



**Date:** December 10, 2024

**To:** Commissioner Kate H. Stacy, President  
 Commissioner Joshua Arce, Vice President  
 Commissioner Avni Jamdar  
 Commissioner Steve Leveroni

**Through:** Dennis J. Herrera, General Manager

**From:** Nancy L. Hom, Chief Financial Officer and Assistant  
 General Manager, Business Services

**Subject:** FY 2024-25 Q1 Audit and Performance Review Report

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This memorandum summarizes the San Francisco Public Utilities Commission (SFPUC) Quarterly Audit and Performance Review (QAPR) report for the first quarter of FY 2024-25, ending September 30, 2024.

**I. Completed Audits**

There were six completed audits during the first quarter of FY 2024-25:

1. 2023 Post Audit | July 17, 2024  
 Report Link: <https://tinyurl.com/5h48hexd>

**Report Summary:** The Controller’s Office performs the Post Audit to examine the effectiveness of the design and implementation of each department’s accounting and internal control practices and compliance with City laws, regulations, and policies.

**Audit Findings Summary:** The post audit highlighted SFPUC’s strengths in process and procedure documentation, prompt clearing of unidentified receipts, manual carryforward survey and transactions, and budget entry documentation. Areas for improvement were identified in purchasing and payables processing, employee recognition documentation, processing of expense reports, community-based organizations, general ledger entry timeliness. In response to the audit, SFPUC staff will continue to evaluate opportunities to promote and improve compliance with particular focus on areas highlighted in the findings.

**London N. Breed**  
 Mayor

**Kate H. Stacy**  
 President

**Joshua Arce**  
 Vice President

**Avni Jamdar**  
 Commissioner

**Steve Leveroni**  
 Commissioner

**Dennis J. Herrera**  
 General Manager



2. FY 2023-24 Cybersecurity Maturity Assessment | September 4, 2024  
Report is confidential.

**Report Summary:** The City Services Auditor (CSA) assessed SFPUC's cybersecurity maturity level based on the National Institute of Standards and Technology (NIST) cybersecurity framework. The assessment is mandated by the Committee on Information Technology (COIT) cybersecurity policy.

**Audit Findings Summary:** SFPUC scored a "3.3" out of a possible "4.0" where a higher score indicates higher maturity. SFPUC continues to improve its cybersecurity program and bolster its cyber infrastructure.

3-7. FY 2023-24 Warehouse Inventory Counts | September 16, 2024  
Report Link: <https://tinyurl.com/4w9s65nn>

**Report Summary:** The SFPUC engaged third-party auditor Crowe, LLP (Crowe) to perform FY 2023-24 physical inventory counts at locations in Millbrae, Sunol Yard, Hetchy Power In-City, Moccasin, Wastewater Southeast, City Distribution Division (CDD), and Auxiliary Water Supply System (AWSS).

**Audit Findings Summary:** The audits found variances between the physical count and the amounts reported in the inventory system (Maximo). Some observed variances were attributed to:

- Issues with the automated fuel tracking system
- Miscounts, double counts, or other errors in data entry
- Issuances made after Maximo report run
- Failure to submit issue tags

Management concurred with the recommendations and provided additional detail regarding mitigating actions.

## II. Audit Recommendation Status

As of 9/30/24, 3 audit recommendations were open for the Procurements Public Integrity Assessment.

If you have questions, please contact me at [NHom@sfgov.org](mailto:NHom@sfgov.org) or Irella Blackwood, Audit Director, at [iblackwood@sfgov.org](mailto:iblackwood@sfgov.org).

cc: Irella Blackwood, Audit Director

att: FY 2024-25 QAPR Audit Plan, By Status

## Quarterly Audit & Performance Review Report FY 2024-25 Audit Plan, By Status As of September 30, 2024

Status	
Completed:	7
In Progress:	10
Upcoming:	13
Total:	30

#	Quarter Status	Audit Type	Enterprise / Bureau	Audit Name	Oversight Body
1-5	[Updated] Completed	Financial	Water	Annual Physical Inventory Count, FY 2023-24	SFPUC, Finance
	[Updated] Completed	Financial	Wastewater		
	[Updated] Completed	Financial	Hetch Hetchy Water & Power		
6	[Updated] Completed	Financial	Business Services, Finance	Post Audit, CY 2023	Controller
7	In Progress	Financial	Business Services, Finance	Wholesale Revenue Requirement: Statement of Changes in Balancing Account, FY 2022-23	BAWSCA
8	In Progress	Financial	Power	Franchise Fee Audit: Energy Center SF LLC	Controller
9	In Progress	Financial	Power	Franchise Fee Audit: Pacific Gas & Electric Company	Controller
10	In Progress	Financial	Business Services, Finance	Single Audit, FY 2023-24	OMB
11	Upcoming	Financial	Water	Audited Financial Statements, FY 2023-24	Controller
12	Upcoming	Financial	Wastewater		
13	Upcoming	Financial	Hetch Hetchy Water & Power & CleanPowerSF		
14	Upcoming	Financial	Business Services, Finance	Annual Comprehensive Financial Report, FY 2023-24	SFPUC
15	Upcoming	Financial	Business Services, Finance	Popular Annual Financial Report, FY 2023-24	SFPUC
16	[Updated] Upcoming	Financial	Business Services, Finance	Post Audit, CY 2024	Controller
17	[Updated] Upcoming	Financial	Business Services, Finance	Wholesale Revenue Requirement: Statement of Changes in Balancing Account, FY 2023-24	BAWSCA
18	[Updated] Upcoming	Financial	Water	Interim Financial Statements, FY 2024-25	Controller
19	[Updated] Upcoming	Financial	Wastewater		
20	[Updated] Upcoming	Financial	Hetch Hetchy Water & Power & CleanPowerSF		

#	Quarter Status	Audit Type	Enterprise / Bureau	Audit Name	Oversight Body
21	[Updated] Completed	Performance	Hetch Hetchy Water & Power	Cybersecurity Maturity Assessment, FY 2023-24	SFPUC
22	In Progress	Performance	All SFPUC	SFPUC Chapter 6 Delegated Authority Audit	BOS
23	In Progress	Performance	All SFPUC	BLA Conflicts of Interest Audit	BOS
24	In Progress	Performance	All SFPUC	BLA Work Orders Audit	BOS
25	In Progress	Performance	Hetch Hetchy Water & Power	EPA Cybersecurity Guidelines Self-Assessment	SFPUC
26	Upcoming	Performance	Customer Services Bureau	Customer Assistance Program Post-Enrollment Verification	SFPUC
27	[Updated] Upcoming	Performance	Human Resources Services	Citywide Payroll Audit	CSA, Controller
28	[Updated] Upcoming	Performance	CleanPowerSF	CleanPowerSF Independent Privacy Audit	SFPUC
29	[Updated] In Progress	Concessions, Lease Revenue	Real Estate Services	Revenue Lease Audit: Mission Valley Rock	CSA, Controller
30	In Progress	Revenue Bond Oversight Committee	RBOC	SFPUC Revenue Bond Programs Audit: Phase III	RBOC



**OFFICE OF THE CONTROLLER**  
**CITY AND COUNTY OF SAN FRANCISCO**

Greg Wagner  
 Controller  
 ChiaYu Ma  
 Deputy Controller

DATE: July 17, 2024  
 TO: Dennis Herrera, General Manager, Public Utilities Commission  
 FROM: Greg Wagner, Controller  
 SUBJECT: **Results of CY2023 Post Audit & Continuous Monitoring Program**

Thank you for your staff’s support of the Controller’s continuous monitoring and post audit program. This letter summarizes the audit work completed and explains observations that may have been found during that work. We recognize the extra work and resources required to collect the subject documentation, especially under these extraordinary circumstances, and we truly appreciate your department’s effort and assistance.

**Department Financial Activity Highlights:**

Financial Activity	Fiscal Year 2021		Fiscal Year 2022		Fiscal Year 2023	
	Count	Amount	Count	Amount	Count	Amount
Voucher	33,409	1,588,215,434.88	33,546	1,622,368,235.70	35,423	1,833,779,271.55
Expense Report	994	184,424.25	869	210,397.36	1,275	540,631.46
GL Journal	5,074	23,145,784,893.40	5,262	30,660,350,651.21	5,062	24,837,227,226.30
KK Journal	1,717	11,736,739,230.79	1,740	12,810,672,792.25	1,607	13,912,451,596.13
Purchase Order	8,303	160,968,291.09	8,068	270,421,420.00	8,885	234,470,863.81
Accounts Receivable	5,147	1,965,463,122.99	6,812	2,004,061,324.43	8,095	2,445,986,483.87
<b>Totals</b>	<b>54,644</b>	<b>38,597,355,397.41</b>	<b>56,297</b>	<b>47,368,084,820.95</b>	<b>60,347</b>	<b>43,264,456,073.12</b>

**Program Overview**

The continuous monitoring and post audit program are designed to help assess each department’s accounting and internal control practices and compliance with City laws, regulations, and policies. The monthly monitoring reports that we send you or your staff provide regular feedback about processing in your department. They can help identify areas that are working well and highlight those that may need immediate attention for change and improvement.

**Post-Audit Approach**

The post audit examines the effectiveness of the design and implementation of each department’s internal control. This year, a risk-based approach was used to determine the transaction cycles selected for testing. Each department was assigned a departmental risk level for each transaction cycle based on the materiality of the department’s operations to the City’s financial reporting objectives. This was done primarily on the magnitude, volume, and complexity of the department’s transactions, and adjusted for factors such as separate reporting funds and new systems, personnel, or management. Departments with more transactions, higher dollar amounts, more complex

transactions, and separate financial statements were assigned a higher risk. The assessment of inherent risk is used to design audit procedures and is not a reflection on your department's management or performance.

Financial transactions were selected for analysis and testing on a risk basis. Documentation provided by your department as well as preliminary inquiries of key personnel were used to evaluate the adequacy of the design of the controls on selected cycles. Subsequent testing was used to evaluate the adequacy of the implementation of the controls. In all cases, the existence of citywide controls and potential compensating controls are considered in the evaluation.

## Procedures

Our audit team:

- Reviewed your response to our internal control questionnaire
- Reviewed your continuous monitoring results
- Reviewed your responses to our manual carryforward survey
- Reviewed your P-Card transactions in both US Bank Access Online and in PeopleSoft
- Reviewed your prior year's post audit results and your response
- Examined your written policies and procedures pertaining to the audit areas
- Interviewed key staff members to understand the design of controls

## Strengths

The following areas are highlighted as your strengths. Your cooperation in timely preparation and organization of backup documentation contributed to an efficient post audit. The Controller's Office thanks you for your prompt response to our inquiries throughout the duration of the post audit.

1. **Documentation.** Your department provided processes and procedures for all requested cycles for this post audit. This demonstrates commitment by management to implement an effective system of internal controls.
2. **Promptly Clearing Unidentified Receipts.** Your department has maintained performance with no exception in this area.
3. **Manual Carryforward Survey & Transactions.** Your department has maintained performance with no findings in this area.
4. **Budget Entry Documents.** Your department has maintained performance with no findings in this area.

## Areas for Improvement

Based on the test work performed, there were certain areas that were found to need improvement or requested documentation was not received. Specific areas include:

1. **Purchasing & Payables Processing.** Three invoices we reviewed were paid more than 30 days after the invoice receipt date. The department should ensure that invoices are processed following City's prompt payment rule of 30 days. See Appendix A, Transaction Documentation for details.
2. **Employee Recognition.** Three vouchers we reviewed were related to Employee Recognition. The department drafted an Employee Recognition Policy; however, it was not finalized and

approved by Controller's Office. Also, the vouchers should be recorded in account code 523050, employee recognition, instead of the food account code of 546990. We recommend the department finalize the Employee Recognition Policy and obtain Controller's Office approval before incurring expenses related to employee recognition. See Appendix A, Transaction Documentation for details.

3. **Expense Reports Processing.** One employee reimbursement for food exceeded Controller's threshold of \$200 per single vendor and should have gone through the procurement process. We recommend the department remind employees of the Controller's guidelines to ensure reimbursements fall within the policy. Six employee reimbursements were for employee recognition and should have been recorded in account code 523050, employee recognition, instead of the food account code of 546990. See Appendix A, Transaction Documentation for details.
4. **Community Based Organizations.** One voucher for a nonprofit organization was submitted late. The nonprofit did not follow the disbursement schedule. We recommend the department work with the nonprofit to send disbursement funding request according to the contract's requirements/schedule. Three vouchers for two separate nonprofits were paid more than 30 days after the invoices were received. We recommend the department review and update their payment procedures to ensure that invoices are paid within the City's prompt payment rule of 30 days. See Appendix B, Community Based Organizations for details.
5. **General Ledger Entry Submitted After Year-End Deadline.** We recognize your department's fiscal staff's effort in meeting the year-end schedule, but improvements could be utilized in meeting the year-end deadlines as department requested exceptions to post accounting transactions after the year-end deadline. Your department's request has grown from one journal entry to three journal entries over the last three fiscal years. One journal entry was processed for CleanPowerSF FY23 expense accruals related to FY24 vouchers. One journal entry was processed for PUC Bureau FY23 Q4 overhead and recovery from Water, Hetchy Water, Power, Clean Power and Wastewater. The last journal entry was processed for PUC Bureau to abate FY23 Q1 to Q3 City Attorney infrastructure charges to various PUC Peoplesoft chartfields. We encourage the department to reconcile the accounting transactions in a timely manner to ensure a smooth fiscal year-end closing.

Summaries of all higher risk findings are presented in **Appendix A: Fieldwork Test Results** on page 5, **Appendix B: Community Based Organizations** on page 8, and **Appendix C: P Card** on page 10.

**Year-End Close**

An ongoing goal of the Controller’s office is to have a well-managed process for CCSF’s Year-End Close. To accomplish this goal, departments must meet the year-end schedule, respond promptly to Controller’s request for information and required actions. This ensures that the processes for the issuance of our Annual Comprehensive Financial Report (ACFR) provides financial data integrity, accuracy, and timeliness. Below is your department’s last three year’s statistics on budget and journal entries submitted after the month 13 deadline and deleted vouchers that were not fully approved by the year-end deadline.

