



**NOTICE OF A REGULAR  
CITY COUNCIL MEETING  
August 13, 2025, at 6:00 PM**

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PUBLIC NOTICE is hereby given that the Vineyard City Council will hold a regularly scheduled City Council meeting on Wednesday, August 13, 2025, at 6:00 PM, in the City Council Chambers at City Hall, 125 South Main Street, Vineyard, UT. This meeting can also be viewed on our [live stream page](#).

**AGENDA**

**Presiding Mayor Julie Fullmer**

**1. CALL TO ORDER/INVOCATION/INSPIRATIONAL THOUGHT/PLEDGE OF ALLEGIANCE**

**2. PRESENTATIONS/RECOGNITIONS/AWARDS/PROCLAMATIONS**

**2.1. Economic Development Strategic Plan Update**

Staff will provide a brief overview of the scope, purpose, and upcoming process of Vineyard's 10-year Economic Development Strategic Plan (EDSP). This item is to update the community and Council on the plan's intent, the key partners involved, and focus areas. It will announce the timeline for Council work sessions and public engagement. A formal work session will be scheduled in the coming weeks.

**2.2. Utah County Sheriff's Office Presentation**

Deputy Chief Holden Rockwell will do a sergeant presentation

**3. WORK SESSION**

**3.1. AI Governance**

**4. PUBLIC COMMENTS**

**"Public Comments"** is defined as time set aside for citizens to express their views for items not on the agenda. During a period designated for public comment, the mayor or chair may allot each speaker a maximum amount of time to present their comments, subject to extension by the mayor or by a majority vote of the council. Speakers offering duplicate comments may be limited. Because of the need for proper public notice, immediate action cannot be taken in the Council Meeting. The Chair of the meeting reserves the right to organize public comments by topic and may group speakers accordingly. If action is necessary, the item will be listed on a future agenda; however, the Council may elect to discuss the item if it is an immediate matter of concern. *Public comments can be submitted ahead of time to [pams@vineyardutah.org](mailto:pams@vineyardutah.org).*

**5. MAYOR AND COUNCILMEMBERS' REPORTS/DISCLOSURES/RECUSALS**

## **6. STAFF, COMMISSION, AND COMMITTEE REPORTS**

City Manager Report

## **7. CONSENT ITEMS**

**7.1. Approval of the July 23, 2025, City Council Meeting Minutes**

**7.2. Interlocal Agreement with Lindon for Emergency Water (Resolution 2025-36)**

**7.3. Ordinance for Water Use and Conservation Practices (Ordinance 2025-14)**

**7.4. Municipal Code Amendment Section 13.16 Public Library (Ordinance 2025-10)**

## **8. APPOINTMENTS/REMOVALS**

**8.1. With the advice and consent of the council, the mayor may appoint members to the Library Board.**

**8.2. With the advice and consent of the council, the mayor may appoint a Youth Council Co-advisor.**

## **9. BUSINESS ITEMS**

**9.1. PUBLIC HEARING - TEFRA Bonds for Franklin Discovery Academy (Resolution 2025-44)**

A public hearing will be held by the Vineyard City Council (the “City”), on August 13, 2025, at 6:00 PM, or as soon thereafter as the matter can be heard, in the Council Chambers at the Vineyard City Hall, located at 125 South Main Street, Vineyard, Utah 84059, regarding the proposed issuance by the Arizona Industrial Development Authority (the “Issuer”) of its revenue notes, bonds or other obligations in one or more series from time to time pursuant to a plan of financing (the “Bonds”), in an amount not to exceed \$6,000,000. The public hearing is required by Section 147(f) of the Internal Revenue Code of 1986, as amended (the “Code”). The mayor and City Council will act to adopt (or deny) this request by resolution.

**9.2. PUBLIC HEARING: Transportation Master Plan + Impact Fee (Ordinance 2025-13) (*This item is being postponed to the September 10, 2025, City Council meeting.*)**

*This was postponed from the June 25, 2025, City Council Meeting.*

**9.3. DISCUSSION AND ACTION - Authorizing Bid Award for Independent Financial Audit & Internal Controls Review (Resolution 2025-41)**

Adopting a resolution allowing the City Manager to award the winning bid to a third-party auditor once the committee has made their selection.

**9.4. Government Records Access Management Act (GRAMA)**

The council will receive a report on recent records requests regarding council communications. If necessary, the council will take action.

## **10. CLOSED SESSION**

The Mayor and City Council pursuant to Utah Code 52-4-205 may vote to go into a closed session for the purpose of (these are just a few of the items listed, see Utah Code 52-4-205 for the entire list):

- a discussion of the character, professional competence, or physical or mental health of an individual
- b strategy sessions to discuss collective bargaining
- c strategy sessions to discuss pending or reasonably imminent litigation
- d strategy sessions to discuss the purchase, exchange, or lease of real property, including any form of a water right or water shares
- e strategy sessions to discuss the sale of real property, including any form of a water right or water shares
- f discussion regarding deployment of security personnel, devices, or systems
- g the purpose of considering information that is designated as a trade secret, as defined in Section [13-24-2](#), if the public body's consideration of the information is necessary in order to properly conduct a procurement under [Title 63G, Chapter 6a, Utah Procurement Code](#)

## 11. ADJOURNMENT

The next scheduled meeting is on August 26, 2025.

This meeting may be held in a way that will allow a councilmember to participate electronically.

The public is invited to participate in all City Council meetings. In compliance with the Americans with Disabilities Act, individuals needing special accommodations during this meeting should notify the City Recorder at least 24 hours prior to the meeting by calling (385) 338-5183.

I, the undersigned Deputy City Recorder for Vineyard, Utah, hereby certify that the foregoing notice and agenda was posted at Vineyard City Hall, on the Vineyard City and Utah Public Notice websites, and delivered electronically to staff and to each member of the Governing Body.

AGENDA NOTICING COMPLETED ON:

August 12, 2025

CERTIFIED (NOTICED) BY:

/s/Tony Lara

TONY LARA, DEPUTY RECORDER



**NOTICE OF A REGULAR  
CITY COUNCIL MEETING**

City Council Chambers  
125 South Main Street, Vineyard, Utah  
July 23, 2025, at 6:00 PM

**Present**


**Absent**

Mayor Julie Fullmer  
Councilmember Sara Cameron  
Councilmember Brett Clawson  
Councilmember Jacob Holdaway  
Councilmember Mardi Sifuentes

**Staff Present:** City Attorney Jayme Blakesley, City Manager Eric Ellis, Deputy Brett Ryan with the Utah County Sheriff's Office, Public Works Director Naseem Ghandour, Finance Director Kristie Bayles, Communications Manager Jenna Ahern, Deputy Recorder Tony Lara, and City Recorder Pamela Spencer

**Others Speaking:** Residents Karen Cornelious, Kathleen Clawson, and David Lauret

**1. CALL TO ORDER/INVOCATION/INSPIRATIONAL THOUGHT/PLEDGE OF ALLEGIANCE**

 Mayor Fullmer opened the meeting at 6:00 PM. Councilmember Sifuentes gave the invocation and led the Pledge of Allegiance.


**2. PRESENTATIONS/RECOGNITIONS/AWARDS/PROCLAMATIONS**


No items were submitted.

**3. WORK SESSION**


No items were submitted.


**4. PUBLIC COMMENTS**

 Mayor Fullmer called for public comments.


 Karen Cornelious, living in the Villas Subdivision, asked about the independent auditor on the agenda.




 Kathleen Clawson, living in the Parkside subdivision, mentioned that she appreciated the Peter Rabbit story on the trails and would like to see more stories.

 Mayor Fullmer called for additional comments. Hearing none, she closed the public comment session. She noted that independent auditor discussion was on the agenda and any questions would be answered then.

## **5. MAYOR AND COUNCILMEMBERS' REPORTS/DISCLOSURES/RECUSALS**

 Councilmember Sifuentes reported that ballots were in the mail for the 2025 Primary Election and asked that residents take the time to research the candidates.

 Councilmember Holdaway reported that he was grateful for the state laws on GRAMA and the current records request. He requested that council enforce compliance. A discussion ensued. City Attorney Jayme Blakesley explained the request and the responsive documents and conversations with the State Records Ombudsman. The discussion continued. He stated that he had not recorded any interviews with the reporters but recorded them with city staff. Mayor Fullmer requested that the council review the records discussed and make a determination.


## **6. STAFF, COMMISSION, AND COMMITTEE REPORTS**


### **7. CONSENT ITEMS**


#### **7.1. Approval of the July 9, 2025, City Council Meeting Minutes**

#### **7.2. Interlocal Agreement with Utah County for Library Services (Resolution 2025-42)**

#### **7.3. Interlocal Cooperative Agreement with Utah County for Substance Misuse prevention and Communities that Care (CTC) Model for FY26 (Resolution 2025-43)**

 Mayor Fullmer called for a motion.

 Councilmember Sifuentes disclosed that with her job with Utah County in Human Services, she works with the department that works with CTC.


 **Motion:** COUNCILMEMBER SIFUENTES MOVED TO ADOPT AND APPROVE THE CONSENT ITEMS AS PRESENTED. COUNCILMEMBER CAMERON SECONDED THE MOTION. ROLL WENT AS FOLLOWS: MAYOR FULLMER, COUNCILMEMBERS CAMERON, CLAWSON, SIFUENTES VOTED YES. COUNCILMEMBER HOLDAWAY VOTED NO. THE MOTION CARRIED FOUR (4) TO ONE (1).


## **8. APPOINTMENTS/REMOVALS**


No names were submitted.


90 **9. BUSINESS ITEMS**


91 **9.1. PUBLIC HEARING - Adoption of the Working Fiscal Year 2025-2026 Budget**  
92 **After Amendment #1(Resolution 2025-40)**  
93 **FY26 Budget Amendment #1**


94  Mayor Fullmer turned the time over to Councilmember Clawson.

95  
96  Councilmember Clawson explained that the budget amendment was due to the scrutiny and  
97 accusations over the city's finances and the clear path forward was to obtain a fully independent  
98 evaluation through a third-party auditor to look for fraud, waste and abuse. He stated that the  
99 purpose was not to Audit the State's Audit. He stated that there was no intention of revising the  
100 audit but looking for areas where they might be able to improve as a city. He explained what the  
101 audit would entail and the reason for the cost and the desire to pick a firm who was fully  
102 independent.


103  
104  Mayor Fullmer called for a motion to open the public hearing.


105  
106  **Motion:** COUNCILMEMBER SIFUENTES MOVED TO OPEN THE PUBLIC HEARING  
107 AT 6:25 PM. COUNCILMEMBER CAMERON SECONDED THE MOTION. MAYOR  
108 FULLMER, COUNCILMEMBERS CAMERON, CLAWSON, HOLDAWAY AND SIFUENTES  
109 VOTED YES. THE MOTION CARRIED UNANIMOUSLY.


110  
111  David Lauret, living on Holdaway Road, asked about the definitions used and criteria for  
112 determining the auditor.


113  
114  Ms. Cornelious asked about the cost of the audit. She asked how they were able to find the  
115 money when they had to raise taxes last year. She felt that the council was not being the best  
116 stewards of taxpayers' dollars.

117  
118  Mayor Fullmer called for additional public comments. Hearing none, she called for a motion to  
119 close the public hearing.

120  
121  **Motion:** COUNCILMEMBER SIFUENTES MOVED TO CLOSE THE PUBLIC HEARING  
122 AT 6:29 PM. COUNCILMEMBER CAMERON SECONDED THE MOTION. MAYOR  
123 FULLMER, COUNCILMEMBERS CAMERON, CLAWSON, HOLDAWAY AND SIFUENTES  
124 VOTED YES. THE MOTION CARRIED UNANIMOUSLY.

125  
126  Mayor Fullmer called for a discussion from the council.

127  
128  Councilmember Clawson said that public trust was low, and they need to take steps to repair  
129 that trust, which did not come for free.

130  
131  Councilmember Holdaway said that he did not feel good about supporting an independent audit.  
132 There was a discussion about the state audit process. Mayor Fullmer clarified that the Auditor  
133 required the mayor to sign the letter, which included the responses from the team working it.  
134 Councilmember Holdaway stated that he did not understand the scope of the independent audit and  
135 felt that he was getting conflicting information. He commented on waste and abuse and how that  
136 was defined. Councilmember Cameron asked him to get to the point. Councilmember Holdaway  
137 continued his comments.



Councilmember Clawson clarified the process and how they determined the scope to be included in the “request for proposal” document. For the record, he read an email that went out on July 12th: “the purpose of the initiative was to proactively: 1. Identify any anomalies related to fraud, waste, or abuse; 2. Identify any vulnerabilities in our policies and operations; 3. Recommend changes to build public trust and ensure government accountability to the highest standards.” The purpose for the email was to express to the entire council and the finance committee what they thought the scope should be and to gather input on what they thought it should look like. He said that he received an email between Councilmember Holdaway and Seth Oveson from the State Auditor’s office which prompted him to contact Mr. Oveson for clarification. He received confirmation today that what they were doing was accurate and shared those notes with the council. He felt that the effort was there to be open and transparent on what they were trying to do and that the RFP was well defined. He believed that it left room for the independent firm to recommend changes. He felt that this was a big deal in order to regain public trust.



Councilmember Sifuentes stated that she did not want to have to spend \$104,000. From her perspective she believed that with everything that Councilmember Holdaway had been pushing for a state audit and they would be pleased if the city were taking care of their own problems. She felt that Councilmember Holdaway’s concerns about having corruption in the finances then they needed to find it. She added the state gave them advice for things they could do for policy changes.





Councilmember Cameron commented that Councilmember Holdaway expressed frustrations because he was not invited to the meetings, but she did not get an invitation to meet with Mr. Oveson, the State Auditor’s Office, or the newspapers to give a different side of the story. She felt Councilmember Holdaway needed to look at his own behavior if he wanted everything to be fair and balanced. She stated that a lot of Councilmember Holdaway’s accusations of corruption were not founded and that his concerns with the previous council’s transparency was not accurate. She said that everyone agreed that they wanted the city run well and have transparency. She had a conversation with Councilmember Tyce Flake, which was eye opening, and validated what she had seen in the past year and half. She said that she was frustrated with Councilmember Holdaway’s misrepresentation of the people and the city. Councilmember Holdaway for clarification on a councilmember adding items to an agenda. Mayor Fullmer clarified that he was interrupting and turned the time back to Councilmember Cameron. Councilmember Sifuentes requested that Mr. Blakesly clarify Title 3 in the municipal code and noted that she worked to change the amount of councilmembers need to get something on the agenda. Councilmember Cameron mentioned two things that she had asked Councilmember Holdaway to correct the record: Bella Lash and Mercedes. Bella Lash was a utility refund, and he did not correct the record. A discussion ensued. The mayor brought the meeting back to order. Councilmember Cameron explained that the Mercedes was the purchase of a used dump truck to be fiscally conservative and felt that Councilmember Holdaway was doing a disservice to the community by not correcting the record.




Mayor Fullmer explained responded to the question on where they found the finances and why they had done this. For the record: “The time they had with the state auditor had closed and they wanted to take what they had given them and implement a process so that if they came back to the city in six months, they would see that the city had taken their suggestions seriously.” She explained that at the last City Council meeting she had suggested that the city look into their policies, best practices, and finances. She felt that taking money from the city’s reserves would be a return on their investment and ensuring money was being spent fiscally. She explained that last year was the first time they had raised taxes in 20 years to recover the cost of inflation. She explained the need for the raise in taxes. She felt it was important to recognize that every time we have to look into


187 these accusations it costs a lot of staff time, and the taxpayer dollars were being spent in an efficient  
188 way. She mentioned the article in the Daily Herald that Councilmember Holdaway had referred to  
189 earlier stating that they were changing away from an independent audit, which they were not doing.  
190 She felt it was important to review the email discussed earlier. She said that sometimes the news  
191 reports things in a way that the city needs to clarify. She said that there was a document that  
192 explained how they were responding to the auditor's findings. She said that on the 9<sup>th</sup> they talked  
193 about how all of this was going to be managed. She said that because Councilmember Clawson was  
194 the council liaison on their finances, along with Councilmember Cameron, he was going to lead the  
195 committee choosing an independent auditor. She mentioned the process they were going through  
196 and how they were being transparent.

197  
198  Mr. Ellis explained that fraud, waste, and abuse were defined in the generally accepted  
199 accounting procedures and that an outside accounting firm would use those definitions. The letter  
200 that was submitted to the State Auditor was that as a city council, they were a political subdivision of  
201 the state, granted a great deal of autonomy to create your own bylaws and operate as a municipality.  
202 The more they rely on outside entities it could have an eroding effect on the value of the council  
203 working as a body. He said that if the city council wanted to arrange for an independent audit, they  
204 were in their realm to do that.


205  
206  Mayor Fullmer felt it would be meaningful to the residents that they could search for the things  
207 that all of the representative brought to the table and determine what they wanted to review and  
208 being transparent. She further explained that they had to be thoughtful of creating quorums.

209  
210  Mr. Blakesley reviewed the amendment to Municipal Code Title 3, allowing any two  
211 councilmembers to request to place an item on the agenda. A discussion ensued.


212  
213  Mayor Fullmer called for further comments.


214  
215  Councilmember Sifuentes asked if they could wait to approve the budget amendment until they  
216 had the proposals. A discussion ensued. Councilmember Holdaway suggested the council sit down  
217 with the state auditor and get clarification on the audit. The discussion continued. Mr. Blakesley  
218 suggested they read the scope in the RFP. He noted that there have heard complaints over the last  
219 few years over how the city manages their finances and the rumors persist because there had not  
220 been an independent review. He noted that there were protocols and procedures established  
221 nationally. He read the deliverables listed in the RFP and items they would look. He stated that he  
222 was baffled by Councilmember Holdaway complaining about these items and then complaining  
223 about having an independent auditor. A heated discussion ensued. Councilmember Holdaway  
224 apologized for the Bella Lash. He said that when they first looked at the ledger, there were several  
225 items he had concerns about, of which Bella Lash and the Mercedes were part of.

226  
227  Mayor Fullmer asked council to move the meeting forward.

228  
229  Mr. Ellis explained that it was a common practice to have a budget amount approved for an  
230 item and he felt they should approve the budget tonight, and a decision would come to the council  
231 later for the specific amount and firm. A discussion ensued. Mayor Fullmer clarified that they would  
232 be putting saving aside for a future possibility; they were not spending any funds yet. She explained  
233 how the scope of work was done and that Councilmember Clawson and Councilmember Cameron  
234 were working together to create the RFP. Mr. Blakesley clarified that the RFP had been put out  
235 today. Mr. Ellis clarified that the RFP was sent to the council for comments before the RFP was


published. There was a discussion about the RFP.


 Mayor Fullmer clarified that they were saving money and that the RFP was out. She suggested that people email Councilmember Clawson and Councilmember Cameron with comments. She then called for a motion to adopt the change.

 **Motion:** COUNCILMEMBER CLAWSON MOVED TO ADOPT RESOLUTION 2025-40 THE VINEYARD CITY FISCAL YEAR 2025 – 2026 BUDGET AMENDMENT #1 AS PRESENTED BY STAFF. COUNCILMEMBER CAMREON SECONDED THE MOTION. ROLL CALL WENT AS FOLLOWS: MAYOR FULLMER, COUNCILMEMBERS CAMERON, CLAWSON, SIFUENTES VOTED YES. COUNCILMEMBER HOLDAWAY VOTED NO. THE MOTION CARRIED FOUR (4) TO ONE (1).

