

Financial Statements December 31, 2014 and 2013

Cass Rural Water Users District

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Independent Auditor's Report

The Board of Directors Cass Rural Water Users District Kindred, North Dakota

Report on the Financial Statements

We have audited the accompanying financial statements of Cass Rural Water Users District as of and for the year ended December 31, 2014 and 2013, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Cass Rural Water Users District as of December 31, 2014 and 2013, and the respective changes in financial position and its cash flows thereof for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Boards who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the District's financial statements. The Schedule of Directors, Officers, and Manager and Comparative Schedules of Operations are presented for purposes of additional analysis and are not a required part of the basic financial statements.

The Comparative Schedule of Operations is the responsibility of management and was derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the comparative schedule of are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

The Schedule of Directors, Officers, and Manager has not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we do not express an opinion or provide any assurance on them

Report Issued in Accordance with Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued a report dated February 19, 2015 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, grant agreements, and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. Those reports are an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

Fargo, North Dakota
February 19, 2015

This section of the District's financial report presents our analysis of the District's financial performance during the fiscal year ended December 31, 2014. Please read it in conjunction with the financial statements, which follow this section.

The information in this MDA is presented under the following headings:

- Financial Highlights
- Organization and Business
- Statement of Net Position Overview
- Capital Assets and Debt Administration
- Statement of Revenues, Expenses and Change in Net Position Overview
- Request for Information

Financial Highlights

- Assets Increased nearly \$2.9 million due primarily to new pipeline added during 2014.
- Operating expenses Increased nearly 3.10% due to with the largest increase in administrative and general expenses.

Organization and Business

Cass Rural Water Users District provides water service to approximately 4,300 rural residences and 14 communities in Cass County and parts of Trail, Barnes, Ransom and Richland counties serving a total estimated population of 13,000 in a 2,000 square mile service area. The District is a political subdivision of the State of North Dakota pursuant to Chapter 61-35 of the North Dakota Century Code. The District recovers cost of service through user fees.

Statement of Net Position Overview

	2014	2013	2012
Assets			
Capital assets	\$ 31,379,589	\$ 29,988,768	\$ 27,806,156
Other property and investments	14,373,515	13,623,504	13,552,301
Current assets	4,662,105	3,916,862	3,386,845
Total assets	\$ 50,415,209	\$ 47,529,134	44,745,302
Net Position			
Invested in capital assets, net of related debt	\$ 8,645,960	\$ 7,552,825	\$ 6,123,749
Restricted for debt service	3,674,228	2,493,643	1,992,358
Unrestricted	14,852,208	14,667,363	14,952,907
Total net position	27,172,396	24,713,831	23,069,014
Liabilities			
Long-term debt, less current maturities	21,395,459	21,226,407	20,629,282
Other liabilities	1,847,354	1,588,896	1,407,006
Total liabilities	23,242,813	22,815,303	22,036,288
Total net position and liabilities	\$ 50,415,209	\$ 47,529,134	\$ 45,105,302

The total assets of the District increased by 6%, from \$47.5 million to \$50.4 million. The increase in total assets is broken down as follows:

Water Plant in service	\$1,391,000
Current Assets	745,000
Other Property and Investments	750,000

During 2009, per terms of the "Memorandum of Understanding" with the City of Fargo and Tharaldson Ethanol Group, the District executed a bill of sale which transferred ownership of a water treatment plant constructed on land owned by the City of Fargo to the city. In return the City of Fargo is committed to sell water to the District for resale to Tharaldson Ethanol for a period of 20 years. Additional terms of the agreement require Tharaldson Ethanol Group and the City of Fargo to make all debt payments for the project. The repayment contract also includes a guarantee from Mr. Gary Tharaldson and Tharaldson Hotels. The District holds an escrow account as additional security for the debt associated with this project.

Current assets increased by nearly \$717,000. This was a result of increase in cash and cash equivalents.

The net position of the District increased by a little over \$2.4 million.

Capital Assets and Debt Administration

At the end of 2014, the District had \$45.7 million (net of accumulated depreciation) in a broad range of utility capital assets and other property. The investment in capital and other property assets includes land, buildings, improvements, water treatment plants, water transmission and distribution mains, water storage facilities, pump stations, machinery, equipment and certain intangible assets. The District's net revenue, long term debt and contributions from customers are used to finance these capital investments. More detailed information concerning the additions and retirements appears later in this document in note 5 of the financial statements.

As of December 31, 2014 the District had total long term debt including current maturities outstanding of \$22.7 million. The District invests funds in certificates of deposit and other similar investments in such a manner so that as these investments mature funds are available to make the necessary payments. As of December 31, 2014 the District had funds on hand to make all debt payments through the year 2015. The details of the various debt instruments are presented in more detail in note 6 of the financial statements.

Statement of Revenues, Expenses and Change in Net Position Overview

	2014	2013	2012
Total Revenues	\$ 6,133,610	\$ 6,269,270	6,486,550
Total Expenses	5,173,147	5,080,280	5,002,071
Income	960,463	1,188,990	1,484,479
Capital Contributions Special assessment	1,498,102	815,827	771,750
Change in Net Position	2,458,565	2,004,817	2,256,229
Net Position, Beginning of Year	24,713,831	22,709,014	20,452,785
Net Position, End of Year	\$ 27,172,396	\$ 24,713,831	\$ 22,709,014

Overall operating expenses increased by 3.10% or approximately \$130,000. Depreciation expense increased by approximately \$64,000 during 2014.

