STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA-AMERICAN WATER COMPANY, INC. FOR (1) AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR WATER AND WASTEWATER UTILITY SERVICE THROUGH A THREE-STEP RATE IMPLEMENTATION, (2) APPROVAL OF NEW SCHEDULES OF RATES AND CHARGES APPLICABLE TO WATER AND WASTEWATER UTILITY SERVICE, INCLUDING A NEW UNIVERSAL AFFORDABILITY RATE, (3) APPROVAL OF REVISED DEPRECIATION RATES APPLICABLE TO WATER AND WASTEWATER PLANT IN SERVICE, (4) APPROVAL OF NECESSARY AND APPROPRIATE ACCOUNTING RELIEF, (5) APPROVAL OF THE EXTENSION OF SERVICE TO AN INFRASTRUCTURE DEVELOPMENT ZONE IN MONTGOMERY COUNTY, INDIANA AND AUTHORITY TO IMPLEMENT A SURCHARGE UNDER IND. CODE § 8-1-2-46.2, AND (6) APPROVAL OF PETITIONER'S PLANS TO DEVELOP FUTURE WATER SOURCES OF SUPPLY UNDER IND. CODE § 8-1-2-23.5.	**)**	**CAUSE NO. 45870**

PUBLIC'S EXHIBIT NO. 9

REDACTED TESTIMONY OF JAMES T. PARKS

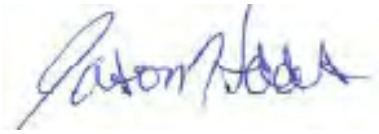
ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

July 21, 2023

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR



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CERTIFICATE OF SERVICE

This is to certify that a copy of the ***Public's Exhibit - No. 9 OUCC's Redacted Testimony of James T. Parks on behalf of the OUCC*** has been served upon the following in the captioned proceeding by electronic service on July 21, 2023.

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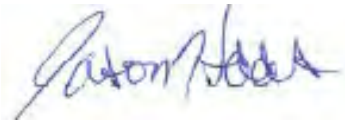

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REDACTED TESTIMONY OF OUCC WITNESS JAMES T. PARKS
CAUSE NO. 45870
INDIANA AMERICAN WATER COMPANY, INC.

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is James T. Parks, P.E., and my business address is 115 W. Washington Street, Suite 1500 South, Indianapolis, IN 46204.

Q: By whom are you employed and in what capacity?

A: I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as a Senior Analyst in the Water/Wastewater Division. My qualifications and experience are described in Appendix A.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to review the prudency and cost reasonableness of (1) the significant capital additions Indiana American Water Company, Inc. ("Indiana American," "Petitioner," or "Company") has made since the rate base cutoff date in Cause No. 45142; and (2) some of the planned capital additions that are projected to cost over $500,000 through the future test year ending April 30, 2025. I explain that Petitioner has failed to justify construction of many of its proposed capital projects and that it has not shown that the projects are needed. I explain why the OUCC opposes some of Petitioner's capital projects and aspects of Petitioner's capital program for ratemaking purposes.

Q: Please describe the review and analysis you conducted for your testimony.

A: I reviewed the Petition and the testimonies of Matthew H. Hobbs, II and Matthew Prine. I reviewed Petitioner's recent Indiana Utility Regulatory Commission

("Commission" or "IURC") Annual Reports. I wrote discovery requests and reviewed Petitioner's responses. Through discovery I sought to understand how Petitioner justified its capital improvements, how these projects were developed, how Petitioner estimated costs, whether Petitioner identified and analyzed any alternatives, and whether Indiana American prepared and completed life cycle cost-benefit analyses of alternatives in accordance with IC § 13-18-26-3.[1] I reviewed pertinent parts of Petitioner's Comprehensive Planning Studies focusing on certain of Petitioner's Districts. I reviewed several Basis of Design reports and Design-Build documents. I reviewed discovery responses provided in Cause No. 45142 -- Petitioner's last rate case. I reviewed various documents, which I refer to in my testimony and which I have attached to my testimony and listed in Appendix B.

Q: If you do not discuss a specific topic or adjustment, does that mean you agree with the Petitioner?

A: No. My silence on any specific topic or adjustment does not indicate my approval or agreement. My testimony is limited to only the issues I discuss herein.

II. INDIANA AMERICAN'S WATER SYSTEM CHARACTERISTICS

Q: Please briefly describe Indiana American's operations.

A: According to Indiana American's most recently filed IURC annual report, in 2022 Petitioner provided metered water utility service to 320,971 customers in 22 water operating districts in Indiana and 24 Sales for Resale customers located primarily

[1] Attachment JTP-1, Life Cycle Cost-Benefit Analysis, IC ch. 13-18-26.

in northwest and southeast Indiana.[2] Petitioner also served 507 flat rate and 1,845 metered wastewater customers. Based on population and service connections data reported to the Indiana Department of Environmental Management ("IDEM") by Indiana American and population and connections data reported to the Indiana Finance Authority (" IFA") by the Sales for Resale customers with their water audits, I estimate Indiana American serves approximately 930,000 people in the State of Indiana or approximately 14% of the population.[3] In contrast, Petitioner reports that it serves 1,420,000 people or 21% of the population.[4] Petitioner's Attachment MHH-1 shows locations of Indiana American's operations.[5]

Petitioner operates 42 water treatment plants having a combined maximum capacity of 268 million gallons per day ("MGD"). Petitioner also owns four retired water treatment plants.[6] Thirty-three (33) of these treatment plants process groundwater at firm capacities (largest unit out of service) ranging from 0.05 million gallons per day ("MGD") (Rivers Edge) to 26.01 MGD (Southern Indiana). Petitioner has four treatment plants that treat surface water, two plants that treat combination sources (both groundwater and surface water), and three plants that treat groundwater under the direct influence of surface water. As of 2022,

[2] 2022 Annual Report to the IURC, page W-1. Metered customers included 289,614 residential (90% of the total), 28,556 commercial (9%), 653 industrial (0.2%), and 2,148 Public Authorities (0.7%). Indiana American also served 6,989 fire protection customers. Petitioner has contracts with 15 Sales for Resale customers who are supplied water through 24 connections from Petitioner's water systems.
[3] The OUCC calculated connected population of 930,000 people based on population and connections data Petitioner reported on IDEM's System Information sheets and from population and connections information reported by the Sale for Resale customers with their IFA required Water Audits.
[4] Attachment JTP-2, Petitioner's response to OUCC DR 27-9.
[5] Petitioner's Exhibit No. 3, Direct Testimony of Matthew Hobbs, Attachment MHH-1.
[6] Lake Station (Northwest), Main Station (Richmond), Westwood (West Lafayette), and Vanada (Newburgh).

Petitioner's transmission and distribution system consisted of approximately 5,245 miles of water mains, 30,838 hydrants, and 25,264 valves.[7]

Q: What are Indiana American's demand characteristics?

A: Petitioner's metered water customer base grew 1.6% annually over the last five years from 296,821 customers (2017) to 320,971 customers (2022). Approximately 48% of the growth was from acquisitions of other utilities[8] and 52% was from organic growth within the Districts. Water pumped volumes (produced and purchased) have remained flat over the same five year period.[9] Petitioner's 2022 average water pumped and purchased and sold for all Districts was 115.4 million gallons per day ("MGD") and 92.4 MGD respectively.

Q: Please provide an overview of Mr. Hobbs' testimony.

A: Mr. Hobbs describes two major projects, the water treatment plant replacement projects for the Sheridan and Winchester systems and provides brief explanations and costs for 33 significant capital additions, each projected to cost more than $500,000 with a total estimated construction cost of $144,321,183.[10] Petitioner forecasts it will complete all significant projects by the end of the future test year ending April 30, 2025. Mr. Hobbs testifies that the gross capital additions total $926.9 million. This includes additions the Company has placed in service or will place in service by the end of the future test year.[11]

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[7] 2022 IURC Annual Report. Petitioner previously reported having 51,060 valves in its 2017 IURC Annual Report.
[8] Acquisitions since Cause No. 45142 added 11,695 of Petitioner's 24,150 new customers including Charlestown (2,898), Lake Station (3,443), Sheridan (1,261), Rivers Edge (93), and Lowell (4,000).
[9] *Id.*, Water pumped was essentially unchanged from 2017 to 2022 (41,400,131,000 gallons in 2017 to 42,122,829,000 gallons in 2022).
[10] Hobbs Direct, Attachment MHH-4.
[11] Hobbs Direct, p. 17.

Q: Did Mr. Hobbs provide the status of the significant projects under construction?

A: No. In attachment MHH-4, Mr. Hobbs lists expected in-service dates for the 33 significant projects, but he does not state the status. In its case-in-chief Petitioner did not demonstrate the percentage of construction that has been completed or state the amount of costs incurred to date.

III. MAJOR PROJECT – WINCHESTER WATER TREATMENT PLANT REPLACEMENT

Q: Please describe the existing Winchester water system.

A: Winchester's existing groundwater treatment facilities include a steel Unilator 4 cell package filtration plant for iron and manganese removal preceded by aeration and a detention tank, and followed by disinfection with liquid sodium hypochlorite, and fluoridation, which was completed in 2001.[12] Orthophosphate chemical addition equipment for corrosion control (lead and copper) was installed in 2019.[13] The source of supply is groundwater from four wells approximately 47 to 52 feet deep.[14] The treatment plant has a 0.72 MGD firm capacity with two of the four cells in service and a rated capacity of 1.44 MGD with all filters in service (normal operation). There is no separate clearwell. High service pumping is provided by three vertical turbine pumps fed from the finished water plenum under the Unilator with a connection to the raw well water feed line designed for bypass capability to

[12] Hobbs Direct, Attachment MHH-10, Winchester Operation, Filter Replacement and Plant Improvements-2001 As-Builts, pp. 178-179.
[13] Permit for Public Water System Construction, Permit No. WS-11846, July 9, 2018.
[14] https://www.in.gov/dnr/water/water-availability-use-rights/significant-water-withdrawal-facility-data/ Significant Water Withdrawal Facility Data, Indiana Dept. of Natural Resources.

direct pump to distribution, presumably for emergencies. Filter backwash drains to the original 40,000-gallon concrete backwash holding tank with pumped disposal to the sanitary sewer. The distribution system includes one 400,000-gallon elevated steel storage tank known as the Short Street tank.[15]

Q: What is the Winchester Major Project?

A: Petitioner proposes to demolish the existing Winchester treatment plant and chemical building and replace them with a new, larger capacity, and fully automated groundwater treatment plant capable of unattended operation, that will continue to remove iron and manganese and will include aeration, a detention tank, four vertical pressure filters, a new 50,000-gallon backwash holding tank, a new 450,000-gallon clearwell, backwash pumps, a new chemical/maintenance/office building, a new high service pump station with higher capacity pumps, and 16" discharge piping. Petitioner's witness Mr. Hobbs provided the Design Concept for the new WTP in Attachment MHH-10.[16]

Q: What is the design flow for the new water treatment plant?

A: According to the Design Concept, the required firm capacity of the new plant (one filter out of service) is nominally 1.25 MGD.[17] The rated capacity (all units in

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[15] In its 2020 IURC Annual Report Petitioner indicated it retired the Short Street tank in 2020. Petitioner did not list a Winchester tank in its 2021 and 2022 IURC reports. However, Petitioner's response to OUCC DR 7-6 indicates it has a 0.40 MG elevated tank in Winchester. A 2022 aerial photo used for property taxation shows the Short Street tank (https://randolphin.wthgis.com/ - Parcel No. 68-09-20-175-014.000-021).

[16] Hobbs Direct, Attachment MHH-10, Design Concept (Redacted), pp. 34 to 82 of 1,141.

[17] *Id.* at pp. 34, 47, 1035, 1038, 1044, and 1051. The 1.25 MGD is higher than the 1.0 MGD Firm Plant Capacity for the maximum day shown once on p. 40. <CONFIDENTIAL> [redacted] <CONFIDENTIAL>. See the Bowen Design-Build proposal, Attachment MHH-11 CONFIDENTIAL, p. 39.

service) is 1.90 MGD based on the Request for Proposal, Addendum No. 1.[18]

Q: What is the proposed cost and in-service date?

A: Petitioner indicates the project cost is $25 million.[19] Removing costs for the Garage and Workshop, I estimate project costs would be reduced to $24.1 million.[20] Based on the 1.90 MGD rated capacity, the capital cost is $12.68 million per MG of capacity.[21] The expected in-service date is April 30, 2025.[22]

Q: How does Winchester's cost per MG of rated capacity compare to other treatment plant projects?

A: Petitioner's capital cost of $12.68 million per MG of capacity is significantly above two other similar WTP projects.

Eastern Bartholomew Water Corporation ("EBWC") placed in service on August 15, 2019, a 3.5 MGD rated capacity (all filters in service) groundwater treatment plant, office, lab, and clearwell. The EBWC facilities are like those proposed for Winchester but with a larger capacity plant, a larger 750,000-gallon clearwell (Winchester's proposed clearwell is 450,000 gallons), and no maintenance building. EBWC's total project cost was $7.412 million, or $2.12 million per MG in 2019.[23] Updating EBWC's 2019 project costs to July 2023 based on an assumed 50% cost increase, EBWC's cost would be $11.118 million, or $3.18 million per MG of rated capacity. Petitioner's $12.68 million per MG cost for Winchester is

[18] Hobbs Direct, Attachment MHH-10 (Redacted), Winchester Request for Proposal, Addendum No. 1, p. 1035 of 1141.
[19] Hobbs Direct, p. 25, line 11.
[20] Calculated conservatively as 2,000 square feet at $450 per square foot equals $900,000.
[21] Calculated as $24.1 million divided by the 1.90 MGD rated capacity (all filters in service) equals $12.68 million per MG of capacity.
[22] Hobbs Direct, p. 25, line 10.
[23] Calculated as $7.412 million divided by 3.5 MGD rated capacity (all filters in service) equals $2.12 million per MG of capacity.

quadruple EBWC's cost of $3.18 million per MG. *See* Attachment JTP-3 for information on Eastern Bartholomew Water Corp.'s treatment plant and costs.

