Increase in ADC Over Prior Year
2024	\$4,226,368	\$9,841,737	\$14,068,105	\$94,177,033	
2025	4,375,542	11,690,234	16,065,776	90,154,431	14.20%
2026	4,529,898	13,817,218	18,347,116	83,878,227	14.20%
2027	4,689,613	16,262,793	20,952,406	74,895,219	14.20%
2028	4,854,870	19,072,778	23,927,648	62,678,063	14.20%
2029	5,025,861	22,299,513	27,325,374	46,614,050	14.20%
2030	5,202,782	25,992,240	31,195,022	25,992,240	14.16%
2031	5,385,834	0	5,385,834	0	-82.73%



4,673,624 4,754,061 80,487 1. 3,916,002 6,991,953 6,275,566 Pension 25.731.490 28.023.799 1,292.008 4.8 moent years' actuarial valuations including the 1,412,647 1,406,900 FY 2023 ySegal. The red line models the example discussed WRA experiences an investment income return of 0%. \$56,651,674 \$58,617,124 \$1,965,450 3,59 m the CY2022 preliminary actuarial valuation with the ount of investment income on the MWRA's AVA is led to contribute according to the preliminary 2022 Comments The MWRA is at the various with regard to its approach on fully funding its pension obligation. The retirement 0 to \$56.9 million - more than double the amount fund CY 2020 actuarial study (dated January 2021) showed its funding level at 88.23%, and it has one of the more aggressive funding schedules in the Commonwealth, with full funding scheduled to be achieved by 2030, rather than o important to note that this calculation is based on after additional contributions are made and the 2040 deadline adopted by many public pension systems. he amount could actually be far greater. However, this Recommen pension's deadline for full funding is only seven years away means the entire remaining liability needs to be Proposed FY23 CEB was based upon, with pension addressed within that timeframe, recardless of the performance of investments within the retirement fund. The fact nearly \$28 million in 2029 - more than double the that current state law makes no mention of anything other than a date-certain for full funding means that each subsequent year, the MWRA retirement fund has one year less to meet its funding deadline regardless of investmen se line item. As projected in the proposed FY23 CEB These increasing levels of pension expense are on the MWRA's Proposed performance. For example, imagine if in 2029 the retirement fund broke even and did not meet its estimated rate of return on its investments. That would mean that the MWPA must make a contribution of not only the amount originally planned for the 2030 contribution, but also the amount of investment income the retirement fund failed to Capital Improvement Program & C the pension and the projected amount of spending to achieve the prior year. All within one year as demonstrated in this chart: reframes to be addressed; the short-term, the midrecommending a "Pillars of Pension" plan to address 'ension on Plan rould use the updated numbers to recalculate the 3 CEB and accompanying planning projections. endorsed by the MWRA Board of Directors, MWRA 70318 70313 70313 70313 70313 70313 70313 70313 **MWRA** Advisory Boaru ewer utility FY23 CEB into the pension line it em 4. The MWRA should propose to the Ret irement Boarda one-time use of water rate stabilization funds to the pension cabulated to achieve no less than 90% funding on the overall pension unfunded liability, keeping this person caused to some who receives that show rung on the overall personal runder lately, yearing the deposit in either runder or stable copilar preservation veide to disolated from potential inapphie meter leparts. This one-time deposit will be confinent upon.

Show and the fellower is the deposit will be confinent upon.

Show and the fellower is the deposit of the deposit of the element function 2003, and to delegite authority to the Executive Director of the fellower Execution 2004, and to delegite authority to the Executive Director of the fellower Execution 2004, and the proposed accepts of the Executive Execution 2004. **JUNE 2022** 20.01 fg. © MWRR shouldwork with the Advisory Eband and other retirement system stakeholders to secure legislation to amend Chapter 32 to authorize the state actualy to develop a plan that addresses well-funded, short-to full amortization systems like the MWRR, with the goal of shifting to a rolling date for full funding if certain oiteria



#### Indirect Expenses

#### Pension

The MWRA retirement system, as with so many other MWRA components stands out as an outlier in comparison to its counterparts across the state. The care and maintenance of the system should likely stand out as well. Last year, the Advisory Board highlighted the strong standing of the MWRA Retirement System, being in the top 15 public retirement systems in the Commonwealth with a funded ratio of 89.05%. We also emphasized the potential burden at the hands of the ratego-payers for furth the manning 15% of the system by 2000. Following the 2023 valuation, the MWRA Retirement System again ranks high, with a funded ratio of 88.36%, but with an even bigger