Financial Activity	Fiscal Year 2021		Fiscal Year 2022		Fiscal Year 2023	
	Count	Amount	Count	Amount	Count	Amount
Deleted Vouchers	32	1,718,100.54	58	2,001,160.95	29	1,258,696.65
GL submitted after year-end deadline	1	18,630,319.28	2	27,906,130.56	3	7,512,306.98
KK submitted after year-end deadline	-	-	2	18,604,087.04	-	-

**Follow-up**

A detailed audit matrix that reflects test work for each area of the Post Audit was provided to your Deputy Chief Financial Officer and discussed at the exit conference. We have not removed findings which we believe are valid although your staff may disagree. In those cases, we have communicated our reasons for retaining the finding to your staff and included any comments in the appendices.

By September 13, 2024, please provide us with a response for the observations that were reported above. If you have any questions about the audit or this report, please call Jocelyn Quintos at 415-554-6609 or Lilly Ting at 415-554-7567.

- Cc: Nancy Hom, Chief Financial Officer and Assistant General Manager, Business Services
- Laura Busch, Deputy Chief Financial Officer, Public Utilities Commission
- Vivian Chen, Deputy Chief Financial Officer, Public Utilities Commission
- Sailaja Kurella, Director, Office of Contract Administration
- Jocelyn Quintos, Director of Accounting Operations and Supplier, Controller’s Office

## Appendix A: Fieldwork Test Results

### Overview

Communication, documentation, and monitoring of compliance are critical elements of every sound financial system, and policies and procedures are an essential part of establishing internal controls. For this year's post audit, departments were asked to respond to an internal control questionnaire and submit copies of their policies and procedures for the basic accounting cycles, submit selected transaction documentation for review and to conduct walkthroughs on accounting cycle procedures.

### Internal Control

While it was not within the scope of this audit to perform an extensive internal control review, the status of procedure documentation your department has submitted on requested cycles is below.

Cycle	Status
Cash Handling	Received
Revenue and Receivables	Received
Purchasing & Payables	Received
Payroll	Received
Grants	Not received. Department follows the Controller's Policies.
Journal Entries & Financial Closing	Received
Budget Changes	Not received. Department follows the Controller's Policies.
Debt	Received
Fixed Assets	Received
Inventory	Received
Trustee Accounts	Received
Claims	N/A

## Transaction Documentation

The following documents were selected for review, document numbers in bold indicate issues found. Please find our observations below.

Employee Recognition	Findings and Recommendation
<p><b>Vouchers:</b></p> <p><b>Hetch Hetchy</b>      <b>CleanPower</b></p> <p><b>02664107</b>          02532896</p> <p>02681984          <b>02831878</b></p> <p>02764959</p> <p>02609797</p> <p>02621773</p> <p><b>Water</b>              <b>PUB</b></p> <p>02762011          02655613</p> <p>02762000          02654248</p> <p>02826955          <b>02542516</b></p> <p><b>02825392</b>          <b>02780633</b></p> <p>02726161          02815892</p> <p><b>Wastewater</b></p> <p>02569422</p> <p>02662173</p> <p>02786292</p> <p><b>Expense Report:</b>    <b>PUB</b></p> <p><b>Hetchy Hetchy</b>      <b>0000106085</b></p> <p><b>0000106691</b>          <b>0000108938</b></p> <p>                                 <b>0000110580</b></p> <p>                                 <b>0000110576</b></p> <p>                                 <b>0000110714</b></p>	<p>Our review found thirteen higher risk items in this category.</p> <p>Three vouchers we reviewed were paid more than 30 days after the invoices were received. We recommend the department review and update their payment procedures to ensure that invoices are paid within the City’s prompt payment rule of 30 days.</p> <p>Three vouchers and six expense reports we reviewed were food purchases related to Employee Recognition. The department drafted an Employee Recognition Policy; however, it was not finalized and approved by the Controller’s Office. However, the department incurred employee recognition expenses prior to final policy approval. In addition, these three vouchers and six expense reports should be recorded in account code 523050, employee recognition, instead of account code 546990, food. We recommend the department finalize the Employee Recognition Policy, obtain Controller’s Office approval and comply with Controller’s reimbursement guidelines.</p> <p>One expense report we reviewed was for food purchases related to Employee Recognition event. The food purchases were over \$200 per single supplier. We recommend the department follow Controller’s reimbursement guidelines to process expense reports.</p> <p>Other observations have been noted in the Fieldwork Summary which was presented to your finance staff.</p>

Manual Appropriation Carryforward of Annual Funds	Findings and Recommendation
<p><b>Hetch Hetchy</b></p> <p>KK23MCF014_19    <b>PUB</b>  KK23MCF014_24    KK23MCF012_6  KK23MCF014_36    KK23MCF012_18  KK23MCF014_42    KK23MCF012_25  KK23MCF014_48    KK23MCF012_30</p> <p><b>Water</b></p> <p>KK23MCF015_8    <b>Wastewater</b>  KK23MCF015_11    KK23MCF016_9  KK23MCF015_24    KK23MCF016_10  KK23MCF015_69    KK23MCF016_19                                    KK23MCF016_49                                    KK23MCF016_57</p> <p><b>CleanPower</b></p> <p>KK23MCF013_8</p>	<p>After reviewing your Manual Appropriation Carryforward Survey, our process consisted of sampling nineteen of your Manual Appropriation Carryforward requests. Twelve financial and procurement transactions were selected for analysis and tested for compliance with your FY23 Manual Appropriation Carryforward Request.</p> <p><u>Purchase Orders Tested</u></p> <p>0000762103  0000752666  0000813628  0000813188  0000738919  0000744938  0000720194</p> <p><u>Requisition Tested</u></p> <p>0000292843  0000292477  0000292124  0000293816  0000282396</p> <p>Our review did not result in any findings for the documents.</p> <p>Other observations have been noted in the Fieldwork Findings Summary which was presented to your finance staff.</p>

## Appendix B: Community Based Organizations

The following Community Based Organizations were selected for review, below are our observations.

Community Based Organizations	Findings and Recommendation
<p><b>BAY AREA VIDEO COALITION</b>            Contract# 1000025334 - \$105,000            PO# 0000712460 -\$35,000            Voucher# 02790699 - \$28,907.64            Voucher# 02803896 - \$6,092.36</p>	<p>Our review found no higher risk items in this category.</p> <p>Other observations have been noted in the Fieldwork Findings Summary which was presented to your finance staff.</p>
<p><b>SAN FRANCISCO CONSERVATION CORPS</b>            Contract # 1000026697 - \$5,853,016            PO# 0000654718 - \$1,056,309.92            Voucher# 02546184 - \$89,108.43            Voucher# 02650089 - \$211,136.33</p>	<p>Our review found one higher risk item in this category.</p> <p>Our review found that one voucher was submitted late. The nonprofit submitted the March invoice on 5/03/23 when the disbursement was due on 4/30/23 per Appendix B of the grant agreement which states "SFCC must submit monthly financial invoice within 15 business days, and no more than 30 calendar days of the last day of the month, in which services were provided". We recommend the department work with the nonprofit to send disbursement funding request according to the contract's requirements/schedule.</p> <p>Other observations have been noted in the Fieldwork Findings Summary which was presented to your finance staff.</p>
<p><b>SUNSET YOUTH SERVICES</b>            Contract # 1000025347 - \$105,000            PO# 0000622332 - \$33,950            Voucher# 02528470 - \$13,961            Voucher# 02643872 - \$19,541</p>	<p>Our review found no higher risk items in this category.</p>

<b>Community Based Organizations</b>	<b>Findings and Recommendation</b>
<p><b>EARTH LAND INSTITUTE</b>  Contract # 1000026639 - \$480,000  PO# 0000655598 - \$160,000  Voucher# 02448049 - \$20,000  Voucher# 02555072 - \$20,000</p>	<p>Our review found one higher risk item in this category.</p> <p>One of the vouchers we reviewed was paid more than 30 days after the invoices were received. Invoice was received on 5/5/23 and paid on 6/5/23. We recommend the department review and update their payment procedures to ensure that invoices are paid within the City's prompt payment rule of 30 days.</p> <p>Other observations have been noted in the Fieldwork Findings Summary which was presented to your finance staff.</p>
<p><b>OLD SKOOL CAFE</b>  Contract # 1000025384 - \$105,000  PO# 0000625082 - \$33,950  Voucher# 02529963 - \$33,950</p>	<p>Our review found no higher risk items in this category.</p> <p>Other observations have been noted in the Fieldwork Findings Summary which was presented to your finance staff.</p>
<p><b>YOUTH LEADERSHIP INSTITUTE</b>  Contract # 1000025349 - \$75,000  PO# 0000622339 - \$24,250  Voucher# 02498534 - \$13,683.3  Voucher# 02560784 - \$9,855.58</p>	<p>Our review found two higher risk items in this category.</p> <p>Two vouchers we reviewed were paid more than 30 days after the invoices were received. One invoice was received on 3/1/23 and paid on 4/19/23 and the other invoice was received on 4/28/23 and paid on 6/7/23. We recommend the department review and update their payment procedures to ensure that invoices are paid within the City's prompt payment rule of 30 days.</p>

## Appendix C: Procurement Card (P-Card)

### Overview

The City Procurement Card (P-Card) program enables designated City employees to make authorized purchases during declared emergencies and for certain employee reimbursement items. All transactions should comply with both the citywide P-Card policy and your pre-approved departmental policy. P-Card purchases are monitored monthly and quarterly using reports available from SF Financials & Procurement and US Bank. Departments must respond to all inquiries from the P-Card team and/or fund accountant to ensure that transactions are compliant and that any potential violations are reviewed and granted an exception.

### Transaction Documentation

The following documents were selected for review. Document numbers in bold indicate exceptions found. Please find our observations below.

Voucher#	Observations	Recommendations
<b>02401427</b> 02632357 02632769 02802758	Missing supporting documentation with justification related to Lomo Libre delivery fee.	Supporting documentation for purchases must be accessible to multiple individuals.

### Table A: Audit Criteria

The following table summarizes the criteria considered for the audit.

Audit Criteria Fulfilled		Exceptions Found
Authorization and Pre-Authorization	<ul style="list-style-type: none"> <li>All requests for business travel/lodging require approval in advance by the Department Head or an Authorized Travel Signatory.</li> <li>Purchases must be made after P-Card Request Authorization form was signed</li> </ul>	None
Supporting Documents	<ul style="list-style-type: none"> <li>Supporting documents such as receipts and registration must be retained and match pre-approvals.</li> <li>Travel expense form must be completed to be used for travel, training, or other employee reimbursement items</li> </ul>	<b>02401427</b>
Items That Should be Procured through Purchase Orders	Recurring purchases that should be obtained through a purchase order or requisition are strictly prohibited	None
Purchases Made by Non-Cardholder Employees	Purchases must be authorized by the person whose name is on the card. P-Cards must be properly stored and handled	None

<b>Audit Criteria Fulfilled</b>		<b>Exceptions Found</b>
Sales Tax Accrual	The department must accrue sales tax when shopping online where sales tax is not charged	None
Employee Recognition	Department must have an approved employee recognition policy before making program-related purchases	None
Food Policy	Department must have a food policy before purchasing food for employees, guests, and/or clients	None
Prohibited Items	Prohibited purchases include, but are not limited to: <ul style="list-style-type: none"> <li>• Personal purchases of any kind (personal purchases are defined as purchases of goods or services intended for non-work-related use or use other than for official business)</li> <li>• Donations or gifts to a charity, a gift to an entity, or a political contribution</li> <li>• Fuel for personal cars since the personal vehicle expenses will be compensated through mileage reimbursement</li> <li>• Refer to the P-Card Policies &amp; Procedures for additional prohibited items</li> </ul>	None
IT Related Items	Departments should utilize the Technology Marketplace and not use P-Cards to circumvent City procurement policies	None
Payments for Recurring Subscriptions	Purchases of recurring subscriptions must be pre-approved and documented in the Departmental policy	None
>\$200 Non-Travel	Purchases should follow non-travel expense reimbursement guidelines when applicable	None
Payment of Existing Invoices for After-the-fact Purchases	P-Card should not be used to pay for after-the-fact purchases	None
Segregation of Duties	An employee cannot be both the Authorized Cardholder and the Purchase Approver	None
Timely Payment	Payment (Scheduled Due Date) must be made within fourteen (14) days of the statement date	None
Voucher amount matches US Bank transactions	Voucher should match transaction receipts and cardholder/managing statements	None
Payment made using assigned department Supplier ID	To ensure that payments are applied to the correct managing account, Departments should use the correct	None

<b>Audit Criteria Fulfilled</b>		<b>Exceptions Found</b>
	Supplier ID Number when processing payment in PeopleSoft.	

**Table B: Strengths and Improvements Needed**

<b>Strengths</b>
Clear separation of duties amongst department P-Card staff.
Detailed tracking of emails and receipts for supporting documentation.
Payments are made within fourteen days of the statement date.

<b>Needs Improvement</b>
Supporting documents should be readily available to other P-card supporting staff.



Date: September 20, 2024

To: Greg Wagner, Controller

Through: Dennis J. Herrera, General Manager 

From: Nancy L. Hom, Chief Financial Officer and Assistant General Manager, Business Services 

Subject: **Management Response to CY 2023 Post Audit Findings**

Thank you for your Post Audit Report dated July 17, 2024, which outlines the findings from the Calendar Year 2023 Post Audit & Continuous Monitoring Program. The Controller’s Office monitoring and review program is invaluable in supporting SFPUC’s commitment to adhering to citywide policies and procedures. We appreciate your recognition of our department’s strengths, as well as the insightful observations included in the report. SFPUC staff will continue to seek opportunities to enhance compliance in the monitored areas, with a particular focus on the issues highlighted by recent findings.