Batesville Water & Gas Utility received bids on August 29, 2019, for a 3.0 MGD rated capacity ion exchange groundwater softening plant that was placed in service in 2021.[24] Reynolds Construction submitted the low bid of $5,723,000. The Batesville plant is different from the proposed Winchester plant in that it softens the water, has a larger treatment capacity, a larger 1,000,000-gallon clearwell, but no maintenance building. Batesville's total loan amount for the softening plant in 2019 was $ 6,053,911, or $2.02 million per MG.[25] Updating Batesville's project costs to July 2023 based on an assumed 50% cost increase, Batesville's cost would be $9.081 million, or $3.03 million per MG of rated capacity. Petitioner's $12.68 million per MG cost is quadruple Batesville's cost of $3.03 million per MG. *See* Attachment JTP-4 for information on Batesville's treatment plant and costs. I summarize and compare the rated capacities, project costs, and project costs per MG of rated capacity for Eastern Bartholomew, Batesville, and Petitioner's Winchester project in Table 1.

[24] Attachment JTP-4, pp. 10-11, June 2021 Monthly Report of Operation - Batesville Water Softening Plant.
[25] Calculated as $6.054 million divided by 3.0 MGD rated capacity (all filters in service) equals $2.02M/MG of capacity.

Table 1
Comparison of Water Treatment Plant Costs per MG of Rated Capacity

Treatment Plant	Rated Capacity (MGD)	2019 Project Cost (millions)	2019 Cost per MG	2023 Project Cost (millions)	2023 Cost Millions per MG
Eastern Bartholomew	3.5	$ 7.412	$ 2.12	$ 11.118	$ 3.18
Batesville	3.0	$ 6.054	$ 2.02	$ 9.081	$ 3.03
Indiana American - Winchester	1.9			$ 24.10	$12.68

Q: Who has Petitioner chosen to construct the new Winchester water plant?

A: On March 21, 2023, Petitioner received proposals from two Design-Build teams: 1) Bowen, and 2) Reynolds.[26] Petitioner selected the Bowen team.[27] The Reynolds-led team was already engaged in Petitioner's other major project, the replacement Sheridan water treatment plant.

Q: Have Petitioner's estimated costs for the new Winchester facilities varied?

A: Yes. Petitioner has varying cost estimates that have increased substantially since 2021. Indiana American included Winchester cost estimates in its annual Strategic Capital Expenditure Plans ("SCEP"), the 2020 Winchester Comprehensive Planning Study ("CPS"), Attachment MHH-2 to Mr. Hobbs' Direct testimony, Mr. Hobbs' Case-in-Chief testimony (p. 25), and in Winchester's Monthly Major Project Updates. In Table 2, I summarize how the cost estimates for Petitioner's Winchester project varied and increased between 2021 and 2023.

[26] Hobbs Direct, p. 3 and Confidential Attachments MHH-12 and MHH-13, Design-Build proposals cover pages.
[27] Attachment JTP-5, Petitioner's Response to OUCC DR 20-18(e).

Table 2
Winchester Major Project (Project No. I10-2500018)
Estimated Cost Variations

Source and Date / Project Name[28]	Est. Cost
2020 - 2024 SCEP (04/22/19) - OUCC DR 30-4[29]	
WIN Chemical Bldg. and Residuals Improvements (I10 480002)	$ 1,435,774
2021 - 2025 SCEP (04/27/20) - OUCC DR 30-4[30]	
RIC WIN Chemical Bldg. and Residuals Improvements (I10-250017)	0
2020 Comprehensive Planning Study (03/31/21) OUCC DR 20-14	<CONFIDENTIAL>
Winchester WTP (A-1, A-2, A-3, B-1, B-2, B-4) - Low range	[redacted]
Winchester WTP (A-1, A-2, A-3, B-1, B-2, B-4) - High range	[redacted] <CONFIDENTIAL>
2022 - 2026 SCEP (04/23/21) - OUCC DR 30-4[30]	
RIC WIN Plant Improvements (A1, A2, A3, B1, B2, B4)	6,801,198
2023 - 2027 SCEP, 45870 Pet. Exh. No. 3 Attach. MHH-2, (4/29/22)	
RIC WIN Plant Improvements (A1, A2, A3, B1, B2, B4)	18,633,854
45870 Petitioner Exhibit No. 3, Hobbs Direct, p. 25 (03/31/23)	
Winchester Water Treatment Plant	25,000,000
45870 Pet. Exh. No. 3, Attach. MHH-13 (undated), (03/31/23)	<CONFIDENTIAL>
WIN Plant Improvements	[redacted] <CONFIDENTIAL>
45870 Winchester Major Project Update No. 3 (06/30/23)	
Winchester Water Treatment Plant	24,284,926

[28] The project names shown include references to A-1, A-2, B-1, etc. These designations indicate Priority A or B projects listed in the 2020 Comprehensive Planning Study for Winchester. The SCEP costs do not include project B-3 <CONFIDENTIAL> [redacted] <CONFIDENTIAL> estimated in the CPS to cost between <CONFIDENTIAL> [redacted] <CONFIDENTIAL>. The costs for a relocated well #4A may be included in $25 million cost listed in Mr. Hobbs' testimony and in the Major Project Updates.

[29] Attachment JTP-6, Petitioner's response to OUCC DR 48-18 (2024 to 2028 SCEP) and Petitioner's response to OUCC DR 30-4 (five-year Strategic Capital Expenditure Plans).

Q: Are cost details provided in the annual SCEPs?

A: No. Only the expected annual expenditures and total costs over the five-year period are shown. There are no other cost details.

Q: What caused the cost jump from $6.8 million in the prior year's SCEP to over $18.6 million in the SCEP provided in Attachment MHH-2 to Mr. Hobbs Testimony, and then to $25 million listed on page 25 of Mr. Hobbs' testimony?

A: Mr. Hobbs does not mention the increases nor address why costs in 2022 and 2023 rose so much from those derived in the Comprehensive Planning Study and shown in the 2022 to 2026 SCEP.[30] The OUCC learned of these increases via discovery from copies of the annual SCEPs and a copy of Winchester's Comprehensive Planning Study. The OUCC requested the dates each annual SCEP including Attachment MHH-2 was prepared because Petitioner did not list them. Petitioner also did not list the date on the Winchester estimate provided in Confidential Attachment MHH-13.[31] The estimated cost rose nearly 175% in only one year from April 2021 to April 2022 to reach $18.6 million and then another 34% to $25 million in March 2023.

Q: Could the increase to $18.6 million been caused by the Design-Build proposals?

A: No. Petitioner did not receive the Design-Build proposals until almost a year later, on March 21, 2023. Therefore, Indiana American would not have had the Bowen Design-Build proposal cost when it finalized the 2023 to 2027 SCEP on April 29, 2022.

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[30] Both the CPS and the 2022-2026 SCEP were finalized in 2021 – the CPS on March 31st and the 2022-2026 SCEP on April 23rd.

[31] Good cost estimating practice is to always show the date when the cost estimate was prepared, who prepared it, what the dollar basis is (e.g., 2022 dollars, 2023 dollars, etc.) and to have the underlying documentation to show and support how the estimated costs including soft costs (non-construction) were calculated.

Q: What caused Petitioner's cost estimate to rise from $6.8 million to $18.6 million?

A: I do not know. The Priority A and B project descriptions in the CPS appear to be what Petitioner is proposing to build. The CPS cost estimates are more closely aligned with Batesville and Eastern Bartholomew's 2019 treatment plant costs that I updated to 2023 dollars.

Q: What is your estimate of the cost for the new Winchester treatment plant?

A: Using a slightly higher unit capital cost than I calculated for Batesville and EBWC of $ 3.5 million per MG of rated capacity, I estimate the new 1.90 MGD Winchester plant without the maintenance garage should cost $6.65 million, which is close to the $6.8 million project cost in Petitioner's CPS.

Q: For the Winchester major project, is Petitioner requesting to include in rate base the $18.6 million shown in Attachment MHH-2?

A: No. Indiana American is requesting the even higher amount of $25 million.[32] There is a significant discrepancy between the two cost estimates in Mr. Hobbs' testimony for the Winchester project, from $18.6 million to $25 M. The higher $25 million project cost appears to indicate an annual 34% inflation rate, and it is unknown what other cost adjustment assumptions were included in the latest estimate.[33]

Q: What reasons does Petitioner give to justify building a completely new plant?

A: Petitioner's witness Mr. Hobbs describes several issues with the existing facility.[34] He claims a new treatment plant is needed because of the condition of the existing Unilator, which needs rehabilitation and repainting, and which Mr. Hobbs asserts

[32]Hobbs Direct, p. 25, line 11.
[33] Calculated as the 2023 cost of $25 million minus the 2022 cost of $18,633,854 equals $6,366,146 divided by the 2022 cost of $18,633,854 equals 34% inflation or ($25,000,000 - $18,633,854) / $18,633,854 = 34%.
[34] Hobbs Direct, p. 23, line 6 to p. 24, line 13.

has inadequate filtration capacity because it cannot reliably meet the projected 0.85 MGD maximum day demand with half of the filters off-line for repairs and repainting.[35] He also claims a large, finished water clearwell is needed to improve chlorine contact times for virus inactivation and provide sustained fire flows. Mr. Hobbs lists additional problems, including that the concrete backwash tank is in poor condition and undersized, the chemical building has structural issues, and has safety concerns with the chemicals. Additional problems cited by Mr. Hobbs include no back-up metering pumps for sodium hypochlorite and fluoride, long chemical feed lines to the high service pump building are sometimes problematic, and high friction losses in the transmission main causes increased energy consumption.[36]

Q: Has Petitioner kept the IURC informed about the Winchester plant's problems?

A: Not to my knowledge. In 2012, Petitioner began listing recommended Comprehensive Planning Study ("CPS") projects in its IURC Annual Reports including CPS project numbers, estimated costs and schedule but did provide details or reasons why the projects might be needed.[37] All Winchester WTP projects were reported to be "Beyond 5-year plan" in the 2012 to 2017 IURC Annual Reports or "Future" in the 2019 to 2022 Reports. Only one project was listed as

[35] Hobbs Direct, p. 23, lines 9-11. Because of decreased population and declining water use, the projected year 2035 average day and maximum day water demands are lower than the original design flows and current flows.
[36] Hobbs Direct, pp. 23-24.
[37] Attachment JTP-7 for the Recommended Improvements for the Winchester System listed in Petitioner's 2012 to 2022 IURC Annual Reports.

current in the 2019 IURC Annual Report.[38]

Q: Is the proposed Winchester major project identified in the 2021 and 2022 IURC Annual Reports as a current project?

A: No. The Winchester major project is shown as "Future" rather than being properly characterized as current.[39] Further, Petitioner minimally describes it as "Winchester Plant Improvements," identifying only its location but without costs and some description of the project that would inform the Commission and others that this major project constitutes a total replacement of the existing Winchester plant.

Q: Has Petitioner previously replaced the Winchester WTP?

A: Yes. Indiana American acquired Winchester in 2000.[40] The following year, Petitioner replaced the existing WTP (aerator, detention tank, high service pumps, and filters) with the Unilator filter system and High Service Pump station that were placed in service in September 2001.

Q: Did Petitioner complete a Comprehensive Planning Study for Winchester before constructing the 2001 replacement WTP?

A: No. In its IURC Annual Reports from 2000 to 2017, Petitioner reported it would complete a CPS as the basis for future system upgrading or expansion planning, but never completed it.[41]

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[38] *Id.* The Winchester WTF Electrical System Improvements, High Service VFD's, and Backup Generator was listed as a current project in the 2019 IURC Annual Report. It is believed that this project has been constructed.

[39] Indiana American 2022 IURC Annual Report, Summary of Recommended Improvements for the Richmond System, April 27, 2023. p. 135 of 205.

[40] Indiana American 2000 IURC Annual Report, p. E-6. Petitioner acquired the Winchester operations (and West Lafayette, Warsaw, and Mooresville systems) on Feb. 1, 2000, from United Water Indiana, Inc. and United Water West Lafayette, Inc.

[41] Indiana American IURC Annual Reports, 2000-2017, p. W-8 for the Winchester system (later the Richmond system). In Cause No. 44450, Mr. Stacy Hoffman reported Indiana American had completed a draft Winchester CPS in 2012. Cause No. 44450, Petitioner's Exhibit SSH-R, Rebuttal testimony of Stacy Hoffman, p. 9, lines 1-2.

Q: Was a CPS finalized before initiating the current Winchester WTP replacement project?

A: Yes. After 20 years of owning the Winchester system, Petitioner completed Winchester's first CPS in 2021.[42]

Q: What projects in the 2020 CPS are proposed in this Cause and what did Petitioner estimate for their costs?

A: Petitioner listed three Priority A and four Priority B projects. I summarized the Priority A and Priority B projects from Appendix B of the 2020 Winchester CPS in Table 3. Note that the Chemical Building cost does not appear to include a <CONFIDENTIAL> [redacted] <CONFIDENTIAL>. The CPS project costs included <CONFIDENTIAL> [redacted] <CONFIDENTIAL> contingency. They included non-construction costs of <CONFIDENTIAL> [redacted] <CONFIDENTIAL> for engineering and <CONFIDENTIAL> [redacted] <CONFIDENTIAL> AFUDC. *See* Attachment JTP-A for copies of the Confidential cost estimates for Priority projects listed in Appendix B of the Winchester CPS.

Another project in the CPS, Project B-3, was developed for <CONFIDENTIAL> [redacted] <CONFIDENTIAL> instead of relocation of Well 4A as described in the Design Concept.[43] In Table WIN-2, CPS project B-3 is not part of the project names for the SCEPs, so I show it as a separate line below the other six Priority A and B projects in Table 3.

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[42] Attachment JTP-8, Petitioner responses to OUCC DRs 20-13 and 20-14. The 2020 Winchester Water System Comprehensive Planning Study was completed on March 31, 2021.