## **9.2. DISCUSSION AND ACTION - Authorizing Bid Award for a 3rd Party Auditor (Resolution 2025-41)**

Adopting a resolution allowing the city manager to award the winning bid to a third-party auditor once the committee has made their selection.


 Mayor Fullmer called for a motion to strike this item from the agenda to give council time to review the RFP responses and then award the bid.

 **Motion:** COUNCILMEMBER CLAWSON MOVED TO STRIKE ITEM 9.2 DISCUSSION AND ACTION - AUTHORIZING BID AWARD FOR A 3RD PARTY AUDITOR (RESOLUTION 2025-41) FROM THE AGENDA. COUNCILMEMBER CAMERON SECONDED THE MOTION. MAYOR FULLMER, COUNCILMEMBERS CAMERON, CLAWSON, HOLDAWAY AND SIFUENTES VOTED YES. THE MOTION CARRIED UNANIMOUSLY.

## **10. CLOSED SESSION**

No closed session was held.

## **11. ADJOURNMENT**

 Mayor Fullmer adjourned the meeting at 7:34 PM.

**MINUTES APPROVED ON:** \_\_\_\_\_

**CERTIFIED CORRECT BY:**   
PAMELA SPENCER, CITY RECORDER





## VINEYARD CITY COUNCIL STAFF REPORT

**Meeting Date:** August 13, 2025

**Agenda Item:** Interlocal Agreement with Lindon for Emergency Water (Resolution 2025-36)

**Department:** Public Works

**Presenter:** Devan Peterson

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### **Background/Discussion:**

Vineyard City continues to invest in long-term infrastructure to provide reliable culinary water to its residents and businesses. While primary supply is sourced through CUWCD connections, emergency redundancy is a critical component of utility resilience planning.

Lindon City has agreed to provide emergency culinary water to Vineyard City through existing interconnection points identified in Exhibit A of the agreement. This interlocal cooperation is consistent with both cities' participation in the Utah Public Works Emergency Management Mutual Aid Agreement.

### **KEY TERMS OF AGREEMENT**

1. **Flow Capacity:** Up to 1,500 gallons per minute (GPM), not to exceed 2,160,000 gallons per day (GPD).
2. **Connection Points:** Existing emergency interconnections between Lindon and Vineyard (identified in Exhibit A of the agreement and map).
3. **Duration:** Limited to 30 consecutive days per event, with written extension possible by mutual consent.
4. **Emergency Use:** Only during unanticipated system disruptions. Vineyard must submit a formal request outlining volume, location, and duration.
5. **Condition:** Lindon may reduce or cease delivery if their system storage drops below 50% or if its ability to serve residents is impacted.
6. **Costs:** Vineyard shall reimburse Lindon based on actual water use per Lindon's fee schedule, labor, equipment, meter testing, and related administrative costs.
7. **Water Quality:** Water must meet all applicable State and Federal standards. Vineyard assumes responsibility at the point of interconnection.
8. **Term:** Agreement is effective for 50 years, with a 120-day notice period for termination.

This agreement supports Vineyard's long-term water reliability by enabling temporary water delivery from Lindon City under specified emergency conditions. The connection supplements Vineyard's water resilience efforts as part of the City's system development aligned with the Central Utah Water Conservancy District (CUWCD).

### **Fiscal Impact:**

Costs will only be incurred during declared emergency use and are reimbursed to Lindon City. No immediate fiscal impact is anticipated.

### **Recommendation:**

Staff recommends approval of an interlocal agreement with Lindon City to formalize emergency water supply connections between the two municipalities.

**Sample Motion:**

"I move to adopt Resolution 2025-36, approving the emergency water supply agreement with Lindon City and authorize the mayor to execute the agreement."

**Attachments:**

1. RES 2025-36 ILA with Lindon City for Emergency Water Connection
2. Lindon - Vineyard Emergency Water Service Agreement 2025
3. Exhibit A - Vineyard City Drinking Water System

RESOLUTION NO. 2025-36

A RESOLUTION AUTHORIZING THE MAYOR TO SIGN AN INTERLOCAL AGREEMENT WITH LINDON CITY FOR EMERGENCY WATER CONNECTION.

WHEREAS, pursuant to the Utah Interlocal Cooperation Act, Utah Code Annotated, Section 11-13-1, et seq., 1953 as amended, governmental entities are allowed to enter into agreements for the joint provision of services; and

WHEREAS, Vineyard, Utah having determined that it is in the public interest, safety, and welfare of its residents has negotiated an agreement with Lindon City for Emergency Water Connection

NOW THEREFORE BE IT RESOLVED BY THE GOVERNING BODY OF VINEYARD AS FOLLOWS:

1. The Vineyard City Council authorizes the Mayor to sign the agreement titled LINDON CITY AND VINEYARD CITY FOR EMERGENCY WATER CONNECTION, in the form attached hereto as Exhibit A.

2. This resolution shall take effect upon passing.

Passed and dated this 25th day of June 2025.

\_\_\_\_\_  
Mayor

Attest:

\_\_\_\_\_  
City Recorder





## INTERLOCAL COOPERATION AGREEMENT

An interlocal cooperative agreement by and between LINDON CITY AND VINEYARD CITY FOR EMERGENCY WATER CONNECTION.

This Interlocal Cooperation Agreement ("Agreement") is entered into this \_\_\_\_ day of \_\_\_\_\_, 2025, by and between Lindon City, a municipal corporation and political subdivision of the State of Utah ("Lindon"), and Vineyard City, a municipal corporation and political subdivision of the State of Utah ("Vineyard").

### RECITALS

**WHEREAS**, both Parties operate culinary water systems and are authorized pursuant to the Utah Interlocal Cooperation Act, Utah Code Ann. §11-13-101 et seq., to enter into agreements for joint or cooperative action;

**WHEREAS**, both Parties are signatories to the Utah Public Works Emergency Management Mutual Aid Agreement ("PW Mutual Aid Agreement") and have pledged to support each other during emergencies affecting public works and utility services;

**WHEREAS**, Vineyard may face situations where its culinary water system becomes temporarily insufficient or disrupted;

**WHEREAS**, Lindon City has agreed to provide a temporary emergency interconnection for culinary water supply to Vineyard City, with the understanding that this support is limited in both scope and capacity; and

**WHEREAS**, Lindon City has determined that, under current operating conditions:

1. It has short-term capacity to provide emergency culinary water to Vineyard City through existing interconnection points, as shown in **Exhibit A**, which identifies the locations of the connections, associated pipe sizes, allowing for a maximum allowable flow rate of 1,500 gallons per minute (GPM) and 2,160,000 gallons per day (GPD), and
2. In the event Lindon City's system storage levels fall below 50%, Lindon may immediately reduce or suspend water deliveries to Vineyard City until system conditions stabilize; and
3. At the time of request, Vineyard City shall provide Lindon City with the expected flow rate (GPM) and total gallons per day (GPD) to ensure operational coordination and confirm availability within the system's constraints, and such delivery does not impair Lindon's ability to meet its system demands.

;

**WHEREAS**, the Parties seek to establish a formal agreement consistent with the principles and operational standards of the PW Mutual Aid Agreement, specifically to authorize and manage emergency water connections in a manner that ensures public health, system reliability, and mutual cooperation;

**NOW, THEREFORE**, the Parties agree as follows:

## **1. PURPOSE**

This Agreement authorizes the use of designated physical interconnections between the Lindon and Vineyard culinary water systems for the limited purpose of providing Vineyard with emergency culinary water supply. It complements the provisions of the PW Mutual Aid Agreement, specifically addressing the unique technical and operational needs related to culinary water delivery.

## **2. EMERGENCY CONNECTIONS**

2.1 Designated Points: The Parties shall mutually identify interconnection points suitable for emergency water transfer.

2.2 Conditions of Use:

- a. The interconnection may only be used upon Vineyard's request and with Lindon's approval, which may be withheld if Lindon determines its own system capacity is at risk.
- b. Emergency use is defined as unanticipated events that disrupt Vineyard's ability to meet culinary water demands, such as main breaks, contamination, or pump failure.
- c. Use shall align with emergency response principles established under the PW Mutual Aid Agreement.

2.3 Duration: Water may be transferred for a period not to exceed 30 consecutive days per incident unless extended in writing by both Parties. Once a transfer of water begins pursuant to this Agreement, Lindon is under no obligation to continue the transfer of water if it determines its own system capacity would be put at risk if the transfer continues, even if the emergency which necessitated the transfer has not been fully resolved.

2.4 Notification and Documentation: Vineyard shall submit a written request identifying the emergency, proposed connection point, estimated volume, and duration of use. Lindon will document and approve each incident of use.

### **3. WATER QUALITY AND SYSTEM CONTROL**

3.1 All transferred water shall meet applicable State and Federal drinking water standards.

3.2 Vineyard is responsible for water quality and distribution from the point of interconnection forward.

3.3 Lindon shall retain the right to isolate the interconnection at any time if water quality, safety, or system integrity is threatened.

### **4. INFRASTRUCTURE AND MAINTENANCE**

4.1 Vineyard shall maintain and, if necessary, install infrastructure on its side of the connection.

4.2 Lindon shall operate and maintain its system up to the interconnection point.

4.3 Metering and monitoring equipment shall be installed and maintained in accordance with industry standards and regulatory requirements.

### **5. LIABILITY, INDEMNIFICATION, AND REIMBURSEMENT**

5.1 Each Party shall be responsible for its own negligence.

5.2 Vineyard shall indemnify and hold harmless Lindon from claims arising out of Vineyard's use of the emergency water supply

5.3 Nothing in this Agreement limits the protections or shared responsibilities provided under the PW Mutual Aid Agreement.

5.4 Vineyard shall reimburse Lindon for all actual costs incurred in providing emergency water, including but not limited to:

- Water production and delivery expenses as calculated by the usage rate reflected in the Lindon City Fee Schedule in effect at the time water is provided;
- Labor, equipment, and materials used during connection and service;
- Costs of meter reading, maintenance, and testing; and
- Any administrative costs directly attributable to providing the emergency service.

5.5 Lindon shall submit an invoice for reimbursement to Vineyard within thirty (30) days

after the conclusion of the emergency event. Vineyard shall remit payment within thirty (30) days of receipt.

## **6. TERM AND TERMINATION**

6.1 This Agreement shall commence upon execution and remain in effect for a period of fifty (50) years. It may be extended by mutual written consent.

6.2 Either Party may terminate this Agreement with One Hundred Twenty (120) days' written notice.

6.3 Termination shall not affect obligations incurred prior to the termination date.

## **7. GENERAL PROVISIONS**

7.1 This Agreement does not create a separate legal entity.

7.2 No joint budget is required.

7.3 A copy of this Agreement shall be filed with the appropriate record keepers of each City.

7.4 Modifications shall be in writing and signed by both Parties.

7.5 This Agreement shall be governed by the laws of the State of Utah.

7.6 This Agreement shall be interpreted to be consistent and complementary with the PW Mutual Aid Agreement in effect between the Parties.

7.7 In accordance with the Utah Local Cooperation Act, this Agreement shall be submitted to the attorney authorized to represent each Party for review as to proper form and compliance with applicable laws before this Agreement may take effect.

## **8. AUTHORIZED REPRESENTATIVES**

All official notices and requests under this Agreement shall be delivered to:

**IN WITNESS WHEREOF**, the Parties have executed this Agreement as of the Effective Date.

Dated this 7th day of July 2025.

Dated this \_\_\_\_ day of \_\_\_\_\_ 2025.

LINDON CITY

Carolyn Lundberg  
Mayor

ATTEST:

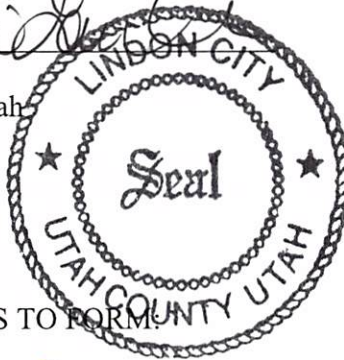
VINEYARD CITY

\_\_\_\_\_  
Mayor

ATTEST:

Britni Peterson  
City Recorder  
Lindon City, Utah

SEAL:



APPROVED AS TO FORM:

Britni Peterson  
Lindon City Attorney

\_\_\_\_\_  
City Recorder  
Vineyard City, Utah

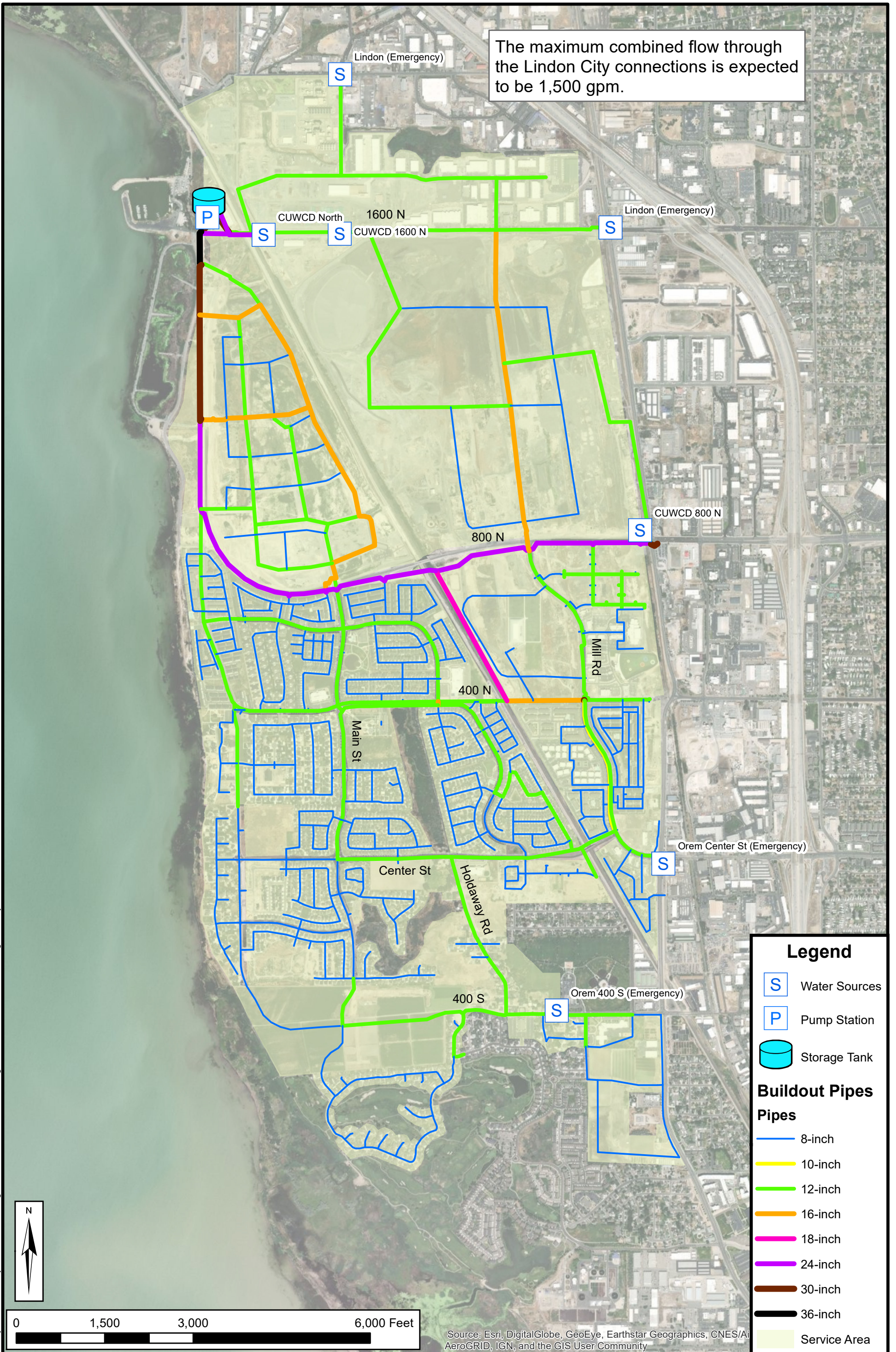
SEAL:

APPROVED AS TO FORM:

\_\_\_\_\_  
Vineyard City Attorney



Date: 6/19/2025  
Document Path: H:\Projects\319 - Vineyard\04 - 100 Drinking Water Master Plan\GIS\Working\Lindon\Exhibit A Future Drinking Water System.mxd





## VINEYARD CITY COUNCIL STAFF REPORT

**Meeting Date:** August 13, 2025

**Agenda Item:** Ordinance for Water Use and Conservation Practices (Ordinance 2025-14)

**Department:** Public Works

**Presenter:** Devan Peterson, Naseem Ghandour

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### Background/Discussion:

The City of Vineyard is committed to responsible water management and conservation, aligning with the State of Utah's water efficiency goals. Increasing water demand, drought conditions, and system capacity limits necessitate the City's adoption of enforceable irrigation schedules, run times, and the authority to restrict water use to maintain service reliability temporarily.

This ordinance codifies the City's Water Use Plan into the municipal code, establishing seasonal irrigation limits, watering day assignments, prohibited hours, and compliance measures. It also grants the Public Works Director or their Designee, Water Division Manager, authority to temporarily restrict or limit water use to prevent waste or maintain adequate system pressure.

The ordinance:

- Establishes a May 1 – September 30 watering season with restrictions between 10:00 a.m. and 6:00 p.m.
- Assigns watering days based on address parity (even/odd) for residential and commercial properties.
- Requires adherence to the State of Utah weekly watering frequency and cycle & soak run time guidelines.
- Directs institutional and privately owned public spaces (e.g., HOA landscaping, parks, open spaces) to follow State recommendations and a schedule set by the Water Division Manager.
- Defines enforcement measures and penalties consistent with the Water Shortage Management Plan.
- Provides administrative flexibility for exceptions (e.g., new landscaping).

These measures will help:

- Reduce peak demand during critical summer months.
- Extend the life of existing infrastructure.
- Support Utah's statewide conservation goals.
- Increase community awareness and participation in sustainable water use practices.

**Fiscal Impact:**

**None**

Enforcement will be conducted by existing staff, with potential fine revenue for violations offsetting minor administrative expenses. Public outreach materials will be developed internally.

**Recommendation:**

Staff recommends that the City Council adopt Ordinance No. 2025-14 as presented to incorporate water use and conservation regulations into the Vineyard City Municipal Code.

**Sample Motion:**

"I move to adopt Ordinance No. 2025-14, amending the Vineyard City Municipal Code to establish water use and conservation regulations, including landscape irrigation scheduling, run times, and authority to restrict water use during shortage conditions."