Below are SFPUC’s detailed responses and action plans:

**A. Purchasing & Payable Processing**

<b>Findings</b>	<b>Response/Action Plan</b>
<p>Three vouchers we reviewed were paid more than 30 days after the invoices were received. We recommend the department review and update their payment procedures to ensure that invoices are paid within the City’s prompt payment rule of 30 days.</p>	<p>SFPUC Accounting will conduct ongoing training sessions for divisional purchasing and accounts payable staff on the City’s Prompt Payment policy, emphasizing the importance of prioritizing payment processing for invoices with discounts.</p> <p>SFPUC’s Payment Processing Checklist offers clear guidelines and procedures for staff at every stage of payment processing, ensuring all staff understands and adheres to the relevant policies and procedures.</p> <p>SFPUC’s Accounts Payable GoPaperless (APGP) system includes automated tracking to flag invoices for expedited processing. Divisional staff are instructed to use the 'Expedited' checkbox to ensure timely handling of discounted invoices. A</p>

- London N. Breed**  
Mayor
- Tim Paulson**  
President
- Anthony Rivera**  
Vice President
- Newsha K. Ajami**  
Commissioner
- Kate H. Stacy**  
Commissioner
- Dennis J. Herrera**  
General Manager



	system enhancement adds the label field labeled "Eligible for Discount," which will remind accounts payable staff to take advantage of discounts, when possible.
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**B. Employee Recognition**

<b>Findings</b>	<b>Response/Action Plan</b>
<p>Three vouchers we reviewed were food purchases related to Employee Recognition. The department drafted an Employee Recognition Policy; however, it was not finalized and approved by the Controller's Office. However, the department incurred employee recognition expenses prior to final policy approval. In addition, these three vouchers should be recorded in account code 523050, employee recognition, instead of account code 546990, food.</p> <p>We recommend the department finalize the Employee Recognition Policy, obtain Controller's Office approval and comply with Controller's reimbursement guidelines.</p>	<p>The SFPUC Employee Recognition Policy was not fully approved in calendar year 2023 and is currently being finalized. Once approved by the Controller's Office, SFPUC Accounting and Human Resource Services will conduct comprehensive training to ensure all employees are well-informed about the purchasing policy.</p> <p>Accounting staff are trained to ensure the proper account codes are used for these transactions.</p>

**C. Expense Reports Processing**

<b>Findings</b>	<b>Response/Action Plan</b>
<p>Six expense reports we reviewed were food purchases related to Employee Recognition. The department drafted an Employee Recognition Policy; however, it was not finalized and approved by the Controller's Office. However, the department incurred employee recognition expenses prior to final policy approval. In addition, these six expense reports should be recorded in account code 523050, employee recognition, instead of account code 546990, food.</p>	<p>The SFPUC Employee Recognition Policy was not fully approved in calendar year 2023 and is currently in the finalization stage. Once approved by the Controller's Office, SFPUC Accounting and the Human Services Department will conduct comprehensive training to ensure all employees are well-informed about the policy details.</p> <p>Accounting staff receive training to ensure the proper account codes are used for these transactions.</p>

<p>We recommend the department finalize the Employee Recognition Policy, obtain Controller's Office approval and comply with Controller's reimbursement guidelines.</p> <p>One expense report we reviewed was for food purchases related to Employee Recognition event. The food purchases were over \$200 per single supplier.</p> <p>We recommend the department follow Controller's reimbursement guidelines to process expense reports.</p>	<p>Employees and managers have been instructed to follow the appropriate purchasing guidelines for future employee recognition-related expenses.</p> <p>All policy violations are documented and reviewed/approved by the Division Manager, Assistant General Manager, and Deputy Chief Financial Officer.</p>
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**D. Community Based Organization**

<b>Findings</b>	<b>Response/Action Plan</b>
<p>1. One voucher for a nonprofit organization was submitted late. The nonprofit did not follow the disbursement schedule.</p> <p>We recommend the department work with the nonprofit to send disbursement funding request according to the contract's requirements/schedule.</p> <p>SF Conservation Corps - \$89,108.43</p>	<p>This finding relates to the joint contribution to the San Francisco Sheriff's Department, which is responsible for processing the payment.</p> <p>The nonprofit submitted the invoice in SOLIS, but the voucher was processed by Sheriff's Department, as they issued the contract and purchase order.</p> <p>The invoice correction was the main cause of the delay, as the original invoice was submitted timely.</p> <p>SFPUC Accounting has informed the Sheriff's Department to ensure that grantee/nonprofit organizations submit their disbursement funding requests according to the grantor's specified requirements and schedule.</p>

<p>2. Three vouchers for two separate nonprofits were paid more than 30 days after the invoices were received.</p> <p>We recommend the department review and update their payment procedures to ensure that invoices are paid within the City's prompt payment rule of 30 days. See Appendix B, Community Based Organizations for details.</p> <p>a. Earth Land Institute - \$20,000.00  b. Youth Leadership - \$13,683.30 and \$9,855.58</p>	<p>2.a. SFPUC strictly follows the City's Prompt Payment policy. This invoice was paid one day late due to a delay during the Infrastructure Review stage. We have informed the Review team about the importance of timely payments to contractors.</p> <p>2.b. The two late payments were due to staffing changes resulting in the absence of the AP Receiver. To prevent similar issues in the future, a backup AP Receiver has been assigned and trained within the Capital Projects &amp; Grants team to ensure timely payments.</p>
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**E. General Ledger Entry Submitted After Year-End Deadline**

<b>Findings</b>	<b>Response/Action Plan</b>
<p>We recognize your department's fiscal staff's effort in meeting the year-end schedule, but improvements could be utilized in meeting the year-end deadlines as department requested exceptions to post accounting transactions after the year-end deadline.</p> <p>Your department's request has grown from one journal entry to three journal entries over the last three fiscal years. One journal entry was processed for CleanPowerSF FY23 expense accruals related to FY24 vouchers. One journal entry was processed for PUC Bureau FY23 Q4 overhead and recovery from Water, Hetchy Water, Power, Clean Power and Wastewater. The last journal entry was processed for PUC Bureau to abate FY23 Q1 to Q3 City Attorney infrastructure charges to various PUC Peoplesoft</p>	<p>SFPUC makes every effort to submit fiscal year end entries on time.</p> <p>However, occasional unique circumstances exist beyond our control that affect timeliness of entries. These include:</p> <ul style="list-style-type: none"> <li>• Third-party invoices received in mid-Q1/2025 from CleanPowerSF vendors requiring necessary extensive reconciliation by staff.</li> <li>• City Attorney's Office work order billings submitted after the year-end closing deadline, delaying our necessary internal management review and reconciliation, abatement, and recovery entries.</li> </ul> <p>SFPUC will continue to work and collaborate closely with City departments and vendors to ensure timely submission of transactions.</p>

chartfields.	
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We encourage the department to reconcile accounting transactions in a timely manner to ensure a smooth fiscal year-end closing.	
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We appreciate the Controller's Office staff's time dedicated to this audit and will ensure that SFPUC management and staff carefully review and consider all observations and recommendations made in this report. Thank you.

cc: Jocelyn Quintos, Director of Accounting Operations and Systems,  
Controller's Office  
Sailaja Kurella, Director of Office of Contract Administration  
Ronald P. Flynn, Deputy General Manager  
Vivian Aiyi Chen, Deputy Chief Financial Officer  
Irella C. Blackwood, Audit Director



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September 16, 2024

To: Steven Ritchie, Assistant General Manager, Water Enterprise  
Ellen Levin, Deputy Assistant General Manager, Water  
Angela Cheung, Water Supply & Treatment Manager  
Annette Devincenzi, Warehouse Manager

Cc: Ronald P. Flynn, Deputy General Manager  
Nancy L. Hom, Assistant General Manager, Business Services and Chief Financial Officer  
Vivian Chen, Deputy Chief Financial Officer  
Laura Busch, Deputy Chief Financial Officer  
Irella Blackwood, Audit Director  
Jennifer Hopkins, Information Technology Services Director

Subject: Fiscal Year End 2023-2024  
Inventory Count – Water Enterprise, Millbrae Warehouse and Sunol Yard Fuel Station

Dear Mr. Ritchie, Ms. Levin, Ms. Cheung, and Ms. Devincenzi:

The San Francisco Public Utilities Commission (SFPUC) engaged Crowe LLP (Crowe) to perform full inventory count services for three enterprise funds including the Wastewater Enterprise, Water Enterprise, and Hetch Hetchy Enterprise.<sup>1</sup> This report represents results of Crowe's full count of the Water Enterprise's Millbrae warehouse and fuel inventory at the Millbrae and Sunol Yards.

### **A. Scope of Inventory Work**

The SFPUC requested Crowe perform full inventory count services of these enterprise activities to test whether significant variances exist between the physical count and the records in the SFPUC's Maximo Inventory Tracking System (Maximo), to determine the cause of variances, and to determine amounts that need to be adjusted in Maximo. The SFPUC requested reporting of the analysis, findings, and recommendations consistent with the format requested by SFPUC's Financial Services Bureau.

### **B. Warehouse Locations**

The locations for the Water Enterprise full inventory count were:

Millbrae Warehouse  
1000 El Camino Real  
Millbrae, CA 94030

Sunol Yard  
505 Paloma Way  
Sunol, CA 94586

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<sup>1</sup> Note that some of the enterprises have multiple warehouse locations.

On June 18, 2024, Crowe visited the locations above and conducted the FY 2023-2024 full inventory count that is the subject of this report. The last full inventory count of the locations was performed by Crowe for FY 2022-2023 on June 27, 2023. In **Table 1** below, we provide key data<sup>2,3</sup> from both full inventory counts.

**Table 1**  
**San Francisco Public Utilities Commission**  
**Water – Millbrae Warehouse and Sunol Yard Inventory Count**  
**Comparison with Prior Full Inventory Counts**  
**(As of June 18, 2024)**

Description	FY 2023-2024		FY 2022-2023	
	Items	Value	Items	Value
Total Inventory (per Maximo)	1,241	\$ 616,535	1,132	\$ 642,514
Total Inventory Variance (per Crowe's Count)	21	\$ (3,741)	15	\$ (6,839)
Total Inventory Variance (as a percentage of Total Inventory)	1.7%	(0.6%)	1.3%	(1.1%)

## Results

As indicated in Table 1, variances were identified between Crowe's full inventory count and the count reported in the Maximo system. The following finding explains the variances in counts. Crowe's recommendation related to this finding is also included.

### Finding #1 – Physical Inventory Counts Differed from Maximo Report Counts

Condition:

Of the 1,241 items we counted, 21, or 1.7%, had a variance between their physical count and their count in Maximo.<sup>4</sup> Based on the physical count, and using the average cost in Maximo, we determined that the total value of the combined variances in the Millbrae Warehouse and Sunol Yard inventories was (\$3,741), or (0.6%) of the total inventory value of \$616,535 in Maximo.<sup>5</sup>

We found 6 positive variances (where the physical count was greater than the Maximo inventory count) which totaled \$29. We found 15 negative variances (where the physical count was less than the Maximo inventory count) which totaled (\$3,769). In **Table 2** below we provide a summary of variances which shows that most of the variance dollar amount is fuel related.

<sup>2</sup> In this report, percentages are rounded to one decimal place. Monetary values are rounded to the nearest whole dollar unless doing so would obscure the data, in which case they are presented without rounding.

<sup>3</sup> Crowe did not perform any procedures related to the assigned value in the Maximo system.

<sup>4</sup> Of the 21 items which had a variance, 5 were issued on an emergency basis after the Maximo system report was generated. Warehouse staff provided documentation of this on the day of Crowe's inventory count. The total value of the variance associated with these 5 items was (\$98). If these items are excluded, total inventory variance as a percentage of total inventory falls from 1.7% to 1.3%.

<sup>5</sup> The (\$3,741) variance is the difference between \$27,358, which is the total value of the 21 items with variances using Crowe's physical count for each item, and \$31,098, which is the total value of the 21 items with variances using the Maximo count for each item. The difference of (\$1) between the (\$3,741) variance in Table 1 and the (\$3,740) implied by the dollar amounts in this footnote (i.e., \$27,358 minus \$31,098 equals (\$3,740)) is due to intermediate rounding.

**Table 2**  
**San Francisco Public Utilities Commission**  
**Water – Millbrae Warehouse and Sunol Yard Inventory Count**  
**Summary of Variances**

Description	Item Count	Amount
Fuel Variances		
Positive	-	\$ -
Negative	4	(3,480)
Total Fuel Variance	4	(3,480)
Other Variances		
Positive	6	29
Negative	11	(289)
Total Other Variances	17	(260)
Rounding Adjustment		(1)
<b>Total Variance</b>	<b>21</b>	<b>\$ (3,741)</b>

As shown in **Table 3** below, based on the fuel dip procedures Crowe performed for this physical count, we found the actual quantities of fuel contained in the four tanks varied from those in the Maximo system. We believe that the quantities we observed during our physical count using a manual dip process and a conversion formula were reasonably accurate as they closely matched quantities registered by an electronic measurement system contained in the fuel tanks that the Water Enterprise generated that day (referred to as the System Status Report). **Table 4** provides the other non-fuel count variances.

**Table 3**  
**San Francisco Public Utilities Commission**  
**Water – Millbrae Warehouse and Sunol Yard Fuel Inventory**  
**Summary of Fuel Gallon and Cost Variances<sup>6</sup>**

Item Number	Description	Item Code	Unit	Maximo 6.17.24	Crowe 6.18.24	Variance	Average Cost	Cost of Variance
1	GASOLINE, AUTO, UNLEADED, MILLBRAE	091-30-3255	GAL	2,618.6	2,134.5	(484.1)	\$ 3.2069	\$ (1,552)
2	GASOLINE, DIESEL FUEL, MILLBRAE	091-40-3146	GAL	1,675.0	1,607.5	(67.5)	4.4931	(303)
3	GASOLINE, AUTO, UNLEADED, SUNOL	091-30-3260	GAL	1,009.1	814.0	(195.1)	5.2714	(1,028)
4	GASOLINE, DIESEL, SUNOL	091-40-3147	GAL	1,006.6	870.0	(136.6)	4.3621	(596)
	Rounding Adjustment							(1)
							<b>Total</b>	<b>\$ (3,480)</b>

<sup>6</sup> The Maximo count and valuation data used in this report is as of the end of the business day prior to Crowe's count. Due to the Maximo inventory system synchronizing with the EJ Ward fuel management system during the night, the fuel tank level data in Maximo is as of the end of the business day that was two business days prior to Crowe's count. Therefore, some of the fuel variance may be due to regular fuel transactions that occurred on the business day prior to Crowe's count.