The pension system is at the "heartbreak hill" of the marsthon that is full funding. It is so close to the finish line, but the final stretch is burdensome and pairful. The Advisory Board remains committed towards bringing as much helid as possible to extrapase on the way to full funding, in the FY22 Comments and Recommendations, the Advisory of th Board proposed a combination of tools aimed at this refef:

- The calculation of pension costs with projected flavorable actuarial numbers

  2. Shift the OPEB contributions in the water utility to the pension line item until "virtual full funding" level is
- 3. Shift of optional debt prepayments in the sewer utility into the pension line item until full funding (not virtual) is
- One-time use of water rate stabilization funds to the pension calculated to achieve no less than 90% funding on the overall pension unfunded lisbility, keeping it as a reserve to isolate it from potential negative market impact. 5. A vote of the Retirement Board to extend the date for full funding of the retirement fund to 2033, and reques that PERAC approve a one- year extension in future if certain criteria are met to simulate a rolling 10-year
- 6. That MWRA work with the Advisory Board, and other retirement system stakeholders to secure legislation to amend Chapter 32 to authorize the state actuary to develop a goal of shifting to a rolling date for full funding

The pilers of pension were invitation for the Authority to encade with the retirement board and secure a steady tride to the funding finish line. As of May 10, 2023, however, the Retirement Board voted to move forward withou exploring the possibilities of extending out the payoff date by multiple years. The newest pension funding schedule includes an actuarily determined contribution (ADC) from the MWRA increasing at over 14% a year. This is up from last year's funding schedule with an ADC increasing closer to 2%s year. With borning issues for the markets the US debt ceiling potentially being surpassed, ongoing inflation, and the continuation of conflict in Europe, prospects for the currier ADC remaining level in future funding schedules are unlesscrade.

	Pension Actuarially								
	Dete	rmined Contribut	tion (ADC)						
	2022 Val	untan	2023 Valuation						
Year	ADC	ADC % Increase	ADC	ADC 56 Increase					
2025	15,763,312	12.1%	16,065,776	14.2%					
2026	17,662,791	12.0%	18,847,116	14.2%					
2027	19,791,157	12.0%	20,952,405	14.2%					
2028	22,175,991	12.0%	23,927,648	14.2%					
2029	24,849,196	12.1%	27,325,374	14.2%					
2030	21 169 116	-14.8N	31.195.022	14.2%					

#### Indirect Expenses

the Retirement Board to implement solutions that responsibly get the staff have targeted areas of relief that can be put into place during the

#### ployment Benefits

PEB) liability on their balance sheet, the MWRA began to explore sility. MWRA staff made the argument that both liabilities were "two sides lected one part of an overall total liability that needed to be addressed adline for the pension system, but not one for the OPEB liability, the i" the pension liability until "virtual full funding" was achieved. Virtual full atio to be within the 95% 105% range. MWRA met this goal and bega

on below the "virtual full funding range." Beginning with the proposed B contributions to more aggressively focus on the pension liability once ortance of addressing the OPEB liability; however, because the the 95% threshold that signifies the "virtual full funding" range, we are inding strategy. To help aggressively target the pension's unfunde that the MWRA redirect all water and sewer utility funds currently and continue to do so until the previously agreed upon "virtual full

ith the "two sides of the same coin" approach of Directors, and in line with previous MWRA policies nity should shift all water and sewer OPEB It o the pension line item and continue to do so until ieved (95% 105%).

Advisory Boaru

funding schedule up through 2040.

**MAY 2023** 

**MWRA** 

FY 2024

Comments

Recommen

on the MWRA's Proposed

Capital Improvement Program 8

he pension full funding date for 2030, public retirement systems in Massachusetts are actually mandated for payoff by 2040. Explaining these of this remaining time could be beneficial for the ratepayers. Extension options beyond one year, or the simulation of a rolling/moving full funding date were not contemplated by the Retirement Board. This unfortunately limits discussion on the prosand cons of such moves.