**Attachments:**

1. DRAFT Ordinance- Vineyard City Water Use Management Plan
2. Vineyard City Water Use Plan - 08132025



## **ORDINANCE NO. 2025-14**

### **AN ORDINANCE OF THE CITY OF VINEYARD, UTAH, AMENDING THE MUNICIPAL CODE TO ESTABLISH WATER USE AND CONSERVATION REGULATIONS, INCLUDING LANDSCAPE IRRIGATION SCHEDULING, RUN TIMES, AND AUTHORITY TO RESTRICT WATER USE DURING SHORTAGE CONDITIONS**

#### **WHEREAS**

The City Council of Vineyard City finds it in the best interest of public health, safety, and welfare to adopt water use regulations to promote water conservation, prevent waste, and ensure sustainable use of the City's water resources; and

**WHEREAS**, The City recognizes that the State of Utah has established seasonal watering frequency and run time guidelines, and that adherence to such recommendations is necessary to maximize water efficiency; and

**WHEREAS**, The City's Water Division Manager, as directed by the City Council, has the responsibility to manage water supply and demand, especially during drought or shortage conditions;

**NOW, THEREFORE**, BE IT ORDAINED BY THE CITY COUNCIL OF VINEYARD, UTAH:

#### **SECTION 1. AUTHORITY TO RESTRICT USE**

The Vineyard City Water Division Manager may prohibit or restrict the use of the City water system during any period of time, by individual users, groups of users, or all users, if it is determined that watering is resulting in waste of water or that use needs to be scheduled in order to meet system demand.

#### **SECTION 2. LANDSCAPE WATERING RESTRICTIONS**

From May 1 through September 30 of each year:

1. The irrigation of landscapes is prohibited between the hours of 10:00 a.m. and 6:00 p.m.
2. Residential and Commercial Properties shall:
  - a. Follow the State of Utah's recommended weekly watering frequency as published at <https://conservewater.utah.gov>, and
  - b. Follow the State's recommended "cycle & soak" run times for irrigation to maximize efficiency and prevent runoff, and
  - c. Water only on the following days:

- Even-numbered street addresses on even-numbered days of the month.
- Odd-numbered street addresses on odd-numbered days of the month.

3. Institutional Spaces (e.g., schools, government facilities, city-owned parks and open spaces) and Privately Owned Public Spaces (e.g., HOA open spaces, park strips, and landscaping) shall:

- a. Water no more frequently than the State-recommended watering frequency, and
- b. Adhere to run times consistent with the State’s “cycle & soak” guidelines, and
- c. Follow a schedule determined by the Vineyard City Water Division Manager.

### **SECTION 3. VIOLATIONS AND PENALTIES**

Violations of this ordinance are subject to enforcement and fines as established in the Vineyard City Consolidated Fee Schedule under Code Violations. Exceptions may be granted in writing by the City’s Water Manager for new landscaping or other approved purposes.

### **SECTION 4. SEVERABILITY**

If any section, subsection, sentence, clause, or phrase of this ordinance is declared invalid, such decision shall not affect the validity of the remaining portions.

### **SECTION 5. EFFECTIVE DATE**

This ordinance shall become effective upon publication or posting as required by law.

PASSED AND ADOPTED by the City Council of Vineyard City, Utah, this \_\_\_\_ day of \_\_\_\_\_, 2025.

VINEYARD CITY

By: \_\_\_\_\_  
Mayor

ATTEST:

\_\_\_\_\_  
City Recorder



# Water Use Management Plan

*Resident Guide to Conserving Water*

Public Works Water Division

August 13, 2025



**VINEYARD**  
STAY CONNECTED

## 1. Purpose & Scope

This plan ensures the health and welfare of Vineyard City during periods of limited water supply. It establishes mandatory and emergency water conservation measures to preserve resources, protect public health, and sustain long-term water availability.

This plan applies to all customers—residential, commercial, municipal, institutional, and privately owned public spaces—served by Vineyard City's water system.

## 2. Water Shortage Phases & Triggers

The City Water Division continually monitors the available water supply. At the beginning of each month during the peak water usage season (June, July, August, and September), the City Water Division will utilize data collected internally, as well as data provided by external sources, to assess drought conditions within the City. Based on drought conditions, the Water Division will determine which watering phase will be implemented for that month.

|  | Phase 1   | Phase 2   | Phase 3   |
|--|-----------|-----------|-----------|
| Lawn Watering                              | Mandatory | Mandatory | Mandatory |
| Hard-Surface Washing                       | Voluntary | Mandatory | Mandatory |
| Swimming Pools                             | Voluntary | Voluntary | Mandatory |
| Outdoors Fountains & Pools                 | Voluntary | Voluntary | Mandatory |
| Recreation Sprinklers & Outdoor Water Toys | Voluntary | Voluntary | Mandatory |

## 3. Mandatory Watering Schedule

From May 1 through September 30 each year, the following landscape watering ordinance is in effect:

### Residential & Commercial Properties

- May water outdoor spaces per the State's listed recommended weekly watering guide, no more than 3 times per week, as found at <https://conservewater.utah.gov/weekly-lawn-watering-guide/>
- Even-numbered street addresses: May water only on even-numbered days of the month
- Odd-numbered street addresses: May water only on odd-numbered days of the month
- Permitted watering hours: **6:00 p.m. to 10:00 a.m. only**

- Watering run times: Shall follow the State of Utah's Recommended Cycle & Soak Guidelines for seasonal watering durations to maximize efficiency and prevent runoff
- **Exceptions:** May be granted in writing by the Public Works Director or designee for new landscaping or seeding.

### **Institutional & Public Spaces**

- Institutional spaces (e.g., schools, government facilities, city-owned parks and open spaces) and privately owned public spaces (e.g., Homeowners Association open spaces, park strips, and landscaping) shall be watered no more frequently than the state-recommended watering frequency.
- Watering run times: Shall follow the State of Utah's Recommended Cycle & Soak Guidelines for irrigation systems to promote deep root growth and water efficiency.
- The Vineyard City Water Division Manager will determine the watering schedule for these spaces to balance plant health, community aesthetics, and water conservation goals.

## **4. Conservation Measures by Phase**

### **PHASE 1: NORMAL WATER CONDITION**

Water users are to follow responsible watering habits. Follow the lawn water guide at [conservewater.utah.gov](http://conservewater.utah.gov).

### **PHASE 2: MODERATE WATER SHORTAGE**

Water users are not permitted to use sprinkler irrigation on consecutive days. May only water 2 days per week with at least 48 hours in between irrigation cycles. Hard Surface Washing shall be limited to scheduled watering days.

### **PHASE 3: SEVERE WATER SHORTAGE**

**Lawn Watering:** Water users are limited to watering no more than one day a week.

**Hard-Surface Washing:** No hard-surface washing, except for health or safety reasons.

## **5. Compliance & Enforcement**

- 1st Violation: up to \$100 fine\*
- 2nd Violation: \$200 fine\*
- 3rd Violation: \$400 fine\*

*\* Or the current Vineyard City Consolidated Fee Schedule, whichever is greater.*

**Exceptions** require prior written approval from the Public Works Director or Designee.

## 6. Public Education & Notifications

Vineyard City will use the following to inform residents:

- Website & Social Media: Real-time updates, conservation tips, watering reminders, and State cycle recommendations
- Utility Bill Inserts & Emails: Phase descriptions, watering rules, and run time charts
- Door Flyers: Distributed in targeted areas if necessary

## 7. Contact Information

### Vineyard City Water Division

Phone: 801-226-1929

Website: [https://www.vineyardutah.gov/government/water\\_conservation](https://www.vineyardutah.gov/government/water_conservation)

## 8. Vineyard City Water Conservation Resources

1. **Vineyard City Water Conservation Page** – Local conservation rules, watering schedules, and Water Conservation Plan.  
[vineyardutah.gov/government/water\\_conservation](https://vineyardutah.gov/government/water_conservation)
2. **EyeOnWater** – Track your water usage in real time, detect leaks, and set alerts.  
[vineyardutah.gov/government/water\\_leak\\_detection\\_and\\_repairs](https://vineyardutah.gov/government/water_leak_detection_and_repairs)
3. **Utah Division of Water Resources – Weekly Lawn Watering Guide** – Recommended watering frequency by region and season.  
[conservewater.utah.gov/weekly-lawn-watering-guide](https://conservewater.utah.gov/weekly-lawn-watering-guide)
4. **State of Utah “Cycle & Soak” Irrigation Method** – Tips to reduce runoff and improve water efficiency.  
[conservewater.utah.gov/cycle-soak-method](https://conservewater.utah.gov/cycle-soak-method)
5. **Slow the Flow** – Utah’s statewide conservation campaign with rebates, tips, and water-saving tools.  
[slowtheflow.org](https://slowtheflow.org)
6. **Utah State University Extension – Landscape Watering Resources** – Guides on drought-tolerant plants, irrigation scheduling, and soil management.  
[extension.usu.edu/waterconservation](https://extension.usu.edu/waterconservation)
7. **Central Utah Water Conservancy District (CUWCD)** – Regional water conservation programs, classes, and landscape rebates.  
[cuwcd.com/conservation.html](https://cuwcd.com/conservation.html)





**VINEYARD CITY**

**WATER USE  
MANAGEMENT  
PLAN**



**VINEYARD CITY COUNCIL STAFF REPORT**

**Meeting Date:** August 13, 2025

**Agenda Item:** Municipal Code Amendment Section 13.16 Public Library (Ordinance 2025-10)

**Department:** Administration and Communications

**Presenter:** Jayme Blakesley, Jenna Ahern

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**Background/Discussion:**

In June 2022, the City Council adopted Ordinance 2022-07, which was later amended by Ordinance 2023-05 amending board member terms. As part of the ongoing effort to achieve certification from the Utah State Library, it is necessary to further amend Chapter 13.16, Public Library, to ensure compliance with State Code.

**Fiscal Impact:**

N/A

**Recommendation:**

Staff recommends adopting Ordinance 2025-10

**Sample Motion:**

"I move to adopt Ordinance 2025-10, amending Municipal Code Chapter 13.16 Public Library, as presented"

**Attachments:**

1. Ord\_2025-10



**VINEYARD  
ORDINANCE 2025-10**

**AN ORDINANCE FO THE VINEYARD CITY COUNCIL AMENDING  
MUNICIPAL CODE CHAPTER 13.16 PUBLIC LIBRARY**

**WHEREAS**, The Vineyard City Council under the authority of Utah Code 10-3 desires to amend the Municipal Code; and

**WHEREAS**, the City Council has determined that it is in the best interest of the public to amend Chapter 13.16 Public Library; and

**NOW THEREFORE**, be it ordained by the Council of the Vineyard, in the State of Utah, as follows:

**SECTION 1:**        **AMENDMENT** “13.16.010 Established-Library Management” of the Vineyard Municipal Code is hereby *amended* as follows:

**AMENDMENT**

13.16.010 ~~Established-Library Management~~Establishment and Management of Library

~~The Vineyard City Library is hereby established and shall be managed and operated by the Vineyard City Council and a library board, which shall be established as hereinafter provided.~~  
The Vineyard City Library (Library) is hereby established and shall be managed and operated by the City Council and a library board, which shall be established hereinafter.

**SECTION 2:**        **AMENDMENT** “13.16.020 Board-Established-Terms Of Office” of the Vineyard Municipal Code is hereby *amended* as follows:

**AMENDMENT**

13.16.020 ~~Board-Established-Terms-Of-Office~~Establishment, Composition, Nomination and Terms of Library Board

~~There is hereby created and established a library board of Vineyard City, which shall be composed of five (5) members, two (2) alternate members, and one (1) ex-officio member. Each member of the board shall be a resident of the city, one of whom shall be a sitting member of the city council. Each member of the Board shall be nominated by the mayor and confirmed by the city council for four-year terms or until their successors are appointed. The members shall serve for a term of four (4) years and shall not serve more than two (2) consecutive terms. Each term shall begin on January 1 of the year of appointment and shall end~~

~~on December 31 of the year when the appointment expires or until a successor is appointed. The terms of commission and committee members shall be staggered. Initially, appointments shall be made for two, and four year terms.~~

- A. ESTABLISHMENT. There is hereby established a library board of Vineyard City (Board).
- B. COMPOSITION. The Board shall consist of seven members (Directors) all of whom shall be residents of the city and one of those members shall be a City Council member.
- C. NOMINATION AND TERM.
  - 1. Each Director shall be nominated by the mayor and confirmed by the City Council for a four-year term, or until the successor to the Director is appointed.
  - 2. Initially, appointments shall be made for two- and four-year terms. Thereafter, the mayor, with the advice and consent of the council, shall, before the first day of July, reappoint a Director or appoint a new Director for a four-year term to take the place of the retiring Directors.
  - 3. Except for the City Council member, Directors shall serve not more than two consecutive terms.

**SECTION 3:**        **AMENDMENT** “13.16.030 Board-Removal-Vacancies” of the Vineyard Municipal Code is hereby *amended* as follows:

#### AMENDMENT

13.16.030 ~~Board-Removal~~ Removing Directors and Filling Board Vacancies

~~Any member of the board may be removed for misconduct or neglect of duty by the city council. Vacancies in the board of directors, occasioned by removals, resignations, or otherwise, shall be filled for the unexpired term in the same manner as original appointments.~~  
The mayor and City Council may remove any Director for misconduct or neglect of duty. Vacancies in the Board shall be filled for the unexpired term in the same manner as original appointments.

**SECTION 4:**        **AMENDMENT** “13.16.050 Board-Chair-Duties” of the Vineyard Municipal Code is hereby *amended* as follows:

#### AMENDMENT

13.16.~~050 Board Chair Duties~~045 Powers, Duties, and Limitations of Board; Library Funds

- ~~A. Following appointment, board members shall meet and elect a chair and such other officers, as they deem necessary, for one-year terms. The chair shall be selected among the appointed, non-city council members of the board. The chair shall present the agenda, as hereinafter provided, of all materials pertaining to the library to be considered at each and every meeting of the board.~~

DUTIES. The Board shall:

1. Maintain and care for the Library.
2. Establish policies for the Library's operation, including making, amending, and repealing rules—consistent with law—for governing the Library.
3. In general, carry out the spirit and intent of the provisions of Title 9, Chapter 7, Part 4 of the Utah Code.

B. DISCRETIONARY POWERS. The Board may:

1. Advise the City Council and Librarian on Library policy.
2. Restrict or allow the Librarian or other authorized personnel to restrict the Library's inclusion of any book, work, video, or other medium that is obscene. A book, work, video, or other medium is "obscene" if it (1) depicts or describes sexual conduct in a pornographic manner, which does not include educational, artistic, scientific, or medical depictions of sexual conduct; (2) advocates for imminent lawless action and is likely to produce such action; (3) threatens or calls for violence against a specific person, group of persons, or property; or (4) constitutes libel.

C. LIMITATIONS. The Board may not:

1. Restrict or allow the Librarian or other authorized personnel to restrict the Library's inclusion of any book, work, video, or other medium that is not obscene as described in subsection B.

D. FUNDS.

1. All money collected by the Library shall be deposited to the credit of the Library fund.

**SECTION 5:            ADOPTION "13.16.050 Election And Duties Of Board Chair"**  
of the Vineyard Municipal Code is hereby *added* as follows:

**ADOPTION**

13.16.050 Election And Duties Of Board Chair(*Added*)

Directors shall meet and elect a chair and such other officers annually. The chair shall be selected from among the ~~five~~six resident-members of the Board. The Chair shall work with

Library staff to provide the agenda for meetings as provided in VCC 13.16.070(A).

**SECTION 6:**        **AMENDMENT** “13.16.060 Board-Space For Meetings-Equipment” of the Vineyard Municipal Code is hereby *amended* as follows:

AMENDMENT

13.16.060 ~~Board-Space For Meetings-Equipment~~Space and Equipment for Board

~~The city council shall establish and furnish suitable space for the meetings and the carrying on of the business and functions of the library and board.~~

The City Council shall furnish the Board with space and equipment suitable for conducting the Board’s meetings, business, and functions.

**SECTION 7:**        **AMENDMENT** “13.16.070 Board-Meetings-Absence” of the Vineyard Municipal Code is hereby *amended* as follows:

AMENDMENT

13.16.070 Board-~~Meetings-Absence~~ Meeting Requirements and Special Meetings

~~A. The board shall meet in regular meetings at a time designated by the board. Special meetings may be convened at any time as determined by the board chair upon giving notice to all members of the board and the city council. At least three members of the board must attend said meeting in response to said notice, and a certified copy of the minutes of each special board meeting shall be furnished to all members of the board.~~  
GENERAL REQUIREMENTS.

1. The Board shall conduct regular meetings at a time designated by the Board.
2. These meetings shall be conducted per the Utah Open and Public Meetings Act.
3. The agenda for each meeting shall be provided by the Chair with the assistance of library staff and may cover all matters pertaining to the operation of the Library.

B. QUORUM.

1. A quorum is required for the Board to pass rules and otherwise take administrative action requiring Board consensus.
2. At least four Directors must attend a meeting to establish a quorum.

C. SPECIAL MEETINGS.

1. A special meeting may be convened at any time as determined by the Chair upon giving notice to all Directors.

**SECTION 8:            AMENDMENT** “13.16.080 Board-Meetings-Agenda-Powers”  
of the Vineyard Municipal Code is hereby *amended* as follows:

A M E N D M E N T

13.16.080 ~~Board-Meetings-Agenda-Powers~~Librarian and Other Personnel

~~The agenda for each meeting of the board shall be prepared by the chair and said agenda may cover all matters pertaining to the operation of the Vineyard City Library, which requires attention or administrative action thereon. The board shall have the power in respect to all matters of policy and operation of the library to have read into the minutes of the board meetings, board decisions, and recommendations on any such matters; and shall have the power to add matters to the aforesaid agenda of the board, which have not been submitted for their consideration as hereinabove provided. The powers of the board are advisory and shall extend to all phases of the library operation.~~

APPOINTMENT AND STATUS.

- A. Three members of the Board and the city manager or a designee of the City Manager shall interview candidates for the position of Librarian. The final decision will be made by the city manager or a designee of the city manager
- B. The Librarian and other personnel shall report to the city manager or the city manager's designee.

**SECTION 9:            AMENDMENT** “13.16.090 Appointment Of Librarian/Library Director” of the Vineyard Municipal Code is hereby *amended* as follows:

A M E N D M E N T

13.16.090 ~~Appointment Of Librarian/Library Director~~Annual Reports of the Board

~~The city manager shall appoint a library volunteer coordinator and, as budget allows, a competent person as librarian/library director to have immediate charge of the library with such duties and compensation for his or her services as the city manager shall fix and determine. The librarian/library director shall act as the executive officer of the library board.~~  
The Board shall provide an annual report to (1) the City Council on the condition and operation of the Library, including a financial statement; and (2) The Board shall also make reports to the Librarian and the state library board.

**SECTION 10:**        **AMENDMENT** “13.16.100 Board-Annual Reports” of the Vineyard Municipal Code is hereby *amended* as follows:

AMENDMENT

13.16.100 ~~Board-Annual Reports~~Free Us of the Library Subject to Board Rules

~~The board chair or designee shall make an annual report to the city council of the condition and operation of the library. The board shall also make reports to the librarian/library director as directed by the librarian/library director. The board shall also provide for the keeping of such records as shall be required by the Utah State Library Commission in its request for an annual report from the public libraries and shall submit such annual report to the commission.~~

Subject to the rules established by the Board, city residents may freely use the Library. The Board may exclude violators of such rules. The Board may allow nonresidents to use the Library subject to rules established by the Board.