[43] In the CPS, Project B-3 is for <CONFIDENTIAL> [redacted] <CONFIDENTIAL> instead of replacement of Well #4R as described in the Design Concept included in Attachment MHH-10 to Mr. Hobbs' Direct Testimony, p. 42 of 1141. <CONFIDENTIAL> [redacted] <CONFIDENTIAL> Well #4R is identified in the Design Concept. The proper well number is 4A according to the DNR well database and Petitioner's 2020 CPS.

Table 3
2020 Winchester Comprehensive Planning Study - March 31, 2021
Priority A and B Projects at the WTP

CPS No.	CPS Project Description[44]	Planning Level Cost Est.	
		Low	High
A-1	Install new filtration capacity	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
A-2	Construct new backwash holding tank	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
A-3	Construct new chemical building	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
B-1	Install 190 ft of 16-in discharge main from the high service pump station	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
B-2	Install 375 ft of 16-in main from plant extending east along SR 32	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
B-4	Construct plant clearwell and pump station	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
	Range of Total Estimated Costs	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
B-3	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>

Q: Please summarize your review of Petitioner's cost estimates in Table 3?

A: <CONFIDENTIAL> [redacted]

[redacted]

[redacted]

[redacted]

[44] Hobbs Direct, Attachment MHH-7.

[redacted]

[redacted]. <CONFIDENTIAL>

Q: Did Petitioner evaluate any alternatives to its preferred $25 million Winchester project?

A: No. Petitioner's witness Mr. Hobbs does not identify or discuss alternatives evaluated, their costs, or why they were discarded. He does not mention performing life cycle cost-benefit analyses. It appears Indiana American has selected its preferred higher cost alternative of an entirely new replacement plant. Mr. Hobbs recommends replacement over improving the existing facilities because of their condition and inadequate capacity. He states alternatives identified in the CPS will be evaluated during Design-Build proposal selection and preliminary design to determine the detailed project scope.[45] However, it appears Petitioner has already selected what it wants to build as listed in the Design Concept document that spells out specific design elements that the two Design-Build teams must provide.[46]

Q: Is a life cycle cost-benefit analysis required under Indiana law?

A: Yes. To receive an IDEM construction permit for water treatment plant modifications or expansions, Indiana American must prepare and certify with its permit application that it has completed a life cycle cost-benefit analysis ("LCCBA") of alternatives in accordance with IC § 13-18-26-3.[47] Indiana American is increasing the nominal firm and rated capacities of the Winchester plant from the existing 0.72 MGD firm capacity / 1.44 MGD rated capacity to 1.25

[45] Hobbs Direct, p. 24.
[46] The Design Concept for the proposed Winchester project was included in Petitioner's Exhibit No. 3, Hobbs Direct, Attachment MHH-10 (Redacted), pages 32 to 82.
[47] Attachment JTP-1, Life Cycle Cost-Benefit Analysis, IC ch. 13-18-26.

MGD / 1.90 MGD.

Q: Has Petitioner conducted a life cycle cost-benefit analysis for the Winchester project?

A: No. Petitioner did not identify alternatives for evaluation in a life cycle analysis. Such an analysis establishes capital costs and annual operation and maintenance costs for each alternative followed by calculating their present worth over a period of time linked to the assets service lives. In discovery, Petitioner stated it had certified to IDEM that it had completed the required LCCBAs for its new Charlestown and Mooresville WTPs but did not provide copies of them to the OUCC.[48] In discovery about whether Indiana American prepared and completed a LCCBA for the proposed Sheridan and Winchester major projects, Petitioner responded in part:

> An evaluation of the costs and benefits for the alternatives considered for the Sheridan and Winchester water treatment plants was performed as part of the CPS process. Relevant portions of those documents are provided with the Direct Testimony of Matthew H. Hobbs, II as part of the case-in-chief in this Cause, including, specifically, in CONFIDENTIAL Attachment MHH-7, CONFIDENTIAL Attachment MHH-14, and CONFIDENTIAL Attachment MHH-15.[49]

Q: In your review of the Attachments cited in Petitioner's responses to DRs 27-6 and 27-7, could you find Life Cycle Cost-Benefit Analyses for the four water treatment plant projects including Winchester?

A: No. It appears Petitioner did not actually prepare and complete the required life cycle cost-benefit analyses.

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[48] Attachment JTP-9 for Petitioner's Responses to OUCC DRs 27-6 and 27-7 regarding Life Cycle Cost-Benefit Analyses ("LCCBA") for the Charlestown, Mooresville, Sheridan and Winchester Water Treatment Plant projects.
[49] *Id.*

Q: What is your recommendation regarding LCCBAs for Petitioner's projects?

A: As part of its standard capital project planning efforts, especially for the higher cost projects including Major Projects, Petitioner should identify alternatives for its capital projects rather than just selecting its preferred alternative. To comply with IC § 13-18-26-3, Petitioner should prepare and complete bona fide and required LCCBAs.

Q: Has Petitioner had the Unilator professionally inspected?

A: Yes. Tank Industry Consultants ("TIC") conducted a field evaluation on December 16, 2020, but did not inspect the top tank section / aerator interior or filter cell interiors.[50] TIC indicated the purpose was to determine conditions of the interior, exterior, exposed foundation, and accessories, identify sanitary/safety deficiencies, and to make recommendations for recoating, repairing, corrosion protection, and maintenance.

Q: What were TIC's findings and recommendations for repainting the Unilator?

A: TIC found the detention tank interior and Unilator exterior coatings to be in fair to poor overall condition. The interior coating had bottom plate pitting and layered rust on the interior roof rafters. TIC recommended Petitioner rehabilitate the Unilator within two years (by 2023) and repaint the detention and filter tanks' interiors and exteriors from a corrosion standpoint.

Q: Did TIC provide cost estimates for the rehabilitation and repainting it recommended?

A: TIC's Inspection Report did not include cost estimates for rehabilitating and

[50] Hobbs Direct, Attachment MHH-8, Evaluation of the Aeralator, Winchester, Indiana, December 16, 2020. TIC previously inspected the Unilator filter ten years earlier on December 14, 2010.

repainting the Unilator filters. My experience is that utilities want to know what work needs to be done *and* the rehabilitation and repainting costs. Normally, as part of the Inspection Report, utilities request that TIC prepare a comparison of new tank costs (in this case, for a new Unilator filter) to costs for the recommended repairs and repainting. However, TIC did not provide these costs in its report for Winchester. In response to discovery, Indiana American stated a list of repairs and estimated costs do not exist because it did not engage TIC to prepare such a list or costs.[51] Petitioner should have evaluated the alternative of rehabilitation and repainting the Unilator as an alternative to replacement, but Petitioner did not. The estimated Unilator rehabilitation and repainting costs are needed for completing the required LCCBA which should have evaluated costs for the following options:

- Rehabilitate and repaint the existing Unilator for continued service.
- Build a second Unilator and rehabilitate and repaint the original Unilator.
- Build a new horizontal or vertical pressure filter plant.

Q: Has Indiana American repainted the Unilator as recommended by TIC?

A: No. Petitioner plans to demolish the Unilator once the replacement plant is built.

Q: What is the expected service life of the Unilator?

A: In the CPS, Petitioner stated that information provided by Bastin Logan Water Services, the Unilator fabricator and installer, indicates the life expectancy can range from 25 to 35 years.[52] The current Unilator will be 22 years old in September 2023.[53]

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[51] Attachment JTP-10, Petitioner's Response to DR 20-11 with no cost estimate in TIC Inspection Report.
[52] Hobbs Direct, Attachment MHH-7 (Redacted), p. 2, 2020 Winchester Comprehensive Planning Study.
[53] Hobbs Direct, Attachment MHH-10 (Redacted) p. 178, Winchester WTP As-Built drawings.

Q: Has Petitioner provided evidence the Unilator cannot be rehabilitated and repainted?

A: No. The evidence provided indicates the Unilator could be rehabilitated and repainted. In the 2020 TIC inspection report, TIC recommended rehabilitating the Unilator in the next two years.

Q: Does Indiana American currently meet peak demand in its Winchester system?

A: Yes. Petitioner has always met peak demand but has not taken half of the Unilator out of service for maintenance over a multi-day period. Petitioner claims it cannot meet maximum day demand (0.85 MGD in 2035) when only two of the four filter cells are in service providing a 0.72 MGD firm capacity based on 3.0 gpm/ft^2.

Q: How often do Winchester's flows exceed 0.72 MGD?

A: I analyzed Petitioner's Monthly Reports of Operation for Winchester over the last five years.[54] Production exceeded 0.72 MGD on fewer than 6% of the days. Of the 1,734 days of available flow data over the 2018 to 2022 period, flows were below 0.72 MGD on 1,636 days or over 94% of the time. As expected, peak flows were generally higher in the summer. Based on my review of daily water production over 1-day to 14-day periods, the vast majority of the time daily production is below 0.72 MGD and is often sustained below 0.72 MGD for greater than 14 days.

Q: Can Petitioner meet maximum day demands while taking half of the filter cells offline for painting?

A: Yes. In the discussion of CPS Project A-1, Petitioner indicates it could temporarily filter at a higher 3.75 gpm/ ft^2 rate (within the 2.0 to 4.0 gpm/ ft^2 standard) in two

[54] MROs for the months of November 2018, May 2019, and January 2020 were not available on IDEM's Virtual File Cabinet.

of the filter cells to meet the 0.85 MGD maximum day demand.[55] Other options would be to: a) schedule repainting in historically lower water demand periods such as early spring or later in the fall when temperatures are still within the range to permit painting; b) coordinate painting when large users may have reduced demand during scheduled downtime; and c) bring in temporary portable filtration units similar to what Petitioner did for its Charlestown system in 2021.[56] Petitioner could also enlist customer help by widely publicizing the need to limit usage by avoiding lawn watering, car washing, etc.

Q: Does Petitioner need to increase Winchester's firm and rated capacities?

A: No. Petitioner testifies that Winchester's maximum day demand is decreasing through the planning horizon.[57] Based on my review of population data and projections by the Indiana Business Research Center, population has been decreasing in Randolph County and in Winchester over many decades and is forecasted to continue decreasing. Customer water usage is decreasing in Winchester due to declining usage that Petitioner testifies will continue. Usage is further restrained by Petitioner's increased rates that signal customers to wisely use water, not waste it, and repair leaky toilets and fixtures. Petitioner's plan to replace the existing plant with an expanded 1.90 MGD plant at a very high $25 million cost is unsupported by Petitioner's 2020 Comprehensive Planning Study, is unwarranted, is not prudent or reasonable, and is not in the ratepayers' interest.

[55] Hobbs Direct, Attachment MHH-7 (Redacted), p. 4 of 20.
[56] Attachment JTP-11 for news articles about the temporary filters Indiana American used at Charlestown.
[57] Hobbs Direct, Attachment MHH-7 (Redacted), p. 1 of 20.

Q: Should Petitioner install a clearwell?

A: A clearwell may be beneficial to help assure sufficient disinfection contact time and virus inactivation and to provide water for sustained high demand periods during fires. However, Petitioner has not demonstrated that it is required by IDEM under the Groundwater Rule to meet a 4-Log virus inactivation. Absent a documented finding by IDEM that additional disinfection facilities including the need for a larger clearwell are required, Petitioner's current disinfection system should be viewed as adequate to meet all regulatory disinfection standards.

The design concept presented by the Design-Builder, Bowen, for <CONFIDENTIAL> [redacted] <CONFIDENTIAL>is based on overly conservative design assumptions for <CONFIDENTIAL> [redacted] <CONFIDENTIAL>.[58] Indiana American's overly conservative design assumptions makes the tank bigger and more expensive than it needs to be.

Clearwell oversizing is also linked to Petitioner's design criteria for providing fire flows at 3,500 gpm for a three-hour fire duration. I recommend that Petitioner refine the sizing calculations for the clearwell and seek lower cost LCCBA options for tank construction such as alternate materials other than a

[58] Hobbs Direct, Attachment MHH-11 CONFIDENTIAL, Design-Build Proposal – Bowen, pp. 40-41.

welded steel tank that will incur substantial interior and exterior repainting costs over the clearwell's lifetime. Such options could include bolted glass lined steel tanks and prestressed concrete tanks.[59]

Q: What is your opinion about the size and features of the proposed treatment plant building and site improvements?

A: The proposed design and site layout are oversized, overly lavish, expensive, and unwarranted. The new treatment building at over <CONFIDENTIAL> [redacted] <CONFIDENTIAL> of the existing treatment plant building and Unilator.[60] Using Petitioner's cost estimates, I calculated that the building alone may cost more than <CONFIDENTIAL> [redacted] <CONFIDENTIAL> per square foot. For the building, Petitioner and the Design-Builder show two offices, two restrooms, a lobby, a conference room for 12 people, a break room, an operator/lab area, <CONFIDENTIAL> [redacted] <CONFIDENTIAL>, brick exterior, a 4-bay garage area with overhead doors, with <CONFIDENTIAL> [redacted] <CONFIDENTIAL>, and parking for seven passenger vehicles and 4 utility trucks for visitors and INAW personnel, <CONFIDENTIAL> [redacted] <CONFIDENTIAL>.[61] The building size and site requirements appear to be excessive when compared to the existing plant that has provided acceptable service over the last two decades.

[59] Glass lined bolted steel tanks are advertised as never needing painting to reduce the long-term costs to own and maintain the tanks.
[60] Hobbs Direct, Attachment MHH-11 CONFIDENTIAL, Design-Build Proposal – Bowen, p. 64.
[61] Hobbs Direct, Attachment MHH-10 (Redacted) Attachment B Design Scope, pp. 67-68 and Attachment MHH-11 CONFIDENTIAL, Design-Build Proposal – Bowen, pp. 45, 57, 64 and 66.

Q: What about the other reasons Petitioner gave to support replacing the Winchester plant again?

A: All the other reasons should be addressed individually such as repairing the spalling concrete on the backwash tank, installing backup metering pumps, repairing the structural deficiencies in the chemical building, adding secondary containment, etc. Combined, these deficiencies do not warrant replacing the existing treatment plant with a completely new, larger capacity, and far more expensive plant.

Q: What do you recommend for the Winchester major project?