Factors Bearing on the District's Future

There are a number of factors or issues that have a bearing on the future of Cass Rural Water District that can be broken down as follows:

- Water Supply Cass Rural Water District is dependent on ground water as its primary source of water. One of the three aquifers the District utilizes has a finite life of perhaps another 25 to 30 years. As a result the District has been very active with the Lake Agassiz Water Authority to develop a more dependable source of water.
- Territorial Integrity Due to the rapid growth of the urban areas around Fargo and West Fargo both cities have extended their boundaries into areas that overlap the District's boundary. To date the District has been able to negotiate reasonable arrangements with both cities to address these territorial issues. The District will continue to foster good working relationships with Fargo and West Fargo as well as making an effort to keep abreast of any legal developments in this area of federal law.
- Federal Regulation Each year the Environmental Protection Agency issues new rules for the regulations of public drinking water systems. With each new regulation comes increased cost and additional record keeping requirements. The District is committed to meeting all applicable drinking water standards while keeping costs as reasonable as possible.

Request for Information

This financial report is designed to provide ratepayers and creditors with a general overview of the District's finances and demonstrate the District's accountability for monies it receives. If you have any questions about this report or need additional information, please contact: the General Manger, Cass Rural Water District, P.O. Box 98, Kindred, North Dakota 58051.

	2014	2012
Assets	2014	2013
Water Plant		
In service	\$ 39,679,874	\$ 38,493,917
Construction in progress	1,119,880	249,990
Total water plant	40,799,754	38,743,907
Less accumulated depreciation	9,420,165	8,755,139
Water plant - net	31,379,589	29,988,768
Other Property and Investments		
Intangible assets, net of accumulated amortization	7,817,538	8,338,707
Special assessment receivable, net of current portion	3,370,411	2,266,773
Patronage capital credits from nonassociated companies	230,482	230,482
Special funds	2,955,084	2,787,542
Total other property and investments	14,373,515	13,623,504
Current Assets		
Cash and cash equivalents	3,194,845	2,785,733
Cash and cash equivalents - restricted	5,265	278
Temporary investments	260,689	129,544
Accounts receivable, less accumulated provision	,	,
for uncollectible accounts (2014 - \$1,481, 2013 - \$143)	455,675	399,938
Delinquent special assessment receivables	397,330	313,124
Special assessment receivable, current portion	303,817	226,870
Inventory	3,422	3,422
Prepaid Items	34,594	51,485
Interest receivable	6,468	6,468
Total current assets	4,662,105	3,916,862
Total assets	\$ 50,415,209	\$ 47,529,134

Net Position and Liabilities	2014	2013
Net Position Net investment in capital assets Restricted for debt service Unrestricted Total net position	\$ 8,645,960 3,674,228 14,852,208 27,172,396	\$ 7,552,825 2,493,643 14,667,363 24,713,831
Long - Term Debt, Less Current Maturities	21,395,459	21,226,407
Current Liabilities Current maturities of long-term debt Accounts payable Accrued vacation Accrued interest Total current liabilities	1,338,170 294,722 26,698 187,764 1,847,354 \$ 50,415,209	1,209,536 147,873 26,698 204,789 1,588,896 \$ 47,529,134

	2014	2013
Operating Revenues		
Metered sales to customers	\$ 5,720,871	\$ 5,841,402
Miscellaneous	52,477	52,064
Total operating revenues	5,773,348	5,893,466
Operating Expenses		
Pumping expense	230,763	224,438
Water treatment and testing expense	126,987	136,737
Transmission and distribution expense	522,268	525,641
Administrative and general expense	792,239	697,224
Purchased water	1,374,665	1,403,557
Depreciation expense	716,976	652,758
Amortization expense	521,169	521,169
Taxes	53,883	47,072
Total operating expenses	4,338,950	4,208,596
Operating Income	1,434,398	1,684,870
Nonoperating Revenues (Expenses)		
Interest on special assessments	135,112	141,690
Investment income	23,387	26,453
Franchise fee payment	144,145	129,360
Grant revenue	50,437	-
Membership revenue	-	500
Miscellaneous revenue	7,181	77,801
Interest expense	(834,197)	(871,684)
Total nonoperating revenues (expenses), net	(473,935)	(495,880)
Income Before Contributions	960,463	1,188,990
Capital Contributions		
Special assessments	1,498,102	815,827
Change in Net Position	2,458,565	2,004,817
Net Position, Beginning of Year	24,713,831	22,709,014
Net Position, End of Year	\$ 27,172,396	\$ 24,713,831

	2014	2013
Operating Activities		
Operating receipts from customers	\$ 7,215,713	\$ 6,695,172
Cash payments to suppliers for goods and services	(716,278)	(868,477)
Cash payments to employees for services	(792,239)	(697,224)
Miscellaneous payments	(1,428,548)	(1,445,761)
Net Cash from Operating Activities	4,278,648	3,683,710
Investing Activities		
Purchase of investments	(333,618)	(254,432)
Sale of investments	34,931	266,129
Interest received	23,387	26,453
Net Cash from (used for) Investing Activities	(275,300)	38,150
Capital and Related Financing Activities		
Interest payments on debt	(851,222)	(871,684)
Proceeds from long-term borrowings	1,500,000	1,860,000
Net additions to special assessments	(1,122,498)	(409,310)
Additions to plant	(2,107,797)	(2,831,050)
Proceeds from grant revenue	50,437	-
Principal payments on long-term debt	(1,202,314)	(1,104,496)
Net Cash used for Capital and Related Financing Activities	(3,733,394)	(3,356,540)
Noncapital Financing Activities		
Franchise fee payment	144,145	129,360
Membership revenue		500
Net Cash from Noncapital Financing Activities	144,145	129,860
Net Change in Cash and Cash Equivalents	414,099	495,180
Cash and Cash Equivalents, Beginning of Year	2,786,011	2,290,831
Cash and Cash Equivalents, End of Year	\$ 3,200,110	\$ 2,786,011