**SECTION 11:**        **AMENDMENT** “13.16.110 Board To Adopt Rules For Library Use-Use Of Library To Be Free” of the Vineyard Municipal Code is hereby *amended* as follows:

AMENDMENT

13.16.110 ~~Board To Adopt Rules For Library Use-Use Of Library To Be Free~~Donations of Money and Property

~~The board shall make and adopt rules and regulations not inconsistent with law, for the governing of the library. Subject to such rules and regulations, the library shall be free to the use of the inhabitants of the city. The board may exclude from the use of the library any and all persons who shall willfully violate such rules. The board may extend the privileges and use of the library to persons residing outside the city on such terms and conditions as it may prescribe by its regulations.~~

The Library may accept donations for the benefit of the Library. Upon acceptance, the donation shall be held and controlled by the Library according to the terms of the gift, devise, or bequest of the donation, and the Library shall be the trustee of the donation.

**SECTION 12:**        **ADOPTION** “13.16.120 Library Cooperation Or Consolidation With Other Entities” of the Vineyard Municipal Code is hereby *added* as follows:

A D O P T I O N

13.16.120 Library Cooperation Or Consolidation With Other Entities(*Added*)

The Board may cooperate, merge, or consolidate in providing library services with the library boards of county libraries, boards of education, governing boards of other educational institutions, library agencies, and local political subdivisions. The Library may consolidate with the county library per Utah Code § 9-7-410, as amended.

**SECTION 13:**        **AMENDMENT** “13.16.040 Board-Members To Serve Without Compensation” of the Vineyard Municipal Code is hereby *amended* as follows:

A M E N D M E N T

13.16.040 Board-~~Members To Serve Without~~ Director Compensation

Board ~~members~~Directors shall serve without compensation, but the~~ir~~ actual and necessary expenses ~~incurred in the performance~~ of their official duties may be paid from library funds.

**SECTION 14:**        **REPEALER CLAUSE** All ordinances or resolutions or parts thereof, which are in conflict herewith, are hereby repealed.

**SECTION 15:**        **SEVERABILITY CLAUSE** Should any part or provision of this Ordinance be declared by the courts to be unconstitutional or invalid, such decision shall not affect the validity of the Ordinances a whole or any part thereof other than the part so declared to be unconstitutional or invalid.

**SECTION 16:**        **EFFECTIVE DATE** This Ordinance shall be in full force and effect from August 13, 2025 and after the required approval and publication according to law.

PASSED AND ADOPTED BY THE VINEYARD COUNCIL

\_\_\_\_\_.

|                     | <b>AYE</b> | <b>NAY</b> | <b>ABSENT</b> | <b>ABSTAIN</b> |
|---------------------|------------|------------|---------------|----------------|
| Mayor Julie Fullmer | _____      | _____      | _____         | _____          |
| Sara Cameron        | _____      | _____      | _____         | _____          |
| Jacob Holdaway      | _____      | _____      | _____         | _____          |
| Mardi Sifuentes     | _____      | _____      | _____         | _____          |
| Brett Clawson       | _____      | _____      | _____         | _____          |

Presiding Officer

Attest

\_\_\_\_\_  
Julie Fullmer, Mayor, Vineyard

\_\_\_\_\_  
Pamela Spencer, City Recorder,  
Vineyard





## VINEYARD CITY COUNCIL STAFF REPORT

**Meeting Date:** August 13, 2025

**Agenda Item:** PUBLIC HEARING - TEFRA Bonds for Franklin Discovery Academy  
(Resolution 2025-44)

**Department:** Administration

**Presenter:** Jacob Carlton

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### **Background/Discussion:**

The Bonds are expected to be issued pursuant to the Industrial Development Financing Act, Title 35, Chapter 5, 35-701, *et seq.*, of the Arizona Revised Statutes, as amended (the “Act”), by the Issuer, an Arizona nonprofit corporation designated as a political subdivision of the State of Arizona, incorporated with the approval of the Arizona Finance Authority (the “Arizona Finance Authority”), pursuant to the provisions of the Constitution and laws of the State of Arizona and the Act. The proceeds from the sale of the Bonds will be loaned to Three Twenty East Gammon Road, LLC (the “Borrower”), a Utah limited liability company, the sole member of which is the Franklin Schools Foundation, a Utah nonprofit corporation and an organization described in Section 501(c)(3) of the Code, and used to (a) finance the cost of the acquisition and construction of an expansion to the Borrower’s existing charter school facilities and the associated improvements thereon, consisting of approximately 20,000 square-feet of additional elementary school facilities located on an approximately 5.98 acre site at 320 E. Gammon Road in Vineyard, Utah (the “Facilities”), (b) fund capitalized interest on the Bonds, if any, and (c) finance costs of issuance of the Bonds (collectively, the “Project”). The Facilities will be owned by the Borrower and will be leased to and operated by Franklin Discovery Academy – Vineyard, a Utah nonprofit corporation and an organization described in Section 501(c)(3) of the Code.

### **Fiscal Impact:**

The city will incur no costs or debt for these bonds.

### **Recommendation:**

Staff recommends approving the issuance of the bonds

### **Sample Motion:**

"I move to adopt Resolution 2025-44, TEFRA Bonds for Franklin Discovery Academy."

### **Attachments:**

1. RES 2025-44 TEFRA Resolution of the City of Vineyard, Utah - Franklin (2025) 4934-6662-9206 v.2

## RESOLUTION 2025-44

### **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VINEYARD, UTAH, APPROVING THE ISSUANCE BY THE ARIZONA INDUSTRIAL DEVELOPMENT AUTHORITY OF ITS CHARTER SCHOOL REVENUE BONDS (FRANKLIN DISCOVERY ACADEMY IMPROVEMENT PROJECT) SERIES 2025 IN ONE OR MORE SERIES IN AN AGGREGATE PRINCIPAL AMOUNT NOT TO EXCEED \$6,000,000**

WHEREAS, Three Twenty East Gammon Road, LLC (the “Borrower”), a Utah limited liability company, the sole member of which is Franklin Schools Foundation, a Utah nonprofit corporation and an organization described in Section 501(c)(3) of the Code, has requested that the Arizona Industrial Development Authority (the “Authority”) an Arizona nonprofit corporation designated as a political subdivision of the State of Arizona to issue revenue bonds in an aggregate principal amount not to exceed \$6,000,000 (the “Bonds”) to assist in financing the costs of the acquisition and construction of an expansion to certain existing charter school facilities and the associated improvements thereon to be owned by the Borrower and leased to Franklin Discovery Academy – Vineyard, a Utah nonprofit corporation and an organization described in Section 501(c)(3) of the Code (the “Charter School”) located on an approximately 5.98 acre site at 320 E. Gammon Road in Vineyard, Utah (the “Facilities”), (ii) fund capitalized interest on the Bonds, if any, and (iii) pay certain issuance expenses (collectively, the “Project”); and

WHEREAS, the Facilities will be initially owned by the Borrower and leased to and operated by the Charter School; and

WHEREAS, in order for interest on the Bonds to be excludable from gross income for federal income tax purposes, the issuance of the Bonds must, among other things, be approved by the applicable elected representative of a governmental unit in whose geographic jurisdiction the Project is located after a public hearing held following reasonable public notice, in compliance with Section 147(f) of the Internal Revenue Code of 1986, as amended (the “Code”); and

WHEREAS, the City Council (the “Council”) of the City of Vineyard, Utah (the “City”) is the “applicable elected representative” of the City for the Facilities located within the City; and

WHEREAS, public notice was given by publication of notice in the Daily Herald on [\_\_\_\_], 2025 (the “Public Notice”), a public hearing (the “Public Hearing”) was convened at [\_\_\_\_] [p.m.] on Wednesday, August 13, 2025, at the Vineyard City Council Chambers (the “City”) located at 125 South Main Street, Vineyard, Utah. No one appeared, and no comments were received with respect to the issuance of the Bonds. The hearing was thereupon closed; and

WHEREAS, such public hearing was conducted in a manner that provided a reasonable opportunity to be heard for persons with differing views on both the issuance of the Bonds and the location and the nature of the Project which is to be financed by the Bonds; and

WHEREAS, the undersigned is the City Recorder of the City as of the date hereof.

NOW, THEREFORE, BE IT RESOLVED that:

Section 1. For the purposes of Section 147(f) of the Internal Revenue Code of 1986, as amended, the Council hereby approves the Project and the financing thereof through the issuance of the Bonds by the Authority in an aggregate principal amount not to exceed \$6,000,000.

Section 2. The City has no responsibility for the payment of the principal of or interest on the Bonds or for any costs incurred by the Borrower with respect to the Bonds or the Project.

Section 3. This resolution is effective immediately on its passage.

STATE OF UTAH     )

: ss.

CITY OF VINEYARD     )

I, \_\_\_\_\_, City Recorder of the City of Vineyard, Utah, do hereby certify that the foregoing is a true copy of so much of the proceedings of the City Council of the City of Vineyard, Utah at a regular meeting held August 13, 2025, as it relates to the adoption of a resolution entitled “Resolution of the City Council of the City of Vineyard, Utah, Approving the Issuance by the Arizona Industrial Development Authority of its Education Revenue Bonds (Franklin Discovery Academy Improvement Project) Series 2025 in one or more series in an Aggregate Principal Amount Not to Exceed \$6,000,000” and the holding of a public hearing related thereto, and that said proceedings will be recorded in the minutes of the City Counsel of the City of Vineyard, Utah.

WITNESS my hand and the seal of the City of Vineyard, Utah, this \_\_\_\_ day of August, 2025.

\_\_\_\_\_  
City Recorder of the City of Vineyard, Utah

(SEAL)



## VINEYARD CITY COUNCIL STAFF REPORT

**Meeting Date:** August 13, 2025

**Agenda Item:** DISCUSSION AND ACTION - Authorizing Bid Award for Independent Financial Audit & Internal Controls Review (Resolution 2025-41)

**Department:** Finance/City Attorney

**Presenter:** Jayme Blakesley, Kristie Bayles

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### Background/Discussion:

Last month, the Vineyard City Council adopted Resolution No. 2025-33, which accepted Audit Report No. 25-02 from the Utah State Auditor and reaffirmed the City's ongoing commitment to compliance and continuous financial transparency.

In alignment with this commitment, Mayor Julie Fullmer tasked the City Council's Finance Committee Chair, Brett Clawson, to organize a procurement process for professional audit services to conduct an independent financial audit and internal controls review. Under Councilmember Clawson's direction, and in consultation with the State Auditor's Office, staff issued RFP No. 2025-61-101 for an Independent Financial Audit and Internal Controls Review.

The engagement will not duplicate the State Auditor's work but will expand upon its recommendations, reinforcing public confidence, promoting transparency, and strengthening internal controls.

### SCOPE OF SERVICES

The selected consultant will perform:

1. Agreed-Upon Procedures (AUP) Audit of Vineyard's FY 2023–2024 financial records.
2. Targeted internal control reviews of:
  - P-Card issuance and use
  - Employee travel and reimbursements
  - Vehicle assignment and usage tracking
  - Cash transactions
  - Utility billing (including meter ownership verification)
  - RDA payments and cleanup-related controls
  - Procurement of food for events or recognition
3. Evaluation of reporting and investigation mechanisms for misconduct, fraud, and waste.
4. Public-facing audit report with plain-language findings and recommendations, presented in an open City Council meeting.
5. Audit Committee establishment support, including recommendations and sample materials aligned with GFOA best practices.

### PROCUREMENT OUTCOME

- Proposals Received: One (CPA Insight Solutions)

- Evaluation: The proposal met all technical qualifications and RFP requirements.
- Lead Auditor: Chris Harding, CPA, CIA, CFE, with nearly 20 years of public-sector audit experience, including serving as the elected Salt Lake County Auditor.
- Contract Amount: \$32,625 for 261 hours (based on RFP scope).
- Timeline: September 1, 2025 – March 15, 2026 (based on RFP scope).

## **KEY NOTES**

- This engagement is an Agreed-Upon Procedures review; no audit opinion will be issued.
- The work will be guided by an AUP framework similar to the attached sample but customized to Vineyard City's specified procedures.
- The final report will list the procedures performed and their factual results, similar to the reporting style shown on page 12 of the attached guide (**Attachment 4**).

## **Fiscal Impact:**

### **Not to Exceed \$60,000.**

The audit engagement will be funded through appropriations previously approved by the City Council, up to \$104,000.

## **Recommendation:**

Staff recommends approval of the attached resolution authorizing the City Manager to execute an agreement for independent audit services subject to specified conditions.

## **Sample Motion:**

"I move to adopt Resolution 2025-41 authorizing the City Manager to execute an agreement for independent audit services as outlined in RFP No. 2025-61-101, contingent on Finance Committee concurrence and the contract being within budget. The City Council acknowledges that the audit engagement is intended to implement, not duplicate, the work of the Utah State Auditor."

## **Attachments:**

1. RES 2025-41 Authorizing Bid Award for Audit Services
2. CPA Insight Proposal RFP No 2025-61-101
3. 2025-07-21 RFP for Audit Services
4. SAMPLE Agreed Upon Procedures Guide

RESOLUTION NO. 2025-41

A RESOLUTION OF THE VINEYARD CITY COUNCIL AUTHORIZING THE CITY  
MANAGER TO NEGOTIATE A CONTRACT FOR AUDIT SERVICES WITH CPA INSIGHT  
SOLUTIONS

WHEREAS, Vineyard City previously issued a Request for Proposals for Independent Financial Audit & Internal Controls Review (“RFP”); and

WHEREAS, following a competitive procurement process, CPA Insight Solutions has been selected to fulfill the needs outlined in the RFP and the City desires to enter into a contract for services; and

WHEREAS, the Vineyard City Council desires that the City Manager be authorized to negotiate a contract on the City Council’s behalf with CPA Insight Solutions for professional auditing services, and that the value of the contract not exceed the budgeted amount of \$60,000; and

WHEREAS, contingent on the above approval, the Vineyard City Council finds it is in the best interest of the City to authorize the City Manager to negotiate a contract with CPA Insight Solutions for the services requested in the RFP; and

NOW THEREFORE BE IT RESOLVED BY THE GOVERNING BODY OF  
VINEYARD, UTAH AS FOLLOWS:

Section 1. Approval. The City Council of the City of Vineyard, Utah, hereby authorizes the City Manager to negotiate the Agreement between the selected firm and the City of Vineyard for Independent Financial Audit & Internal Controls Review (“Agreement”) attached hereto as Exhibit A, and incorporated herein by reference. This approval is contingent on the value of the contract being within the budgeted amount of \$50,000.

Section 2. Severability. If any section, part or provision of this Resolution is held invalid or unenforceable, such invalidity or unenforceability shall not affect any other portion of this Resolution, and all sections, parts and provisions of this Resolution shall be severable.

Section 3. Effective Date. This Resolution shall become effective immediately upon its approval by the City Council.

Passed and dated this 13<sup>th</sup> day of August, 2025.

Attest:

\_\_\_\_\_  
Julie Fullmer, Mayor

\_\_\_\_\_  
Pamela Spencer, City Recorder

# Proposal for Internal Audit Services

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## 1. Cover Letter

Justine Marshall  
Vineyard City Project Manager  
125 S. Main Street  
Vineyard, Utah 84057  
engineering@vineyardutah.gov

August 7, 2025

Dear Ms. Marshall,

On behalf of CPA Insight Solutions, I am pleased to submit this proposal to provide internal audit and agreed-upon procedures services to Vineyard City in response to RFP No. 2025-61-101.

I understand the City's goals to enhance financial transparency, strengthen internal controls, and establish sustainable audit oversight. With over 19 years of auditing experience in federal, local, and municipal government settings, and as the current elected Auditor of Salt Lake County, I bring a uniquely practical, standards-based approach that ensures clarity, accountability, and results.

CPA Insight Solutions is committed to full independence in accordance with Government Auditing Standards. I acknowledge receipt of the RFP and agree to its terms and conditions. I am available to begin the engagement by September 2, 2025, and will ensure all deliverables are met by March 15, 2026.

Sincerely,



Chris Harding, CPA, CIA, CFE  
Principal Auditor, CPA Insight Solutions  
chrishardingg@gmail.com | (385) 695-0501

## 2. Firm Qualifications

CPA Insight Solutions is a sole proprietorship owned and operated by Chris Harding, a licensed CPA, CIA, and CFE with nearly two decades of public-sector audit experience. I've provided contracted audit services for multiple Utah local governments, including Provo City, Jordan School District, and Salt Lake City School District.

As the elected Salt Lake County Auditor since 2022, I transformed the internal audit division and led it to receive a "Pass" rating in a 2024 peer review by the Association of Local Government Auditors (ALGA)—the highest rating available. While CPA Insight Solutions has not undergone a firm-level peer review, my extensive leadership in Yellow Book-compliant government auditing provides a strong foundation for excellence in this engagement.

## 3. Key Personnel

Chris Harding, CPA, CIA, CFE, will be the sole practitioner performing 100% of the work.

- CPA – Utah License #7071683-2601
- CIA – Certificate #106253
- CFE – Member #603637
- Estimated Hours: 251 total, see page 7 for a detailed estimate of hours.

Résumé attached in Appendix B, starting on page 12

## 4. Approach & Work Plan

My approach to this engagement integrates proven audit methodologies, tailored risk assessments, and efficient execution. The work plan is built to comply with:

- **SSAE No. 19** – for Agreed-Upon Procedures (AUP) engagements,
- **GAO's Green Book and Yellow Book** – for internal control evaluations and reporting, and
- **COSO Framework and GFOA best practices** – for internal control structure and governance.

The project is divided into **four major phases**:



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## Phase 1: Planning & Risk Assessment (September 1–October 5)

- **Engagement kickoff & liaison coordination**
  - Hold kickoff meeting with the City's designated liaison to clarify expectations, finalize deliverables, and establish communication cadence.
- **Document & data request**
  - Collect and review relevant policies, general ledger extracts, transaction-level detail, organizational charts, and prior audit results.
- **Preliminary risk ranking**
  - Apply a qualitative risk assessment using factors such as transaction volume, public sensitivity, policy complexity, and prior findings.
- **Customized test plan development**
  - Develop detailed test plans for each of the eight AUP areas and their corresponding internal controls, ensuring alignment with City policy and COSO principles.

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## Phase 2: Fieldwork – AUP Testing and Internal Control Evaluation (October 6–January 10)

### *Agreed-Upon Procedures (AUPs)*

Each of the following areas will be treated as a distinct procedure, tested using tailored sampling methods, and documented under SSAE No. 19 requirements:

1. **P-Card Transactions**
  - Sample selection from FY 2023–2024
  - Verify documentation, approvals, policy adherence
  - Identify signs of personal/inappropriate use
2. **Employee Travel & Reimbursements**
  - Confirm adherence to per diem and travel policy
  - Validate required documentation and supervisory approval
3. **Cash Transactions**
  - Evaluate physical controls, deposit processes, and reconciliations
  - Trace from receipt to bank
4. **Utility Billing & Meter Verification**
  - Verify meter assignments and test rate accuracy
  - Confirm billing aligns with authorized properties

## 5. **RDA Payments – Cleanup**

- Review sample cleanup-related expenditures
- Confirm destination of materials and policy alignment

## 6. **Procurement of Food**

- Confirm purpose, documentation, and City authorization
- Evaluate compliance with policy and reasonableness standards

## 7. **Vehicle Assignment & Use**

- Review logs, assignment forms, and GPS/fuel data (if available)
- Evaluate policy compliance and documentation

## 8. **Planning, Coordination, and Follow-Up**

- Meet regularly with City liaison to resolve open items
- Document all procedures for transparency and replicability

### *Internal Control Review*

Each of the eight AUP areas will be accompanied by a review of relevant controls:

- **Design** – Is the policy clearly written, understandable, and enforceable?
- **Implementation** – Is it being followed consistently across departments?
- **Monitoring** – Are reviews or follow-ups conducted?
- **Tone at the top** – Are department heads reinforcing compliance?