A: I recommend the Commission disallow including the Winchester project in rate base because Petitioner has failed to support the need for the project at the $25 million cost. The proposed replacement plant is oversized, there is no Life Cycle Cost-Benefit Analysis of alternatives as required by IC § 13-18-26-3, and it is too expensive at $25 million or $12.68 million per MG of rated capacity, which exceeds costs paid by other utilities for groundwater treatment plants. In addition, Petitioner has not supported that its preferred project, a total replacement of the existing plant with a much larger plant, and its requested project costs are prudent and in the best interest of ratepayers. I also showed there are substantial cost discrepancies in Petitioner's cost estimates that Petitioner has not mentioned or explained.

IV. MAJOR PROJECT - SHERIDAN WATER TREATMENT PLANT REPLACEMENT

Q: Please describe Sheridan's existing water treatment and distribution facilities.

A: Sheridan has a groundwater treatment plant consisting of three 150 gpm steel vertical pressure filters for iron and manganese removal preceded by aeration, pre-

chlorination, and a detention tank and followed by post chlorination with gaseous chlorine and orthophosphate chemical addition equipment for corrosion control. The source of supply is groundwater from three wells each with a 500-gpm capacity.[62] Well Nos 4 and 5 were installed in 1961 and Well No. 6 was installed in 2010.[63] Total well field capacity is 2.16 MGD for all three wells in service.[64]

Average water production was 212,000 gallons per day (0.212 MGD) from 2019 to 2022. The filters have a 0.43 MGD firm capacity with two of three filters in service based on a 3.0 gpm/ft^2 filtration rate and a 0.65 MGD rated capacity with all filters in service (normal operation).[65] The filter media was replaced in 2019. The two high service vertical turbine pumps, each rated at 300 gpm, were also replaced in 2019 and are located before, not after the filters, to pressurize flow through the filters and on to distribution. Chlorine is applied before the detention tank (pre-chlorination) and then after the filters. The chlorine mixes with ammonia present in the well water for disinfection using chloramination.[66] There is no clearwell after the filters. Filter backwash drains to an onsite lagoon west of the treatment building before discharge to the sanitary sewer.[67]

The distribution system includes one 0.5 MG elevated storage tank. The

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[62] https://www.in.gov/dnr/water/water-availability-use-rights/significant-water-withdrawal-facility-data/, *see* data for Hamilton County. Significant Water Withdrawal Facility Data, Indiana Dept. of Natural Resources. Well Nos. 4 and 5 were installed in 1961 Well No. 6 was installed in 2010. They range in depth from 126 feet to 158 feet.

[63] 2022 Sheridan IURC Annual Report, p. W-7.

[64] *Id.*

[65] Hobbs Direct, Attachment MHH-15 Draft Sheridan CPS (Redacted), p. 1-9. Petitioner indicated in its' response to OUCC DR 20-4, a slightly lower firm capacity and a slightly higher rated capacity for the existing treatment plant of 0.4 MGD and 0.7 MGD.

[66] *Id.*

[67] *Id.*

steel spheroid tank, listed as the Sheridan tank, is located on the southwest side of Sheridan on West 236th Street (State Road 47). It was installed in 2007.[68] The distribution system consists of <CONFIDENTIAL> [redacted] <CONFIDENTIAL> miles of main, varying in size from one to 12 inches in diameter.[69]

Q: What has been the water production since Indiana American acquired the system?

A: Water production has been steady over the last five years, averaging 0.21 MGD as summarized in Table 4.

Table 4

Sheridan Water Production 2018 - 2022

Year	Average Day (MGD)	Maximum Day (MGD)
2018[70]	0.18	0.39
2019	0.22	0.40
2020	0.19	0.38
2021	0.21	0.41
2022[71]	0.23	0.38
Average / Maximum	0.21	0.41

Q: How many customers and people are served by the Sheridan water system?

A: The Sheridan system, acquired in December 2018, currently serves 1,350

[68] 2022 Sheridan IURC Annual Report, p. W-7.
[69] Draft Sheridan Comprehensive Planning Study, undated, p. 4-1. The miles of water main listed in the CPS are <CONFIDENTIAL> [redacted] <CONFIDENTIAL> of the water main miles Petitioner reported in response to Crown Point DR 1-2 and 2-5. Petitioner indicated Sheridan has 2.87 miles of 10-inch and 12-inch transmission mains and 23.23 miles of distribution mains 8-inch and smaller.
[70] Values shown for 2018 to 2021 are taken from the Draft Sheridan Comprehensive Planning study, p. 2-16.
[71] Petitioner's response to OUCC DR 20-3.

residential customers.[72, 73] Petitioner did not indicate Sheridan's population in its Case-in-Chief testimony or in Sheridan's draft Comprehensive Planning Study but based on 2.54 people per occupied housing unit, I estimated Sheridan's 2023 connected population to be 3,429 people.[74] Sheridan has added approximately 45 new customers and 115 people per year since 2018 as summarized in Table 5.

Table 5

Residential Customers - Estimated Population[75]

Year	Residential Customers	OUCC Estimated Connected Population
2018 (Dec.)	1,147	2,913
2019	1,141	2,898
2020	1,159	2,944[76]
2021	1,229	3,122
2022	1,310	3,327
2023 (June)	1,350	3,429
2018-2023 Increase	203	516
Increase per Year	45	115

Q: What is the Sheridan Major Project?

A: Petitioner plans to demolish and replace the existing Sheridan WTP with an expanded plant at initial firm and rated capacities of 1.5 MGD and 2.0 MGD respectively.[77] Several plant components (detention tank, piping, clearwell,

[72] Cause No. 45050, Final Order, September 12, 2018.
[73] Petitioner's response to OUCC DR 7-42. Sheridan currently serves 1,463 customers including 1,350 residential, 104 commercial, 0 industrial, and 8 public authority customers. Petitioner also serves 5 fire customers in Sheridan. The current customer counts appear to be for 2023.
[74] Calculated as 1,350 residential customers in 2023 times 2.54 people per housing unit equals 3,429 people.
[75] Values shown in red text are OUCC estimates or calculations.
[76] Sheridan's population was 3,106 people (2020 Census). It appears not all residences are connected to the water system.
[77] Hobbs Direct, p. 26, line 3.

chemical storage, high service pump station, and the treatment building) are sized for a future expansion to 4.0 MGD. The new, larger capacity, and fully automated groundwater treatment plant will be capable of unattended operation. The replacement plant will continue to remove iron and manganese and will include aeration, a detention tank, three <CONFIDENTIAL> [redacted] <CONFIDENTIAL> pressure filters, a new 500,000-gallon clearwell, a new high service pump station with three higher capacity <CONFIDENTIAL> [redacted] <CONFIDENTIAL> MGD pumps with space for a fourth pump, dedicated backwash pumps, a new <CONFIDENTIAL> [redacted] <CONFIDENTIAL>-gallon backwash lined equalization basin, a new chemical/maintenance/office building, and 16" discharge piping sized for 4.0 MGD. Petitioner's witness Mr. Hobbs provided the Design Concept for the new WTP in Attachment MHH-16.[78]

Q: What is the proposed cost and in-service date for the Sheridan WTP?

A: In its Case-in-Chief, Petitioner stated the project cost was $29,817,795.[79] Petitioner later reported costs increased to $30,761,981.[80] Based on the 2.0 MGD rated capacity, the capital cost is $15.38 million per MG of capacity.[81] The expected in-service date is August 31, 2024.[82]

[78] Hobbs Direct, Attachment MHH-16 Design Concept (Redacted), pp. 33 to 78 of 986.
[79] Hobbs Direct, p. 27, line 12.
[80] Sheridan Major Project Monthly Update No. 3, June 30, 2023.
[81] Calculated as $30,761,981 divided by the 2.0 MGD rated capacity (all filters in service) equals $15.38 million per MG of capacity. Sheridan's estimated cost is 21% higher than the $12.68 million per MG of capacity that I calculated for Petitioner's other major project, the replacement of the Winchester WTP.
[82] Sheridan Major Project Monthly Update No. 3, June 30, 2023.

Q: How does Sheridan's cost per MG of rated capacity compare to other WTP projects?

A: Sheridan's capital cost at $15.38 million per MG of capacity is significantly more expensive than two similar WTP projects at Eastern Bartholomew Water Corp. and Batesville described above, as well as Petitioner's other major project, the complete replacement of the Winchester WTP. I summarize and compare the rated capacities, project costs, and project costs per MG of rated capacity for Eastern Bartholomew, Batesville, and Petitioner's Winchester and Sheridan projects in Table 6.

Table 6
Comparison of Water Treatment Plant Costs per MG of Rated Capacity

Treatment Plant	Rated Capacity (MGD)	2019 Project Cost (millions)	2019 Cost – Millions per MG	2023 Project Cost (millions)	2023 Cost – Millions per MG
Eastern Bartholomew[83]	3.5	$ 7.412	$ 2.12	$ 11.118	$ 3.18
Batesville[84]	3.0	$ 6.054	$ 2.02	$ 9.081	$ 3.03
INAW - Winchester	1.9			$ 25.000	$12.68
INAW - Sheridan[85]	2.0			$ 30.762	$15.38

Q: Who has Petitioner chosen to construct the new Sheridan water treatment plant?

A: On July 20, 2022, Petitioner received proposals from three invited Design-Build teams: 1) Bowen; 2) Reynolds (awarded); and 3) Kokosing.[86] Petitioner selected Reynolds.[87] Based on my experience with this utility, Indiana American only takes

[83] Attachment JTP-3 for information on Eastern Bartholomew Water Corp.'s treatment plant and costs.
[84] Attachment JTP-4 for information on Batesville's treatment plant and costs.
[85] Expandable to 4.0 MGD.
[86] Petitioner's Exhibit No. 3, Hobbs Direct, p. 4 and Confidential Attachments MHH-17, MHH-18, and MHH-19, Design-Build proposals cover pages.
[87] *Id.*

proposals from invited contractors. The contractor was not selected through an open, competitive public bid in which all contractors wanting to complete the work can submit a bid.

Q: Did Reynolds have the lowest cost proposal?

A: <CONFIDENTIAL> [redacted] <CONFIDENTIAL> In the Request for Proposals ("RFP"), Petitioner indicated that the cost of construction activities was not included in the RFP phase but asked the Proposers to provide a construction cost estimate. I understand selection of the Design-Build team was not based on lowest construction cost or lowest total project cost (with the design-build fees) but rather on the Lump Sum Price Proposal for design fees, Design/Builder's fee, construction superintendence, and bond costs and on evaluation criteria identified by the Petitioner in the RFP.[88] Petitioner's RFP included the following about how the contractor would be chosen:[89]

> The Proposals will be evaluated based upon five criteria as listed below. For the purpose of evaluating Proposals, these evaluation criteria will be given the following weights:
> 1) Fees and Innovative Cost Solutions 20%
> 2) Technical Merit & Quality 25%
> 3) Schedule 20%
> 4) Qualifications & Experience 15%
> 5) Personnel & Resources 20%

Q: What were the proposed design fees and estimated construction costs from the three Design-Build teams?

A: I summarized the Confidential Design-Build proposals in Table 7.

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[88] Hobbs Direct, Attachment MHH-16 (Redacted), Sheridan Water Treatment Facility Design-Build Request for Proposal pp. 9-11 of 941.
[89] *Id.*, p. 11.

Table 7
Comparison of July 20, 2022, Proposals for the Sheridan WTP Project

Cost Component	Reynolds (Awarded)[90]	Bowen[91]	Kokosing[92]
Lump Sum Fees (superintendence, design, bond costs)	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Design-Builder's Fee	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Total Design Fees[93]	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Estimated Construction Cost	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Estimated Contingency	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Total Construction Cost	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
Total Project Cost	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>

Q: Have Petitioner's estimated costs for the new Sheridan facilities changed?

A: Yes. Petitioner has varying cost estimates. The Sheridan project was not listed on the annual Strategic Capital Expenditure Plan ("SCEP") until 2022 for the 2023-

[90] Hobbs Direct, Attachment MHH-17 CONFIDENTIAL - Reynolds proposal (Awarded).
[91] Hobbs Direct, Attachment MHH-18 CONFIDENTIAL - Bowen proposal.
[92] Hobbs Direct, Attachment MHH-19 CONFIDENTIAL – Kokosing proposal.
[93] Selection of the Design-Build team was based on the total design fees and the Proposal evaluation criteria.

2027 SCEP.[94] Costs varied in the Draft Sheridan Comprehensive Planning Study ("CPS"), Confidential Attachment MHH-23 (Detailed Estimates of Cost dated 04/09/22 and 8/19/22), Attachment MHH-2 to Mr. Hobbs Direct testimony, Mr. Hobbs Case-in-Chief testimony (p. 27), the contractor's Confidential Target Cost Estimate (OUCC DR 20-19), and in Sheridan's Monthly Major Project Updates. In Table 8, I summarize the variations in Petitioner's Sheridan project costs between 2021 and 2023.

Q: What is your estimate of the cost for a new Sheridan treatment plant?

A: In the previous discussion of the Winchester Major Project, I calculated capital costs per MG of treatment capacity for two WTP projects at other utilities and updated those costs to 2023 dollars. Using the updated 2023 costs for the competitively bid Batesville and Eastern Bartholomew water treatment plants that I describe above that I increased further to $ 3.5 million per MG of rated capacity, I estimate a new 2.0 MGD Sheridan plant should cost $7.0 million instead of the $29.82 million requested by Petitioner.

[94] Hobbs Direct, Attachment MHH-2, line 33, "KOK Sheridan REP WTP and REP Well 4".