	,	2014	 2013
Operating Activity Reconciliation			
Operating income	\$	1,434,398	\$ 1,684,870
Adjustments to reconcile operating income			
to net cash from operating activities			
Depreciation expense		716,976	652,758
Amortization of debt expense		-	4,868
Amortization of intangible assets		521,169	521,169
Changes in assets and liabilities			
Accounts receivable		1,442,365	801,706
Prepayments		16,891	(7,140)
Accounts payable		146,849	 25,479
Net Cash from Operating Activities	\$	4,278,648	\$ 3,683,710
Noncash Investing Activities			
Patronage capital credit	\$	(7,187)	\$ (14,282)
Capital contribution recognized by special assessment	\$	1,498,102	\$ 815,827

Note 1 - Organization and Nature of Operations

The District was organized and formally incorporated as of November 6, 1973, for the express purpose of providing water service in the state of North Dakota for the use and benefit of its members on a cooperative basis. Effective September 1, 2002, the organization reorganized as a water district under the authority of the North Dakota Century Code.

Note 2 - Summary of Significant Accounting Policies

General

The public utility activities of Cass Rural Water Users District (District) are non-regulated as such. However, the District follows the National Association of Regulatory Utility Commissioners' Uniform System of Accounts prescribed for Class A and B Water Utilities.

Reporting entity

For financial reporting purposes, a reporting entity's financial statements should include all component units over which another component unit (oversight unit) exercises financial accountability. Financial accountability includes such aspects as appointment of governing body members, designation of management, the ability to significantly influence operations and accountability for fiscal matters.

Based upon the above criteria, there are no component units to be included within Cass Rural Water Users District as a reporting entity.

Basis of Accounting

With respect to proprietary activities Cass Rural Water Users District has adopted GASB statement No. 62 "Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements."

Receivable and Credit Policy

Trade receivables are uncollateralized customer obligations due under normal trade terms requiring payment within 30 days from the invoice date. Customers are charged a one-time 10% charge for late payments. The receivables are non-interest bearing. Payments on trade receivables are applied to the latest unpaid invoices. The carrying amount of trade receivables is reduced by a valuation allowance that reflects management's best estimate of the amounts that will not be collected.

Cash and Cash Equivalents

The District's cash and cash equivalents consist of all cash sources and certificates of deposit that have an original maturity of three months or less.

Prepaid Items

Certain payments to vendors reflect costs applicable to future accounting periods and are recorded as prepaid items. Prepaid items are reported using the consumption method and recorded as an expense at the time of consumption.

Temporary Investments

Investments in asset backed securities are reported at fair value. Fair value is determined based on quoted market prices if available or estimated fair value using quoted market prices for similar securities. Interest, dividends, gains and losses, both realized and unrealized, on investments in debt and equity securities are included in other income (deductions).

Special Funds

Several of the District's loan agreements require funds to be set aside in a reserve account. These amounts are reported as "special funds" on the Statement of Net Position. At December 31, 2014 and 2013, the District has complied with the reserve account requirements of the loan agreements.

Plant Additions and Retirements

Utility plant is stated at cost. The cost of additions to utility plant includes contracted work, direct labor and materials, and allocable overheads. When units of property are retired, sold or otherwise disposed of in the ordinary course of business, their average book cost, less net salvage, is charged to accumulated provision for depreciation. Repairs and the replacement and renewal of items determined to be less than units of property are charged to maintenance expense. Capital assets are defined by the District as assets with an initial, individual cost equal to or greater than \$500, except for plant which is capitalized in their entirety.

Depreciation

Depreciation is computed on the straight-line method based upon estimated useful lives of the various classes of property. Such provision, as a percentage of the average balance of depreciable property in service, was 1.85% and 1.89% in 2014 and 2013.

Intangible Assets

Intangible assets are stated at amortized cost. The intangible assets are the right to supply treated wastewater and treat the wastewater return flow for a period of years to come. They are being amortized over the life of the agreement, which is over 20 years. The project was completed at the end of 2009. The amortization expense recorded in 2014 and 2013 was \$521,169.

Operating and Nonoperating Revenues and Expenditures

The District reports operating revenues and expenses separately from nonoperating items. Operating revenues and expenses generally result from producing and delivering goods in connection with the District's principal ongoing operations. The principal operating revenues of the District are charges to customers for sale of water. Operating expenses for the District include the costs of sales, administrative expenses, and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as nonoperating revenues and expenses.

Revenue Recognition

Revenue from water sales is reflected in the accounts at the time delivered.

Accounting Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Business and Credit Risk

The District provides water service on account to its members which are located primarily in Cass County, North Dakota.

Restricted and Unrestricted Resources

When both restricted and unrestricted resources are available for use, it is the District's policy to use restricted resources first, and then unrestricted resources as they are needed.

Note 3 - Long-Term Receivables

Special assessments

During 2004, the District entered into an agreement with the City of Fargo, to sell water within specified properties in the Osgood development located in Fargo. In order to serve the development, the District levied special assessments against the property in the development. The special assessments call for annual payments of \$66,000 plus interest at 5.6% commencing with 2005 and ending 2020.

The District has created one or more improvement districts for the purpose of constructing improvements. For 2006, the improvement districts are Silverleaf and Custer Crossing Water Improvement Districts. To finance such improvements, the District has issued \$303,000 Improvement Bonds of 2006 and has levied assessments on the property in the improvement districts benefited thereby to pay for the bonds. The special assessments call for annual payments varying from \$6,000 to \$24,000 at 5.20% commencing with 2007 and ending 2022.