The internal control matrix will identify:

- Control gaps
- Policy enforcement challenges
- Risks of noncompliance, waste, or abuse

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### **Phase 3: Reporting & Recommendations (January 11–March 7)**

- **AUP Report**

- Factual, findings-based report presented in plain language with minimal technical jargon
- Each AUP area reported separately and concisely
- Includes management response section (if desired)

- **Internal Control Review Report**

- Integrated into the same document or delivered as an appendix
- Includes a risk-ranked matrix with control gaps, root causes, and actionable recommendations

- Incorporates GFOA best practices and cites COSO components where applicable
  - **Audit Committee Support Deliverables**
    - Sample bylaws, charter, onboarding guide, and training outline
    - Optional consultation on member qualifications and independence practices
- 

#### Phase 4: Presentation & State Submission (March 8–March 15)

- Present summary of findings and recommendations to the **City Council** in a public meeting
  - Provide an **executive briefing deck** suitable for governance-level understanding
  - Submit the final report to the **Office of the Utah State Auditor** by the required deadline
- 

#### Ongoing Communication & Coordination

- Weekly status updates via email or virtual check-ins
  - Shared document tracker (e.g., Google Sheets or Excel) if preferred by City staff
  - All documentation maintained to Yellow Book standards for reproducibility
- 

#### Tools, Templates, and Techniques Used

- Sampling and testing procedures based on AICPA and GAGAS standards
- Internal control evaluation using a custom COSO-aligned matrix
- Narrative reports supplemented with summary tables, risk rankings, and management-friendly language
- Secure cloud storage for document exchange (if allowed)
- No proprietary tools; all deliverables are fully transferable

The detailed timeline and milestone calendar appear in Appendix A.

## **5. Internal Control Review Expertise**

I have audited P-card programs, travel reimbursements, and fleet use at Salt Lake County and Provo City. I've performed cash handling audits for nearly every past client. Although I've not audited Utility Billing or RDAs directly, my nearly 20 years of experience ensure confident and effective execution of those areas using established frameworks and custom test plans.

## **6. Audit Committee Support**

I helped implement and Chair, the Salt Lake County Audit Committee, providing draft bylaws, onboarding tools, and accountability mechanisms. My deliverables will include sample charters and practical implementation guides based on that successful experience.

## **7. References**

Provo City – John Borget, Administrative Services Director – JBorget@provo.utah.gov – (801) 852-6504

Work: P-Card and purchasing audit, policy compliance.

Jordan School District – John Larsen, Business Administrator – john.larsen@jordandistrict.org – (801) 567-8148

Work: AUP across 11 financial areas and one departmental review.

Salt Lake City School District – Alan Kearsley, Finance Director – Alan.Kearsley@slcschools.org – (801) 578-8307

Work: Cash handling and purchasing process audits at West, East, and Highland High Schools.

## **8. Cost Proposal**

See Exhibit 2 – Fee Schedule on the following page.

## Exhibit 2 – Fee Schedule at an hourly rate of \$125/hr

| Timeline        | Task Description                                      | Estimated Hours | Cost     |
|-----------------|---|-----------------|----------|
| Sep 1 – Sep 13  | Engagement Kickoff & Planning                         | 12              | \$1,500  |
| Sep 14 – Oct 5  | Policy Review & Risk Assessment                       | 18              | \$2,250  |
| Oct 6 – Nov 15  | Fieldwork: AUP Testing (P-Card, Travel, Cash)         | 54              | \$6,750  |
| Nov 16 – Dec 15 | Fieldwork: AUP Testing (Utility, RDA, Food, Vehicles) | 58              | \$7,250  |
| Dec 16 – Jan 10 | Internal Controls Fieldwork & Gap Analysis            | 61              | \$7,625  |
| Jan 11 – Jan 25 | Draft Findings & Report Compilation (AUP & IC)        | 22              | \$2,750  |
| Jan 26 – Feb 6  | Audit Committee Support Materials                     | 12              | \$1,500  |
| Feb 7 – Feb 21  | Final Drafting, QA & Revisions                        | 10              | \$1,250  |
| Feb 22 – Mar 7  | Presentation Prep & Council Meeting                   | 9               | \$1,125  |
| Mar 8 – Mar 15  | State Submission & Wrap-Up                            | 5               | \$625    |
| Total           |   | 261             | \$32,625 |

Note: Vineyard City's scope effectively requires eight separate and distinct AUPs and eight internal control reviews. The \$125/hour rate is fully inclusive: no additional charges for travel, communications, or administrative time will be billed.

## 9. Required Forms

### *A. Conflict of Interest Certification*

I, Chris Harding, hereby certify that CPA Insight Solutions has no conflict of interest that would interfere with the ability to perform the services requested in RFP No. 2025-61-101. CPA Insight Solutions has not performed any financial advisory or consulting services for Vineyard City in the past three years and maintains full independence in accordance with Government Auditing Standards (GAO-3).

Signed,



Chris Harding, CPA, CIA, CFE  
CPA Insight Solutions  
Date: August 7, 2025

### *B. Non-Collusion Affidavit*

I, Chris Harding, declare that this proposal has been made independently and without collusion, fraud, or participation with any other individual, firm, or corporation submitting a proposal for the same purpose.

Signed,



Chris Harding, CPA, CIA, CFE  
CPA Insight Solutions  
Date: August 7, 2025



**Form W-9**  
(Rev. March 2024)  
Department of the Treasury  
Internal Revenue Service

## Request for Taxpayer Identification Number and Certification

Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Give form to the  
requester. Do not  
send to the IRS.

**Before you begin.** For guidance related to the purpose of Form W-9, see *Purpose of Form*, below.

**1** Name of entity/individual. An entry is required. (For a sole proprietor or disregarded entity, enter the owner's name on line 1, and enter the business/disregarded entity's name on line 2.)

**Christopher Harding**

**2** Business name/disregarded entity name, if different from above.

**CPA Insight Solutions**

**3a** Check the appropriate box for federal tax classification of the entity/individual whose name is entered on line 1. Check only one of the following seven boxes.

☒ Individual/sole proprietor    ☐ C corporation    ☐ S corporation    ☐ Partnership    ☐ Trust/estate

☐ LLC. Enter the tax classification (C = C corporation, S = S corporation, P = Partnership) \_\_\_\_\_

**Note:** Check the "LLC" box above and, in the entry space, enter the appropriate code (C, S, or P) for the tax classification of the LLC, unless it is a disregarded entity. A disregarded entity should instead check the appropriate box for the tax classification of its owner.

☐ Other (see instructions) \_\_\_\_\_

**3b** If on line 3a you checked "Partnership" or "Trust/estate," or checked "LLC" and entered "P" as its tax classification, and you are providing this form to a partnership, trust, or estate in which you have an ownership interest, check this box if you have any foreign partners, owners, or beneficiaries. See instructions \_\_\_\_\_ ☐

**4** Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):

Exempt payee code (if any) \_\_\_\_\_

Exemption from Foreign Account Tax Compliance Act (FATCA) reporting code (if any) \_\_\_\_\_

(Applies to accounts maintained outside the United States.)

**5** Address (number, street, and apt. or suite no.). See instructions.

**2410 W. Temple View Ln.**

**6** City, state, and ZIP code

**South Jordan, Utah, 84095**

**7** List account number(s) here (optional)

**Requester's name and address (optional)**

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

**Note:** If the account is in more than one name, see the instructions for line 1. See also *What Name and Number To Give the Requester* for guidelines on whose number to enter.

**Social security number**

|   |   |   |   |   |   |   |   |   |   |   |
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| 5 | 2 | 9 | - | 6 | 3 | - | 4 | 6 | 1 | 1 |
|---|---|---|---|---|---|---|---|---|---|---|

**or**

**Employer identification number**

|  |  |   |  |  |  |  |  |  |  |  |
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### Part II Certification

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to backup withholding because (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- I am a U.S. citizen or other U.S. person (defined below); and
- The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and, generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

**Sign Here**

Signature of  
U.S. person

*Chris Harding*

Date

8/7/2025

### General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

### What's New

Line 3a has been modified to clarify how a disregarded entity completes this line. An LLC that is a disregarded entity should check the appropriate box for the tax classification of its owner. Otherwise, it should check the "LLC" box and enter its appropriate tax classification.

New line 3b has been added to this form. A flow-through entity is required to complete this line to indicate that it has direct or indirect foreign partners, owners, or beneficiaries when it provides the Form W-9 to another flow-through entity in which it has an ownership interest. This change is intended to provide a flow-through entity with information regarding the status of its indirect foreign partners, owners, or beneficiaries, so that it can satisfy any applicable reporting requirements. For example, a partnership that has any indirect foreign partners may be required to complete Schedules K-2 and K-3. See the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

### Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS is giving you this form because they

#### ***D. Utah Business License Statement***

I, Chris Harding, hereby certify that I have submitted an application for a Utah business license for CPA Insight Solutions as a sole proprietorship. The license is currently pending as of August 5, 2025. Proof of application and payment has been included in this proposal. CPA Insight Solutions commits to submitting an active business license before the contract start date of September 2, 2025.



Chris Harding, CPA, CIA, CFE  
CPA Insight Solutions  
Date: August 7, 2025

See Appendix D for screen shots of the applied CPA firm and Registration of the DBA with the Division of Corporations. I have also registered for a business license with South Jordan, Utah. I also have a screen shot showing the ability and intent to get the Professional Liability insurance of \$2 Mil, should I win the contract.

#### ***E. Independence Certification***

I certify that CPA Insight Solutions complies with the independence requirements of GAO-3 (Government Auditing Standards). I have not provided any prohibited services to Vineyard City, its staff, or elected officials in the past three years. I attest that no impairments to independence exist with respect to this engagement.

Signed,



Chris Harding, CPA, CIA, CFE  
CPA Insight Solutions  
Date: August 7, 2025



## Appendix A – Milestone Calendar

| Dates           | Milestone   | Estimated Hours |
|-----------------|---|-----------------|
| Sep 1 – Sep 13  | Engagement Kickoff & Planning                         | 12              |
| Sep 14 – Oct 5  | Policy Review & Risk Assessment                       | 18              |
| Oct 6 – Nov 15  | Fieldwork: AUP Testing (P-Card, Travel, Cash)         | 54              |
| Nov 16 – Dec 15 | Fieldwork: AUP Testing (Utility, RDA, Food, Vehicles) | 58              |
| Dec 16 – Jan 10 | Internal Controls Fieldwork & Gap Analysis            | 61              |
| Jan 11 – Jan 25 | Draft Findings & Report Compilation (AUP & IC)        | 22              |
| Jan 26 – Feb 6  | Audit Committee Support Materials                     | 12              |
| Feb 7 – Feb 21  | Final Drafting, QA & Revisions                        | 10              |
| Feb 22 – Mar 7  | Presentation Prep & Council Meeting                   | 9               |
| Mar 8 – Mar 15  | State Submission & Wrap-Up                            | 5               |

## Appendix B – Résumé: Chris Harding, CPA, CIA, CFE

### CHRIS HARDING, CPA, CFE, CIA

2410 W. Temple View Ln.

South Jordan UT, 84095

Mobile (385) 695-0501

[chrishardingg@gmail.com](mailto:chrishardingg@gmail.com)

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### PROFESSIONAL SUMMARY

Internal auditor with experience planning, performing, and leading a wide range of complex audits, reviews, and agreed upon procedures in the public, private, and governmental sectors.

#### Areas of Expertise Include:

- Internal Controls
- Report Writing
- Finding Control Gaps
- Risk Assessments
- Client Communication
- Interviewing

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### PROFESSIONAL EXPERIENCE

#### Salt Lake County

February 2022 – Present

#### **Elected County Auditor**

As the Salt Lake County Auditor, I oversee two major divisions—Property Tax and Audit—managing a team of 28 full-time employees and an annual operating budget of just over \$4 million. I am responsible for ensuring financial accountability, transparency, and integrity across county operations. My office conducts independent audits, enforces property tax compliance, and promotes the efficient use of public resources. Significant accomplishments include:

- Successfully transformed the Salt Lake County Auditor's audit division into a fully GAGAS-compliant operation, culminating in the office undergoing its first-ever external peer review. The office received the highest possible rating of "Pass," demonstrating full adherence to Generally Accepted Government Auditing Standards and national best practices in auditing.
- Regularly deliver audit findings and recommendations to the Salt Lake County Council in public meetings, reinforcing transparency and enabling the Council to provide meaningful oversight, hold executive management accountable, and drive corrective action on systemic issues.
- Established a strong tone at the top by prioritizing a county-wide, risk-based audit plan. These audits are conducted in accordance with GAGAS standards and focus on high-impact areas, fostering a culture of accountability, continuous improvement, and responsible stewardship of public funds.
- Designed and implemented an internal Audit Findings and Recommendations Dashboard to track the status of all issued findings across county agencies. This tool has significantly improved transparency, facilitated management follow-up, and ensured timely resolution of control weaknesses.
- Led audits that uncovered multiple instances of fraud, waste, and abuse. These findings enabled department leadership and governing bodies to take corrective action, recover public funds where possible, and hold employees accountable through disciplinary measures or termination.
- Modernized the Property Tax Division by launching an online property tax appeal submission platform, and in 2025 expanded its functionality to include real-time tracking and automated email/text updates for appellants, greatly improving customer service and operational efficiency.
- Oversaw the development and ongoing implementation of TORUS, Salt Lake County's new tax administration system. This system modernizes tax data processing, improves accuracy and compliance, and supports a seamless interface with other county departments and external stakeholders.
- Conducted a full organizational assessment of the Audit Division and secured approval from both the Mayor's Office and the County Council to increase staffing levels based on demonstrated audit needs. Successfully reorganized the division into a more effective and scalable structure, consisting of an Audit Director, two Audit Managers, and two fully staffed five-person audit teams—dramatically increasing audit capacity, balance, and throughput.
- Issued hundreds of audit findings and recommendations across county departments, with a remarkable implementation rate of over 97%. This high adoption rate reflects the relevance, clarity, and impact of the audit work being performed under my leadership.

**SENIOR AUDITOR**

Responsible for executing innovative and complex performance audits of the Internal Revenue Service (IRS) and its key processes and controls. Evaluated IRS handling of emerging threats (e.g. backlog of returns due to COVID-19 pandemic and subsequent shut down), and how it implements new laws enacted by Congress and signed into law by the President (e.g. Tax Cuts and Jobs Act & CARES Act). Significant accomplishments include:

- Coordinated and performed multiple extensive walkthroughs of IRS' return processing pipeline at locations throughout the United States while navigating challenges associated with the COVID-19 pandemic.
- Methodically documented field work, observations, interviews, and key processes to demonstrate an understanding of IRS' tax return processes, to support audit findings exposing control gaps and opportunities for process efficiencies.
- Subject Matter Expert (SME) with SAS-Enterprise Guide software used to analyze millions of lines of data to identify over \$876,000 in incorrectly assessed estimated tax penalties and over \$45,000 in erroneously assessed failure to pay penalties. As a result of the analysis, IRS refunded 100% of those penalties.
- Frequently briefed senior executives within TIGTA and the IRS with timely audit findings.
- Presented agency level ~~WebEx~~ training on how to obtain the Certified Fraud Examiners (CFE) credential.
- Received individual cash performance awards in July 2020, February 2021, and a time off award in September 2021.

**DIRECTOR OF INTERNAL REVIEW AND COMPLIANCE**

Served as the principal advisor to the commander on internal control and audit matters. Ensured internal review services were delivered in accordance with GAGAS and appropriate DOD/DA policies and regulations. Directed, managed, and executed all internal review services. Significant accomplishments include:

- Identified control gaps to senior leadership that showed department directors were negligent in performing their required Management Internal Control Program (MICP) responsibilities.
- Facilitated comprehensive training to leadership in their MICP duties, such as risk assessment, identification, monitoring, mitigation, and documentation.
- Frequent interaction with audit clients during weekly in person briefing to the base commander, garrison manager, senior management and those charged with governance, risk management, and compliance.
- Built a consensus to help audit clients understand audit findings and outcomes using data visualization such as graphs, charts, and process flow diagrams.

**Defense Contract Management Agency** (Magna, UT)**October 2015 – April 2017****PRICE/COST ANALYST**

Responsible for proposal analysis, evaluation, and participation in the negotiations for the Navy's Trident D5 II, submarine-launched ballistic missile. Communicated with key participants throughout all stages of the contracting process to ensure a complete and successful review of the proposed costs. Monitored and evaluated quality assurance activities and reported on compliance with established surveillance plans. Significant accomplishments include:

- Briefed management on team progress at weekly project management reviews.
- Performed data analysis and provided negotiation support for a \$139.1 million missile production buy, saving the US taxpayer \$13.4 million.

**Defense Contract Audit Agency** (Salt Lake City, UT; Baghdad, Iraq; Tel Aviv, Israel) **May 2008 – October 2015****SENIOR AUDITOR**

Responsible for conducting complex audits of defense contracts, in a wide array of specialties (e.g. defense applications, engineering, aerospace, communications, robotics, and software), in accordance with GAGAS. Significant Accomplishments include:

- Routinely managed numerous defense contract related audits consisting of proposals, forward pricing rates, defective pricing, and assist audits.
- Responsible for saving the US taxpayer more than \$100 million through detailed contract analysis and audit procedures.
- Selected twice for highly competitive overseas positions in Iraq (6 months) and Israel (2 years).
- Conducted test of controls and key processes through floor checks at forward operating bases throughout Iraq as part of the mandatory annual audits of the DoD's multi-billion-dollar contract.
- Autonomously performed technically complex audits at all Israeli defense contractor locations for DCAA command, located remotely in Germany.
- Mentored 3 auditors in obtaining their CFE credential.
- Served as guest instructor at the Defense Contract Audit Institute (DCAI) multiple times. Teaching classes on statistical sampling, regression analysis, report writing, and technical indoctrination.
- Pioneered and became the first auditor to acquire the DoD financial management level II certification.

**Chris Harding, CPA****May 2018 - December 2021****SOLE PROPRIETOR**

Execute contracted internal audit services for local school districts and cities. Use proven knowledge and understanding of internal audit process, internal controls, risk management, and compliance auditing to provide ad-hoc services to community organizations. Audits are performed in accordance with the Institute of Internal Auditor's (IIA) International Professional Practices Framework (IPPF).

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**PROFESSIONAL CERTIFICATIONS**

- |   |               |
|---|---------------|
| • Certified Public Accountant (CPA) License Number 7071683-2601 | May 2009      |
| • Certified Fraud Examiner (CFE) Member # 603637                | May 2011      |
| • Certified Internal Auditor (CIA) Certificate # 106253         | February 2012 |
| • DoD Financial Management Certification Level II               | June 2015     |

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**EDUCATION****Weber State University**

Master of Business Administration MBA

May 2008

**University of Utah**

Bachelor of Science in Accounting

May 2006

## Appendix C – Peer Review: Salt Lake County Auditor’s Office

This appendix includes the Association of Local Government Auditors (ALGA) peer review of the Salt Lake County Auditor’s Office completed in 2024, which received the highest possible rating of 'Pass'.