**Table 4**  
**San Francisco Public Utilities Commission**  
**Water – Millbrae Warehouse and Sunol Yard Fuel Inventory**  
**Summary of Non-Fuel Count Variances<sup>7</sup>**

Item Number	Description	Item Code	Unit	Maximo 6.17.24	Crowe 6.18.24	Variance	Average Cost	Cost of Variance
1	BOLT, HEX, STEEL, N.C., 5/8"X 4-1/2"	053-06-4467	EA	214	223	9	\$ 0.99	\$ 9
2	EAR PLUG, YELLOW, FOAM, UNCORDED, 200 PR/BX. (4T147)	042-40-0500	PR	180	200	20	0.31	6
3	REDUCER, PIPE, M.I., GALV, 1 X 1/2" (1MPN6)	047-33-5842	EA	28	29	1	5.23	5
4	GASKET MATERIAL, RUBBER	047-31-9031	SF	167	168	1	3.33	3
5	CHAIN, WELDED, PROOF COIL, 3/16"	040-10-1650	FT	75	77	2	1.63	3
6	BOLT, CARRIAGE, STEEL, H.T., 1/2" X 5"	053-06-1539	EA	90	92	2	0.99	2
7	NUT, HEX, STL, HVY, N.C. 3/4", ZINC PLTD	053-10-2087	EA	252	244	(8)	0.75	(6)
8	NUT, HEX, STL., HVY., 1" ZINC PLTD.	053-10-2099	EA	130	125	(5)	1.40	(7)
9	GLOVE, G-TEK, MEDIUM	084-15-6015	PR	60	59	(1)	7.88	(8)
10	BOLT, HEX, STEEL, NC, 5/8 X 2-1/2"	053-06-4460	EA	90	79	(11)	1.12	(12)
11	BOLT, HEX, STL, GR-5, NC, 3/8" X 1", PLAIN	053-00-3545	EA	100	54	(46)	0.31	(14)
12	BOLT, HEX, STL, GR-5, NC, 3/4" X 3-1/2", ZINC PLT	053-00-3918	EA	132	124	(8)	2.38	(19)
13	GASKET, RUBBER, FULL FACE, C.I., 1/8" THICK, 8" DIA, NSF-61	047-31-9014	EA	40	39	(1)	26.58	(27)
14	CEMENT, PORTLAND, #105, LOW TYPE I-II ALKALI	056-10-1400	SJ	16	13	(3)	10.85	(33)
15	ELBOW, PIPE, STEEL, WELDING, 6", 90 DEG, SHORT RADIUS	047-31-5025	EA	5	4	(1)	32.67	(33)
16	CARTRIDGE, FILTER, RESPIRATOR - COMBINATION - NORTH 75SCP100	042-40-1560	EA	21	20	(1)	38.50	(39)
17	NUT, PLN, NC, THRD, 1/4"	053-10-2089	HUN	170	150	(20)	4.62	(92)
	Rounding Adjustment							1
	<b>Total</b>						<b>\$</b>	<b>(261)</b>

**Criteria:**

Chapter 6 of the City and County of San Francisco Office of the Controller’s Accounting Policies and Procedures identifies that Departments shall conduct a physical inventory at least annually and ensure that the inventory management system records accurately reflect inventory on hand. Additionally, Section 6.1 (Policy Guidelines) indicates that inventory system records must be promptly adjusted for any variances identified in the physical counts; Departments must periodically review the inventory records for reasonableness and appropriateness of any changes to inventory unit cost, inventory valuation, and unit of measure, and Departments must periodically review the inventory for obsolescence and reasonableness of inventory classification. The Policy Guidelines also indicate that Departments should investigate significant variances between the physical count, the inventory system records, and the accounting records; document the reasons for variance; and take corrective actions to reduce future variances.

**Cause:**

Millbrae and Sunol Warehouse staff identified the reasons for the differences in this physical count compared to the count in Maximo. The reasons included minor miscounts during periodic cycle counts, occasional system posting manual errors by the individual entering the quantity or unit of measure, and several items issued by warehouse staff after the Maximo system inventory report was generated.<sup>8</sup>

Regarding the fuel variances observed, we determined that the Water Enterprise uses the automated fuel tracking information system, E.J. Ward, to capture fuel usage and the SFPUC Information Technology Services Bureau has developed an interface designed to periodically upload the E.J. Ward fuel usage data to the Maximo system. However, based on problems with the system interface between the E.J. Ward system and the Maximo system, actual Water Enterprise fuel usage data was not consistently and accurately uploaded into Maximo causing the variances.

<sup>7</sup> The total of (\$261) from Table 4 is the sum of two items from Table 2: Total Other Variances of (\$260) and Rounding Adjustment of (\$1).

<sup>8</sup> This was the case for five items which warehouse staff issued on an emergency basis. The total dollar value of the variance due to these five items was (\$98).

**Effect:**

The combined Millbrae and Sunol inventory value in the Maximo system is overstated by \$3,741. Regarding the fuel usage variances, absent periodic monitoring of the fuel levels, the Millbrae Warehouse and Sunol Yard will have difficulty reconciling future inventories and identifying variances that are the result of missing fuel (e.g., theft), delivery errors, data entry errors, tank leaks, or shrinkage.

**Recommendation:**

The Millbrae Warehouse staff should update the asset inventory counts in Maximo after management approval. The SFPUC's Financial Services Bureau should adjust the General Ledger to reflect the actual cost of inventory on hand. If the E.J. Ward system cannot be made to work consistently it should be replaced or upgraded.

**Management Response:**

Millbrae Warehouse's asset inventory counts were updated in Maximo following the audit. All inventory items are updated on a regular basis.

The E. J. Ward fuel management system is managed by SFPUC Fleet. There is another cause for fuel variances between E. J. Ward and Maximo. Leased vehicles are included in the E.J. Ward system so the vehicles could obtain fuel from Millbrae and Sunol Yards. However, the short-term leased vehicles are not added to Maximo. If these vehicles are added to Maximo, the fuel variances should be lower between the two systems. The E. J. Ward system is in need of an upgrade. The current system is used by all SFPUC worksites and is at the end of its service life. Repairs had to be made to the system in Millbrae in the past year to make it functional again.

**Other Matters**

This full inventory count did not constitute an audit, examination, review, or compilation of the historical and prospective financial information conducted in accordance with generally accepted auditing standards or with other standards established by the American Institute of Certified Public Accountants (AICPA). Accordingly, Crowe is unable to express an opinion or any other form of assurance with respect to any of the historical or prospective financial information. Crowe did not perform any procedures to verify the Management Response and Crowe does not provide any assurance regarding the accuracy or completeness of the response. Any and all amounts referred to in this letter are preliminary and could change should additional procedures be performed. Additionally, issues that are not mentioned here could develop subsequent to the date of this letter that may have impacted Crowe's analysis or that Crowe may cite should additional procedures be performed.

The inventory services did not contemplate obtaining the understanding of internal controls or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit or examination. Thus, this engagement did not provide assurance that we became aware of significant matters that would be disclosed in an audit or examination.

As part of this inventory, the SFPUC agreed to be responsible to: make all management decisions and perform all management functions; designate an individual who possesses suitable skill, knowledge, and/or experience, preferably within senior management to oversee our services; evaluate the adequacy and results of the services performed; accept responsibility for the results of the services; and establish and maintain internal controls, including monitoring ongoing activities. The SFPUC has ultimate authority for making changes to inventory reported in its Maximo system and on its financial statements.

Crowe's fees are not dependent upon the outcome of this report and Crowe is independent with respect to any other economic interests.

We appreciate the contribution of SFPUC management and your input and direction on this project. We also thank Millbrae Warehouse and Sunol Yard management and staff for providing access to the inventory and for timely responses to our requests.

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September 16, 2024

To: Steve Ritchie, Assistant General Manager, Water Enterprise  
Margaret Hannaford, Division Manager, Hetch Hetchy Water/Moccasin  
Cheryl Sperry, Business Services Manager  
Alan Thoburn, Asset Management Services Manager  
Ray Emerald, Assistant Materials Coordinator

Cc: Ronald P. Flynn, Deputy General Manager  
Nancy L. Hom, Assistant General Manager, Business Services and Chief Financial Officer  
Vivian Chen, Deputy Chief Financial Officer  
Laura Busch, Deputy Chief Financial Officer  
Irella Blackwood, Audit Director  
Jennifer Hopkins, Information Technology Services Director

Subject: Fiscal Year End 2023-2024  
Inventory Count – Hetch Hetchy Enterprise, Moccasin Warehouse

Dear Mr. Ritchie, Ms. Hannaford, Ms. Sperry, Mr. Thoburn, and Mr. Emerald:

The San Francisco Public Utilities Commission (SFPUC) engaged Crowe LLP (Crowe) to perform full inventory count services for three enterprise funds including the Wastewater Enterprise, Water Enterprise, and Hetch Hetchy Enterprise.<sup>1</sup> This report represents results of Crowe's full count of the Hetch Hetchy Enterprise – Moccasin Warehouse inventory.

### **A. Scope of Inventory Work**

The SFPUC requested Crowe perform full inventory count services of these enterprise activities to test whether significant variances exist between the physical count and the records in the SFPUC's Maximo Inventory Tracking System (Maximo), to determine the cause of variances, and to determine amounts that need to be adjusted in Maximo. The SFPUC requested reporting of the analysis, findings, and recommendations consistent with the format requested by SFPUC's Financial Services Bureau.

### **B. Warehouse Location**

The location for the Hetch Hetchy Enterprise full inventory count was:

Moccasin Warehouse  
10390 Moccasin Switchback Road  
Moccasin, CA 95347

On June 20, 2024, Crowe visited the location above and conducted the FY 2023-2024 full inventory count that is the subject of this report. The last full inventory count of the location above was performed by

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<sup>1</sup> Note that some of the enterprises have multiple warehouse locations.

**DRAFT**

Crowe for FY 2022-2023 on June 22, 2023. In **Table 1** below, we provide key data<sup>2,3</sup> from both full inventory counts.

**Table 1**  
**San Francisco Public Utilities Commission**  
**Hetch Hetchy Moccasin Warehouse Inventory Count**  
**Comparison with Prior Full Inventory Counts**  
**(As of June 20, 2024)**

Description	FY 2023-2024		FY 2022-2023	
	Items	Value	Items	Value
Total Inventory (per Maximo)	2,349	\$ 465,934	2,339	\$ 470,945
Total Inventory Variance (per Crowe's Count)	36	\$ (977)	34	\$ (220)
Total Inventory Variance (as a percentage of Total Inventory)	1.5%	(0.2%)	1.5%	(0.05%)

**Results**

As indicated in Table 1, variances were identified between Crowe’s full inventory count and the count reported in the Maximo system. The following finding explains the variances in counts. Crowe’s recommendation related to this finding is also included.

**Finding #1 – Physical Inventory Counts Differed from Maximo Report Counts**

Condition:

Of the 2,349 items we counted, 36 items, or 1.5%, had a variance between their physical count and their count in Maximo. Based on the physical count, and using the average cost in Maximo, we determined that the total value of the variances in the Moccasin Warehouse inventory was (\$977), or (0.2%) of the total inventory value of \$465,934 in Maximo.<sup>4</sup>

We found 17 positive variances (where the physical count was greater than the Maximo inventory count) which totaled \$3,392.<sup>5</sup> We found 19 negative variances (where the physical count was less than the Maximo inventory count) which totaled (\$4,369). In **Table 2** below we provide a summary of variances.

<sup>2</sup> In this report, percentages are rounded to one decimal place unless they would round to 0.0%, in which case they are rounded to two decimal places. Monetary values are rounded to the nearest whole dollar unless doing so would obscure the data, in which case they are presented without rounding.

<sup>3</sup> Crowe did not perform any procedures related to the assigned value in the Maximo system.

<sup>4</sup> The (\$977) variance is the difference between \$36,785, which is the total value of the 36 items with variances using Crowe’s physical count for each item, and \$37,762, which is the total value of the 36 items with variances using the Maximo count for each item.

<sup>5</sup> While it appears that the total positive variance in Table 2 is \$3,393, this is because the \$3,300 of positive variance and the \$93 of positive fuel variance in Table 2 are intermediate rounded figures. If the unrounded amounts are added and then rounded to the nearest dollar, the total is \$3,392.

**Table 2**  
**San Francisco Public Utilities Commission**  
**Hetch Hetchy Moccasin Warehouse Inventory Count**  
**Summary of Variances**

Description	Item Count	Amount
Fuel Variances		
Positive	2	\$ 93
Negative	7	(4,342)
Total Fuel Variance	9	(4,249)
Other Variances		
Positive	15	3,300
Negative	12	(27)
Total Other Variances	27	3,273
Rounding Adjustment		(1)
<b>Total Variance</b>	<b>36</b>	<b>\$ (977)</b>

As shown in **Table 3** below, based on the fuel dip procedures Crowe performed for this physical count, we found the actual quantities of fuel contained in the nine tanks varied slightly, or by (\$4,249), from those in the Maximo system. **Table 4** provides the other \$3,273 in non-fuel count variances.