Table 8
Sheridan Major Project (Project No. I10-1000018)
Estimated Cost Variations

Source and Date / Project Name[95]	Est. Cost
Draft Comprehensive Planning Study (undated) OUCC DR 43-7 Sheridan WTP (A-2 (Well), A-3 (WTP), A-4 (WTP Trans. Main))	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
2021 - 2025 SCEP (04/27/20) - OUCC DR 30-4[96] Sheridan WTP (not identified as a project)	Not Listed
2022 - 2026 SCEP (04/23/21) - OUCC DR 30-4 Sheridan WTP (not identified as a project)	Not Listed
45870 Pet. Exh. No. 3, Attachment MHH-23 (04/06/22) Sheridan Water Treatment Facility	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
2023 - 2027 SCEP, 45870 Pet. Exh. No. 3 Attach. MHH-2, (4/29/22) KOK Sheridan REP WTP and REP Well 4	29,419,344
45870 Pet. Exh. No. 3, Attachment MHH-23 (08/19/22) Sheridan Water Treatment Facility	<CONFIDENTIAL> 29,542,795 <CONFIDENTIAL>
Reynolds Target Cost Est. (02/24/23) DR 20-19 Conf.[97] Sheridan WTF – Reynolds	<CONFIDENTIAL> [redacted][98] <CONFIDENTIAL>
45870 Petitioner Exhibit No. 3, Hobbs Direct, p. 27 (03/31/23) Sheridan Water Treatment Plant	29,817,795
45870 Sheridan Major Project Update No. 3 (06/30/23) Sheridan Water Treatment Plant	30,761,981

Q: For the Sheridan major project, is Petitioner requesting the rate base addition of $29,817,795, listed on page 27 of Mr. Hobbs' testimony?

A: Yes. However, Petitioner's Major Projects Monthly Update shows project costs that

[95] The project names shown include references to Priority projects A-2, A-3, and A-4 listed in the Draft Comprehensive Planning Study for Sheridan.
[96] Attachment JTP-6.
[97] Attachment JTP-12 for Petitioner's Response to OUCC DR 20-19
[98] Confidential Attachment JTP-B for Petitioner's response to OUCC DR 20-19, Target Cost Estimate for the Sheridan WTF, prepared by Reynolds Construction LLC, February 24, 2023. The Target Cost Estimate includes 3% contingency and a 2% allowance for supply chain and escalation, but does not include design, design-builder's fee, Indiana American labor, labor overhead, indirect capital overhead, or AFUDC.

are almost $1 million higher.[99] It appears Petitioner will seek rate base addition of the updated cost.

Q: What reasons does Petitioner give to justify building a completely new plant?

A: Petitioner's witness Mr. Hobbs testified that the new WTP is needed to help address:

1) challenges meeting max day demands,
2) potential growth in this service area, and
3) other operational challenges including the need to add a new well due to overlapping drawdown areas of two existing, to switch from chlorine gas to liquid sodium hypochlorite, and to add an ammonia feed system.[100]

Q: Mr. Hobbs asserts Sheridan has a challenge meeting maximum day demand. Does he present any evidence that Indiana American has been unable to meet customers' maximum day demands?

A: No. I did not see evidence in Petitioner's Case-in-Chief that it has not met customer demands. Petitioner's daily demand averaged 0.21 MGD over the last four years with a maximum day flow of 0.41 MGD in 2021. The plant's firm capacity is 0.43 MGD and rated capacity is 0.65 MGD (all filters in service). Mr. Hobbs is referring to always meeting maximum day demand if the largest filter or high service pump is out of service. Most of the time, all three filters are operating. Additionally, Petitioner has a 500,000-gallon elevated water storage tank with over two-days average storage that helps meet maximum day demand and fire flows.

[99] Sheridan WTP Major Project Update No. 3, June 30, 2023.
[100] Hobbs Direct, p. 26.

Q: Mr. Hobbs states that the Sheridan WTP is not designed for expansion. Is that correct?

A: No. The treatment building includes the existing three vertical pressure filters but there is space reserved for a fourth filter that if installed, would increase firm and rated capacities to 0.65 MGD and 0.86 MGD.[101] Petitioner should evaluate the costs to add the fourth filter in the space already reserved and evaluate adding a third high service pump.

Q: Mr. Hobbs also states that much of the existing facility and equipment also dates to the 1960s and has limited remaining life. Has Petitioner conducted a condition assessment to evaluate the equipment and treatment building?

A: Mr. Hobbs does not indicate that a condition assessment has been conducted. The draft CPS states an alternate solution is that in lieu of constructing a new WTP, the existing facility could be expanded but a condition-based assessment of the WTP building would be needed.[102] The CPS also states that improving the existing WTP may be less cost effective than new construction.[103] I interpret this to mean that Petitioner has not developed and evaluated any alternatives that may serve to meet near term water demands but delay the need to completely replace the WTP at high cost to ratepayers.

Q: Has Petitioner kept the IURC informed about the need to demolish Sheridan's existing water treatment plant to replace and expand it with a new plant to serve growth around Sheridan?

A: Not that I know of. Petitioner listed the Sheridan Water Treatment Plant Improvements and the Sheridan Source of Supply project for the first time in its 2022 IURC Annual Report that was only recently submitted to the IURC on April

[101] Hobbs Direct, Attachment MHH-16 (Redacted) Sheridan Waterworks Improvements drawings, p. 181.
[102] Hobbs Direct, Attachment MHH-15, Sheridan Draft Comprehensive Study, undated, (Redacted) p. 5.
[103] *Id.*, p. 2.

27, 2023. Both projects are listed as current.

Q: Was a CPS finalized before initiating the current Sheridan WTP replacement project?

A: No. In response to OUCC discovery, <CONFIDENTIAL>[redacted]<CONFIDENTIAL> but did not provide a copy to the OUCC.[104] In follow-up discovery, Petitioner provided an undated copy of the draft Sheridan CPS.[105] Because the CPS references water demands and customer counts from 2021, the OUCC assumes that the draft Sheridan CPS was being written in early 2022 before Petitioner sent out the RFP for the Sheridan Project in June 2022.

Q: What projects did Petitioner propose from Sheridan's draft CPS and what are the estimated costs?

A: Petitioner listed four Priority A projects. Three of these, Projects A-2, A-3, and A-4 are proposed in this Cause. I summarized the Priority A projects from the draft Sheridan CPS in Table 9. The draft CPS project costs were single line costs only with no details and no discussion about contingencies and non-construction costs. Petitioner did not mention Life Cycle Cost-Benefit Analyses. It appears that none were conducted. Detailed cost estimates were to have been provided in Appendix B, but Appendix B was empty.

[104] Attachment JTP-8, Petitioner's non-confidential responses to OUCC DRs 20-13 and 20-14; Attachment JTP-C for Petitioner's OUCC DR 20-013_Attachment - CONFIDENTIAL.
[105] Petitioner's response to OUCC DR 43-7.

Table 9
Draft Sheridan Comprehensive Planning Study – undated
Priority A Projects at the WTP

CPS No.	CPS Project Description	Project Cost		
		Low	Estimate	High
A-1	Regionalization Study	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
A-2	Additional Source of Supply	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
A-3	New Sheridan WTP	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
A-4	Distribution System Main Upgrade for New WTP	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>
	Total Project Costs	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>	<CONFIDENTIAL> [redacted] <CONFIDENTIAL>

Q: Why did you include Project A-1, Regionalization Study in Table 9?

A: Petitioner indicates that <CONFIDENTIAL> [redacted] [redacted] <CONFIDENTIAL>[106] Petitioner noted that the newly formed Hamilton County Regional Utility District ("HCRUD") is developing water service in Baker's Corner, east of Sheridan. In the near term (unspecified year), service is expected for approximately <CONFIDENTIAL> [redacted] <CONFIDENTIAL> existing commercial properties with water demand at <CONFIDENTIAL> [redacted] <CONFIDENTIAL> MGD.[107] In the CPS Indiana

[106] Sheridan Draft Comprehensive Planning Study, Executive Summary, undated, Executive Summary, p. x.
[107] Sheridan Draft Comprehensive Planning Study, undated, p. 2-14.

American recommended a Regionalization Study to determine how best to serve HCRUD including providing service from Sheridan or from Noblesville via an eight-mile cross-county transmission main.[108] I agree that such a study would be advisable and believe ratepayers would benefit if Petitioner paused on its plan to replace the Sheridan WTP until the study was completed.

Q: Did Petitioner evaluate *any* alternatives to its preferred $29.82 million Sheridan WTP replacement project?

A: No. Mr. Hobbs did not provide any testimony or cost analyses for options considered besides the replacement WTP. Mr. Hobbs stated Indiana American considered continuing to use the existing facility, but it was not recommended because "it would require major upgrades and replacements, or essentially a rebuild" with added capacity.[109] Mr. Hobbs provided no evidence Petitioner considered the rebuild/expansion/upgrade alternative in any way other than a perfunctory manner. There is a total absence of any attachment, evaluation, cost estimate, or Life Cycle Cost-Benefit Analysis examining any alternative.

Q: Isn't Petitioner's preferred total replacement operationally equivalent to a lower cost facility rebuild with capacity additions if both options satisfy the needed water production over the five-year near-term period?

A: Yes. Petitioner has not provided any evidence that its existing filters cannot continue to operate.[110] Value to ratepayers will be enhanced if the rebuild/expansion/upgrade alternative can postpone the need for the high-cost replacement WTP until the Regionalization Study is completed, supply chain/inflation issues subside, and construction markets return to normal.

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[108] Hobbs Direct, Attachment MHH-4, p. 1
[109] Hobbs Direct, p. 27, lines 2-3.
[110] Sheridan Draft Comprehensive Planning Study, undated, pp. 3-17.

Q: Is a life cycle cost-benefit analysis of the WTP options required under Indiana law?

A: Yes. To receive an IDEM construction permit for water treatment plant modifications or expansions, Indiana American must prepare and certify with its permit application that it has prepared and completed a LCCBA of alternatives in accordance with IC § 13-18-26-3.[111]

Q: Has Petitioner conducted a life cycle cost-benefit analysis for the Sheridan project?

A: No. Petitioner identified the rebuild alternative but did not evaluate life cycle costs. For further discussion of Life Cycle costs and LCCBAs, please see my testimony for the Winchester Major Project.

Q: Have Sheridan's three vertical pressure filters been professionally inspected?

A: In its Case-in-Chief testimony, Indiana American did not report on any filter inspections conducted since acquiring the Sheridan system. In response to discovery, Petitioner provided the draft Sheridan CPS.[112] Petitioner noted there were filter <CONFIDENTIAL> [redacted] <CONFIDENTIAL>.[113]

Q: Has Petitioner provided evidence that the three vertical pressure filters cannot continue in service?

A: No. Mr. Hobbs testifies the equipment dates to the 1960s with limited remaining life but did not report on their condition, provide an inspection report, or state the filters' service lives.

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[111] Attachment JTP-1, Life Cycle Cost-Benefit Analysis, IC § 13-18-26.
[112] Petitioner's response to OUCC DR 43-7.
[113] Sheridan Draft Comprehensive Planning Study, undated, p. 3-17.

Q: Does Petitioner need to increase Sheridan's firm and rated capacities?

A: Petitioner's proposed flows are overestimated. Expansion in the near term (five years) does not appear to be needed and could be delayed further if a fourth vertical pressure filter is added. The main driver for increased water demand is customer growth. Petitioner has averaged 45 new customers annually since 2018 but assumes <CONFIDENTIAL> [redacted] . <CONFIDENTIAL> [114], [115] Remarkably, Petitioner states that the new plant's capacity does not include water demand for the Hamilton County Regional Utility District. I discuss this new Utility District and Petitioner's main extension now under design to serve the District later in my testimony. Petitioner forecasts that by 2035, Sheridan's average day demand will increase from the current 0.21 MGD to 0.49 MGD and the maximum day demand will increase from 0.41 MGD to 1.07 MGD.[116] Petitioner's growth assumption and demand forecasts appear to be aggressive.

There are two other problems besides optimistic growth causing overstated demand forecasts. First, Petitioner follows American Water's practice to forecast maximum day demand at a 95% confidence interval, representing a level not exceeded more than once in 20 years.[117] This is overly conservative and causes oversized facilities with excess capacity and higher costs. Second, Petitioner assumes all new residential customers will use <CONFIDENTIAL> [redacted]

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[114] *Id.*, Sheridan's number of residential customers rose from <CONFIDENTIAL> [redacted] <CONFIDENTIAL>in 2018 to 1,350 in May 2023 averaging 45 new residential customers per year. The 1,350 residential customers in 2023 was provided in Petitioner's response to OUCC DR 7-42.

[115] Sheridan Draft Comprehensive Planning Study, undated, p. 2-4.

[116] Hobbs Direct, Attachment MHH-15 (Redacted), pp. 1-2 of 9.

[117] Petitioner's response to DR 27-1.

<CONFIDENTIAL> gallons per day or <CONFIDENTIAL> [redacted] <CONFIDENTIAL> gallons per month, which is a much higher rate than existing customers' usage of 108 gallons per day.[118] This exceeds the Kokomo (which includes Sheridan) District's average monthly use of 3,650 gallons per month.[119] The assumed higher usage is despite new homes having to be built with water efficient plumbing fixtures (toilets, showers, faucets) and appliances (dishwasher, clothes washer). In its Case-in-Chief, Petitioner acknowledges that water efficient plumbing fixtures and appliances reduce water use.[120]

Petitioner's plan to replace the existing plant with an expanded plant at a 2.0 MGD rated capacity at a very high $29.82 million cost is unsupported by Petitioner's Draft Comprehensive Planning Study, is unwarranted, and is not prudent, reasonable, or in ratepayers' interest.

Q: What is your opinion about the size and features of the proposed treatment plant building and site improvements?

A: The proposed design and site layout are oversized, overly lavish, high cost and unwarranted. The new treatment building at nearly <CONFIDENTIAL> [redacted] <CONFIDENTIAL> square feet is more than <CONFIDENTIAL> [redacted] <CONFIDENTIAL> times bigger than the size of the existing treatment plant building. Petitioner needs to explain why it needs to build facilities that are so drastically oversized and expensive and, why they must be built now.

I calculated that the building alone may cost almost <CONFIDENTIAL>

[118] Sheridan Draft Comprehensive Planning Study, undated, p. 2-4.
[119] Petitioner's response to OUCC DR 11-1, Indiana Average Use 2012-2022. The 3,650 gallons per month is for 2022.
[120] Petitioner's Exhibit No. 5, Direct Testimony of Charles Rea, p. 69, lines 9-19.