### External Quality Control Review

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of the  
Office of the Salt Lake County Auditor

Conducted in accordance with guidelines of the  
**Association of Local Government  
Auditors**  
for the period August 1, 2022 to December 31, 2023

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## Association of Local Government Auditors

April 11, 2024

Mr. Chris Harding, CPA, CFE, CIA  
Salt Lake County Auditor  
2001 S. State Street, Ste N3-300  
Salt Lake City, UT 84190

Dear Mr. Harding,

We have completed a peer review of the Office of the Salt Lake County Auditor for the period August 1, 2022 to December 31, 2023. In conducting our review, we followed the standards and guidelines contained in the *Peer Review Guide for Assessing Conformance with Government Auditing Standards* published by the Association of Local Government Auditors (ALGA).

We reviewed the internal quality control system of your audit organization and conducted tests to determine whether your internal quality control system was adequately designed and operating effectively to provide reasonable assurance of compliance with *Government Auditing Standards* issued by the Comptroller General of the United States and applicable legal and regulatory requirements. Our procedures included:

- Reviewing the audit organization's written policies and procedures.
- Reviewing internal monitoring procedures.
- Reviewing a sample of engagements and working papers.
- Reviewing documents related to independence, training, and development of auditing staff.
- Interviewing auditing staff and management.

Due to variances in individual performance and judgment, compliance does not imply adherence to standards in every case but does imply adherence in most situations. Organizations can receive a rating of pass, pass with deficiencies, or fail. The Office of the Salt Lake County Auditor has received a rating of pass.

Based on the results of our review, it is our opinion that Salt Lake County, Utah's internal quality control system was adequately designed and operating effectively to provide assurance of compliance with *Government Auditing Standards* and applicable legal and regulatory requirements for engagements during the period August 1, 2022 to December 31, 2023.

We have prepared a separate letter providing findings and recommendations to further strengthen your internal quality control system.

Angela Baxter  
Hanover County, Virginia

Andrew Scoggin  
City of Seattle, Washington



## Association of Local Government Auditors

April 11, 2024

Mr. Chris Harding, CPA, CFE, CIA  
Salt Lake County Auditor  
2001 S State Street, Ste N3-300  
Salt Lake City, UT 84190

Dear Mr. Harding,

We have completed a peer review of the Office of the Salt Lake County Auditor for the period August 1, 2022, to December 31, 2023, and issued our report thereon dated April 11, 2024. Congratulations on passing your first GAGAS (Generally Accepted Government Auditing Standards) peer review. This remarkable accomplishment reflects not only your organization's commitment to excellence but also your dedication to upholding the highest standards of accountability and integrity in government auditing. We are offering this companion letter to offer findings and recommendations from our peer review.

We want to mention some of the areas in which we believe your office excels:

- We commend that your office proactively sought to go through the peer review process after 18 months of adherence to *Government Auditing Standards* when the normal review period is three years. We found that your office already has the foundational practices and culture in place to ensure that audits meet the *Standards*.
- In our conversations with management and staff, we sensed they are bought into the efforts your office is making to ensure compliance with the *Government Auditing Standards*.
- Your office has successfully adapted their processes to a new audit management software, without any major hiccups.

The journey to achieving and maintaining the highest standards in government auditing is ongoing, and your success in this peer review is a strong foundation for continued excellence and leadership in the field. In light of this being your first peer review, we offer the following findings and recommendations to enhance your organization's demonstrated adherence to *Government Auditing Standards*.

- The Conceptual Framework Approach to Independence Standards 3.27 to 3.34 ensures auditors maintain independence in both mind and appearance throughout their engagements. This approach requires auditors to apply a process of identifying threats to independence, evaluating the significance of these threats, and applying

safeguards to eliminate the threats or reduce them to an acceptable level. During our review of the Office's work papers, we noted opportunities to improve documentation of the office's process of applying safeguards to threats identified. As a best practice, independence reassessments should be documented at the beginning and conclusion of each engagement and during the follow-up audit process.

- Standard 8.33 requires a written audit plan for each audit. Auditors should update the plan, as necessary, to reflect any significant changes to the plan made during the audit. Page 21 of the Audit Manual states that the audit plan is documented in writing and updated when significant changes to the plan are made during the audit. In reviewing the Office's work papers, we did not observe any specific method of updating the plan if necessary. We recommend that methodology be developed so that workpapers can be standardized.
- Standards 8.108 to 8.110 underline the critical role of thorough and clear documentation in maintaining an audit's integrity, transparency, and accountability. They ensure that third parties can effectively review and understand audit work, contributing to the reliability and credibility of the audit findings. While reviewing the Office's workpapers, we did not observe specific conclusions regarding the validity and reliability of specific evidence. We recommend that such conclusions be made at an individual test level and/or a collective level to improve transparency.
- Standard 8.116 emphasizes the importance of finding audit documentation. This section outlines the necessity for auditors to prepare and maintain adequate documentation that supports the findings, conclusions, and recommendations of the audit. It specifies that the documentation should be detailed enough to allow an experienced auditor, having no previous connection to the audit, to understand the audit work performed, the evidence gathered, and the reasoning behind the auditors' conclusions. Page 27 of the Audit Manual references a finding development worksheet. Upon review of the Office's workpapers in AuditBoard, issues (or findings) are documented, which contain criteria, condition, cause and effect. The process for establishing the evolution of findings to the report in AuditBoard should be finalized, and the Audit Manual should be updated to reflect the new process.
- Standards 8.71 and 8.72 detail the importance of assessing the risk of fraud while conducting an audit. Our review found that your office is assessing fraud risk, but the documentation regarding this assessment could be improved. We recommend adding standard procedures and documentation noting explicitly how fraud has been assessed during an audit project, whether your office's Fraud Hotline has received related allegations,

We extend our thanks to you, and your staff we met for the hospitality and cooperation extended to us during our review.

Sincerely,



Angela Baxter  
Hanover County, Virginia



Andrew Scoggin  
City of Seattle, Washington





**CHRIS HARDING**  
CPA, CFE, CIA  
Salt Lake County Auditor

**RICHARD JAUSSE**  
Chief Deputy Auditor

**ROSWELL ROGERS**  
Policy Advisor

**OFFICE OF THE  
SALT LAKE COUNTY  
AUDITOR**  
2001 S State Street, N3-300  
PO Box 144575  
Salt Lake City, UT 84114-4575

385-468-7200 | TTY 711



April 11, 2024

Lyndon S. Remias, CPA, CIA  
ALGA Peer Review Coordinator  
Virginia Beach City Auditor

Angela W. Baxter, CPA  
Peer Review Team Leader  
Director of Internal Audit  
Hanover, Virginia

Andrew Scoggin  
Peer Review Team Member  
Assistant City Auditor  
Seattle Office of City Auditor

Dear Peer Review Team:

Thank you for your thorough peer review of the Audit Services Division of the Salt Lake County Auditor's Office to determine our compliance with the Generally Accepted Government Auditing Standards (GAGAS) for August 1, 2022, through December 31, 2023. We are pleased you found our quality control system was adequately designed and operating effectively to provide reasonable assurance of our compliance with GAGAS.

We are grateful for the acknowledgment of the measures we have already put into place and value the illustrative guidance provided. Such insights are instrumental in refining our approach to ensure that our documentation is comprehensive and easily navigable for future peer reviews and for any parties interested in evaluating our audit work. Please find below our responses to your findings:

1. Regarding the Conceptual Framework Approach to Independence, we acknowledge the importance of meticulous documentation when applying safeguards against identified threats to independence. We will incorporate a standardized procedure for documenting independence reassessments at the end of each audit engagement, as well as during the follow-up process, to reinforce our compliance with Standards 3.27 to 3.34.
2. With respect to Standard 8.33 and the audit planning process, we recognize the opportunity for more thorough documentation. We are committed to developing a structured methodology for updating our audit plans. This will involve creating a consistent approach to documenting any significant changes during the audit, thereby ensuring our workpapers are comprehensive and up to date.

3. In response to the recommendations pertaining to Standards 8.108 to 8.110, we will enhance our workpaper documentation to include specific conclusions regarding the validity and reliability of individual pieces of evidence, as well as collective evidence. This will improve the clarity and transparency of our audit findings and will facilitate a better understanding of our audit work by third parties.
4. As for the audit documentation findings related to Standard 8.116, we will finalize the procedures that outline the progression of findings from their inception to their reporting in Audit Board. This will involve updating our Audit Manual to reflect these revised procedures, ensuring that our documentation is sufficiently detailed to enable any experienced auditor to understand the audit work, evidence, and conclusions.  
We are committed to continuous improvement and will take immediate steps to integrate these recommendations into our practices. We plan to provide training to all relevant staff members to ensure consistent application of these enhancements across all future audits.
5. Concerning Standards 8.71 and 8.72 regarding fraud risk assessment, we acknowledge the need for more detailed documentation. We will create and implement standard operating procedures that specify how fraud risk is assessed within each audit. This will include a mandatory step to consult and document any relevant information from our office's Fraud Hotline. This enhancement will ensure that our fraud risk assessment process is transparent and verifiable in our documentation.
6. With regards to the recommendations on information system controls as per Standards 8.59 to 8.62, we understand the importance of explicit documentation in this area. We will refine our documentation practices to clearly demonstrate that information system controls have been considered and, where necessary, tested. Our revised documentation will outline the rationale for considering certain controls relevant, the method of evaluation conducted, and the conclusions drawn from such assessments.

Thank you for taking the time to participate in this external peer review. It was a pleasure working with such a knowledgeable and skilled peer review team. We recognize the peer review process is a valuable tool to help ensure quality, independence, and objectivity in the audit process. We look forward to future opportunities to participate in the peer review process with the Association of Local Government Auditors (ALGA).

Sincerely,



Chris Harding, CPA, CIA, CFE  
Salt Lake County Auditor

## **Appendix D – Business License Application & Insurance Commitment**

This appendix contains screenshots and confirmations of the submitted business license application and intent to secure the required \$2 million professional liability insurance policy.



Welcome to the  
**CPA Value Plan**  
Online Process

Application  
Number: 277041

Thank you for your firm information.

The premiums for your selected coverage options are provided below.

|                       | Limits of Liability<br>Per Claim/Annual Aggregate | Annual Aggregate Deductible | Annual Premium |
|-----------------------|---|-----------------------------|----------------|
| <input type="radio"/> | 1,000,000/2,000,000                               | 1,000                       | \$336.00       |

Policy Term: 8/05/2025 to 8/05/2026

Prior Acts Date: 8/03/2025

Claims expenses are paid in addition to limits of liability.

Premium Credits applied:

5.00% Engagement Letter

**Additional Benefit available for the CPA Value Plan**

When applying for the CPA Value Plan, you can now add CPA NetProtect coverage, which provides two significant enhancements to the network risk and privacy claim coverage included in your professional liability insurance policy. [Learn more](#) about this important coverage.

|                       | Network Limit<br>Aggregate  | Network Deductible<br>Per claim | Extortion Sublimit<br>Aggregate Sublimit of Network Limit | Extortion Deductible<br>Per claim | Privacy Expense Limit<br>Aggregate | Privacy Expense Deductible<br>Per claim | NetProtect Premium |
|-----------------------|---|---------------------------------|---|-----------------------------------|------------------------------------|---|--------------------|
| <input type="radio"/> | \$100,000   | \$1,000                         | \$15,000  | \$1,000                           | \$100,000                          | \$0                                     | \$ 219.00          |
| <input type="radio"/> | No thanks, I am not interested in adding this valuable coverage at this time. |                                 |   |                                   |                                    |   |                    |

FATCA Notice: Please go to Aon.com/FATCA to obtain the appropriate W-9.

After inquiry of all owners, partners, officers and professionals of the firm and firm affiliates, if within the past 5 years you have: (1) become aware of claims, incidents, circumstances or events that could reasonably give rise to a claim involving matters of privacy injury, identity theft, denial of service attacks, computer virus infections, theft of information, extortion demand, damage to a third party network, or a customer's inability to rely on your network; (2) sustained a loss of or damage to your network that resulted in a loss of income; or (3) been the subject of any regulatory or disciplinary investigation or inquiry, please call 800-221-3023 before adding CPA NetProtect coverage.

Your agent is: Aon Insurance Services.

To complete this process, choose one of the options above, and select a payment option.

- ☐ I want to complete my purchase online now.
- ☐ I want to complete my purchase offline.
- ☐ I am not ready to make my decision at this time.

[Select new coverage options and recalculate premium quotation.](#)

[View benefits and features of the CPA Value Plan.](#)

Feedback



### Menu

|                        |
|------------------------|
| Initial Application    |
| Duplicate License      |
| Mailing Address Change |
| Pending Prereqs        |
| Cart                   |
| Logout                 |

### Licensing Home Page

Displayed below, are all process that you, or the facility you represent, are licensed to operate. The display may also include any pending applications currently in process for your program.

- To apply for a license, click on the **Initial Application** link in the Menu on the left.
- To request a duplicate copy of your license, click on the **Duplicate License** link in the Menu on the left.
- To update a license address, click on the **Mailing Address Change** link in the Menu on the left.

### Name

**Business / Facility Name:** CPA Insight Solutions  
**Owner / Manager Name:** Chris Harding

### Mailing Address

**Street:** 2410 W Temple View Ln  
**APT No / P.O. Box:**  
**City, State, Zip:** South Jordan, UT 84095  
**Phone:** 3856950501  
**Email:** chrishardingg@gmail.com

### Licenses

| C.P.A. Firm     | <a href="#">View Checklist</a> |                  |
|-----------------|--------------------------------|------------------|
| Profession:     | Accountancy                    | License Number:  |
| License Status: | Pending                        | Expiration Date: |



## Application Submitted

Your application has been submitted and all fees have been applied to your card. Please print this page as your proof of submission and receipt of payment.

### Application Information

|                 |                                   |
|-----------------|-----------------------------------|
| Date Submitted: | 5 August 2025                     |
| Applicant Name: | CPA Insight Solutions             |
| License Number: | Pending                           |
| Process:        | Apply for Initial License process |

### Payment Information

|                     |  |
|---------------------|--|
| Authorization Code: | 215020                                   |
| Received Date:      | 8/5/2025 10:17:51 AM                     |
| Transaction #:      | 68922EAD1288694300001F9D0000BBA55250542D |
| Credit Card Number: | XXXX XXXX XXXX XXXX                      |
| Fee Amount:         | \$90.00                                  |
| Total Fee:          | \$90.00                                  |
| Received Amount:    | \$90.00                                  |

[Print Receipt](#)

Now that you have submitted your application, you can check the status of your application on the Home Page at any time. [Click here to go to the Home Page.](#)

[Utah.gov Home](#) | [Utah.gov Terms of Use](#) | [Utah.gov Privacy Policy](#)  
[Utah.gov Accessibility Policy](#) | [Translate Utah.gov](#)

Copyright © 2014 State of Utah - All rights reserved.

Submitter Name: Christopher W Harding  
Submitter ID: 273221  
Submitter Address: 2410 W Temple View Ln. UT 84095  
Submitter Email: chrishardingg@gmail.com

Date/time: August 6, 2025  
Receipt Version: 1

**Receipt Summary**

Total Transaction Fees: \$22.00  
Total Payment Received: \$22.00

**Receipt Details**

**Fees**

| Description / Transaction Type                                  | Reference # | Work Order #    | Filing Status | Filing Fees |
|---|-------------|-----------------|---------------|-------------|
| Certificate of Assumed and of True Name - CPA Insight Solutions |             | W20250806881107 | Submitted     | \$22.00     |
| Total   |             |                 |               | \$22.00     |

**Payment Information**

| Payment Type | Payment Details                | Amount  |
|--------------|--------------------------------|---------|
| Credit Card  | 6893ACC535D26AAD00002B5400004E | \$22.00 |
| Total        |                                | \$22.00 |

**Submitter Account Information**

| WorkOrder #     | Submitter ID | Submitter Name        |
|-----------------|--------------|-----------------------|
| W20250806881107 | 273221       | Christopher W Harding |



# South Jordan City Web Portal

Welcome Chris Harding

[Sign Out](#) [My Account](#) [My Items](#) [Portal Home](#) [Search for a Property](#)

## My Items

[Expand All](#) | [Collapse All](#)

Note: You can collapse and expand individual sections by clicking the header of the section you wish to collapse/expand.

### My Business License Items (1) ☺

Filter Applications:

Show Active (1 of 1) ▾

| Licensee Number↕              | Name↕                 | Address↕                                     | Status↕ | Date Created↕ |
|-------------------------------|-----------------------|--|---------|---------------|
| <a href="#">LCHO202500576</a> | CPA Insight Solutions | 2410 W Temple View Ln South Jordan, UT 84095 | New     | 08/07/2025    |
| <div>Upload Submittals</div>  |                       |  |         |               |

## Exhibit 2 – Fee Schedule at an hourly rate of \$125/hr

| Timeline        | Task Description                                      | Estimated Hours | Cost     |
|-----------------|---|-----------------|----------|
| Sep 1 – Sep 13  | Engagement Kickoff & Planning                         | 12              | \$1,500  |
| Sep 14 – Oct 5  | Policy Review & Risk Assessment                       | 18              | \$2,250  |
| Oct 6 – Nov 15  | Fieldwork: AUP Testing (P-Card, Travel, Cash)         | 54              | \$6,750  |
| Nov 16 – Dec 15 | Fieldwork: AUP Testing (Utility, RDA, Food, Vehicles) | 58              | \$7,250  |
| Dec 16 – Jan 10 | Internal Controls Fieldwork & Gap Analysis            | 61              | \$7,625  |
| Jan 11 – Jan 25 | Draft Findings & Report Compilation (AUP & IC)        | 22              | \$2,750  |
| Jan 26 – Feb 6  | Audit Committee Support Materials                     | 12              | \$1,500  |
| Feb 7 – Feb 21  | Final Drafting, QA & Revisions                        | 10              | \$1,250  |
| Feb 22 – Mar 7  | Presentation Prep & Council Meeting                   | 9               | \$1,125  |
| Mar 8 – Mar 15  | State Submission & Wrap-Up                            | 5               | \$625    |
| Total           |   | 261             | \$32,625 |

Note: Vineyard City's scope effectively requires eight separate and distinct AUPs and eight internal control reviews. The \$125/hour rate is fully inclusive: no additional charges for travel, communications, or administrative time will be billed.

**VINEYARD CITY**  
**Request for Proposals (RFP)**  
**Independent Financial Audit & Internal Controls Review**  
**RFP No. 2025-61-101**

---

**I. Introduction & Purpose**

Vineyard City (“City”) is soliciting sealed Proposals from qualified independent certified public accounting firms (“Proposer” or “Firm”) with a demonstrated reputation for excellence in government auditing, municipal finance, and compliance to:

- a. Perform an agreed-upon procedures (“AUP”) engagement to review the City’s FY 2023 to 2024 financial records.
- b. Conduct a targeted review of internal controls, policies, and procedures in the following high-risk areas:
  - Purchase (P-) Card issuance & use
  - Employee travel & reimbursement
  - Municipal vehicle assignment & usage tracking
  - Redevelopment Agency (RDA) payments & compliance
  - Procurement of food (meals, events, employee recognition)
- c. Advise the City on best practices for establishing a standing Audit Committee.