The Advisory Board still encourages these discussions to take place among the Refirement Board and does not believe the shift of OPEB funds should cease before full funding unless an extension of the refirement funding schedule is implemented, that does not dramatically impact the Rate Revenue Requirement

Recommendation: The Authority should not move away from the Advisory Board's previous recommendation on shifting all OPEB contributions to the pension fund without extending out the current pension funding schedule provided it doesn't dramatically impact the CEB Rate Revenue Requirement.

FY24 COMMENTS & RECOMMENDATIONS

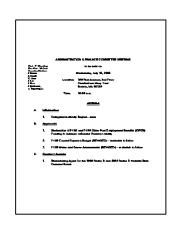
FY23 COMMENTS & RECOMMENDATIONS

are met (e.g. the system must be 90% funded)

[1] Note: the criteria still need to be determined. Possibilities include not meeting the MWRA's anticipated actuarial rate of return

Indirect Costs





July 2008: MWRA adopts "two sides of the same coin"

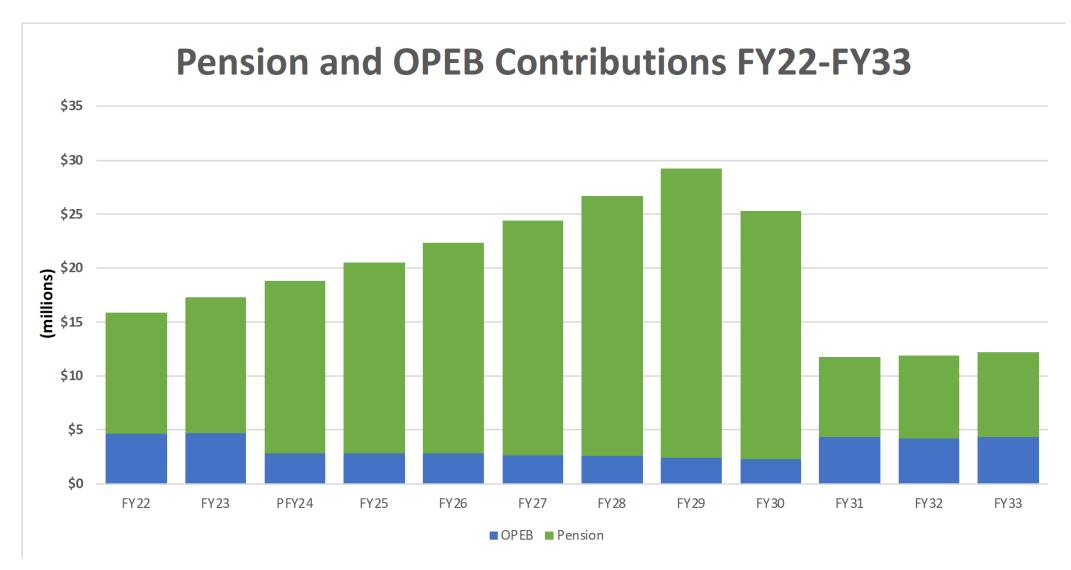
Transfer of \$13,691,514 (from FY08 and FY09) OPEB to Pension



#### **PFY23 Comments & Recommendations**

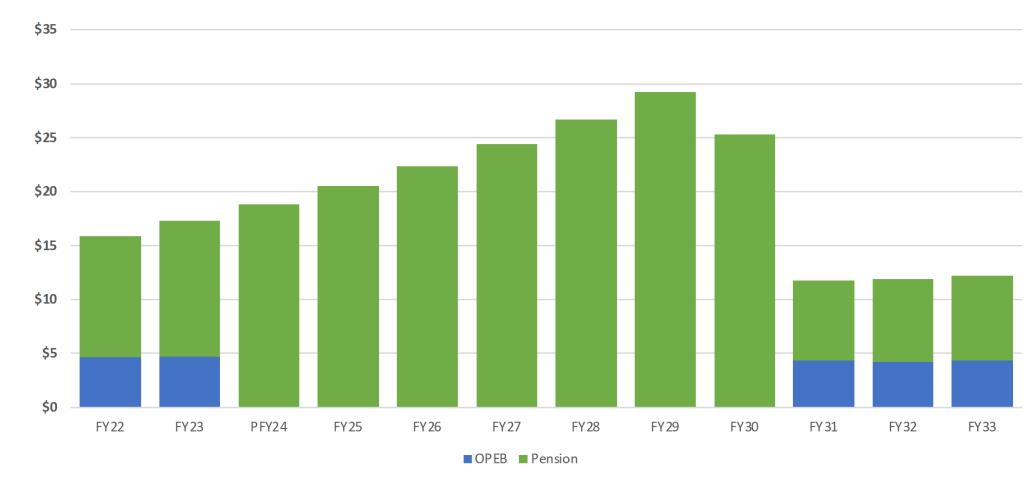
Consistent with the "two sides of the same coin" approach endorsed by the MWRA Board of Directors, and in line with previous MWRA policies (including in PFY24), the Authority should shift all water and sewer OPEB contributions PFY24 CEB to the pension line item and continue to do so until "virtual full funding" level is achieved (95%-105%).