[redacted] <CONFIDENTIAL>.[121] The Sheridan project suffers from many of the same problems I identified for the Winchester project. Despite the design calling for a fully automated treatment plant capable of unattended operations, Petitioner required the new treatment building include <CONFIDENTIAL>[redacted] <CONFIDENTIAL> The building size and site requirements appear to be excessive when compared to the existing plant that has provided satisfactory service. In addition, there is no finding from IDEM that under the Groundwater Rule Petitioner must provide disinfection that achieves a 4-Log virus inactivation.[122]

Q: What about the other reasons Petitioner gave to support replacing the Sheridan plant again?

A: All the other reasons should be addressed individually such as building repairs, the switch from gaseous chlorine for disinfection to liquid sodium hypochlorite, adding an ammonia feed system, and replacing a well. Combined, these deficiencies do not warrant replacing the existing treatment plant with a completely new, larger capacity, and far more expensive plant.

Q: What do you recommend for the Sheridan major project?

A: I recommend the Commission disallow including the Sheridan project in rate base because Petitioner has failed to support the need for the project at the excessively

[121] Attachment JTP-D – OUCC Building Cost calculations for the Sheridan and Winchester Major Projects.
[122] IDEM determined Sheridan's groundwater supply has a low susceptibility to contamination from waterborne micro-organisms and therefore does not have to disinfect to meet a 4-Log inactivation of viruses.

high $29.82 million cost. The proposed replacement plant is oversized, has no Life Cycle Cost-Benefit Analysis of alternatives as required by IC § 13-18-26-3, and is too expensive at $29.82 million or $15.38 per MG of rated capacity which exceeds costs paid by other utilities for groundwater treatment plants. In addition, Petitioner has not supported that its preferred project, a total replacement of the existing plant with a much larger plant, is prudent, reasonable, or in the best interest of ratepayers.

V. MAIN EXTENSION TO THE HAMILTON COUNTY REGIONAL UTILITY DISTRICT

Q: Please describe Petitioner's proposed project, the Kokomo Sheridan Interconnect-EST to Springmill, Project No. I10-100019

A: Petitioner proposes to extend 11,400 feet of 20-inch (Phase 1) and 7,700 feet of 16-inch (Phase 2) transmission main east from Sheridan's 500,000-gallon elevated storage tank on West 236th Street. The new transmission main will connect to the future Hamilton County Regional Utility District ("HCRUD") water system at Spring Mill Road and 236th Street.[123]

Q: What are the estimated costs and schedule?

A: Petitioner estimates the total project cost is $9,278,301 and indicates construction will start in August 2023 and reach final completion on September 30,2024.[124]

Q: Why does Petitioner call it the Kokomo Sheridan Interconnect? Does this transmission main interconnect Petitioner's Kokomo and Sheridan water systems?

A: No. Petitioner uses the word "Kokomo" to designate what District the project is

[123] Hobbs Direct, Attachment MHH-4, pp. 1-2.
[124] *Id.*

located in. In this case, it is in the Kokomo District which includes Kokomo, Russiaville, and Sheridan. However, it does not interconnect these separate water systems. Rather, it will interconnect Petitioner's Sheridan District with the yet to be developed Hamilton County Regional Utility District ("HCRUD").

Q: What is the Hamilton County Regional Utility District?

A: It is a newly formed Regional Water and Sewer District approved by IDEM on February 27, 2023. Due to interest in spurring development within the US 31 Corridor Project area near Baker's Corner, Ind., Hamilton County created HCRUD to provide water and sewer services.

Q: Why is the new water transmission main necessary?

A: HCRUD does not have its own water treatment facilities. Petitioner explained that Indiana American Water entered into a sale-for-resale agreement to provide drinking water through an interconnection with an existing Indiana American Water system.[125] Petitioner investigated providing water via an eight-mile transmission main across Hamilton County from its Noblesville system which has excess water production capacity. However, due to the shorter length, Petitioner decided to construct the new transmission main from the Sheridan system.

Q: How much water is needed by HCRUD?

A: Petitioner estimates initially <CONFIDENTIAL> [redacted] <CONFIDENTIAL>[126] The Water Supply Agreement between Indiana American and HCRUD lists a higher initial water demand

[125] *Id.*
[126] Sheridan Draft Comprehensive Planning Study, undated, p. 2-14.

estimated at 500 gpm with a long-term estimated demand of 2.5 million gallons per day average and 6.0 million gallons per day peak flow.[127] The years for the initial demand and the long-term demand are not listed in the Water Supply Agreement.

Q: When will Petitioner need to provide the long term estimated average day demand of 2.5 MGD and the maximum day demand of 6.0 MGD?

A: Petitioner does not discuss or specify a timeframe for meeting the long-term demand. The Water Supply Agreement also does not define long term. However, the term of the agreement is twenty years renewable every ten years.

Q: Are Petitioner's groundwater wells and water treatment facilities at Sheridan able to meet HCRUD's long-term demand?

A: No. Meeting HCRUD's demand would require a new or expanded water treatment plant as well as high service pumps and probably a booster station.

Q: Is Petitioner's proposed Sheridan Major Project in this Cause intended to produce the water for HCRUD?

A: No. In Priority Project A-3, New Sheridan WTP, Petitioner claims that capacity for Baker's Corner is not included in the Sheridan WTP replacement project,

> Capacity for the WTP is based on the Base maximum day demand scenario, which does not include near or long-term demand from the area referred to as "Baker's Corner." Service to the Baker's Corner area would require significant additional supply and a hydrogeological study to determine supply location and feasibility. Details regarding supplying this area are discussed in **Section 2.4** and **Project A-1.** Additional capacity may be required to meet the future needs from Bakers Corner, and sizing of the WTP should be expandable based on the results of **Project A-1**.[128]
>
> (Emphasis added)

This passage seems to imply the need to locate a separate well field to supply Baker's Corner.

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[127] Hobbs Direct, Attachment MHH-10, Water Supply Agreement, Dec. 12, 2022, p. 2.
[128] Hobbs Direct, Attachment MHH-15 – Priority Project A-3, New Sheridan WTP, p. 2.

Q: Does Petitioner have other possible alternatives to supply water to Baker's Corner?

A: Yes. In response to discovery, Petitioner provided a copy of Sheridan's Draft Comprehensive Planning Study. <CONFIDENTIAL>[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

<CONFIDENTIAL>[129]

Q: In its Case-in-Chief, does Petitioner call the proposed new transmission main to Baker's Corner a "main extension" subject to 170 IAC 6-1.5 – Extension of Water Mains?

A: No. Mr. Hobbs does not mention or discuss the main extension rules in his testimony about the Kokomo Sheridan Interconnect-EST to Springmill, Project No. I10-100019.

Q: Does the Water Supply Agreement between Indiana American and HCRUD call out the new transmission main as a "main extension" subject to 170 IAC 6-1.5 – Extension of Water Mains?

A: No.

[129] Sheridan Draft Comprehensive Planning Study, undated, pp. 2-15.

Q: Who is paying to design, install, and acquire easements for the new transmission main to Baker's Corner?

A: Although I am not a lawyer, it appears to me that Section 2 of the Water Supply Agreement obligates Indiana American to pay for the transmission main. I could not find any other section of the Water Supply Agreement that discusses who pays to install the transmission main. Section 2 reads in part:

> Initial demand is estimated at 500 gallons per minute (at 50-60 pounds per square inch) with a long-term estimated demand of 2.5 million gallons per day average and 6.0 million gallons per day peak flow. INAW will design and construct delivery to meet this demand and such will be cooperatively adjusted as demands change.[130]
>
> (Emphasis added)

Section 7 of the Water Supply Agreement defines the County's obligations as follows:

> The County shall be responsible for the cost and installation of the meter vaults(s); piping, valves, and appurtenances necessary for the installation of the meter(s); other required devices; and the cost of connecting the County's main to INAW's system.

Q: How would you characterize this transmission main project?

A: It is clearly a main extension subject to the Commission's main extension rules under 170 IAC 6-1.5. Petitioner should have developed a main extension agreement and developed the estimated costs to design and construct the main extension. All costs except a three-year revenue allowance are the responsibility of HCRUD and should be paid to Indiana American.

[130] Hobbs Direct, Attachment MHH-10, Water Supply Agreement, Dec. 12, 2022, p. 2.

Q: Who should pay to extend the main?

A: Petitioner should calculate the cost to design and extend the main for payment by HCRUD. The project costs, estimated by Petitioner at $9,278,301, should not be added to rate base without a main extension payment by HCRUD reflecting its contribution in aid of construction. Because it appears that Petitioner has not properly characterized this project as a main extension, I recommend that the Commission disallow recovery of the capital costs in rate base.

Q: Where will the proposed transmission main be located?

A: In response to discovery, Petitioner indicated design was in the preliminary stages but that the new main will be constructed within the right of way The preliminary routes under review include both the north and south sides of 236th Street.[131]

Q: Will Petitioner obtain easements for the transmission main?

A: Yes.

Q: Do you have any concerns with the proposed location of the new transmission main?

A: Yes. It appears Petitioner may not have checked with the Hamilton County Thoroughfare Plan that guides traffic planning and road improvements in the county. Currently, the proposed main's location along 236th Street, even though it will be within the right-of-way with easements, will cause it to have to be relocated in the future at considerable expense when 236th Street is widened. That is because 236th Street has been designated by the County as a Primary Arterial which will have a 150 ft. right-of-way, four lanes and either a curbed median (12 to 14 feet) or an uncurbed median (22 feet) between the east and west bound lanes.[132]

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[131] Petitioner's Response to OUCC DR 20-22.
[132] 2007 Hamilton County Thoroughfare Plan Update.

Q: Who will have to pay to relocate the transmission main when 236th Street is widened?

A: If Petitioner has written and recorded permanent easements, then the county or INDOT would have to pay to relocate the main. Otherwise, Indiana American would be responsible for the relocation costs.

Q: How can Petitioner minimize the risk that the transmission main will have to be relocated?

A: I recommend Petitioner install the transmission main in permanent easements along a path of agricultural fields and county roads that are not likely to be widened in the future.

IV. INACTIVATION OF THE LAKE STATION WATER TREATMENT PLANT

Q: Please provide background information on the Lake Station Water Treatment Plant.

A: Until late 2019, the City of Lake Station provided municipal water utility services to 3,443 customers in the eastern two-thirds of the city, initially with disinfected groundwater from four wells and purchased water.[133] Choosing to remain a municipal water utility and self-produce its water rather than become a 100% wholesale customer of Indiana American, Lake Station constructed a groundwater treatment plant which was placed in service in early 2015.[134]

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[133] The groundwater wells provided 79% of the 700,000 gallons per day average demand with the remaining 21% met by purchased water under a 25-year Water Supply Agreement with Indiana American that ended in June 2015, but Lake Station continued to purchase water from Indiana American until October 22, 2019, when the acquisition closed. The Town of New Chicago supplies purchased water from Indiana American as a Sale for Resale customer to the remaining one-third of Lake Station residents on the city's west side.

[134] The Lake Station water treatment plant, a Spiractor catalytic water softening plant with recarbonation for pH adjustment followed by horizontal pressure filters, disinfection, fluoridation, and corrosion control. was started up on January 7, 2015.

In March 2016, Lake Station began discussions to sell its water system to Indiana American. [135] This was due to Lake Station wanting to exit the water business after concluding it was unable to adequately maintain its system, that it did not have the size to provide reliable and adequate service, and that it was in a dire financial crisis, struggling to even make payroll.[136] The acquisition discussions resulted in a signed purchase agreement on September 27, 2017, followed by Joint Petitioners petitioning for IURC approval of the acquisition on January 19, 2018.[137]

The OUCC, the City of Crown Point and the Town of Schererville opposed including Lake Station's wells and WTP in rate base due to Indiana American's testimony it would provide Lake Station with high-quality treated Lake Michigan water and not operate the WTP for daily flows. Indiana American asserted it would use the wells and WTP to some extent, such as in emergencies and as backup to Indiana American's existing system, particularly to assist with threats to its water supply, and as such, Indiana American claimed they would continue to be used and useful after the acquisition.[138] The IURC approved Indiana American's purchase of Lake Station's water system for $20.68 million including $7,366,043 for the WTP and wells which the Commission found were currently used and useful.[139] Indiana American closed on the Lake Station acquisition on October 22, 2019.[140]

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[135] Cause No. 45041, Direct Testimony of Christopher Anderson, January 19, 2018, p. 6.
[136] Cause No. 45041, Rebuttal Testimony of Christopher Anderson, April 9, 2018, p. 8.
[137] Cause No. 45041, Submittal of Petition and Joint Petitioners' Case-in-Chief, January 19, 2018.
[138] Cause No. 45041, Rebuttal Testimony of Stacy S. Hoffman, April 9, 2018, p. 27.
[139] Cause No. 45041, Final Order, August 15, 2018, p. 28.
[140] Attachment JTP-13, Press Release, Indiana American Water Acquires Lake Station Water System in Northwest Indiana, October 22, 2019.

Q: Was Lake Station's Water Treatment Plant in operation throughout 2018?

A: Yes. The wells and treatment plant produced water daily in 2018 while the acquisition case, Cause No. 45041, was under review.

Q: Was Lake Station's Water Treatment Plant operational throughout 2019?

A: No. Lake Station operated the WTP briefly in 2019 but shut it down on February 5, 2019.[141] This was due to brown tap water complaints in late 2018 and "glitches" in equipment at the water treatment plant that prompted the city to begin buying all water wholesale from Indiana American and shut down the treatment plant.[142] The existing interconnection with Indiana American's system was reopened and Lake Station began supplying its customers with treated Lake Michigan water purchased from Indiana American.

Q: Did the City of Lake Station restart water production in 2019?