The City seeks an objective, highly qualified firm with relevant experience serving municipalities to deliver clear, actionable recommendations that strengthen transparency, safeguard public funds, and align with Government Finance Officers Association (GFOA) “Best Practices” and guidance from the Utah State Auditor.

This engagement is not intended to duplicate or second-guess the findings or scope of a prior audit conducted by the Office of the Utah State Auditor. Rather, its purpose is to follow through on the recommendations identified in that audit and to strengthen the City itself to ensure independent, proactive oversight, and to reinforce public confidence in local financial management.

**II. Procurement Authority**

This RFP is issued pursuant to the Utah Procurement Code ([Utah Code Title 63G, Chapter 6a](#)), Utah Municipal Code ([Utah Code Title 10, Chapter 7, Section 86](#)) and the City’s own procurement ordinance. The City reserves all rights provided therein, including the right to cancel or amend this RFP at any time, to reject any or all Proposals, and to waive immaterial defects.

### III. Project Scope

| Task  | Deliverables   | Standards & References  |
|---|--|---|
| <b>Agreed-Upon Procedures (AUP)</b>         | AUP Report based on City-identified financial procedures for FY 2023 to 2024; Summary of findings and recommendations  | SSAE No. 19 (Agreed-Upon Procedures Engagements), AICPA Attestation Standards, relevant Utah Code |
| <b>Targeted Review of Internal Controls</b> | Written evaluation of policies and procedures for each listed category; Risk-ranked findings matrix; Gap analysis against best practices; and an evaluation of the City's mechanisms for reporting and investigating employee misconduct, waste, or fraud, including whistleblower protections, staff awareness of reporting mechanisms, and tone at the top | COSO Framework; GFOA Best Practices; Utah State Auditor guidance                                  |
| <b>Audit Committee Guidance</b>             | Sample Audit Committee charter/bylaws; Qualifications and appointment process recommendations; Sample onboarding or training materials   | GFOA "Audit Committees" Guidelines; IIA Standards   |

The AUP engagement shall include (but is not limited to):

- Review of transaction-level data for procurement and disbursement cycles;
- Review of compliance with internal spending thresholds and approvals;
- Sampling of employee reimbursements and credit card charges;
- Verification of year-end balances and fund transfers for selected fiscal years; and
- Compliance with key state laws, including [Title 10, Chapter 6 of Utah State Code](#).

The targeted review of internal controls shall include a review of internal controls, policies, and procedures in the following high-risk areas:

Conduct a targeted review of internal controls, policies, and procedures in the following high-risk areas:

- Purchase (P-) Card issuance & use;
- Employee travel & reimbursement;
- Municipal vehicle assignment & usage tracking;
- Redevelopment Agency (RDA) payments & compliance;
- Procurement of food (meals, events, employee recognition);
- Cash transactions;
- Utility billing, including verification that billed accounts correspond to valid City-owned meters;
- RDA cleanup material controls, including review of weigh-in and weigh-out documentation from transfer stations

Upon completion of the above-listed tasks, the Firm shall prepare final written reports summarizing all findings and recommendations. These reports will be:

- Presented to the Vineyard City Council in a public meeting;
- Submitted to the Utah Office of the State Auditor;
- Published on the City's official website and made available for public inspection under GRAMA; and
- Accompanied by an executive summary written in plain language for non-technical audiences.

The auditor shall prepare a slide deck or executive summary suitable for public presentation, present findings in a public City Council meeting, and participate in a Q&A session with the City Council.

#### **Project Timeline:**

Work should begin no later than September 2, 2025. Draft reports are due November 30, 2025. Final deliverables due by December 10, 2026, including public-facing report, submission to the Utah State Auditor, and digital publication.

#### **IV. Proposal Requirements**

Submit one (1) electronic PDF and three (3) hard-copy Proposals, clearly labeled **“RFP No. 2025-61-101 – Audit Services”**. Page limit: 25 pages excluding required forms.

1. **Cover Letter** – Authorized signature, acknowledgment of addenda.
2. **Firm Qualifications** – Regional/national presence, peer review results, Utah municipal audit experience, staffing levels.
3. **Key Personnel** – Résumés, licenses, role descriptions, anticipated hours. Identify engagement partner residing in or licensed for Utah.
4. **Approach & Work Plan** – Methodology for each Task; timeline; data & staff needs; deliverable samples.
5. **Internal Control Review Expertise** – Demonstrated experience evaluating P-Cards, travel, fleet, RDAs, and food expenditures.
6. **Audit Committee Support** – Example charters, prior committee implementations.
7. **References** – At least three Utah local government entities audited in past five years.
8. **Cost Proposal – Submitted in a separate, sealed envelope** labeled “Cost Proposal – RFP 2025-61-101.” Itemize fees by Task and year; include hourly rates for additional services.
9. **Required Forms** – Conflict of Interest Certification, Non-Collusion Affidavit, W-9, Utah Business License (or commitment to obtain), and Independence Certification.

DRAFT

## V. Evaluation Criteria (100 Points)

| Criterion                                       | Weight |
|---|--------|
| Technical qualifications & municipal experience | 25     |
| Audit & controls review methodology             | 25     |
| Key personnel expertise & availability          | 20     |
| Quality of sample deliverables / innovation     | 10     |
| References & past performance                   | 10     |
| Proposed cost                                   | 10     |

Short-listed Firms may be invited to oral interviews (virtual or in person).

## VI. Anticipated Schedule

| Milestone                      | Date (Mountain Time)         |
|--------------------------------|------------------------------|
| RFP issued                     | July 22, 2025                |
| Deadline for written questions | Aug 5, 2025 – 2:00 PM        |
| Addendum posted                | As needed                    |
| <b>Proposal due (sealed)</b>   | <b>Aug 7, 2025 – 2:00 PM</b> |
| Interviews (if held)           | Aug 12-13, 2025              |
| Notice of Intent to Award      | Aug 20, 2025                 |
| Contract Approval              | Aug 26, 2025                 |
| Contract start                 | Sept 2, 2025                 |

## VII. Questions & Addenda

Direct all questions in writing to:

**Justine Marshall, Project Manager**

Email: [engineering@vineyardutah.gov](mailto:engineering@vineyardutah.gov)

Subject: “Questions – RFP 2025-61-101”

Answers will be issued via written addendum on the City’s procurement webpage. Firms are responsible for monitoring the site.



## VIII. Contract & Legal Requirements

- **Term & Renewal** – Term-limited engagement based on tasks outlined herein.
- **Independence** – Firm must meet the independence requirements of GAO-3 (Government Auditing Standards), and shall not have provided financial, advisory, or consulting services to the City, its elected officials, or staff in the past three years that would impair its independence. The Firm shall certify in its Proposal that no conflict of interest exists, and must disclose any prior work performed for the City. The selected auditor will report directly to the City Council, not administrative staff, to ensure independence and objectivity.
- **Insurance** – Minimum \$2 million professional liability; \$1 million general liability; statutory workers' compensation.
- **Non-appropriation Clause** – Contract terminates if funds are not appropriated in any fiscal year.
- **Utah Records** – All records are subject to the Utah Governmental Records Access and Management Act (GRAMA).
- **E-Verify** – Firm shall certify participation in E-Verify pursuant to Utah Code § 63G-12-302.
- **Tax Compliance** – Proof of good standing with Utah State Tax Commission.

A Draft Professional Services Agreement is attached as Exhibit A. By submitting a Proposal, Firm agrees to accept the Agreement's terms or clearly identify requested exceptions.

## IX. Reservation of Rights

The City, at its sole discretion, may:

- Reject any or all Proposals;
- Waive minor informalities;
- Seek clarification or negotiate terms;
- Cancel and reissue the RFP.

## X. Attachments

- Exhibit A: Draft Professional Services Agreement
- Exhibit B: Required Forms (Conflict of Interest, Non-Collusion, W-9)
- Exhibit C: FY 2024 Audit Report (for reference)
- Exhibit D: Current P-Card, Travel, and Vehicle Policies

**Issued this 22st day of July, 2025.**

*Prepared by the City Attorney's Office in coordination with the Finance Department.*

**EXHIBIT A**

**DRAFT PROFESSIONAL SERVICES AGREEMENT**

DRAFT

## **EXHIBIT B**

### **REQUIRED FORMS**

**(Conflict of Interest Certification, Non-Collusion Affidavit, W-9, Utah Business License (or commitment to obtain), and Independence Certification)**

DRAFT

**EXHIBIT C**  
**FY 2024 AUDIT REPORT**

DRAFT

**EXHIBIT D**

**CURRENT CITY POLICIES**

**(P-Card, Travel, Vehicle, and Purchasing)**

DRAFT

## **EXHIBIT E**

### **CITY-IDENTIFIED PROCEDURES FOR AGREED-UPON (AUP) ENGAGEMENT**

The selected auditor shall perform the following agreed-upon procedures, at a minimum:

**1. P-Card Transactions**

- Select a representative sample of transactions from FY 2023–2024.
- Verify presence of receipts, approvals, and policy compliance.
- Test for personal or inappropriate expenditures.

**2. Employee Travel & Reimbursements**

- Review a sample of reimbursement requests.
- Verify compliance with per diem and travel policy.
- Confirm required documentation is retained.

**3. Cash Transactions**

- Examine cash-handling policies and physical controls.
- Review deposits and reconciliations for selected months.
- Trace receipts to bank deposits.

**4. Utility Billing & Meter Verification**

- Select random utility accounts and verify billed meters are assigned to valid City-owned properties.
- Test accuracy of rate application.

**5. RDA Payments & Transfer Station Controls**

- Review a sample of cleanup-related payments.
- Verify that destination of materials matches expectations of removal operations

**6. Procurement of Food**

- Review selected food/meals purchases.
- Confirm appropriateness and documentation of purpose.

**7. Vehicle Assignment & Use**

- Review logs and assignments.
- Confirm compliance with usage policies.

**EXHIBIT F**

**UTAH STATE AUDITOR REPORT**

DRAFT



## **EXHIBIT G**

### **CITY ORGANIZATIONAL CHART AND DEPARTMENT CONTACT MATRIX**

DRAFT

## **EXHIBIT H**

### **REQUIRED COMMUNICATIONS & REPORTING PROTOCOL**

#### **1. Audit Liaison**

The City will assign a staff liaison (not the City Manager or Finance Director) to coordinate logistics. All fieldwork, interviews, and document requests shall go through the Liaison.

#### **2. Reporting Line**

The auditor shall report directly to the City Council, not staff. Draft findings and final results will be presented at a public City Council meeting.

#### **3. Public Meeting Requirement**

The final report shall be formally presented in an open public meeting of the City Council. The auditor must be available to answer questions and to summarize key findings and recommendations.

#### **4. Written Deliverables**

A formal report, with:

- Executive summary in plain language
- Risk-ranked findings
- Recommendations with responsible department and remediation timeline

#### **5. State Auditor Submission**

The final report shall be submitted to the Utah State Auditor's Office within 15 days of City Council presentation.

#### **6. Public Release**

Reports will be published on the City's website and made available under GRAMA.

#### **7. Optional Debrief with Staff**

The auditor may be invited to conduct a Q&A or staff training session to review findings and improvements.

# Utah Office of Energy Development

## AGREED-UPON PROCEDURES GUIDE

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**Resources: Standards:** *Utah Code 79-6-6;*  
**Information Contact:** *Utah Administrative Rule R362*  
*AICPA Statements on Standards for Attestation Engagements (AT-C); GAO*  
*Government Auditing Standards (GAS)*

**Utah Energy Tax Credits**  
**energytaxcredits@utah.gov; (801) 538-8682**

**288 N 1460 W, Fourth Floor**  
**Salt Lake City, UT 84116**  
**(801) 538-8732**  
**energy.utah.gov**

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*This Guide is prepared to assist independent public accountants in planning, performing, and reporting on procedures established by the Utah Office of Energy Development. The independent public accountant obtains evidence from applying agreed-upon procedures to provide reasonable basis for the findings expressed in its report. This Guide includes but does not embrace all performance standards applicable to independent public accountants.*

*The agreed-upon procedures engagement is to be conducted in accordance with U.S. Government Accountability Office Government Auditing Standards, 2024 Revision, and AICPA Statements on Standards for Attestation Engagements (SSAE) Number 19, AT-C section 215, Agreed-Upon Procedures Engagements, issued December 2019. SSAE-23 is effective for engagements performed on or after December 15, 2025.*

### 1. BACKGROUND

Utah offers a suite of tax credits for commercial projects that span significant infrastructure projects, as well as renewable energy, oil and gas, and alternative energy installations.

The High Cost Infrastructure Tax Credit Act encourages significant infrastructure investments in the state, supporting the cost-effective and sustainable delivery of Utah's commodities to domestic and global markets.

Tax credits may be granted to businesses whose Utah-based projects meet requirements defined by *Utah Code 79-6-6*. Qualifying projects and investments in infrastructure may include:

- Energy delivery (including hydroelectric energy storage systems, utility-scale battery storage systems, or nuclear power generation systems);
- Fuel standard compliance;
- Mineral processing;
- Underground mine processing;
- Emissions reduction;
- Water purification; and
- Water resource forecasting projects.

Qualifying infrastructure construction costs that are certified by the Utah Office of Energy Development (OED) and approved by the Utah Energy Infrastructure Authority Board will generally receive a post-performance, non-refundable tax credit of 30 percent of qualifying infrastructure-related state revenue generated during a qualifying tax period. The

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total tax credit authorized for a project can be 50 percent of the infrastructure construction costs or, if the high cost infrastructure project is a fuel standard compliance project, can be up to 30 percent of the infrastructure construction costs.

For each tax credit period, the infrastructure cost-burdened entity (Entity) applies for a tax credit certificate from the OED. If eligible, a tax credit certificate is issued to the Entity who may then claim a tax credit as provided by *Utah Code 79-6-6* and related rules. Tax credits authorized by OED are used as follows:

- For an Entity taxed as a C corporation, to offset the Entity's Utah state corporate income tax liability.
- For an Entity reporting as a pass-through entity (partnerships, limited liability companies, S corporations, trusts, and estates), the tax credit is passed through to the pass-through entity taxpayers and claimed on the ultimate pass-through entity taxpayers' income tax returns.

Unused tax credits can be carried forward for a period that does not exceed seven taxable years (refer to *Utah Code 59-5-305, 59-7-619, and 59-10-1034*).

*Infrastructure-related state revenue* is the amount of state tax revenue generated in a tax credit period by the Entity creating a high cost infrastructure project (Project) that is directly attributable to the Project, including:

- State income taxes:
  - For C corporations, calculated by applying the Utah current corporate tax rate to net Utah taxable income as reported on Form TC-20.
  - For pass-through entities, calculated by applying the current individual tax rate to Utah income allocated to pass-through entity taxpayers as reported on Forms TC-20S or TC-65 or TC-41.

(Only new state tax revenue generated by the Project is counted. The baseline amount is the state tax revenue generated during the taxable year prior to starting the project. State tax revenue generated in a tax credit period is reduced by the baseline amount. For newly created Projects, fuel standard compliance projects, emission reduction projects, or other projects outlined in Utah Administrative Rule R362, the baseline amount is zero.)

- State sales taxes:
  - This is the amount of Utah state sales tax paid by the Entity on taxable purchases for the Project.

(Only the state sales tax should be used. Local and county options sales tax, transient and highways tax, and other taxes are excluded. The state sales tax rate, effective January 1, 2025 is 4.85 percent.)

- State severance taxes:
  - This is the amount of Utah severance tax paid by the Entity on the value metals, oil, gas, natural gas, and other gaseous or liquid hydrocarbons extracted in Utah.

For fuel standard compliance projects, emission reduction projects, and other projects outlined in Utah Administrative Rule R362 infrastructure-related revenue means state revenues generated by an applicant after the completion of the project.

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*Infrastructure construction costs* are the costs associated with constructing the infrastructure portion of the project. Infrastructure construction costs are direct costs and certain indirect costs allocable to inherently permanent structures (real property) produced subject to capitalization under the Uniform Capitalization (UNICAP) rules of Internal Revenue Code Section 263A. Costs that are capitalized under Section 263A by the Entity are recovered through depreciation or amortization.

The Entity should have a process in place to isolate, document, and report the Project's infrastructure-related state revenue and infrastructure construction costs from other activities. The Entity's process should also facilitate compliance with applicable laws and rules. The Entity is responsible for the preparation and presentation of infrastructure-related information and related internal control.

Three parties are involved in the attest service covered by this Guide, namely:

- The responsible party, the Entity who is responsible for subject matter,
- The independent public accountant (IA) who performs procedures and issues a report intended to add credibility to the subject matter.
- The engaging party, the OED who may rely on both the Entity and the IA in judging the credibility of the subject matter.

An IA is engaged by the Entity to apply agreed-upon procedures to assist the OED in relying on reported information and determining compliance with *Utah Code 79-6-6* and related rules. The agreed-upon procedures applied by the IA will include verification of the Entity's infrastructure-related information prepared by the Entity. A report prepared by the IA is due to the OED within 300 days of the end of each reporting period. The report (uploaded by the IA to the OED) will include a schedule of infrastructure-related information (the Schedule) that provides the following information:

- The Project's infrastructure-related state tax revenue that has been generated during the taxable period for which the tax credit will be claimed;
- The infrastructure construction costs, excluding other capitalized construction costs and other Entity costs, incurred during the taxable period and to date for the Project;
- For the Project, a summary of significant transactions between the Entity and related entities or individuals; and
- A summary of tax credit certificates that have been issued to Entity for the Project.

The IA is to become familiar with the applicable resources and standards cited above.

AICPA Statements on Standards for Attestation Standards (AT-C) apply whenever an IA is engaged to issue or does issue an agreed-upon procedures report on subject matter that is the responsibility of another party (refer to AT-C sections 105 and 215). A compliance attestation includes engagements related to an entity's compliance with specified requirements of applicable laws and related rules (refer to AT-C section 315). Compliance requirements may be either financial or nonfinancial in nature.

Also, the procedures performed and reports issued by the IA should meet the standards for attestation engagements established by the Comptroller General of the United States in the most recent edition of *Government Auditing Standards* (refer to 2024 revision of *Government Auditing Standards* published by the U.S. Government Accountability Office).

IA's engaged to conduct agreed-upon procedures engagements should be licensed CPAs or persons working for licensed certified public accounting firms (refer to *GAS 7.79*).

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The IA is obligated to design, implement, and operate a system of quality management for engagements performed in its accounting and auditing practice that provides the firm with reasonable assurance that the firm and its personnel comply with professional standards and applicable legal and regulatory requirements and reports issued by the firm are appropriate under the circumstances (refer to AT-C 105.08 – .09 and *GAS* Chapter 5). The firm's most recent peer review report normally would be available in the peer review public file at [https://peerreview.aicpa.org/public\\_file\\_search.html](https://peerreview.aicpa.org/public_file_search.html)

The IA must follow ethical principles and independent standards and use professional judgment when performing this attestation engagement (refer to AT-C 105.28 and *GAS* Chapter 3).