#### **PFY23 Comments & Recommendations**

The Authority should not move away the Advisory Board recommendation on shifting all OPEB contributions to pension without extending out the current pension funding schedule provided it doesn't dramatically impact the CEB Rate Revenue Requirement.



### Capital Finance

Proposed Fiscal Year 2024									
Capital Financing Summary									
(\$ milions)									
Line Item/Description	Final FY23	Proposed FY24	∆ (\$s)	∆ (%)					
Senior Debt Service	\$302.17	\$301.17	-\$1.00	-0.3%					
Subordinate Debt Service	75.49	68.76	-6.73	-8.9%					
SRF Debt Service	96.34	95.12	-1.22	-1.3%					
TOTAL DEBT SERVICE	474.00	465.05	-8.95	-1.9%					
Water Pipeline Commercial Paper	6.23	7.77	1.54	24.7%					
Debt service supporting \$25 million/year for the Local Water Pipeline Improvement and Local Water System Assistance Loan Programs									
Current Revenue/Capital	18.20	19.20	1.00	5.5%					
Amount of current revenue used to fund ongoing capital projects and to meet coverage requirements									
CORE Fund Deposit	-	-	-	-					
The CORE Fund is is no longer required, per revisions to the bo	nd resolution								
Capital Lease	3.22	3.22	0.00	0.0%					
Chelsea facility lease payment									
Debt Prepayment	5.50	6.00	0.00	0.0%					
Advance payment to Commonwealth on watershed related debt									
TOTAL OTHER CAPITAL EXPENSES	33.15	36.19	3.04	9.2%					
Debt Service Assistance (offset)	-1.18	0.00	1.18	-100.0%					
The state-wide program providing assistance with wastewater debt service is not assumed in the Commonwealth's FY17 budget.									
TOTAL CAPITAL FINANCING EXPENSES	\$505.97	\$501.25	(\$4.73)	-0.9%					



### Capital Finance

#### **PFY23 Comments & Recommendations**

The Advisory Board strongly advocates for prioritizing defeasance towards water debt service expenses in the upcoming fiscal year (FY24). This targeted approach aims to address the specific financial demands and optimize the MWRA's financial position.



### Capital Finance

#### **PFY23 Comments & Recommendations**

Taking into account the projected availability of surplus funds for defeasance, the Advisory Board recommends allocating \$2,850,000 towards targeting water defeasance in the final FY2024 operating budget.



### FY24 Budget Review Recap

- Spring Revisits
- Debt Service Assistance
- Sludge Pelletization
- MWRA personnel/vacancy rate
- Watershed
- Capital Finance



Budget	Water	Water Sewer	
Original PFY24	3.90%	3.10%	3.42%
Draft Final FY24	5.34%	2.30%	3.38%
Advisory Board C&R	3.84%	1.64%	2.42%



#### **Massachusetts Water Resources Authority**

AF 1.B 05/24/2023

## MWRA Fiscal Year 2024 Current Expense Budget Development Update

May 24, 2023



#### **FY24 CEB – Largest Changes from the Spring Revisit**

#### **Direct Expenses**

- Wages & Salaries
- Chemicals
- Utilities
- Maintenance
- Other Services

#### **Indirect Expenses**

Watershed Reimbursement



#### FY24 CEB – Largest Changes from the Spring Revisit

#### **Debt Service**

- SRF
- Senior Debt
- Subordinate Debt
- Debt Service Assistance
- Defeasance

#### Revenue

Investment Income

#### **Advisory Board**

- Cooperation throughout the budget process
- Staff will develop formal responses to the Advisory Board's comments and recommendations
- Staff will be back in June with a Draft Final recommendation

#### Thank You!