A: No. The treatment plant was never restarted and has remained out of service since February 5, 2019. Quoted in a news article about the plant shut down and the switch to 100% purchased water, Mayor Christopher Anderson stated the city was "doing a financial analysis that compares the purchase of water wholesale versus the operation of its own plant again."[143] I have not reviewed the city's financial analysis and do not know if one was ever completed, but based on Lake Station's Monthly Reports of Operation ("MROs") submitted to IDEM, the city never restarted the water plant.[144]

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[141] February 2019 Monthly Report of Operations, Lake Station Water Treatment Plant, Public Water System Identification ("PWSID") Number: IN5245027. Lake Station's water production averaged 0.7 million gallons per day ("MGD") prior to plant shut down by the City on Tuesday, February 5, 2019.
[142] Attachment JTP-14, Lake Station taps into new water supply, Post-Tribune February 6, 2019.
[143] *Id.*
[144] Monthly Reports of Operations, Lake Station Water Treatment Plant, PWSID Number: IN5245027, February 2019 to October 2019.

Q: After closing on the Lake Station acquisition on October 22, 2019, did Indiana American rectify the treatment plant's problems and restart the plant?

A: No. The wells and the water softening plant have not produced any finished water for 4-1/2 years. They remain out of service. I do not know if Indiana American assessed the plant with the goal of restoring it to service.

Q: When did you become aware that Lake Station shut down its wells and WTP, and that Indiana American kept these assets out of production?

A: I became aware that the wells and WTP have been continually out of service since February 5, 2019, when I reviewed the Monthly Reports of Operation while preparing testimony in this docket.

Q: Did Indiana American plan to utilize the Lake Station treatment plant to produce water after it acquired Lake Station's system?

A: No. In the Cause No. 45041 acquisition case, Mr. Prine testified Indiana American would instead supply Lake Station through the existing interconnection, describing it as follows:

> In addition, Indiana American has maintained an existing system interconnection with Lake Station Water System. This existing system interconnection enables delivery of high-quality treated Lake Michigan water, which has naturally low hardness. This connection enables the provision of service reliability to Lake Station from the Company's existing Northwest Indiana District treatment capacity of nearly 80 million gallons of water per day. Through this connection, the Company will be able to provide daily water service at a lower operational cost than to operate the existing Lake Station treatment and softening plant as the primary source of system delivery.[145]

Q: What did Petitioner indicate would happen with Lake Station's plant?

A: Mr. Prine testified Indiana American would maintain and regularly place the plant into operation to ensure rapid reliability. But due to high operating costs, Indiana

[145] Cause No. 45041, Direct Testimony of Matthew Prine, January 19, 2018, pp. 16-17.

American intended to only use the plant during peak demand days, or as emergency supply.[146]

Q: Has this occurred?

A: No. Contrary to Mr. Prine's testimony, Indiana American has not restarted the wells and treatment plant nor produced any water since closing on the acquisition on October 22, 2019. It appears Petitioner has not regularly placed the plant in operation to be available to produce water again to ensure rapid reliability.

Q: Was Indiana American able to show it is incurring operation and maintenance costs to keep the Lake Station WTP in a state of ready availability if needed during peak demand days or emergencies?

Q: No. In discovery, the OUCC requested the annual costs incurred at the Lake Station WTP for each of the following: power, labor, chemicals, and well cleaning. Petitioner tabulated purchased electrical power cost of approximately $155,000 incurred between November 2019 to May 2023. No other costs were provided. Petitioner indicated labor costs are not tracked down to the plant level and stated there were no chemical or well cleaning costs.[147] I interpret the absence of these costs to confirm that Petitioner has not operated the Lake Station wells and WTP. Other costs of ownership not accounted for include property taxes and insurance, capital cost recovery and depreciation expense.

Q: Is the Lake Station WTP needed during peak demand days or emergencies?

A: No. There is no need for softened water (from the Lake Station WTP) during an emergency. The equipment and chemicals are unnecessary. Given that there were

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[146] *Id.*, at 17.

[147] Attachment JTP-15, Petitioner's response to OUCC DR 27-10 regarding the annual operations and maintenance costs for power, labor, chemicals, and well cleaning for the Lake Station WTP since 2019.

no costs incurred for chemicals, it appears that Indiana American does not maintain an inventory of treatment chemicals at the Lake Station WTP that would be needed for water softening.

Q: Has the issue of chemicals at the Lake Station WTP come up with IDEM?

A: Yes. Indiana American personnel recently indicated to IDEM Hazardous Waste inspectors on May 8, 2023, that the Lake Station WTP "is an unmanned public drinking water plant" that "Indiana American Water bought from the City of Lake Station in 2019 for use as an emergency pumping station. Indiana American Water made the decision to discontinue the use of the water softening process and abandoned the tanks in place. As part of this process, it registered as a small quantity generator of hazardous waste and applied for an episodic generation event in 2022 to remove the sodium hydroxide from the plant."[148] This indicates that Indiana American removed the treatment chemicals needed to operate the WTP and demonstrates to me Petitioner has no intention to operate the Lake Station WTP.

Q: Is the Lake Station water treatment plant still an active public water system?

A: No. IDEM inactivated the Lake Station WTP on January 9, 2020, because it learned it was connected to Indiana American – Northwest (receiving treated Lake Michigan water) and was no longer producing softened and filtered groundwater.[149] Based on my review of Monthly Reports of Operation from 2019 to the present, no water was produced from February 5 to October 21, 2019 under Lake Station ownership, with no water production continuing from October 22, 2019 to the

[148] Attachment JTP-16, Inspection Summary Letter from IDEM's Hazardous Waste Section regarding the disposal of sodium hydroxide from the Lake Station WTP as a Small Quantity Generator.
[149] Attachment JTP-17, Public Water System Inactivation letter for PWSID #5245027, IDEM, January 9, 2020.

present under Indiana American's ownership as shown in Table 10.

Table 10 Northwest Indiana District Water Production Average Day (MGD) – 2019 - 2022

Treatment Plant	2019	2020	2021	2022
Borman Park	27.97	27.12	27.51	25.74
Ogden Dunes	9.93	9.94	9.03	9.85
Lake Station[150]	0.07	Inactivated	Inactivated	Inactivated
Total Northwest[151]	37.98	37.06	36.54	35.59

Q: Does Indiana American meet peak demand in its Northwest Indiana District without operating the Lake Station treatment plant?

A: Yes. Petitioner has met peak demand from 2019 to the present without the Lake Station WTP. In 2022, the maximum day water production was 48.275 MGD for Northwest Indiana which was readily supplied by the Borman Park and Ogden Dunes WTPs.[152]

Q: Has Indiana American met demand in Northwest Indiana during voluntary shutdowns of the Ogden Dunes WTP without the Lake Station WTP on-line?

A: Yes. As precautionary (voluntary) responses to pollutant discharges from local steel mills, Indiana American restricted or ceased pumping from the Lake Michigan intake into the Ogden Dunes WTP several times in the last five years. Each time, the Borman Park WTP met all customer needs and Indiana American did not yet

[150] The City of Lake Station shut down its supply wells and water treatment plant on February 5, 2019. The WTP remained out of service to October 22, 2019, when Indiana American acquired the Lake Station water system. The WTP continued out of service and was inactivated by IDEM on January 9, 2020.
[151] In response to OUCC DR 20-3, Petitioner reported Northwest Indiana's WTP capacity was 72.9 MGD.
[152] June 2022 Monthly Reports of Operation. The 2022 maximum day production of 48.275 MGD on June 21, 2022, was met with the Borman Park and Ogden Dunes WTPs producing 36.021 MGD and 14.498 MGD respectively. This was approximately 72% of the 66.7 firm combined capacity of the Borman Park and Ogden Dunes WTPs with the largest filter out of service at Ogden Dunes (Borman Park at 48.7 MGD, Ogden Dunes at 18.0 MGD, and Lake Station at 0.0 MGD). Petitioner provided the firm and rated capacities in response to DR 20-4.

own the Lake Station WTP (2017) or did not restart the Lake Station WTP (2019 – two occasions and 2021). The three most recent shutdowns occurred August 20 - 23, 2019 (four days), September 6 - 11, 2019 (six days) September 26 – October 3, 2021 (eight days).[153]

Q: Is the Lake Station WTP shown on Petitioner's Northwest Indiana service area map?

A: <CONFIDENTIAL>[redacted]

<CONFIDENTIAL>[154]

Q: What should be done with Petitioner's inactivated supply wells and water softening plant in Lake Station?

A: The Lake Station wells and WTP should be removed from rate base. They are not needed from a technical, operational, or economic standpoint. The unneeded assets include the wells, well pumps, and the softening /filtration plant. The softening / filtration plant includes the main building, clearwell, filter backwash tank, pumps/motors/electrical equipment, plant piping and valves, chemical feed systems, SCADA, and emergency power.

All salvageable equipment such as pumps, treatment tanks, motors, generator, etc. should be removed and sold. The property and building should be sold. This recommendation will return the building to a productive use by a third party. It will avoid future operations and maintenance expenses and capital costs

[153] Ogden Dunes Water Treatment Plant Monthly Reports of Operations ("MROs") for August 2019, September 2019, September 2021 and October 2021.

[154] Indiana American's confidential response to OUCC DR 20-1 requesting maps of Petitioner's service territories and distribution systems showing treatment facilities, transmission and distribution mains, booster stations, storage tanks, and interconnections.

arising from having to operate and maintain the building. It will reduce Indiana American's property taxes and insurance costs. It will also reduce the future costs of removal by transferring the remaining useable assets to a third party.

Q: Did Indiana American propose any "ratemaking options that might mitigate the impact of the purchase price" of the wells and WTP, as suggested by the Commission in its order in Cause No. 45041?

A: No, Indiana American does not mention the Lake Station acquisition or operations in this Cause. Indiana American did not propose any ratemaking options and seeks to continue recovering the full return of and return on the wells and WTP.

Q: Did Petitioner address the issue of keeping the Lake Station plant in service in the acquisition case, Cause No. 45041?

A: Yes. In his rebuttal, Mr. Prine stated:

> If the deal is approved, that cost is sunk. Decisions in the future about whether that plant should reasonably be kept in service should be based upon the marginal costs of doing so. In other words, the plant adds value to our system as explained by Mr. Hoffman. Only upon finding of a lower marginal cost alternative should retirement of the plant be evaluated.[155]

Q: Is there a lower marginal cost alternative than restarting the Lake Station wells and softening plant in response to an emergency?

A: The lowest marginal cost alternative would be to reopen the existing East Chicago interconnection and purchase water that might be able to be produced by the Lake Station plant. Because Lake Station assets have been abandoned in place and not been operated, they probably cannot be brought back on line quickly. IDEM would have to re-activate Lake Station as a public water supply and the treatment plant

[155] Cause No. 45041, Joint Petitioner's Exhibit No. 1-R, Rebuttal Testimony of Matthew Prine, p. 14, lines 12-16.

chemicals would have to be ordered and delivered. The Lake Station plant would then have to undergo start-up procedures before it could begin delivering the softened water. In contrast, the East Chicago emergency connection could be quickly available.

Q: What is your recommendation regarding the costs of the wells and WTP?

A: Because the assets have not been used since 2019, I recommend that the costs related to the wells and WTP be removed from Indiana American's rate base. OUCC witness, Margaret Stull discusses the amount of rate base that should be removed to reflect that the Lake Station wells and water softening plant are not in service.

V. RECOMMENDATIONS

Q: What are your recommendations?

A: I recommend the following:

To comply with IC § 13-18-26-3, Petitioner should prepare and complete bona fide and required Life Cycle Cost-Benefit Analyses, as part of its standard capital project planning efforts, especially for the higher cost projects including Major Projects. Petitioner should also identify alternatives for its capital projects rather than just selecting its preferred alternative.

Petitioner should refine the sizing calculations for the Winchester clearwell and seek lower cost LCCBA options for tank construction such as alternate materials other than a welded steel tank that will incur substantial interior and exterior repainting costs over the clearwell's lifetime.

The Commission should disallow from rate base the cost associated with the proposed transmission main to connect to the Hamilton County Regional Utility District.

If the transmission main to the Hamilton County Regional Utility District is constructed, Petitioner should be required to install the transmission main in permanent easements along a path of agricultural fields and county roads that are not likely to be widened in the future.

Costs related to the wells and WTP at Lake Station should be removed from Indiana American's rate base.

Q: Does this conclude your testimony?

A: Yes.

Appendix A

Q: Please describe your educational background and experience.

A: In 1980 I graduated from Purdue University, where I received a Bachelor of Science degree in Civil Engineering, having specialized in Environmental Engineering. I then worked with the Peace Corps for two years in Honduras as a municipal engineer and as a Project Engineer on self-help rural water supply and sanitation projects funded by the U.S. Agency for International Development (U.S. AID). In 1984 I earned a Master of Science degree in Civil Engineering and Environmental Engineering from Purdue University. I have been a Registered Professional Engineer in the State of Indiana since 1986. In 1984, I accepted an engineering position with Purdue University, and was assigned to work as a process engineer with the Indianapolis Department of Public Works ("DPW") at the City's Advanced Wastewater Treatment Plants. I left Purdue and subsequently worked for engineering consulting firms, first as a Project Engineer for Process Engineering Group of Indianapolis and then as a Project Manager for the consulting firm HNTB in Indianapolis. In 1999, I returned to DPW as a Project Engineer working on planning projects, permitting, compliance monitoring, wastewater treatment plant upgrades, and combined sewer overflow control projects.

Q: What are the duties and responsibilities of your current position?

A: My duties include evaluating the condition, operation, maintenance, expansion, and replacement of water and wastewater facilities at utilities subject to Indiana Utility Regulatory Commission ("Commission") jurisdiction.

Q: Have you previously testified before the Commission?

A: Yes.