In this agreed-upon procedures engagement, it is assumed that the OED (the engaging party) agrees to the unmodified procedures to be performed as enumerated in this Guide; the OED acknowledges that the procedures are appropriate for the intended purpose of the engagement.

Financial statements are not audited or issued. No opinion on the effectiveness of internal controls is issued. No opinion on compliance is issued. Rather, a report is presented specifying the procedures performed and the results (presented as findings) of performing those procedures. The engaging party and intended users assess for themselves the procedures and findings reported by the IA and draw their own conclusions from the work performed by the IA.

### 2. OBJECTIVES

The objectives of the IA are to:

- Apply to the Entity's Schedule and compliance with specified requirements procedures that the OED agrees to and acknowledges are appropriate to meet the intended purposes of the engagement,
- Issue a written report that describes the procedures applied and the IA's findings (results of applying the procedures), and
- To assist the OED in validating the Entity's Schedule and evaluating the Entity's compliance with specified requirements.

### 3. AGREED-UPON PROCEDURES TO BE PERFORMED BY THE INDEPENDENT ACCOUNTANT

The procedures to be performed are as follows:

#### A. Schedule of Infrastructure-Related Information (the Schedule)

1. Obtain a schedule of infrastructure-related information, prepared by the Entity, which provides the following information:
  - The Project's new infrastructure-related state tax revenue that has been generated during the taxable period for which the tax credit will be claimed.
  - The infrastructure construction costs incurred during the taxable period and to date for the Project.
  - For the Project, a summary of significant transactions between the Entity and related entities or individuals, disclosing relationships, purposes, and amounts of related-party transactions.
  - A summary of tax credit certificates that have been issued to Entity for the Project.

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2. Obtain an understanding of the Entity's preparation and presentation of the Schedule through:
  - Inquiring appropriate management and personnel.
  - Observing the Entity's activities and operations.
3. For state income tax revenue generated:
  - Inspect the Entity's income tax returns filed or to be filed for current tax year and baseline year.
  - Confirm amounts reported on the return match similar amounts included on the Schedule.
4. For sales tax paid:
  - Inspect the Entity's sales and use tax returns filed or to be file for each taxable period.
  - Confirm amounts reported on the returns match similar amounts included on the Schedule.

or

  - Obtain the Entity's detailed record of taxable purchases for the year.
  - Agree detailed record of taxable purchases for the year match similar amounts included on the Schedule.
  - Systematically select 10 percent (but no more than 40) paid invoices.
  - Agree information on selected paid invoices (amounts, dates, payee, purpose) with information on detailed record of taxable purchases.
  - Agree state sales tax rate with current publications.
  - Check math.
5. For severance tax paid:
  - Inspect the Entity's severance tax returns filed or to be file for each taxable period.
  - Confirm amounts reported on the returns match similar amounts included on the Schedule.
6. For infrastructure construction costs incurred:
  - Inquire and observe the Entity's method of isolating infrastructure construction costs from other activities.
  - Inspect applicable construction contracts.
  - Obtain the Entity's detailed record of infrastructure construction costs incurred (amounts, dates, payee, purpose) supporting amounts reported on the depreciation schedule.
  - Systematically select 10 percent (but no more than 40) paid invoices.
  - Agree information on selected paid invoices (amounts, dates, payee, purpose) with information on the detailed record of infrastructure construction costs incurred.
  - Ensure selected costs are related to approved infrastructure project.
  - Confirm that costs are net of refunds, adjustments, and allowances.
7. For tax credit certificates issued:
  - Obtain copies of tax credit certificates issued by the OED to the Entity
  - Compare information reported on the certificates with related information reported on the Schedule



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### **B. Compliance**

When inspecting documentation supporting new state tax revenue and infrastructure construction costs, compare information to the following requirements:

- The project must be physically located in the State of Utah.
- Documentation should distinguish infrastructure-related costs from other project and Entity costs.
- Documentation supporting costs and tax filings should be retained for a time period to allow the OED and taxing authorities to assess tax liabilities and credits.
- Costs should be reported in the tax period when incurred.
- Costs should be incurred by the Entity and for the approved Project.
- Related-party transactions have been disclosed on the Schedule.

## **4. ENGAGEMENT ADMINISTRATION**

### **Terms of the Engagement**

It is in the interests of both the Entity and the IA to document the agreed-upon terms of the engagement before the commencement of the engagement to help avoid misunderstandings. The form and content of the engagement letter or other suitable form of written agreement will vary with the engagement circumstances.

A sample engagement letter is provided as Appendix A to this Guide (refer to AT-C 215.15).

### **Communication with the OED**

It may be necessary for the IA to communicate directly with the OED to understand the appropriateness (nature, timing, and extent) of the agreed-upon procedures to be performed as the OED best understands its own needs. Communication could include:

- Discussing the procedures to be applied with the appropriate representatives of the OED,
- Reviewing agreements with or correspondence from the OED,
- Providing a draft of the anticipated IA's report to the OED and obtaining its agreement, or
- When the IA finds it necessary to modify procedures enumerated in this Guide, requesting the OED to agree to the modified procedures and acknowledge that those procedures performed are appropriate for its purposes.

### **Written Representations**

Written representations in the form of a letter addressed to the IA should be obtained from the Entity (and, when procedures are modified, from the OED). The representations should include the relevant elements listed in AT-C 215.27 and AT-C 315.25. The date of the written representations is the date of the IA's report. The written representations address the schedule of infrastructure-related information and compliance for periods covered by the IA's findings.

Written confirmation of oral representations reduces the possibility of misunderstandings between the IA, the Entity, and, if applicable, the OED. The person from whom the IA requests written representations is ordinarily a member of senior management or those charged with governance depending on, for example, the management and governance structure of the parties, which may vary by entity, reflecting influences such as size and ownership characteristics (refer to AT-C 215.A43).

A sample written representation letter is provided as Appendix B to this Guide.

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### Documentation

For each agreed-upon procedures engagement performed under this Guide, the IA should prepare documentation (in addition to an engagement letter, written representations, and the IA's report) that is sufficient to determine:

- The nature, timing, and extent of procedures performed, including –
  - What was tested,
  - Who performed the work and the date the work was completed, and
  - Who reviewed the engagement work performed and the date and extent of such review.
- The results of the procedures performed and the evidence obtained.

The documentation should be retained by the IA for seven years and be available to the OED upon request.

### 5. REPORTING

A sample written report is provided as Appendix C to this Guide (refer to AT-C 315.26, AT-C 215 Example 4 and AT-C 315 Example 3).

A sample schedule of infrastructure-related information is provided as Appendix D to this Guide.

Findings are factual results of procedures performed. Findings are capable of being objectively verified and objectively described, which means that procedures to be applied to the subject matter are expected to result in reasonably consistent findings. Accordingly, findings exclude opinions or conclusions in any form as well as any recommendations that the IA may make (refer to AT-C 215.26, AT-C 215.A36 and GAS 7.84).

When the OED has established a threshold for reporting exceptions, the IA should describe such threshold in its report (refer to AT-C 215.25). Otherwise, the IA should present *all* the results of applying procedures to the specific subject matter in the form of findings (refer to AT-C 215.24 and AT-C 215.A37).

The IA should avoid vague or ambiguous language in reporting findings (refer to AT-C 215.26 and AT-C 215.A38).

The IA has no obligation to perform procedures beyond the agreed-upon procedures. However, if in connection with the application, and through the completion of, the agreed-upon procedures engagement, matters come to the IA's attention by other means that significantly contradict the subject matter or assertion referred to in the IA's report, the IA should discuss the matters with the OED and take appropriate actions, including determining whether the IA's report should be revised to disclose the matters (refer to AT-C 215.40).

In the event the practitioner encounters known or suspected fraud or noncompliance with laws or regulations in connection with the engagement, the practitioner should consider responsibilities under the AICPA Code of Professional Conduct and applicable law prior to communicating such information either to the responsible party or the engaging party (refer to AT-C 215.41 and AT-C 215.A74).

Because GAS incorporates by reference the AICPA's attestation standards, GAS does not require the IA to cite compliance with AICPA standards when citing compliance with GAS (refer to GAS 7.83).

The IA is to distribute its report to both the Entity and the OED (refer to GAS 7.85).

If certain necessary and detailed information is excluded from a report because of its confidential or sensitive nature, the IA should disclose in the report that certain information has been omitted and the circumstances that make the omission necessary.

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### APPENDIX A – Engagement Letter

[Date]

[Board or officer of Entity]  
[Name of Entity]  
[Address of Entity]  
[Identification of Project]

We are pleased to confirm our understanding of the services we are to provide for [Name of Entity] (the Entity). This letter will confirm the nature and limitations of the services we will provide and the various responsibilities and other terms of the engagement.

We agree to apply procedures which the Utah Office of Energy Development (the OED) has specified, enumerated in the Agreed-Upon Procedures Guide, to the schedule of infrastructure-related information (the Schedule) for [Name of Entity] for the year ended December 31, 202X, and the Entity's compliance with *Utah Code 79-6-6* and related rules for the period January 1, 202X to December 31, 202X. These procedures will be applied for the purpose of reporting our findings as a result of the procedures performed.

#### Agreed-Upon Procedures

We will conduct our engagement in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. We are responsible for carrying out the procedures and reporting findings in accordance with these standards. We have no responsibility to determine the differences between the procedures to be performed and the procedures that we would have determined to be necessary had we been engaged to perform another form of attestation engagement.

The OED has the responsibility to agree to and acknowledge that the procedures performed are appropriate to meet the intended purpose of assisting users in understanding the Schedule for the year ended December 31, 2020 and determining whether the Entity complied with the specified statutory requirements identified above. Our report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of our report and may not meet the needs of all users of our report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The agreed-upon procedures are not designed to constitute an examination or review of the Entity's Schedule. Also, the agreed-upon procedures are not designed to constitute an examination or review of the Entity's compliance with *Utah Code 79-6-6* and related rules. Therefore, we will not express an opinion or conclusion on these matters. If we did perform additional procedures, other matters might come to our attention that would be reported to you.

Our report (which will include the Schedule) will list the procedures performed and our findings. We will distribute our report to officials of the Entity. We will also upload our report to the OED as specified by the OED.

The purpose of our report will be solely to describe the procedures performed on the Schedule and on compliance with specified requirements and to describe the results of applying those procedures without providing an opinion or conclusion. Accordingly, our report will not be suitable for any other purpose. Our report will contain such restricted-use language. We are also obligated to report known and suspected fraud and noncompliance with laws or rules that come to our attention during our agreed-upon procedures.

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## AGREED-UPON PROCEDURES GUIDE

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Should we have any reservations with respect to the subject matter, we will discuss them with you before the report is issued.

We have no responsibility to update our report for events and circumstances occurring after the date of our report.

### Management Responsibility

Our engagement will be conducted on the basis that the Entity's management acknowledge and understand that they have responsibility for:

- Designing, implementing, and maintaining internal control relevant to the Entity's Schedule and the Entity's compliance with *Utah Code 79-6-6* and related rules;
- Providing us with:
  - Access to all information of which management is aware that is relevant to the Entity's Schedule and compliance such as records, documentation, and other matters;
  - Additional information that we may request from management for performing the agreed-upon procedures; and
  - Unrestricted access to persons within the Entity from whom we determine it necessary to obtain attest evidence.

### Engagement Administration and Fees

Our engagement is scheduled for performance beginning in March 202X and, unless unforeseeable problems are encountered, the engagement should be completed by May 15, 202X.

[Name of engagement partner], CPA is the engagement partner for the services specified in this letter and is responsible for supervising the engagement and signing the report.

Our fee for this service will be \$\_\_\_\_\_ and is payable when invoiced at the completion of this engagement. Finance charges of 1½ percent per month will be assessed on unpaid balances over 30 days old.

Prior to the completion of the engagement, we will request from management of the Entity written confirmation concerning representations made to us in connection with the agreed-upon procedures that, among other things, will confirm its responsibility for the accuracy and completeness of the Entity's Schedule and the Entity's compliance with *Utah Code 79-6-6* and related rules.

We agree to retain our attest documentation for seven years from the date of our report.

If any difference arises between the Entity and our firm related to services performed by us that cannot be resolved, the Entity and we agree first to try in good faith to settle the difference.

The attest documentation for this engagement is the property of [Name of CPA firm] and constitutes confidential information. However, we may be requested to make certain attest documentation available to the OED and other oversight agencies pursuant to authority given to them by law or regulation. If requested, access to such attest documentation will be provided under the supervision of [Name of CPA firm]'s personnel. Furthermore, upon request, we may provide copies of selected attest documentation to oversight agencies. The oversight agencies may intend, or decide, to distribute the copies of information contained therein to others, including other governmental agencies. However, the Entity shall have the sole obligation or privilege of releasing any information obtained or prepared in performance of our procedures.

In accordance with the requirements of *Government Auditing Standards*, our most recent external peer review report can be viewed in the public file at [www.aicpa.org](http://www.aicpa.org).

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Please sign and return a copy of this letter to indicate your acknowledgment of, and agreement with, the arrangement for our engagement including our respective responsibilities. If management has questions, please let us know. We appreciate the opportunity to be of service to the Entity and look forward to working with the Entity and its personnel.

Respectfully,

[Name of CPA firm]

RESPONSE:

This letter correctly sets forth the understanding of the Entity. Acknowledged and agreed on behalf of the Entity by:

Official's Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# Utah Office of Energy Development

## AGREED-UPON PROCEDURES GUIDE

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Subject: High Cost Infrastructure Development Tax Credit Act

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### APPENDIX B – Written Representation Letter

[Name of CPA firm]  
[Address of CPA firm]

We are providing this letter in connection with your agreed-upon procedures on the schedule of infrastructure-related information (the Schedule) for the year ended December 31, 202X and related to the compliance of [Name of Entity] (the Entity) with *Utah Code 79-6-6* and related rules for the period January 1, 202X to December 31, 202X, for the purpose of reporting your findings to the Utah Office of Energy Development (the OED) and the Entity regarding the Schedule and the Entity's compliance.

We confirm, to the best of our knowledge and belief, as of [Date of report], the following representations made to you during your engagement:

- We are responsible for the accuracy and completeness of the Schedule and establishing and maintaining effective internal control relevant to the Schedule.
- The Schedule agrees with the underlying accounting information.
- We are responsible for the Entity's compliance with *Utah Code 79-6-6* and related rules and affirm our assertion about the Entity's compliance.
- We are responsible for establishing and maintaining effective internal control over compliance.
- We have performed an evaluation of the Entity's compliance with *Utah Code 79-6-6* and related rules and we are responsible for selecting and determining the suitability and appropriateness of the criteria upon which that evaluation was performed.
- We have disclosed any known noncompliance occurring after the period covered by your report.
- We affirm that all known matters contradicting the Schedule with the underlying accounting information or the Entity's compliance with *Utah Code 79-6-6* and related rules and any related communication from regulatory agencies or others have been disclosed to you, including communications received between December 31, 202X and the date of your report.
- We affirm that we have provided you with all relevant information and access, as applicable, as agreed upon in the terms of the engagement.
- We have responded fully to all inquiries made to us by you during the engagement.
- We understand that the purpose of your report is solely to describe the procedures performed on the Schedule and on compliance with specified requirements and to describe the results of applying those procedures without providing an opinion or conclusion. Accordingly, your report will not be suitable for any other purpose.

Entity Officer:  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

Member of Management:  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

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### APPENDIX C – Independent Accountant's Report on Applying Agreed-upon Procedures

[Board or officers of Entity]  
[Name of Entity]  
[Address of Entity]  
[Identification of Project]

We have performed the procedures enumerated below, which were agreed to by Utah Office of Energy Development (the OED) and on the accompanying schedule of infrastructure-related information (the Schedule) of [Name of Entity] (the Entity) for the year ended December 31, 202X and related to the Entity's compliance with *Utah Code 79-6-6* and related rules for the period January 1, 202X to December 31, 202X. The Entity's management is responsible for the Schedule and its compliance with *Utah Code 79-6-6* and related rules.

The OED has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting users in understanding the Schedule for the year ended December 31, 202X and determining whether the Entity's complied with the specified requirements identified above. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and the associated finding are as follows:

[Enumerate procedures and findings]

We were engaged by the Entity to perform this agreed-upon procedures engagement and conducted our engagement in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Schedule and on compliance with specified requirements. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Entity and to meet other ethical responsibilities in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

[Additional paragraph(s) may be added to describe other matters.]

This purpose of this report is solely to describe the procedures performed on the Schedule and on compliance with specified requirements and to describe the results of applying those procedures without providing an opinion or conclusion. Accordingly, this communication is not suitable for any other purpose.

[Signature of IA's firm]  
[City and state where the IA's report is issued]  
[Date of the IA's report]



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### APPENDIX D – Schedule of Infrastructure-Related Information

**Infrastructure-related state revenue:**

|   |                            |
|---|----------------------------|
| Utah income tax as reported on the Entity's income tax return   | \$ 2,000,000               |
| Baseline Utah state income tax generated  | - <sup>1</sup>             |
| Utah state income tax generated   | <u>2,000,000</u>           |
| Utah state sales tax as reported on Entity's sales and use tax returns  | 100,000 <sup>2</sup>       |
| Utah state severance tax as reported on Entity's severance tax return   | <u>2,100,000</u>           |
| Total infrastructure-related state revenue reported   | <u><u>\$ 4,200,000</u></u> |
| Calculated eligible non-refundable credit of 30 percent of qualifying infrastructure-related state revenue generated during qualifying tax period | <u><u>\$ 1,260,000</u></u> |

**Infrastructure construction costs:**

|  |                             |
|--|-----------------------------|
| Infrastructure construction costs incurred   | <u><u>\$ 15,000,000</u></u> |
| Calculated eligible non-refundable credit of 30 percent of qualifying infrastructure construction costs during qualifying tax period | <u><u>\$ 4,500,000</u></u>  |

<sup>1</sup> For fuel standard compliance project, infrastructure-related revenue mean state revenues generated by an applicant after the completion of a fuel standard compliance project. As a result, the baseline Utah state income tax generated is zero for this project is zero.

<sup>2</sup> Prorated sales tax reported on Entity's tax return for portion of rate related to state rate (70 percent) to exclude local and county options sales tax and transient and highways tax.

**Total project to date:**

|   | Infrastructure-<br>related State<br>Revenue | Infrastructure<br>Construction<br>Costs Incurred | Tax Credit<br>Certificates<br>Issued for<br>Taxable Period |
|---|---|--|--|
| Period from June 1, 20X1 (inception) to December 31, 20X1       | \$ 1,900,000                                | \$ 5,000,000                                     | \$ -   |
| Year ended December 31, 20X2                                    | 3,800,000                                   | 30,000,000                                       | -  |
| Year ended December 31, 20X3                                    | <u>4,200,000</u>                            | <u>15,000,000</u>                                | <u>-</u>   |
| Total project from inception                                    | <u><u>\$ 9,900,000</u></u>                  | <u><u>\$ 50,000,000</u></u>                      | <u><u>\$ -</u></u>   |
| Maximum calculated eligible non-refundable credit of 30 percent | <u><u>\$ 2,970,000</u></u>                  | <u><u>\$ 15,000,000</u></u>                      |  |