**Table 3**  
**San Francisco Public Utilities Commission**  
**Hetch Hetchy Moccasin Warehouse Inventory Count**  
**Summary of Fuel Count Variances<sup>6</sup>**

Item Number	Description	Item Code	Unit	Maximo 6.18.24	Crowe 6.20.24	Variance	Average Cost	Cost of Variance
1	GASOLINE, UNLEADED,CHERRY VLY.,#11.	091-30-3185	GAL	324.0	314.0	(10.0)	\$ 4.87	\$ (49)
2	GASOLINE,unlead,EARLY INTAKE,#05	091-30-3212	GAL	2,813.0	2,835.0	22.0	4.20	93
3	FUEL,RENEWABLE DIESEL,EARLY INTAKE (CHANGED FROM #2 DIESEL 4/12/16)	091-40-3149	GAL	1,182.0	775.0	(407.0)	4.67	(1,899)
4	FUEL, RENEWABLE DIESEL, LOCATION: MOCC,#03	091-40-3148	GAL	1,225.0	1,247.0	22.0	-	-
5	GASOLINE, MOCCASIN , # 4-5 tanks	091-30-3271	GAL	3,020.0	2,922.0	(98.0)	-	-
6	GASOLINE,UNLEAD,SOUTH FORK,#09.	091-30-3240	GAL	154.4	86.2	(68.2)	3.12	(213)
7	FUEL, RENEWABLE DIESEL,SOUTH FORK,#10 (CHANGED FROM #2 DIESEL	091-40-3150	GAL	159.7	157.9	(1.8)	4.47	(8)
8	GASOLINE, UNLEADED, OAKDALE,#7.	091-30-3195	GAL	1,784.0	1,330.0	(454.0)	4.73	(2,147)
9	FUEL, RENEWABLE DIESEL OAKDALE (renamed from BIO DIESEL 3/3/16)	091-40-3170	GAL	876.5	870.4	(6.1)	4.37	(27)
	Rounding Adjustment							1
							<b>Total</b>	<b>\$ (4,249)</b>

<sup>6</sup> The Maximo count and valuation data used in this report is as of the end of the business day prior to Crowe's count. Due to the Maximo inventory system synchronizing with the EJ Ward fuel management system during the night, the fuel tank level data in Maximo is as of the end of the business day that was two business days prior to Crowe's count. Therefore, some of the fuel variance may be due to regular fuel transactions that occurred on the business day prior to Crowe's count.

**Table 4**  
**San Francisco Public Utilities Commission**  
**Hetch Hetchy Moccasin Warehouse Inventory Count**  
**Summary of Non-Fuel Count Variances**

Item Number	Description	Item Code	Unit	Maximo 6.18.24	Crowe 6.20.24	Variance	Average Cost	Cost of Variance
1	PIPE, 2" STAINLESS STEEL, ROLLED GROOVE, S-10, 20' LENGTH	047-10-SS20	EA	10	17	7	\$ 425.14	\$ 2,976
2	TONER CARTRIDGE, CF413X, MAGENTA, HP	010-10-CF413A	EA	1	2	1	217.22	217
3	WIRE NUT CONNECTOR, GREY, IDEAL#30-342 (6YH57)	059-40-4971	EA	150	250	100	0.28	28
4	NAPA# 3536 FUEL FILTER, EQUIP. 712	023-81-3536	EA	0	1	1	25.99	26
5	BOWERS# 4SW SPL 4" METAL BOX	059-77-6800	EA	4	19	15	1.24	19
6	4" NO HUB CLAMP	048-32-0400	EA	2	4	2	5.91	12
7	BOLT, GALV.,SQ. HD., 5/8" X 10", KORTICK ,25/BX.	053-01-5810M	EA	48	50	2	3.67	7
8	NIPPLE, GALV. STEEL, 3/4 X 6,(6P814)	047-32-4685	EA	6	8	2	3.06	6
9	TBD -- SPLICE, SPLIT BOLT, 12 Str-10 Str, CONDUCTOR	059-40-5009	EA	51	56	5	0.81	4
10	1/2" 1 HOLE GRC STRAP	059-76-1521	EA	88	90	2	1.13	2
11	T&B #C33 NON INS RING TERM 12-10	059-40-6548	EA	500	512	12	0.11	1
12	T&B, #A18-10F, NON INS FORK TERM, 22-16, 100/PKG.	059-40-6602	EA	250	252	2	0.36	1
13	ROMEX STAPLE, #125P5, (500 bx.)	059-40-1251	EA	500	512	12	0.03	-
14	10-32 X 2", RND. HD. MACH SCREW	053-01-1020	EA	385	386	1	0.09	-
15	GLOVES, NITRILE, DISPOSABLE, SMALL	084-15-6364B	BX	0	3	3	-	-
16	REDUCING WASHER, 1" X 1/2"	059-75-0112	EA	54	50	(4)	-	-
17	REDUCING WASHER, 1" X 3/4"	059-75-0134	EA	59	50	(9)	-	-
18	REDUCING WASHER, 3/4" X 1/2"	059-75-3412	EA	110	99	(11)	-	-
19	10-32 X 1", RND. HD. MACH SCREW, 100/PKG. (2EE25)	053-01-1010	EA	318	316	(2)	0.06	-
20	3/4" EMT 2 HOLE STRAP	059-76-1602	EA	103	101	(2)	0.08	-
21	WIRENUT, TAN, IDEAL# 30-341 100/BX.	059-40-4970	EA	100	97	(3)	0.22	(1)
22	COUPLING, 1-1/2" PVC PIPE, SCH 40, S X S	047-30-9033	EA	24	22	(2)	0.63	(1)
23	BOLT, CAP, HEX, NC, 1/2-13 x 4, 5/PKG. (23KZ79)	053-01-2127	EA	15	13	(2)	0.90	(2)
24	T&B #C10-8F NON INS FORK TERM 12-10	059-40-6801	EA	150	144	(6)	0.51	(3)
25	T&B #B14-6F NON INS FORK TERM 18-14	059-40-6700	EA	200	180	(20)	0.32	(6)
26	REPAIR NIPPLE, 1/2" SLIP	048-22-12RN	EA	13	11	(2)	3.25	(6)
27	REDUCING WASHER, 1 1/2-1	059-75-0151	EA	56	50	(6)	1.15	(7)
<b>Total</b>							<b>\$</b>	<b>3,273</b>

**Criteria:**

Chapter 6 of the City and County of San Francisco Office of the Controller’s Accounting Policies and Procedures identifies that Departments shall conduct a physical inventory at least annually and ensure that the inventory management system records accurately reflect inventory on hand. Additionally, Section 6.1 (Policy Guidelines) indicates that inventory system records must be promptly adjusted for any variances identified in the physical counts; Departments must periodically review the inventory records for reasonableness and appropriateness of any changes to inventory unit cost, inventory valuation, and unit of measure, and Departments must periodically review the inventory for obsolescence and reasonableness of inventory classification. The Policy Guidelines also indicate that Departments should investigate significant variances between the physical count, the inventory system records, and the accounting records; document the reasons for variance; and take corrective actions to reduce future variances.

**Cause:**

Moccasin Warehouse staff identified the reasons for the differences in this physical count compared to the count in Maximo. The reasons included miscounting, data entry errors, and small variances due to weighing nuts and bolts with a scale instead of individually counting them. Regarding the fuel variances observed, we determined that the Moccasin Warehouse uses the automated fuel tracking information system, E.J. Ward, to capture fuel usage and the SFPUC Information Technology Services Bureau has developed an interface designed to periodically upload the E.J. Ward fuel usage data to the Maximo system. There may be delays in updating data because of poor network communication systems. The small variances from the quantities we observed during our physical count and those current in Maximo were caused by rounding errors as a result of using a manual dip process and a conversion formula to determine fuel quantities.

**Effect:**

The Moccasin Warehouse inventory value in the Maximo system is overstated by \$977.

**Recommendation:**

The Moccasin warehouse staff should update the asset inventory counts in Maximo after management approval. The SFPUC Financial Services Bureau should adjust the General Ledger to reflect the actual cost of inventory on hand. If the E.J. Ward system cannot be made to work consistently it should be replaced or upgraded.

**Management Response:**

Hetch Hetchy Water concurs with the recommendations and has made the corresponding adjustments in Maximo. Improvement in Hetch Hetchy Water's fuel inventory management is a critical need. The EJ Ward fuel system continues to be an ongoing challenge with connectivity (telemetry issues) that negatively impacts inventory accuracy, reordering, and preventative maintenance scheduling for vehicles. This has led to manually tracking fuel inventory to mitigate system shortfalls. Correcting E.J. Ward fuel system problems will require network connectivity and communication system upgrades, as well as fuel system hardware and software upgrades. Hetch Hetchy Water is investigating options for next steps.

## Other Matters

This full inventory count did not constitute an audit, examination, review, or compilation of the historical and prospective financial information conducted in accordance with generally accepted auditing standards or with other standards established by the American Institute of Certified Public Accountants (AICPA). Accordingly, Crowe is unable to express an opinion or any other form of assurance with respect to any of the historical or prospective financial information. Crowe did not perform any procedures to verify the Management Response and Crowe does not provide any assurance regarding the accuracy or completeness of the response. Any and all amounts referred to in this letter are preliminary and could change should additional procedures be performed. Additionally, issues that are not mentioned here could develop subsequent to the date of this letter that may have impacted Crowe's analysis or that Crowe may cite should additional procedures be performed.

The inventory services did not contemplate obtaining the understanding of internal controls or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit or examination. Thus, this engagement did not provide assurance that we became aware of significant matters that would be disclosed in an audit or examination.

As part of this inventory, the SFPUC agreed to be responsible to make all management decisions and perform all management functions; designate an individual who possesses suitable skill, knowledge, and/or experience, preferably within senior management to oversee our services; evaluate the adequacy and results of the services performed; accept responsibility for the results of the services; and establish and maintain internal controls, including monitoring ongoing activities. The SFPUC has ultimate authority for making changes to inventory reported in its Maximo system and on its financial statements.

Crowe's fees are not dependent upon the outcome of this report and Crowe is independent with respect to any other economic interests.

We appreciate the contribution of SFPUC management and your input and direction on this project. We also thank Moccasin Warehouse management and staff for providing access to the inventory and for timely responses to our requests.

*Crowe LLP*

Crowe LLP



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525 Golden Gate Avenue, 13<sup>th</sup> Floor  
San Francisco, CA 94102

September 16, 2024

To: Barbara Hale, Assistant General Manager, Power  
Richard Stephens, Utility Services Manager  
David Carter, Materials Coordinator  
Bart Murphy, Materials Coordinator

Cc: Ronald P. Flynn, Deputy General Manager  
Nancy L. Hom, Assistant General Manager, Business Services and Chief Financial Officer  
Vivian Chen, Deputy Chief Financial Officer  
Laura Busch, Deputy Chief Financial Officer  
Irella Blackwood, Audit Director  
Jennifer Hopkins, Information Technology Services Director

Subject: Fiscal Year End 2023-2024  
Inventory Count – Hetch Hetchy Enterprise, Hetchy Power In-City Warehouse

Dear Ms. Hale, Mr. Stephens, Mr. Carter, and Mr. Murphy:

The San Francisco Public Utilities Commission (SFPUC) engaged Crowe LLP (Crowe) to perform full inventory count services for three enterprise funds including the Wastewater Enterprise, Water Enterprise, and Hetch Hetchy Enterprise.<sup>1</sup> This report represents results of Crowe's full count of the Hetch Hetchy Enterprise – Hetchy Power In-City Warehouse inventory.

### **A. Scope of Inventory Work**

The SFPUC requested Crowe perform full inventory count services of these enterprise activities to test whether significant variances exist between the physical count and the records in the SFPUC's Maximo Inventory Tracking System (Maximo), to determine the cause of variances, and to determine amounts that need to be adjusted in Maximo. The SFPUC requested reporting of the analysis, findings, and recommendations consistent with the format requested by SFPUC's Financial Services Bureau.

### **B. Warehouse Locations**

The locations for the Hetchy Power In-City full inventory count were:

Hetchy Power In-City Warehouse  
Pier 23  
San Francisco, California 94111

Treasure Island  
Lot 69 (End of Avenue M)  
San Francisco, California 94130

On June 26, 2024, Crowe visited the locations above and conducted the FY 2023-2024 full inventory count that is the subject of this report. The last full inventory count of the locations above was performed

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<sup>1</sup> Note that some of the enterprises have multiple warehouse locations.

by Crowe for FY 2022-2023 on June 21, 2023. In **Table 1** below, we provide key data<sup>2,3</sup> from both full inventory counts.

**Table 1**  
**San Francisco Public Utilities Commission**  
**Hetchy Power In-City Warehouse Inventory Count**  
**Comparison with Prior Full Inventory Counts**  
**(As of June 26, 2024)**

Description	FY 2023-2024		FY 2022-2023	
	Items	Value	Items	Value
Total Inventory (per Maximo)	970	\$ 1,455,929	1,318	\$ 1,372,997
Total Inventory Variance (per Crowe's Count)	183	\$ (32,523)	475	\$ (75,192)
Total Inventory Variance (as a percentage of Total Inventory)	18.9%	(2.2%)	36.0%	(5.5%)

**Results**

As indicated in Table 1, variances were identified between Crowe’s full inventory count and the count reported in the Maximo system. The following finding explains the variances in counts. Crowe’s recommendations related to this finding are also included.

**Finding #1 – Physical Inventory Counts Differed from Maximo Report Counts**

Condition:

Of the 970 items we counted, 183 items, or 18.9%, had a variance between their physical count and their count in Maximo. This is a repeat finding. Based on the physical count, and using the average cost in Maximo, we determined that the total value of the variances in the Hetchy Power In-City inventory was (\$32,523), or (2.2%) of the total inventory value of \$1,455,929 in Maximo.<sup>4</sup>

We found 72 positive variances (where the physical count was greater than the Maximo inventory count) which totaled \$11,085. We found 111 negative variances (where the physical count was less than the Maximo inventory count) which totaled (\$43,609). In **Table 2** below we list items with variances that are either above \$500 or below (\$500).<sup>5</sup> The sum of the absolute values of the variances is \$54,694, or 3.8% of the total inventory value of \$1,455,929 in Maximo.