In 2008, the District issued \$620,000 Improvement Bonds of 2008 and has levied the assessments on the property in the improvement districts benefited thereby to pay for the bonds. The improvement districts are Maple Valley and Prairie Grove Water Improvement Districts. The special assessments call for annual payments varying from \$30,000 to \$55,000 at 4.25% to 5.00% commencing in 2009 and ending 2023.

In 2009, the District issued \$265,000 Improvement Bonds of 2009 and has levied the assessments on the property in the Maple Valley Improvement District to pay for the bonds. The special assessments call for annual payments varying from \$21,000 to \$27,000 at 2.60% to 4.50% commencing in 2010 and ending 2024.

In 2010, the District levied additional assessments on the property in Maple Valley Improvement District to pay for the Improvement Bonds of 2009.

In 2012, the District levied additional assessments on the properties in the Deer Creek, Silverleaf, Maple Valley and other smaller improvement districts. The special assessments call for annual payments varying from \$60,000 to \$85,000 at 0.60% to 2.650% commencing in 2013 and ending 2027.

In 2013, the District issued \$810,000 Series B of 2013 Bonds and has levied the assessments on the property in the Davies and Deer Creek Improvement Districts to pay for the bonds. The special assessments call for annual payments varying from \$35,000 to \$60,000 at 0.80% to 4.00% commencing in 2014 and ending 2028.

In 2014, the District issued \$1,500,000 of 2014 Bonds and has levied the assessments on the property in the Eagle Point, Deer Creek, Fargo Park, and Davies Improvement Districts to pay for the bonds. The special assessments call for annual payments varying from \$90,000 to \$105,000 at 0.80% to 3.10% commencing in 2015 and ending 2029.

Note 4 - Deposits, Investments and Investment Income

The District's investments are generally reported at fair value, as discussed in Note 1. At December 31, 2014 and 2013, the District had the following investments, all of which are held in the District's name by various custodial banks that were agents of the District:

As of December 31, 2014, the District has the following investments and maturities:

Investment Type	Fair Value Less than 1		ss than 1	 1-5	
Certificate of Deposits	\$	1,860,000	\$		\$ 1,860,000
Government National Mortgage Association	\$	95,964	\$	95,964	\$ _

As of December 31, 2013, the District has the following investments and maturities:

Investment Type	Fair Value Less			ess than 1	1-5
Certificate of Deposits	\$	2,003,546	\$	506,945	\$ 1,496,601
Government National Mortgage Association	\$	117,171	\$	117,171	\$

Interest Rate Risk

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

Credit Risk

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. The District does not have a formal policy to limit exposure to credit risk. The asset back securities noted above are not rated.

Concentration of Credit Risk

The District does not have a formal investment policy that limits the total amount of securities that can be held with any one company or government agency.

Custodial Credit Risk

Custodial credit risk is the risk that in the event of a bank failure, the District's deposits may not be returned to it. The District does not have a formal policy to limit exposure to custodial credit risk.

Pledged Collateral

In accordance with North Dakota Century Code, the District maintains deposits at those depository banks and brokerages authorized by the Board of Directors, all of which are covered by Federal Depository Insurance or Securities Investor Protection. Century Code requires that all of the District's deposits be protected by insurance, collateral or surety bond. The market value of the collateral pledged must be equal to or greater than 110% of the deposits not covered by insurance or bonds. At December 31, 2014 all deposits were insured or collateralized by securities held by the District's agent in the District's name.

The carrying amount of deposits and investments shown above is in the District's balance sheet as follows:

	 2014	2013
Carrying Amount		
Deposits in bank	\$ 4,459,919	\$ 3,539,866
Certificates of deposit	1,860,000	1,988,552
Investments	95,964	174,679
	\$ 6,415,883	\$ 5,703,097
Included in the following balance sheet captions		
Cash and cash equivalents	\$ 3,194,845	\$ 2,785,733
Cash and cash equivalents - restricted	5,265	278
Temporary cash investments	260,689	129,544
Special funds	 2,955,084	2,787,542
	\$ 6,415,883	\$ 5,703,097

Note 5 - Water Plant And Depreciation

As of December 31, 2014:

		Balance 1/1/14	 Additions	R	etirements	 Balance 12/31/14
Classified Water Plant in Service						
Construction in progress	\$	249,990	 1,924,033	\$	1,054,143	\$ 1,119,880
Intangible plant						
Organization		3,191	_		_	3,191
Franchises and consents		316	_		_	316
		3,507	-			3,507
Distribution plant						
Land and land rights		395,436	-		-	395,436
Collecting and impounding reservoirs		3,744,354	-		-	3,744,354
Wells		817,751	-		-	817,751
Electric pumping equipment		874,943	-		-	874,943
Water treatment equipment		879,725	-		-	879,725
Transmission and distribution mains		23,685,202	1,034,328		-	24,719,530
Transmission mains - Ethanol pipe		5,233,269	-		-	5,233,269
Service leads		21,169	-		-	21,169
Services		45	-		-	45
Meters		984,299	85,179		-	1,069,478
		36,636,193	1,119,507			37,755,700
General plant						
Structures and improvements		237,462	-		-	237,462
Office furniture and equipment		224,413	7,152		-	231,565
Transportation equipment		309,179	32,128		51,950	289,357
Tools, shop and garage equipment		313,119	25,817		-	338,936
Other equipment - reservoir monitors		770,044	53,303		-	823,347
		1,854,217	118,400		51,950	1,920,667
Total water plant	\$ 3	38,743,907	\$ 3,161,940	\$	1,106,093	\$ 40,799,754

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Accumulated depreciation as of December 31, 2014:

	Depreciation Rates in %	Balance 1/01/14	Accruals	Retirements	Balance 12/31/14	
Distribution Plant						
Collecting and impounding reservoirs	2.0	\$ 1,492,305	\$ 74,887	\$ -	\$ 1,567,192	
Wells	2.0	262,001	16,355	-	278,356	
Electric pumping equipment	5.0	874,943	35,189	-	910,132	
Water treatment equipment	5.0	848,019	236,852	-	1,084,871	
Transmission	1.0	3,802,973	104,665	-	3,907,638	
Meters	4.0	479,805	39,372	-	519,177	
Service Leads	1.0	10,585	4,234		14,819	
Totals - distribution mains		7,770,631	511,554		8,282,185	
General Plant						
Structures and improvements	2.0	94,356	4,749	-	99,105	
Office furniture and equipment	10.0-15.0	167,833	33,662	-	201,495	
Transportation equipment	33.3	262,014	43,039	51,950	253,103	
Tools, shop and garage equipment	15.0	241,905	46,968	-	288,873	
Reservoir monitors	10.0	218,400	77,004		295,404	
Totals - general plant		984,508	205,422	51,950	1,137,980	
Totals - all plant		\$ 8,755,139	\$ 716,976	\$ 51,950	\$ 9,420,165	

During 2007, the District entered into an agreement with Tharaldson Ethanol Plant I, LLC to design and construct an ethanol plant in the Casselton Township. The total cost of the project was \$15,656,652, and was completed during 2009. The project was financed by the District through a note from the North Dakota Public Finance Authority. Upon completion of the construction project, ownership of \$10,423,383 of plant was transferred to the City of Fargo who is responsible for operation and maintenance of plant. Because the Districts retains the right to supply treated wastewater and treat the wastewater return flow for the next 20 years, that amount has been recorded as an intangible asset and is being amortized over the life of the agreement. The District will own, operate, and maintain the remaining \$5,233,269.

The City of Fargo is responsible for the repayment of \$1,703,088 of a note acquired for construction. The remaining balance is the responsibility of Tharaldson Ethanol Plant I, LLC (Tharaldson). As security for Tharaldson's debt service obligations, the District required personal guarantee of Gary Tharaldson and also Tharaldson Hotels for the bonding and required one year's bond payment (Upfront Deposit) to be held by a mutually agreed-upon third party. Until the bonds are retired, Tharaldson will pay its bond payment amount, plus an additional 20% which the District will place in a reserve fund. Interest earned on the reserve fund will be held for Tharaldson's debt service payment schedule.

As of December 31, 2013:

	Balance 1/1/13	Additions	Retirements	Balance 12/31/13
Classified Water Plant in Service				
Construction in progress	\$ 7,971	\$ 249,990	\$ 7,971	\$ 249,990
Intangible plant				
Organization	3,191	-	-	3,191
Franchises and consents	316	-	-	316
	3,507			3,507
Distribution plant				
Land and land rights	395,436	-	-	395,436
Collecting and impounding reservoirs	3,724,251	20,103	-	3,744,354
Wells	796,566	21,185	-	817,751
Electric pumping equipment	874,943	-	-	874,943
Water treatment equipment	879,725	-	-	879,725
Transmission and distribution mains	21,435,718	2,249,484	-	23,685,202
Transmission mains - Ethanol pipe	5,233,269	-	-	5,233,269
Service leads	21,169	-	-	21,169
Services	45	-	-	45
Meters	824,104	160,195		984,299
	34,185,226	2,450,967		36,636,193
General plant				
Structures and improvements	237,462	-	-	237,462
Office furniture and equipment	207,862	16,551	-	224,413
Transportation equipment	248,226	60,953	-	309,179
Tools, shop and garage equipment	290,281	22,838	-	313,119
Other equipment - reservoir monitors	728,003	42,041	-	770,044
	1,711,834	142,383		1,854,217
Total water plant	\$ 35,908,538	\$ 2,843,340	\$ 7,971	\$ 38,743,907

Accumulated depreciation as of December 31, 2013:

	Depreciation Rates in %	Balance 01/01/13	Accruals	Retirements	Balance 12/31/13
Distribution Plant					
Collecting and impounding reservoirs	2.0	\$ 1,417,820	\$ 74,485	\$ -	\$ 1,492,305
Wells	2.0	246,070	15,931	-	262,001
Electric pumping equipment	5.0	874,943	-	-	874,943
Water treatment equipment	5.0	812,830	35,189	-	848,019
Transmission	1.0	3,483,951	319,022	-	3,802,973
Meters	4.0	446,841	32,964	-	479,805
Service Leads	1.0	6,351	4,234		10,585
Totals - distribution mains		7,288,806	481,825		7,770,631
General Plant					
Structures and improvements	2.0	89,606	4,750	-	94,356
Office furniture and equipment	10.0-15.0	152,544	15,289	-	167,833
Transportation equipment	33.3	225,508	36,506	-	262,014
Tools, shop and garage equipment	15.0	200,317	41,588	-	241,905
Reservoir monitors	10.0	145,600	72,800		218,400
Totals - general plant		813,575	170,933		984,508
Totals - all plant		\$ 8,102,381	\$ 652,758	\$ -	\$ 8,755,139