<sup>2</sup> In this report, percentages are rounded to one decimal place. Monetary values are rounded to the nearest whole dollar unless doing so would obscure the data, in which case they are presented without rounding.

<sup>3</sup> Crowe did not perform any procedures related to the assigned value in the Maximo system.

<sup>4</sup> The (\$32,540) variance is the difference between \$273,462, which is the total value of the 183 items with variances using Crowe's physical count for each item, and \$306,003, which is the total value of the 183 items with variances using the Maximo count for each item.

<sup>5</sup> Of the 183 items with a difference between the physical count and the count in Maximo, 26 are items from the Streetlight1 and Streetlight2 storerooms which warehouse staff should have removed from Maximo as they can no longer be used due to a Board of Supervisors mandate that older City lighting, e.g., halogen and mercury vapor light bulbs, be replaced with LED light bulbs. Of these items, 4 have positive variances totaling \$1,282 and 22 have negative variances totaling (\$17,505), for a combined variance of (\$16,223). If the total variance in the number of items counted is adjusted to exclude these Streetlight items, it falls from 18.9% (183 items divided by 970 items) to 16.6% (157 items divided by 944 items). If the total dollar variance is adjusted to exclude these Streetlight items, it changes from (2.2%) ((\$32,523) divided by \$1,455,929) to (1.1%) ((\$16,300) divided by \$1,455,929).

**Table 2**  
**San Francisco Public Utilities Commission**  
**Hetchy Power In-City Warehouse Inventory Count**  
**Summary of Items with Variances**  
**(As of June 26, 2024)<sup>6</sup>**

Item	Description	Shop	Item Code	Unit	Maximo 6.25.24	Crowe 6.26.24	Variance	Average Cost	Cost of Variance
1	Automatic Deadend Clevis Bail 6 SOL CU PG&E 184097	PE-MAIN	PE-10-0848	EA	24	92	68	\$ 17.3743	\$ 1,181
2	WIRE, #10 THW BLACK COPPER WIRE,(SOLID) .045 JACKET (500 FOOT SPOOL)	PE-MAIN	PE-10-0339	FT	500	2,500	2,000	0.4422	884
3	ABB PT/CT TXF 500A	PE-MAIN	950-7525G05	EA	12	16	4	207.4500	830
4	Ground Rod Clamp - 3/4 rod for 4/0-250	PE-MAIN	PE-10-1026	EA	130	178	48	16.9141	812
5	N36 STREET LIGHTING CHRISTY BOX LID NEW	PE-MAIN	PE-10-0354	EA	14	25	11	65.5564	721
6	2" RIGID 90 DEGREE ELBOW	PE-MAIN	PE-10-0266	EA	15	36	21	29.5042	620
7	Asphalt, black top cold patch, QUIKRETE #1701	PE-MAIN	PE-10-1614	EA	193	255	62	9.5444	592
8	4M /66R BULB, PHILIPS, PS40 LAMP	PE-STREETLIGHT2	PE-10-1876	EA	(46)	-	46	12.0000	552
9	LED,Luminaire Cobra Head, 145W, ROAD FOCUSLuminaire RFL-145W64LED3K-G2-R3M-UNV-DMG-[API-226]-API2011-RCD7-GY3,	PE-MAIN	PE-10-1554	EA	38	39	1	526.9066	527
	<b>Subtotal: Variances Above \$500 (9 Items)</b>								\$ 6,719
	<b>Subtotal: Variances Between \$0 and \$500 (63 Items)</b>								\$ 4,366
	<b>Category Subtotal: All Positive Variances (72 Items)</b>								\$ 11,085
	WIRE, UNDERGROUND, TRI-PLEX 4/0 SERVICE WIRE, 600 VOLT	PE-MAIN	PE-10-1657	FT	9,173	4,673	(4,500)	\$ 1.9860	\$ (8,937)
10	XLP INSULATED CABLE, 3 CONDUCTOR								
11	MVR 175V/BU/PA LAMP	PE-STREETLIGHT2	PE-10-0639	EA	99	68	(31)	250.0000	(7,750)
12	Bayonet Fuse 100A High Amp CPS 4038-361-C04	PE-MAIN	E-5920-33000	EA	30	15	(15)	151.9000	(2,279)
13	200W INSTANT RESTRIKE LAMP	PE-STREETLIGHT2	PE-10-0623	EA	58	-	(58)	39.1771	(2,272)
14	HANDHOLE COVER STEEL, GALVANIZED, AMERON P/N 43338G	PE-MAIN	PE-10-1650	EA	57	-	(57)	36.3258	(2,071)
15	1" ALL THREAD	PE-STREETLIGHT1	PE-10-0311	EA	21	-	(21)	69.9978	(1,470)
16	Echo Lighting Retrofit Kit 100W Mission Bay LED	PE-MAIN	6210-100W19	LOT	24	23	(1)	1,374.1063	(1,374)
17	LU1005BY XL ECO 100W LAMP	PE-MAIN	PE-10-0621	EA	25	-	(25)	47.9579	(1,199)
18	MVR400/U LAMP E37	PE-STREETLIGHT2	PE-10-0607	EA	6	-	(6)	196.1500	(1,177)
19	ABB PT/CT TXF 1000A	PE-MAIN	950-7525G231	EA	10	6	(4)	214.9300	(860)
20	ABB PT/CT TXF 800A	PE-MAIN	950-7525G098	EA	6	2	(4)	214.9300	(860)
21	ABB PT/CT TXF 400A	PE-MAIN	950-7525G034	EA	10	6	(4)	207.4500	(830)
22	250W INSTANT RESTRIKE LAMP	PE-STREETLIGHT2	PE-10-0625	EA	26	-	(26)	28.0000	(728)
23	MVR250/VBU/PA LAMP	PE-STREETLIGHT2	PE-10-0638	EA	30	-	(30)	23.0489	(691)
24	LU100/ECD LUMALUX LAMP	PE-STREETLIGHT2	PE-10-0596	EA	32	-	(32)	20.0000	(640)
25	4M /66R BULB, PHILIPS, PS40 LAMP	PE-STREETLIGHT2	PE-10-1876	EA	46	-	(46)	12.0000	(552)
26	1 1/2" RIGID THREADED GROUNDING BUSHING	PE-MAIN	PE-10-0229	EA	426	371	(55)	10.0266	(551)
27	CONCRETE MIX, FAST-SETTING NON-SHRINK GROUT	PE-MAIN	PE-10-0320	EA	72	51	(21)	25.9694	(545)
28	LU1005BY XL ECO 100W LAMP	PE-STREETLIGHT2	PE-10-0621	EA	11	-	(11)	52.8228	(581)
29	N36 HIGH VOLTAGE CHRISTY BOX LID OLD	PE-MAIN	PE-10-0355	EA	29	17	(12)	41.7500	(501)
	<b>Subtotal: Variances Below (\$500) (20 Items)</b>								\$ (35,868)
	<b>Subtotal: Variances Between \$0 and (\$500) (91 Items)</b>								\$ (7,741)
	<b>Category Subtotal: All Negative Variances (111 Items)</b>								\$ (43,609)
	Rounding Adjustment								\$ 1
	<b>Total</b>								\$ (32,523)

**Criteria:**

Chapter 6 of the City and County of San Francisco Office of the Controller’s Accounting Policies and Procedures identifies that Departments shall conduct a physical inventory at least annually and ensure that the inventory management system records accurately reflect inventory on hand. Additionally, Section 6.1 (Policy Guidelines) indicates that inventory system records must be promptly adjusted for any variances identified in the physical counts; Departments must periodically review the inventory records for reasonableness and appropriateness of any changes to inventory unit cost, inventory valuation, and unit of measure, and Departments must periodically review the inventory for obsolescence and reasonableness of inventory classification. The Policy Guidelines also indicate that Departments should investigate significant variances between the physical count, the inventory system records, and the accounting records; document the reasons for variances; and take corrective actions to reduce future variances.

<sup>6</sup> The Maximo count and valuation data used in this report is as of the end of the business day prior to Crowe’s count.

**Cause:**

Hetchy Power In-City Warehouse staff identified the following reasons for the differences in this physical count compared to the count in Maximo:

- Some items have a current balance in Maximo when they should either have a balance of zero or be removed from the system entirely (e.g., halogen and mercury vapor light bulbs; see footnote 6).
- Some items were miscounted during periodic cycle counts.
- Some items were used on projects but not issued in Maximo.

**Effect:**

The Hetchy Power In-City inventory value in the Maximo system is overstated by \$32,523.

**Recommendation:**

Hetchy Power In-City warehouse staff should update the asset inventory counts in Maximo after management approval. The SFPUC Financial Services Bureau should adjust the General Ledger to reflect the actual cost of inventory on hand. Hetchy Power In-City should investigate the significant variances between the physical counts noted in Tables 1 and 2, the Maximo system records, and the accounting records; document the reasons for variances; and implement corrective actions to reduce future variances. Warehouse staff should periodically review the inventory records to remove duplicate and obsolete items and to ensure the reasonableness and appropriateness of inventory unit cost, unit of measure, and bin location. Finally, warehouse staff should continue to conduct regular physical inventory cycle counts and compare results with those in Maximo to ensure Maximo data is up-to-date and accurate.

**Management Response:**

Hetchy Power In-City Management staff and Warehouse staff agree with the assessment. We also note the improvement over year-to-year measurements; this last count is half the dollar variance we had the previous year.

Warehouse action plan for fiscal year 2024-2025 will focus on:

1. All Stock inventory will be removed from Storerooms Streetlight 1 and Streetlight 2 by moving existing stock to PE-MAIN with Bin Locations.
2. The number of Cycle counts has been increased from previous years.
3. Consideration of Backflushing: record remaining inventory at end of period instead of recording inventory at issuance. For high-volume items (e.g., Elbows, Bushings, Wire, and Connectors), they are recorded daily to increase accuracy of Maximo.
4. Closer monitoring of Field crews and contractor usage to ensure proper procedures are followed.
5. Tighten pre-audit procedures with field crews and conduct more counts before the audit.

**Other Matters**

This full inventory count did not constitute an audit, examination, review, or compilation of the historical and prospective financial information conducted in accordance with generally accepted auditing standards or with other standards established by the American Institute of Certified Public Accountants (AICPA). Accordingly, Crowe is unable to express an opinion or any other form of assurance with respect to any of the historical or prospective financial information. Crowe did not perform any procedures to verify the Management Response and Crowe does not provide any assurance regarding the accuracy or completeness of the response. Any and all amounts referred to in this letter are preliminary and could change should additional procedures be performed. Additionally, issues that are not mentioned here could develop subsequent to the date of this letter that may have impacted Crowe's analysis or that Crowe may cite should additional procedures be performed.

The inventory services did not contemplate obtaining the understanding of internal controls or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit or examination. Thus, this engagement did not provide assurance that we became aware of significant matters that would be disclosed in an audit or examination.

As part of this inventory, the SFPUC agreed to be responsible to make all management decisions and perform all management functions; designate an individual who possesses suitable skill, knowledge, and/or experience, preferably within senior management to oversee our services; evaluate the adequacy and results of the services performed; accept responsibility for the results of the services; and establish and maintain internal controls, including monitoring ongoing activities. The SFPUC has ultimate authority for making changes to inventory reported in its Maximo system and on its financial statements.

Crowe's fees are not dependent upon the outcome of this report and Crowe is independent with respect to any other economic interests.

We appreciate the contribution of SFPUC management and your input and direction on this project. We also thank Hetchy Power In-City management and staff for providing access to the inventory and for timely responses to our requests.

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San Francisco, CA 94102

September 16, 2024

To: Joel Prather, Assistant General Manager, Wastewater Enterprise  
Mike Maraviglia, Acting Maintenance Manager  
Christian Losno, Materials Coordinator  
Jorge Gonzalez, Assistant Supervisor of Stores & Equipment

Cc: Ronald P. Flynn, Deputy General Manager  
Nancy L. Hom, Assistant General Manager, Business Services/Chief Financial Officer  
Vivian Chen, Deputy Chief Financial Officer  
Laura Busch, Deputy Chief Financial Officer  
Irella Blackwood, Audit Director  
Jennifer Hopkins, Information Technology Services Director

Subject: Fiscal Year End 2023-2024  
Inventory Count – Wastewater Enterprise Warehouse

Dear Mr. Prather, Jones, Losno, and Gonzalez:

The San Francisco Public Utilities Commission (SFPUC) engaged Crowe LLP (Crowe) to perform full inventory count services for three enterprise funds including the Wastewater Enterprise, Water Enterprise, and Hetch Hetchy Enterprise.<sup>1</sup> This report represents results of Crowe's full count of the Wastewater Enterprise inventory.

### **A. Scope of Inventory Work**

The SFPUC requested Crowe perform full inventory count services of these enterprise activities to test whether significant variances exist between the physical count and the records in the SFPUC's Maximo Inventory Tracking System (Maximo), to determine the cause of variances, and to determine amounts that need to be adjusted in Maximo. The SFPUC requested reporting of the analysis, findings, and recommendations consistent with the format requested by SFPUC's Financial Services Bureau.

### **B. Warehouse Location**

The location for the Wastewater Enterprise full inventory count was:

2725 Oakdale Avenue  
San Francisco, California 94124

On June 5, 2024, Crowe visited the location above and conducted the FY 2023-2024 full inventory count that is the subject of this report. The last full inventory count of the location above was performed by

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<sup>1</sup> Note that some of the enterprises have multiple warehouse locations.

Crowe for FY 2022-2023 on June 28 and June 29, 2023. In **Table 1** below, we provide key data<sup>2,3</sup> from both full inventory counts.

**Table 1**  
**San Francisco Public Utilities Commission**  
**Wastewater Warehouse Inventory Count**  
**Comparison with Prior Full Inventory Counts**  
**(As of June 5, 2024)**

Description	FY 2023-2024		FY 2022-2023	
	Items	Value	Items	Value
Total Inventory (per Maximo)	3,760	\$ 3,712,176	3,757	\$ 3,356,658
Total Inventory Variance (per Crowe's Count)	7	\$ (1,711)	13	\$ (2,048)
Total Inventory Variance (as a percentage of Total Inventory)	0.2%	(0.05%)	0.3%	(0.1%)

**Results**

As indicated in Table 1, variances were identified between Crowe’s full inventory count and the count reported in the Maximo system. The following finding explains the variances in counts. Crowe’s recommendation related to this finding is also included.

**Finding #1 – Physical Inventory Counts Differed from Maximo Report Counts**

Condition:

Of the 3,760 items we counted, 7 items, or 0.2%, had a variance between their physical count and their count in Maximo. Based on the physical count, and using the average cost in Maximo, we determined that the total value of the variances in the Wastewater Enterprise inventory was (\$1,711), or (0.05%) of the total inventory value of \$3,712,176 in Maximo.<sup>4</sup>

We found 3 positive variances (where the physical count was greater than the Maximo inventory count) which totaled \$363. We found 4 negative variances (where the physical count was less than the Maximo inventory count) which totaled (\$2,074).<sup>5</sup> In **Table 2** below we list the 7 items with variances from the Maximo count.

<sup>2</sup> Crowe did not perform any procedures related to the assigned value in the Maximo system.

<sup>3</sup> In this report, percentages are rounded to one decimal place unless they would round to 0.0%, in which case they are rounded to two decimal places. Monetary values are rounded to the nearest whole dollar unless doing so would obscure the data, in which case they are presented without rounding.

<sup>4</sup> The (\$1,711) variance is the difference between \$6,557, which is the total value of the 7 items with variances using Crowe’s physical count for each item, and \$8,268, which is the total value of the 7 items with variances using the Maximo count for each item.

<sup>5</sup> Most of the negative variance is caused by a single item, GBRNG-0026. Warehouse staff were unable to locate this item and suggested that it should not have been included in the inventory count based on Maximo data indicating that it has not been issued since 2012.

**Table 2**  
**San Francisco Public Utilities Commission**  
**Wastewater Inventory Count**  
**List of All Items with Variances<sup>6</sup>**

Item Number	Description	Item Code	Unit	Maximo 6.4.24	Crowe 6.5.24	Variance	Average Cost	Cost of Variance
1	BEARING, LINK BELT, 23091-150-113	GBRNG-0026	EA	4	0	(4)	\$ 488.59	\$ (1,954)
2	WIPES, HIGH GLOSS, UNITED LABS, 640	GYHGW-0640	EA	20	19	(1)	62.41	(62)
3	GASKET, ROPE, KEWANEE, 7L-284-X, 1-032-9-031-24-01, 1/8 IN X 3/8 IN X 3/4 IN	GGSKT-0367	FT	60	58	(2)	26.78	(54)
4	PIN, SHEAR	GPINS-0112	EA	385	383	(2)	2.00	(4)
5	GASKET, ROPE, KEWANEE, 7L-284-X, 0-032-9-011-48-02, 3/4 IN X 3/4 IN	GGSKT-0366	FT	12	13	1	0.40	-
6	Grunge Grippers Heavy Duty Degreasing Wipes, UNITED LABS, 629V	GYHDW-0629	EA	19	20	1	62.25	62
7	CHAIN, ROLLER	ARCHN-0201	BOX	5	6	1	300.27	300
	Rounding Adjustment							1
								<b>\$ (1,711)</b>

Criteria:

Chapter 6 of the City and County of San Francisco Office of the Controller’s Accounting Policies and Procedures identifies that Departments shall conduct a physical inventory at least annually and ensure that the inventory management system records accurately reflect inventory on hand. Additionally, Section 6.1 (Policy Guidelines) indicates that inventory system records must be promptly adjusted for any variances identified in the physical counts; Departments must periodically review the inventory records for reasonableness and appropriateness of any changes to inventory unit cost, inventory valuation, and unit of measure, and Departments must periodically review the inventory for obsolescence and reasonableness of inventory classification. The Policy Guidelines also indicate that Departments should investigate significant variances between the physical count, the inventory system records, and the accounting records; document the reasons for variance; and take corrective actions to reduce future variances.

Cause:

Wastewater Warehouse staff identified the reasons for the differences in this physical count compared to the count in Maximo. The reasons included minor miscounts during periodic cycle counts and one item which may have been misclassified as an inventory item in Maximo.

Effect:

The Wastewater Enterprise inventory value in the Maximo system is overstated by \$1,711.

Recommendation:

The Wastewater warehouse staff should update the asset inventory counts in Maximo system after management approval. The SFPUC Financial Services Bureau should adjust the General Ledger to reflect the actual cost of inventory on hand. The Wastewater Enterprise should investigate the variances between the physical counts noted in Tables 1 and 2, the Maximo system records, and the accounting records; document the reasons for variances; and implement corrective actions to reduce future variances.

<sup>6</sup> The Maximo count and valuation data used in this report is as of the end of the business day prior to Crowe’s count.

**Management Response:**

WWE concurs with the findings presented in this report and is pleased to see a marked improvement from last year. We will continue to improve our cycle count process, to include investigation of variances between the reports and physical counts. We feel that we succeeded here and look forward to continuing our improvements across all WWE warehouse functions.

**Other Matters**

This full inventory count did not constitute an audit, examination, review, or compilation of the historical and prospective financial information conducted in accordance with generally accepted auditing standards or with other standards established by the American Institute of Certified Public Accountants (AICPA). Accordingly, Crowe is unable to express an opinion or any other form of assurance with respect to any of the historical or prospective financial information. Crowe did not perform any procedures to verify the Management Response and Crowe does not provide any assurance regarding the accuracy or completeness of the response. Any and all amounts referred to in this letter are preliminary and could change should additional procedures be performed. Additionally, issues that are not mentioned here could develop subsequent to the date of this letter that may have impacted Crowe's analysis or that Crowe may cite should additional procedures be performed.

The inventory services did not contemplate obtaining the understanding of internal controls or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit or examination. Thus, this engagement did not provide assurance that we became aware of significant matters that would be disclosed in an audit or examination.

As part of this inventory, the SFPUC agreed to be responsible to: make all management decisions and perform all management functions; designate an individual who possesses suitable skill, knowledge, and/or experience, preferably within senior management to oversee our services; evaluate the adequacy and results of the services performed; accept responsibility for the results of the services; and establish and maintain internal controls, including monitoring ongoing activities. The SFPUC has ultimate authority for making changes to inventory reported in its Maximo system and on its financial statements.

Crowe's fees are not dependent upon the outcome of this report and Crowe is independent with respect to any other economic interests.

We appreciate the contribution of SFPUC management and your input and direction on this project. We also thank Wastewater Enterprise management and staff for providing access to the inventory and for timely responses to our requests.



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525 Golden Gate Avenue, 13<sup>th</sup> Floor  
San Francisco, CA 94102

September 16, 2024

To: Steve Ritchie, Assistant General Manager, Water Enterprise  
Ellen Levin, Deputy Assistant General Manager, Water Enterprise  
William Teahan, CDD Division Manager  
William Toman, CDD Materials Coordinator  
Andy O'Brien, CDD Materials Coordinator

Cc: Ronald P. Flynn, Deputy General Manager  
Nancy L. Hom, Assistant General Manager, Business Services and Chief Financial Officer  
Vivian Chen, Deputy Chief Financial Officer  
Laura Busch, Deputy Chief Financial Officer  
Irella Blackwood, Audit Director  
Jennifer Hopkins, Information Technology Services Director

Subject: Fiscal Year End 2023-2024  
Inventory Count – Water Enterprise, CDD Main Warehouse, AWSS Warehouse, and  
6 Satellite Warehouses (Auto, Carpentry, Electrical, Ground, LMPS, and Machine Shops)

Dear Mr. Ritchie, Ms. Levin, Mr. Teahan, Mr. Toman and Mr. O'Brien:

The San Francisco Public Utilities Commission (SFPUC) engaged Crowe LLP (Crowe) to perform full inventory count services for three enterprise funds including the Wastewater Enterprise, Water Enterprise, and Hetch Hetchy Enterprise.<sup>1</sup> This report represents results of Crowe's full count of the Water Enterprise inventory at the CDD Main and AWSS Warehouses and 6 Satellite Warehouses but excluding the Millbrae Warehouse and Sunol Yard, which are addressed in a separate report.

## **A. Scope of Inventory Work**

The SFPUC requested Crowe perform full inventory count services of these enterprise activities to test whether significant variances exist between the physical count and the records in the SFPUC's Maximo Inventory Tracking System (Maximo), to determine the cause of variances, and to determine amounts that need to be adjusted in Maximo. The SFPUC requested reporting of the analysis, findings, and recommendations consistent with the format requested by SFPUC's Financial Services Bureau.

## **B. Warehouse Locations**

The locations for the Water Enterprise full inventory count were:

CDD Main (and 5 Satellites)  
1990 Newcomb Ave  
San Francisco, California 94124

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<sup>1</sup> Note that some of the enterprises have multiple warehouse locations.

AWSS  
 1980 Oakdale Ave  
 Twin Peaks Reservoir  
 San Francisco, California 94124

LPMS Satellite  
 991 Lake Merced Blvd.  
 San Francisco, California 94132

From June 10 through June 12, 2024, Crowe visited the locations above and conducted the FY 2023-2024 full inventory count that is the subject of this report. The last full inventory count of the locations above was performed by Crowe for FY 2022-2023 from June 12 through June 14, 2023. In **Table 1** below, we provide key data<sup>2,3</sup> from both full inventory counts.

**Table 1**  
**San Francisco Public Utilities Commission**  
**Water CDD (MAIN, AWSS, and 6 Satellite Shops) Warehouse Inventory Count**  
**Comparison with Prior Full Inventory Counts**  
**(As of June 12, 2024)**

Description	FY 2023-2024		FY 2022-2023	
	Items	Value	Items	Value
Total Inventory (per Maximo)	1,735	\$ 6,781,049	1,648	\$ 7,271,844
Total Inventory Variance (per Crowe's Count)	79	\$ 2,387	253	\$ (153,390)
Total Inventory Variance (as a percentage of Total Inventory)	4.6%	0.04%	15.4%	(2.1%)

**Results**

As indicated in Table 1, variances were identified between Crowe’s full inventory count and the count reported in the Maximo system. The following finding explains the variances in counts. Crowe’s recommendation related to this finding is also included.

**Finding #1 – Physical Inventory Counts Differed from Maximo Report Counts**

Condition:

Of the 1,735 items we counted, 79 items, or 4.6%, had a variance between their physical count and their count in Maximo. This is a repeat finding. Based on the physical count, and using the average cost in Maximo, we determined that the total value of the variances in the Water Enterprise inventory locations specified above was \$2,387, or 0.04% of the total inventory value of \$6,781,049 in Maximo.<sup>4</sup>

We found 38 positive variances (where the physical count was greater than the Maximo inventory count) which totaled \$36,172. We found 41 negative variances (where the physical count was less than the Maximo inventory count) which totaled (\$33,785). In **Table 2** below we list 18 items with variances that are either above \$1,000 or below (\$1,000) and provide a summary of all variances, both fuel and non-fuel. The

<sup>2</sup> In this report, percentages are rounded to one decimal place, unless they would round to 0.0%, in which case they are rounded to two decimal places. Monetary values are rounded to the nearest whole dollar unless doing so would obscure the data, in which case they are presented without rounding.

<sup>3</sup> Crowe did not perform any procedures related to the assigned value in the Maximo system.

<sup>4</sup> The \$2,387 variance is the difference between \$579,808, which is the total value of the 79 items with variances using Crowe’s physical count for each item, and \$577,421, which is the total value of the 79 items with variances using the Maximo count for each item.

relatively low total inventory variance of \$2,387 is due to the offsetting effect of negative and positive variances which are balancing each other out. The sum of the absolute values of the variances is \$69,957, or 1.0% of the total inventory value of \$6,781,049 in Maximo.