Note 6 - Long-Term Debt

	Balance January 1, 2014	Additions	Payments	Balance December 31, 2014	Due within One Year
Bank of North Dakota	\$ 264,898	\$ -	\$ 42,283	\$ 222,615	\$ 42,818
Rural Utilities Service	1,667,409	-	35,925	1,631,484	36,959
State Revolving Fund	1,190,000	-	85,000	1,105,000	90,000
Bond Issue 2006	189,000	-	20,000	169,000	20,000
Radcliffe Revocable Trust North Dakota Public	101,864	-	7,120	94,744	7,486
Finance Authority North Dakota Public	13,315,651	-	690,000	12,625,651	715,000
Finance Authority	1,070,001	-	55,001	1,015,000	55,000
Bond Issue 2008	450,000	-	35,000	415,000	40,000
Bremer Bond Issue	1,006,008	-	25,021	980,987	25,907
Bond Issue 2009	205,000	-	15,000	190,000	15,000
Bond Issue 2010	390,000	-	70,000	320,000	65,000
Tharaldson Ethanol Escrow	786,112	-	1,964	784,148	-
Starion Bond Series A	990,000	-	85,000	905,000	85,000
Starion Bond Series B	810,000	-	35,000	775,000	50,000
Starion Bond Series 2014		1,500,000		1,500,000	90,000
	\$ 22,435,943	\$ 1,500,000	\$ 1,202,314	\$ 22,733,629	\$ 1,338,170
	Balance			Balance	
	January 1,		_	December 31,	Due within
	2013	Additions	Payments	2013	One Year
Bank of North Dakota	\$ 305,690	\$ -	\$ 40,792	\$ 264,898	\$ 41,979
Rural Utilities Service	1,701,543	-	34,134	1,667,409	36,117
State Revolving Fund	1,275,000	-	85,000	1,190,000	95,000
Bond Issue 2006	208,000	-	19,000	189,000	20,000
Radcliffe Revocable Trust North Dakota Public	108,637	-	6,773	101,864	7,120
Finance Authority North Dakota Public	13,980,651	-	665,000	13,315,651	690,000
Finance Authority	1,120,000	-	49,999	1,070,001	55,000
Bond Issue 2008	485,000	-	35,000	450,000	35,000
Bremer Bond Issue	1,029,806	-	23,798	1,006,008	24,320
Bond Issue 2009	220,000	-	15,000	205,000	15,000
Bond Issue 2010	460,000	-	70,000	390,000	70,000
Tharaldson Ethanol Escrow	788,080	-	1,968	786,112	-
Starion Bond Series A	, -	1,050,000	60,000	990,000	85,000
Starion Bond Series B		810,000		810,000	35,000
	\$ 21,682,407	\$ 1,860,000	\$ 1,046,464	\$ 22,435,943	\$ 1,209,536

Maturity dates and interest rates are as follows:

	Maturity Date	Interest Rate
Bank of North Dakota	2019	2.00%
Rural Utilities Service	2038	5.125%
State Revolving Fund	2029	2.50%
Bond Issue 2004	2019	3.30 - 4.40%
Bond Issue 2006	2023	5.20%
Radcliffe Revocable Trust	2024	5.02%
North Dakota Public Finance Authority	2028	3.50%
North Dakota Public Finance Authority	2029	2.50%
Series 2008 Revenue Bond	2011	4.75%
Bond Issue 2008	2023	4.25 - 5.00%
Bremer Bond Issue	2034	6.25%
Bond Issue 2009	2024	2.6 - 4.5
Bond Issue 2010	2019	1.10 - 3.35%
Tharaldson Ethanol Escrow	2028	-
Starion Bond Series A	2027	0.60 - 2.65%
Starion Bond Series B	2028	0.80 - 4.00%
Starion Bond Series 2014	2029	0.80 - 3.10%

All assets are pledged as security for these debts. The Bank of North Dakota and Radcliffe Revocable Trust notes require annual payments of principal and interest and the North Dakota Public Finance Authority notes require annual payments of principal and semi-annual payments of interest.

During 2013, the District issued \$1,050,000 of Series A 2013 Bonds. The agreement requires semi-annual payments, including interest, at an interest rate from 0.60% to 2.65%. Payments commence in May 2013 through May 2027.

During 2013, the District issued \$810,000 of Series B 2013 Bonds. The agreement requires semi-annual payments, including interest, at an interest rate from 0.80% to 4.00%. Payments commence in May 2014 through May 2028.

During 2014, the District issued \$1,500,000 of Series 2014 Bonds. The agreement requires semi-annual payments, including interest, at an interest rate from 0.80% to 3.10%. Payments commence in May 2015 through May 2029.

Minimum principal and interest payments required are estimated as follows:

Year ending December 31:	Principal	Interest
2015	\$ 1,338,170	\$ 827,277
2016	1,373,865	785,789
2017	1,400,148	739,193
2018	1,446,529	690,229
2019	1,481,976	639,097
2020 - 2024	7,415,324	2,387,466
2025 - 2029	7,104,384	955,804
2030 - 2034	796,249	216,680
2035 - 2038	376,984	36,285
	\$ 22,733,629	\$ 7,277,820

Note 7 - Lease Agreement

The District entered into a lease agreement with the City of Casselton to permit the District to utilize a portion of the storage capacity in the City of Casselton water tower. Under the agreement, the District is liable for 24% of the total shared cost which equates to the Districts portion of storage capacity. The agreement will remain in effect for an initial term of 25 years and shall be automatically extended for successive terms of 5 years each unless either entity provides a minimum of 2 years advance written notice of intent to discontinue agreement. In the event the City of Casselton chooses to discontinue this agreement or any extension thereof, the City of Casselton shall remit to the District the initial project cost assumed by the District less accumulated depreciation which shall be calculated using the straight line method with a useful life of 80 years.

Future minimum lease payments are as follows:

2015 2016	\$ 17,964 17,973
2017	17,973
2018	17,964
2019	17,946
2020 - 2023	 71,582
	\$ 161,402

The operation and maintenance cost for the water tower shall be the responsibility of the City of Casselton, except that the District shall be liable to the City of Casselton for a portion of said costs of operating and maintenance, as determined on a monthly gallon usage basis attributable to the District. The initial charge to cover these costs shall be \$.20 per 1,000 gallons. The District is expensing these costs as purchased water. Expense for December 31, 2014 and 2013 was \$41,710 and \$95,391, respectively.

Note 8 - Pension Plan

Retirement benefits for substantially all employees are provided through participation in a Simplified Employee Pension Individual Retirement Account. The pension plan is a defined contribution plan to which the employer contributes a variable percentage of employees' gross salaries. The monies are deposited in an Individual Retirement Custodial Account in the name of the employee. The employees may contribute to the plan an amount equal to the legal limitation. The District contributed \$23,798, \$22,079, and \$20,750 to the custodial accounts for the years ended December 31, 2014, 2013, and 2012, respectively.

Note 9 - Commitments

Wholesale Water

Under its wholesale water agreement, the District is committed to purchase water from the City of Fargo. The District must purchase at least 500,000 gallons of treated water per month at \$3.20 per thousand gallons of treated water. This agreement has expired as of December 31, 2011 and another agreement has not been completed as of December 31, 2014. Both parties are operating under the terms of the expired agreement until a new agreement is signed, as no significant changes are expected.

Franchise Fee Agreement

The District entered into an agreement with the City of West Fargo on June 2005 in which the City of West Fargo purchased the rights and acquired a franchise to provide residential water services to the Westport Beach Additions located within the City of West Fargo city limits. In accordance with the agreement, the District agrees to release the Westport Beach Addition from its exclusive jurisdiction to the City of West Fargo as long as the City of West Fargo performs certain obligations, including installation of water meters at its own cost for each individual lot or user within the Westport Beach Addition, and payment of \$1,848 per meter installed to the District until the City of West Fargo has installed a meter for each individual lot within the Westport Beach Addition.

Agreement with the City of Oxbow

The District entered into an agreement with the City of Oxbow to provide billing and collection services for sewer services to the residents of the Bakke Subdivision and the Town of Hickson on a quarterly basis. Specific services to be provided by the District under this agreement included calculation, printing, and mailing of quarterly utility bills, receiving and processing payments from the citizens, account maintenance services such as name changes, adjustments, and address changes, and reasonable and necessary steps to collect amounts due from the citizens. The City of Oxbow agrees to a billing charge for the services provided. The initial cost to the City of Oxbow for the billing charge shall be \$.96 per bill.



Supplementary Information December 31, 2014 and 2013

Cass Rural Water Users District

Name	Position
Brad Koetz	Chairman
Jon Zuther	Vice Chairman
Jeff Dahl	Secretary/Treasurer
R. Gordon Blixt	Director
Barry Bowman	Director
Keith Burley	Director
Todd Ellison	Director
Ed Finger	Director
Mark Johnson	Director
Jerry Blomeke	Manager

Cass Rural Water Users District Comparative Schedules of Operations Years Ended December 31, 2010 - 2014

	2010)	201	1	2012	2	2013	3	2014	4
	Amount	Percent								
Operating Revenue	\$ 4,417,979	100.0 %	\$ 5,201,464	100.0 %	\$ 5,795,153	100.0 %	\$ 5,893,466	100.0 %	\$ 5,773,348	100.0 %
Operating Expenses										
Pumping	179,354	4.1	191,118	3.7	203,983	3.5	224,438	3.8	230,763	4.0
Water treatment and testing	114,006	2.6	120,400	2.3	121,675	2.1	136,737	2.3	126,987	2.2
Transmission and distribution	435,228	9.9	469,867	9.0	454,160	7.8	525,641	8.9	522,268	9.0
Administrative and general	636,796	14.4	759,965	14.6	672,424	11.6	697,224	11.8	792,239	13.7
Purchased water	1,108,542	25.1	1,228,588	23.6	1,424,307	24.6	1,403,557	23.8	1,374,665	23.8
Depreciation and amortization	1,004,805	22.7	1,104,796	21.2	1,189,095	20.5	1,173,927	19.9	1,238,145	21.4
Taxes	40,341	0.9	50,273	1.0	44,107	0.8	47,072	0.8	53,883	0.9
Total operating expenses	3,519,072	79.7	3,925,007	75.4	4,109,751	70.9	4,208,596	71.3	4,338,950	75.0
Utility Operating Income	898,907	20.3	1,276,457	24.6	1,685,402	29.1	1,684,870	28.7	1,434,398	25.0
Other Income (Deductions)										
Investment income	74,910	1.7	86,207	1.7	137,217	2.4	104,254	1.8	30,568	0.5
Interest special assessment	145,843	3.3	74,158	1.4	163,891	2.8	141,690	2.4	135,112	2.3
Special assessment	108,999	2.5	-	-	771,750	13.3	815,827	13.8	1,498,102	25.9
Franchise fee payment	94,248	2.1	55,440	1.1	70,224	1.2	129,360	2.2	144,145	2.5
Interest expense	(896,478)	(20.3)	(891,808)	(17.1)	(892,320)	(15.4)	(871,684)	(14.8)	(834,197)	(14.4)
Other	1,946,589	44.1	2,445,140	47.0	320,065	5.5	500	0.0	50,437	0.9
Total other income										
(deductions)	1,474,111	33.3	1,769,137	34.0	570,827	9.9	319,947	5.4	1,024,167	17.7
Net Income	\$ 2,373,018	53.6 %	\$ 3,045,594	58.6 %	\$ 2,256,229	39.0 %	\$ 2,004,817	34.1 %	\$ 2,458,565	42.7 %



Additional Reports December 31, 2014 and 2013

Cass Rural Water Users District



Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards

The Board of Directors Cass Rural Water Users District Kindred, North Dakota

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of Cass Rural Water Users District as of and for the year ended December 31, 2014, and the related notes to the financial statements, which comprise the District's basic financial statements, and have issued our report thereon dated February 19, 2015.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as described in the accompanying schedule of findings, we identified certain deficiencies in internal control that we consider to be material weaknesses.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. We consider deficiency 2014-A, 2014-B, and 2014-C described in the accompanying schedule of findings to be a material weaknesses.