**Table 2**  
**San Francisco Public Utilities Commission**  
**Water (CDD and AWSS and 6 Satellite Shops) Warehouse Inventory Count**  
**Summary of Items with Variances**  
**(As of June 12, 2024)<sup>5</sup>**

Item	Description	Shop	Item Code	Unit	Maximo 6.7.24	Crowe 6.12.24	Variance	Average Cost	Cost of Variance
1	GASOLINE, AUTO, UNLEADED, C.D.D.	MAIN	091-30-3250	GAL	3,535.9	5,760.0	2,224.1	\$ 4.5057	\$ 10,021
2	PIPE, D.I., CLASS 54, BELL & SPIGOT, TYPE 2, 12" PUSH ON, ZINC COATING	MAIN	047-10-4569	FT	534.5	594.0	59.5	75.1873	4,474
3	PIPE, D.I., CLASS 54, BELL & SPIGOT, TYPE 2, 4" PUSH ON, ZINC COATING	MAIN	047-10-4565	FT	602.0	694.0	92.0	41.5162	3,819
4	DIESEL, RENEWABLE (99%)	MAIN	091-40-3151	GAL	-	662.0	662.0	4.5947	3,042
5	DIESEL, RENEWABLE (99%)	MAIN	091-40-3151	GAL	2,443.8	2,970.0	526.2	4.5947	2,418
6	COLLAR, STOP, 18"	AWSS	047-33-9018	EA	10.0	12.0	2.0	904.0000	1,808
7	VALVE, CHECK, SWING, BRONZE, 3"	MAIN	048-22-1906	EA	10.0	12.0	2.0	897.5144	1,795
8	TIRE, 295/75/22.5	AUTO	026-10-5510	EA	10.0	13.0	3.0	520.2144	1,561
9	TRANSMITTER, PRESSURE, STAINLESS	ELECT	062-40-4400	EA	5.0	7.0	2.0	549.7810	1,100
	Rounding Adjustment								(1)
	<b>Subtotal: Variances Above \$1,000 (9 Items)</b>								<b>\$ 30,037</b>
	<b>Subtotal: Variances Between \$0 and \$1,000 (29 Items)</b>								<b>\$ 6,135</b>
	<b>Category Subtotal: All Positive Variances (38 Items)</b>								<b>\$ 36,172</b>
10	DUSTPAN, 12"-20"	AWSS	048-21-1020	EA	52.0	48.0	(4.0)	260.0000	(1,040)
11	DUSTPAN, COVER, 10"	AWSS	048-21-1110	EA	5.0	3.0	(2.0)	739.9380	(1,480)
12	PLYWOOD, DOUGLAS FIR, 4' X 8' X 1 1/8", CDX	CARP	055-30-4046	SH	88.0	60.0	(28.0)	60.5529	(1,695)
13	VALVE, CHECK, SWING, BRONZE, 3"	MAIN	048-22-1906	EA	14.0	12.0	(2.0)	897.5144	(1,795)
14	PIPE, D.I., CLASS 54, BELL & SPIGOT, TYPE 2, 8" PUSH ON, ZINC COATING	MAIN	047-10-4567	FT	983.0	938.0	(45.0)	47.6321	(2,143)
15	COLLAR, BELL, 8"	AWSS	047-33-9108	EA	132.0	121.0	(11.0)	263.0000	(2,893)
16	COLLAR, STOP, 20"	AWSS	047-33-9020	EA	42.0	38.0	(4.0)	1,032.0000	(4,128)
17	PIPE, 20", NS, KUBOTA	AWSS	047-10-4320	EA	12.0	11.0	(1.0)	4,955.0000	(4,955)
18	LAMP, F32T8, GE27621	ELECT	062-40-3200	EA	40.0	-	(40.0)	182.1800	(7,287)
	Rounding Adjustment								(1)
	<b>Subtotal: Variances Below (\$1,000) (9 Items)</b>								<b>\$ (27,417)</b>
	<b>Subtotal: Variances Between \$0 and (\$1,000) (32 Items)</b>								<b>\$ (6,368)</b>
	<b>Category Subtotal: All Negative Variances (41 Items)</b>								<b>\$ (33,785)</b>
	<b>Total</b>								<b>\$ 2,387</b>

As shown in **Table 3** below, based on the fuel dip procedures Crowe performed for this physical count, we found the actual quantities of fuel contained in the two tanks varied from those in the Maximo system. We believe that the quantities we observed during our physical count using a manual dip process and a conversion formula were reasonably accurate as they closely matched quantities registered by an electronic measurement system contained in the fuel tanks that the Water Enterprise generated that day (referred to as the System Status Report).

<sup>5</sup> The Maximo count and valuation data used in this report is as of the end of the business day prior to Crowe's count. Due to the Maximo inventory system synchronizing with the EJ Ward fuel management system during the night, the fuel tank level data in Maximo is as of the end of the business day that was two business days prior to Crowe's count. Therefore, some of the fuel variance may be due to regular fuel transactions that occurred on the business day prior to Crowe's count.

**Table 3**  
**San Francisco Public Utilities Commission**  
**Water (CDD and AWSS and 6 Satellite Shops) Warehouse Inventory Count**  
**Summary of Fuel Gallon and Cost Variances<sup>6</sup>**  
**(As of June 12, 2024)**

Item	Tank Numbers	Fuel Type per Maximo	Fuel Type per CDD Staff	Item Code	Unit	Maximo 6.7.24	Crowe 6.12.24	Variance	Average Cost	Cost of Variance
1	2	GASOLINE, AUTO, UNLEADED, C.D.D.	Unleaded gas for vehicles and equipment	091-30-3250	GAL	3,535.9	5,760.0	2,224.1	\$ 4.5057	\$ 10,021.13
2	6	DIESEL, RENEWABLE (99%)	Red-dyed diesel for a generator located in the boiler room	091-40-3151	GAL	-	662.0	662.0	4.5947	3,041.69
3	1 & 3	DIESEL, RENEWABLE (99%)	Renewable diesel for vehicles and equipment	091-40-3151	GAL	2,443.8	2,970.0	526.2	4.5947	2,417.73
<b>Total</b>									<b>\$</b>	<b>\$ 15,480.55</b>

Criteria:

Chapter 6 of the City and County of San Francisco Office of the Controller’s Accounting Policies and Procedures identifies that Departments shall conduct a physical inventory at least annually and ensure that the inventory management system records accurately reflect inventory on hand. Additionally, Section 6.1 (Policy Guidelines) indicates that inventory system records must be promptly adjusted for any variances identified in the physical counts, Departments must periodically review the inventory records for reasonableness and appropriateness of any changes to inventory unit cost, inventory valuation, and unit of measure, and Departments must periodically review the inventory for obsolescence and reasonableness of inventory classification. The Policy Guidelines also indicate that Departments should investigate significant variances between the physical count, the inventory system records, and the accounting records; document the reasons for variance; and take corrective actions to reduce future variances.

Cause:

The Water Enterprise Warehouse staff identified the following reasons for the differences in this physical count compared to the count in Maximo:

- Occasional manual system posting errors by the individual entering the quantity or unit of measure.
- Miscounted items from periodic cycle counts, including use of different counting methods and items not being fully separated to make accurate counts.
- For Satellite shop counts (i.e., Carpentry, Electrical, Meter, Machine, Auto, and LMPS), the inventory users had not submitted issue tags to warehouse management when items were used.

Examples of errors identified in our assessment of a sample of recent E.J. Ward fuel transaction data include the following:

- Transactions where a vehicle had the same odometer reading as the previous transaction for the same vehicle and fuel card.
- Duplicate vehicles identified within the system.
- Multiple vehicles with the same make and model sometimes resulted in fuel transactions assigned to the wrong vehicle.
- Vehicles without a specific year, make, or model identified in the system. After comparing system generated E.J. Ward reports showing all CDD vehicles as of June 20, 2023, and June 13, 2024, Crowe determined that no changes had been made to the year, make, or model of any existing CDD vehicles since last year’s inventory count.<sup>7</sup>

<sup>6</sup> For clarity, item 3 in Table 3 above is the sum of the balances for diesel tank 1 (1,339 gallons) and diesel tank 3 (1,631 gallons).

<sup>7</sup> The only changes since last year’s inventory count were the addition of 14 new vehicles and, for some existing vehicles, updated odometer readings, hourly use totals, and dates of most recent fuel transactions.

- Vehicles with an increase in their odometer reading but not their total hourly use, or vice versa, suggesting that these items are not being recorded accurately.
- Vehicle-specific fuel cards which were used without the associated vehicle showing any increase in odometer reading or total hourly use.

The Water Enterprise uses the automated fuel tracking information system, E.J. Ward, to capture fuel usage and the SFPUC Information Technology Services Bureau has developed an interface designed to periodically upload the E.J. Ward fuel usage data to the Maximo system. However, based on problems with the interface between the E.J. Ward system and the Maximo system, actual Water Enterprise fuel usage data is not consistently and accurately uploaded into Maximo. In addition, between Crowe's FY 2022-23 and FY 2023-24 inventory counts, warehouse staff only conducted one fuel dip (measurement) of unleaded gasoline and two fuel dips of diesel fuel.<sup>8</sup> Finally, the variance in item 2 from **Table 3** above is due to warehouse management manually entering a balance of zero gallons in Maximo despite fuel system status reports and a prior physical count showing the tank was more than half full.<sup>9</sup>

Effect:

The Water Enterprise inventory value in the Maximo system is understated by \$2,387. Regarding the fuel usage variances, absent periodic monitoring of the fuel levels, the Water Enterprise will have difficulty reconciling future inventories and identifying variances that are the result of missing fuel (e.g., theft), delivery errors, data entry errors, unrecorded transactions, tank leaks, or shrinkage.

Recommendation:

The Water warehouse staff should update the asset inventory counts in Maximo after management approval. The SFPUC Financial Services Bureau should adjust the General Ledger to reflect the actual cost of inventory on hand. The Water Enterprise should investigate the significant variances between the physical counts noted in Tables 1 and 2, the Maximo system records, and the accounting records; document the reasons for variances; and implement corrective actions to reduce future variances.

If the E.J. Ward system cannot be made to work consistently it should be replaced or upgraded. SFPUC staff also should frequently review the vehicle data in the Fuel View / E.J. Ward software to remove duplicate entries and ensure the make, model, and year fields are populated for all vehicles. In addition, SFPUC should investigate the increased use of the manual override process, or site card S-51, as it can lead to data entry errors and fuel transactions associated with incorrect vehicles.<sup>10</sup>

Finally, until the system matters are resolved, warehouse staff should begin tracking fuel tank levels and fuel usage for gasoline and diesel using a weekly process similar to the following:

- Process all outstanding fuel invoices in Maximo and determine the week-over-week fuel level change for both fuel types (i.e., fuel level increase from deliveries/inflows).

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<sup>8</sup> According to Maximo records, between Crowe's FY 2022-23 and FY 2023-24 inventory counts, warehouse staff made eight fuel balance adjustments in Maximo: three for unleaded gasoline (item 091-30-3250) and five for diesel (item 091-40-3151). However, only one of the adjustments for unleaded gasoline was for a regular cycle count, and only two of the adjustments for diesel fuel were for regular cycle counts. The other adjustments were either prompted by fuel deliveries (both authorized and unauthorized) or were simply adjustments made based on the tank readout (fuel system status report) without a physical fuel dip to verify the reading.

<sup>9</sup> While on site at CDD, Crowe observed warehouse staff performing fuel dips for three of the four fuel tanks listed on the fuel system status report. When Crowe inquired about the fourth fuel tank (tank 6, or item 2 in Table 3 above), which had a balance of zero gallons in Maximo but was more than half full according to a system-generated fuel system status report, warehouse management responded that they did not know why the fuel system status report showed that there was fuel in the tank, nor did they have any information about the purpose or location of the fourth fuel tank. After further inquiry, Crowe subsequently determined that the reading of 662 gallons on the fuel system status report was correct.

<sup>10</sup> Since the prior inventory count, the number of fuel transactions utilizing site card S-51 has increased from 12% to 15% of total transactions. For the prior inventory count, Crowe reviewed CDD fuel transaction data from June 1, 2022, to June 20, 2023, and found that 1,160, or 12.3%, of the 9,457 total transactions were authorized using site card S-51. For the current inventory count, Crowe reviewed CDD fuel transaction data from June 1, 2023, through June 13, 2024, and found that 1,321, or 14.5%, of the 9,098 total transactions were authorized using site card S-51.

- Perform a weekly fuel dip for each tank and determine the week-over-week fuel level change for both fuel types (i.e., net change in fuel level). Measurements should be made to the nearest half-inch and CDD staff should not be permitted to refill vehicles or equipment while the fuel dip is taking place.<sup>11</sup>
- Determine the total amount of fuel dispensed per E.J. Ward system data and paper logs, including cross-referencing the two to remove any duplicate transactions.<sup>12</sup>
- Compare the fuel level change based on fuel dips with the net fuel level change per Maximo, E.J. Ward, and paper logs, calculated as Maximo balance change (inflows) minus total fuel dispensed per E.J. Ward and paper logs (outflows).
- Attempt to determine the cause of any variances greater than the margin of error associated with the fuel dip conversion formula.

#### Management Response:

CDD inventory management team has requested and received the raw data supporting Crowe's findings. Supervisors, managers and subject matter experts are in the process of reviewing the data and will attempt to determine the causes for the variances reported. CDD's Inventory Management Team will offer feedback regarding Crowe's comments, along with a process improvement plan, before the end of this 2024 calendar year (mid-fiscal year).

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<sup>11</sup> The fuel dip conversion charts that CDD staff have are accurate to the nearest half-inch, however, CDD staff only measured to the nearest inch during the fuel dip that Crowe observed for this inventory count. In addition, on the first day of the inventory count, Crowe staff observed trucks and heavy equipment refueling, which effectively altered the fuel variance that was measured against the Maximo fuel balance from the prior business day.

<sup>12</sup> Crowe cross-referenced E.J. Ward fuel transaction data against 100 recent CDD fuel transactions manually recorded on paper fuel logs from May 9, 2024 to June 13, 2024 and found that 10, or 10%, were also captured in the E.J. Ward fuel system, as they had the same date, odometer reading, and vehicle number as an E.J. Ward entry, in addition to having a dispensed fuel volume that was either identical to the E.J. Ward entry or differed by only 0.1 gallons.

**Other Matters**

This full inventory count did not constitute an audit, examination, review, or compilation of the historical and prospective financial information conducted in accordance with generally accepted auditing standards or with other standards established by the American Institute of Certified Public Accountants (AICPA). Accordingly, Crowe is unable to express an opinion or any other form of assurance with respect to any of the historical or prospective financial information. Crowe did not perform any procedures to verify the Management Response and Crowe does not provide any assurance regarding the accuracy or completeness of the response. Any and all amounts referred to in this letter are preliminary and could change should additional procedures be performed. Additionally, issues that are not mentioned here could develop subsequent to the date of this letter that may have impacted Crowe's analysis or that Crowe may cite should additional procedures be performed.

The inventory services did not contemplate obtaining the understanding of internal controls or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit or examination. Thus, this engagement did not provide assurance that we became aware of significant matters that would be disclosed in an audit or examination.

As part of this inventory, the SFPUC agreed to be responsible to make all management decisions and perform all management functions; designate an individual who possesses suitable skill, knowledge, and/or experience, preferably within senior management to oversee our services; evaluate the adequacy and results of the services performed; accept responsibility for the results of the services; and establish and maintain internal controls, including monitoring ongoing activities. The SFPUC has ultimate authority for making changes to inventory reported in its Maximo system and on its financial statements.

Crowe's fees are not dependent upon the outcome of this report and Crowe is independent with respect to any other economic interests.

We appreciate the contribution of SFPUC management and your input and direction on this project. We also thank Water Enterprise management and staff for providing access to the inventory and for timely responses to our requests.



Crowe LLP