A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

District's Response to Findings

The District's responses to the findings identified in our audit are described in the accompanying schedule of findings. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Fargo, North Dakota February 19, 2015

Esde Sailly LLP

Material Weakness

2014-A Segregation of Duties

Condition – The District has a lack of segregation of duties due to a limited number of office personnel.

Criteria – A good system of internal accounting control requires an adequate segregation of duties so that no one individual has incompatible responsibilities. No one person should have more than one duty relating to the authorization (approval), custody of checks (check signers), record keeping and reconciliation functions.

Effect – Inadequate segregation of duties could adversely affect the District's ability to detect misstatements in amounts that would be material in relation to the financial statements in a timely period by employees in the normal course of performing their assigned functions.

Cause – There is a limited amount of office employees involved in the internal control process.

Recommendation – While we recognize that your office staff may not be large enough to permit complete segregation of duties in all material respects for an effective system of internal control, the functions should be reviewed to determine if additional segregation of duties is feasible and to improve the efficiency and effectiveness of financial management and financial statement accuracy for the District. Segregation of authorization, custody of assets, record keeping and reconciliation functions would assist in mitigating the risk of fraud or misstatements to the financial statements.

Management Response – At the present time, the District has segregated the duties of in the most efficient manner possible, given its limited staff. Due to cost constraints, there will be no further administrative employees added.

Material Weakness

2014-B Material Journal Entries

Condition – During the course of our engagement, we proposed material audit adjustments that would not have been identified as a result of the District's existing internal controls, and therefore could have resulted in a material misstatement of the District's financial statements.

Criteria – A good system of internal accounting control contemplates an adequate system for recording and processing entries material to the financial statements.

Effect – Inadequate controls could adversely affect the District's ability to detect misstatements in amounts that would be material in relation to the financial statements.

Cause – District personnel do not have adequate training to apply U.S. generally accepted accounting principles internally.

Recommendation – While we recognize that your office staff is limited, it is important that you be aware of this condition. In situations like this, management's close supervision and review of accounting information is the best means of preventing and detecting errors and irregularities.

Management Response – Due to the limited office staff, the District is aware of the deficiency in internal control. The District accepts the risk and due to cost constraints, there will be no further administrative employees added.

Material Weakness

2014-C Preparation of Financial Statements

Condition – The District does not have an internal control system designed to provide for the preparation of the financial statements being audited. As auditors, we were requested to draft the financial statements and accompanying notes to the financial statements.

Criteria – A good system of internal accounting control contemplates an adequate system for recording and processing entries material to the financial statements.

Cause – District personnel do not have adequate training to apply U.S. generally accepted accounting principles internally.

Effect – This control deficiency could result in a misstatement to the financial statements that would not be prevented or detected.

Recommendation – This circumstance is not unusual in a District of your size. It is the responsibility of management and those charged with governance to make the decision whether to accept the degree of risk associated with this condition because of cost or other considerations.

Management Response – The District is aware of the deficiency in internal control. The District accepts the risk and will not added additional administrative employees due to cost constraints.



Farmers Home Administration (FmHA) Comments

The Board of Directors Cass Rural Water Users District Kindred, North Dakota

We have audited the financial statements of Cass Rural Water Users District, for the year ended December 31, 2014, and have issued our report thereon dated February 19, 2015.

In planning and performing our audit of the financial statements of the District for the year ended December 31, 2014, we considered its internal control over financial reporting in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control over financial reporting. However, we noted certain matters involving the internal control over financial reporting and its operation that we consider to be control deficiencies under standards established by the American Institute of Certified Public Accountants. A control deficiency involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control over financial reporting that, in our judgment, could adversely affect the District's ability to record, process, summarize and report financial data consistent with the assertions of management in the financial statements. The control deficiencies are described in the accompanying schedule of findings.

A significant deficiency is a deficiency in internal control, or combinations of deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected.

A material weakness is a significant deficiency or a combination of significant deficiencies that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the District's internal control.

Our consideration of the internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in the internal control that might be significant deficiencies and, accordingly, would not necessarily disclose all significant deficiencies that are also considered to be a significant deficiency or a material weakness. However, we do believe findings 2014-A, 2014-B, and 2014-C are material weaknesses as described in the schedule of findings.

Our comments on specific financial and accounting matters, as required by the Farmers Home Administration (FmHA), are detailed below:

Accounting Records

The District's accounting records and procedures in effect during the year were considered to be adequate in all material respects, except as noted in the internal control over financial reporting deficiency above.

Controls over Assets

Physical controls over assets of the system are considered to be adequate, except as noted in the internal control over financial reporting material weaknesses above.

Compliance with Loan Documents

The District has complied with the provisions of the loan agreements, including maintenance of adequate cash reserves.

Agreement of Financial Statements and Accounting Records

The District's accounting records, after consideration of audit entries, are in agreement with the information in the audit report.

Deposits

All cash deposits are in institutions whose accounts are insured by an agency of the federal government.

Insurance Coverage

Commercial general liability	\$ 3,000,000
Property	6,713,439
Automobile:	
Liability	Any Auto
Uninsured motorist	All owned Autos
Physical damage	ACV (less \$25)
Workers' compensation	Statutory

Income Taxes

The District is a governmental entity, and as such, is not required to file income tax returns.

Users Delinquent Over 60 Days

The total amount due from users delinquent over 60 days was \$7,002.

This letter supplements the information included in the financial statements. It is intended solely for the information and use of management, the Board of Directors, and lenders and is not intended to be and should not be used by anyone other than these specified parties.

Edde Saully LLP
Fargo, North Dakota
February 19, 2015