Appendix B - List of Attachments

JTP-1	Life Cycle Cost-Benefit Analysis requirements.
JTP-2	Petitioner's response to OUCC DR 27-9.
JTP-3	Eastern Bartholomew Water Corp. 3.5 MGD Treatment Plant Information.
JTP-4	Batesville 3.0 MGD Water Softening Plant Information.
JTP-5	Petitioner's response to OUCC DR 20-18 – Winchester project.
JTP-6	Petitioner's responses to OUCC DR 30-4 (five-year Strategic Capital Expenditure Plans) and OUCC DR 48-18 (2024 to 2028 SCEP).
JTP-7	Recommended Improvements for the Winchester System listed in Petitioner's 2012 to 2022 IURC Annual Reports.
JTP-8	Petitioner's responses to OUCC DRs 20-13 and 20-14 regarding Comprehensive Planning Studies.
JTP-9	Petitioner's responses to OUCC DRs 27-6 and 27-7 regarding Life Cycle Cost-Benefit Analyses ("LCCBA") for the Charlestown, Mooresville, Sheridan and Winchester Water Treatment Plant projects.
JTP-10	Petitioner's Response to DR 20-11 regarding no TIC cost estimate.
JTP-11	News articles about temporary filters at the Charlestown Water system.
JTP-12	Petitioner's Response to OUCC DR 20-19.
JTP-13	Press Release, Indiana American Water Acquires Lake Station Water System in Northwest Indiana, October 22, 2019.
JTP-14	Newspaper article - Lake Station taps into new water supply, Post-Tribune February 6, 2019.
JTP-15	Petitioner's Response to OUCC DR 27-10 regarding the annual operations and maintenance costs for power, labor, chemicals, and well cleaning for the Lake Station WTP since 2019.
JTP-16	Inspection Summary Letter from IDEM's Hazardous Waste Section regarding the disposal of sodium hydroxide from the Lake Station WTP as a Small Quantity Generator.
JTP-17	Public Water System Inactivation letter for PWSID #5245027, IDEM, January 9, 2020.

Appendix C - List of Confidential Attachments

JTP-A Priority Projects Confidential Cost Estimates from Appendix B of the 2020 Winchester Comprehensive Planning Study.

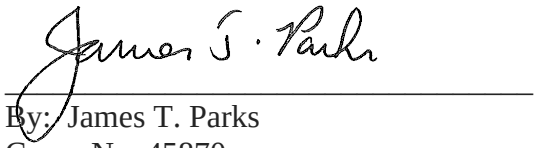
JTP-B Petitioner's response to OUCC DR 20-19 – Target Cost Estimate for the Sheridan WTF, prepared by Reynolds Construction, LLC, February 24, 2023.

JTP-C Petitioner's OUCC DR 20-013_Attachment – CONFIDENTIAL regarding Comprehensive Planning Studies dates and costs

JTP-D OUCC Water Treatment Building Cost calculations for the Sheridan and Winchester Major Projects.

AFFIRMATION

I affirm the representations I made in the foregoing testimony are true to the best of my knowledge, information, and belief.



By: James T. Parks
Cause No. 45870
Office of Utility Consumer Counselor (OUCC)

Date: July 21, 2023

IC 13-18-26 Chapter 26. Permit and Permit Application Conditions for Water and Wastewater Treatment Plants

IC 13-18-26-1 Certificate of completion required

Sec. 1. (a) Except as provided in subsection (c), a permit required under IC 13-18-16 for the operation of a public water system may not be issued unless the application contains the certification of completion required under section 2 of this chapter.

(b) Except as provided in subsection (c), the department may not issue a permit required under environmental management laws for the discharge from a wastewater treatment plant, as defined in IC 13-11-2-258(b), unless the application contains the certification of completion required under section 2 of this chapter.

(c) The requirement of a certification of completion under section 2 of this chapter does not apply to the following:

(1) A noncommunity public water system that has fewer than fifteen (15) service connections used by year-round residents.

(2) A noncommunity public water system that regularly serves fewer than twenty-five (25) year-round residents.

(3) A permit for the modification or expansion of a drinking water treatment plant that does not increase system design capacity.

(4) A permit for a wastewater treatment plant with an average design flow of not more than one hundred thousand (100,000) gallons per day.

(5) A permit for the modification or expansion of a wastewater treatment plant that does not increase average design flow.

(6) The renewal of an NPDES permit for the discharge from a wastewater treatment plant that does not include a modification or expansion as described in subdivision (5).

As added by P.L.126-2018, SEC.6. Amended by P.L.15-2019, SEC.12.

IC 13-18-26-2 Certification that documents have been prepared

Sec. 2. A permit described in section 1(a) or 1(b) of this chapter may not be issued unless the applicant submits, along with the permit application, a certification that all of the following documents have been prepared and are complete under the requirements of this chapter:

(1) A life cycle cost-benefit analysis, as described in section 3 of this chapter.

(2) A capital asset management plan, as described in section 4 of this chapter.

(3) A cybersecurity plan, as described in section 5 of this chapter.

As added by P.L.126-2018, SEC.6. Amended by P.L.15-2019, SEC.13.

IC 13-18-26-3 Life cycle cost-benefit analysis

Sec. 3. A life cycle cost-benefit analysis must include a comparison of the alternatives of:

(1) meeting the water supply or wastewater service needs of the community or area served or proposed to be served through the operation of the water and wastewater treatment plant, as:

(A) owned and operated; or

(B) proposed to be owned and operated;

according to the terms of the permit application; and

(2) meeting the water supply or wastewater service needs of the community or area

served or proposed to be served through one (1) or more other potential means.
As added by P.L.126-2018, SEC.6.

IC 13-18-26-4 Capital asset management plan

Sec. 4. A capital asset management plan must include all of the following:

(1) A plan to annually review infrastructure needs of the water or wastewater treatment plant.

(2) A detailed engineering analysis of asset conditions and useful life, to be used to develop an infrastructure inspection, repair, and maintenance plan.

(3) An analysis of customer rates necessary to support the capital asset management plan, including emergency repairs.

(4) A certification that the water or wastewater treatment plant has:

(A) a certified operator;

(B) a corporate officer or system manager; and

(C) access to an engineer, either on staff or by contract.

As added by P.L.126-2018, SEC.6.

IC 13-18-26-5 Cybersecurity plan

Sec. 5. A cybersecurity plan must provide for the protection of the water or wastewater treatment plant from unauthorized use, alteration, or destruction of electronic data.
As added by P.L.126-2018, SEC.6.

IC 13-18-26-6 Completion, periodic revision, and public disclosure of analysis and plans

Sec. 6. (a) The analyses and plans described in sections 3, 4, and 5 of this chapter must be:

(1) complete under the requirements of this chapter at the time an application for a permit described in section 1(a) or 1(b) of this chapter is submitted;

(2) reviewed and revised at least once every five (5) years, for as long as the permit holder operates the water treatment plant or wastewater treatment plant; and

(3) except for customer specific data, including information excluded from public access under IC 5-14-3-4(a), or for a cybersecurity plan required under section 5 of this chapter, made publicly available.

(b) A certification that the analyses and plans described in sections 3, 4, and 5 of this chapter are complete under the requirements of this chapter must be submitted to the department:

(1) under section 2 of this chapter at the time an application for a permit described in section 1(a) or 1(b) of this chapter is submitted; and

(2) at least once every five (5) years after an application for a permit described in section 1(a) or 1(b) of this chapter is submitted, when the analysis and plans are reviewed and revised.

(c) A certification submitted to the department under this chapter must be notarized.
As added by P.L.126-2018, SEC.6. Amended by P.L.15-2019, SEC.14.

IC 13-18-26-7 Denial of permit application for failure to include notarized certification

Sec. 7. Failure to include a notarized certification with an application for a permit described in section 1(a) or 1(b) of this chapter constitutes grounds for denial of the permit application.
As added by P.L.126-2018, SEC.6. Amended by P.L.15-2019, SEC.15.

OUCC 27-009

DATA INFORMATION REQUEST 06/15/2023
Indiana-American Water Company
Cause No. 45870

Information Requested:

Reference Petitioner's March 31, 2023, press release regarding this rate case. Please indicate the number of people Petitioner serves by District and system and provide the calculations, all data and assumptions Petitioner relied on to determine Indiana American provides water and wastewater services to approximately 1.32 million people.

Information Provided:

The press release should have stated 1.42 million people. The calculations are explained below and done only at a state level. Please see OUCC 27-009_Attachment for this calculation.

This number is an estimate based on two components: Basic Residential portion and the contribution from Commercial and Other Public Authorities (OPA) at a state level.

a) Basic Residential (single family dwelling) contribution to drinking water Equivalent Population Served estimate is calculated by multiplying the Number of Residential Water Connections by the Average Household Size (taken from the United States Census Statistics 2010, 2020 was not available at the time calculations were done).
b) Commercial and OPA bill class contribution to drinking water Equivalent Population Served estimate is calculated by taking the combined drinking Billed Water Sales in most recent December for these two bill classes and dividing by the most recent 3-Year average per person Residential drinking Billed Water Sales. Note: at this time it is not possible to consistently differentiate the Commercial and OPA accounts into those supporting a residential or living facility (such as apartments, hospitals, dormitories, or hotels/motel) from other types of commercial or municipal buildings.
c) Billed Water Sales from the Industrial Bill Class do not contribute to the Equivalent Population Estimate since this volume is predominantly for industrial processes rather than the day-to-day domestic water usage.

Attachment:

OUCC 27-009_Attachment

Summary

Cause No. 45870
OUCC 27-009 Attachment

State	Regulated Utility		
	Water	Wastewater	Total*
Indiana	1,415,078	5,557	1,415,078

*** Totals account for population so that the same user with both drinking water and wastewater is not counted twice**

Cause No. 45870
OUCC 27-009 Attachment

2022 YTD Days
2022 Pd 12 Days

12/31/2022

Company	Residential Connections	Average Household Size (2010 Census)	Average Residential Population Served	Residential Sales YTD 12/31/22 Thousand Gal	3 Year Annual Average Per Person Thousand Gal	Period 12 Commercial Sales	Period 12 OPA Sales
Indiana	289,643	2.52	729,900	14,089,388	19.67	733,282	110,517

Population Calculation

Cause No. 45870
OUCC 27-009 Atta

			Water loss in Resale Systems		**Eq. Population Drinking Water**		**Eq. Population Wastewater**
	365		0.85				
	31						
						12/31/2022	
Company	Average Pd 12 Sales/Person	Sales for Resale YTD 12/31/22 in Thousand Gal	Resale Population	Commercial & OPA Population	Total Res, OPA, Comm and Resale People Served	Residential Waste Water Connections	Average Waste Water People Served
					Population Served		
Indiana	1.67	4,167,631	180,095	505,083	1,415,078	2,205	5,557

Cause No. 45870
OUCC 27-009 Atta

Eq. Population
DW & WW

Company	Duplicate Customers	Waste Water Only Services	Total People Served
Indiana	5,557	-	1,415,078

Cause No. 45870
OUCC 27-009 Attachment

State	Average Household Size
New York	2.57
New Jersey	2.68
Pennsylvania	2.45
Maryland	2.61
Kentucky	2.45
Georgia	2.63
Tennessee	2.48
Virginia	2.54
West Virginia	2.36
Missouri	2.45
Michigan	2.49
Iowa	2.41
Indiana	2.52
Illinois	2.59
Lake Water	2.59
Ohio	2.44
California	2.90
Arizona	2.63
Texas	2.75
New Mexico	2.55
Hawaii	2.89

*Based on 2010 US Census Bureau Statistics

Press Release

INDIANA AMERICAN WATER

March 31, 2023 | American Water (NYSE: AWK) | PDF

Indiana American Water Files Rate Request Driven by $875 Million in Investment

Request reinforces company's commitment to providing safe, reliable and affordable water and wastewater service

GREENWOOD, Ind. (March 31, 2023) – Indiana American Water filed a rate adjustment request today with the Indiana Utility Regulatory Commission (IURC) reflecting $875 million in water and wastewater system investments to be made through 2025 to continue providing safe and reliable service as well as a significant increase in the cost of procuring chemicals, goods and services.

"Indiana American Water has made significant investments in aging infrastructure and its treatment and distribution facilities to ensure service reliability, water quality, and fire protection capabilities that help protect customers and the communities we serve," said Indiana American Water President Matt Prine. "We also remain steadfastly committed to addressing the needs of our most vulnerable customers and have included components in our request to keep their rates affordable."

In today's filing, Indiana American Water is seeking to increase revenues over a phased, three step process through May 2025 that would result in $86.7 million of additional annual revenue when fully implemented. If the company's proposed rates are approved as requested, the bill for a typical residential customer using 4,000 gallons per month would increase approximately $14 per month when rates are fully implemented in 2025. The company last filed for new rates through a general rate filing in September 2018 and last implemented new rates in 2019.

The increases for residential wastewater customers will vary depending on the community served. Additional information on current rates is available on the company's website at https://www.amwater.com/inaw/customer-service-billing/your-water-rates.

Results of a customer affordability study conducted as part of the filing demonstrate that the affordability of the company's water and wastewater services as a comparison of monthly bills to monthly household income has steadily improved over the past decadeand will remain affordable under the company's proposed rates.

Recognizing that affordability may still be an issue for some customers, the company is proposing a new rate design that provides 1,500 gallons of water usage at no additional cost above the fixed monthly customer charge for all water customers. The proposed change would provide relatively low-cost basic water service for customers on fixed incomes that use a lower volume of water than the typical residential customer.

The filing also includes a proposed Universal Affordability Tariff to provide multiple tiers of discounts to address the affordability needs of different levels of household income. Under the new rate structure, eligible households would receive monthly bill discounts of between 30 and 80 percent for water service.

The IURC's rate review process offers multiple opportunities for customer involvement. Customers can participate through written comments, attendance at public input hearings, and consumer advocacy organizations that participate in the proceedings. For more information on the company's rate proposal and to find out what actions customers may take, visit us online at https://www.amwater.com/inaw/customer-service-billing/your-water-rates.

For customers facing a financial hardship, Indiana American Water offers payment plans and budget billing. Indiana American Water also provides information to customers about the Low-Income Household Water Assistance Plan (LIHWAP). More information can be found by clicking on the https://www.amwater.com/inaw/customer-service-billing/low-income-program under the Customer Service & Billing heading on the https://www.amwater.com/inaw or by clicking https://www.amwater.com/inaw/customer-service-billing/low-income-program. For tips on how to reduce your water bill by conserving water, visit our

https://www.amwater.com/inaw/Water-Wastewater-Information/wise-water-use at https://www.amwater.com/inaw/Water-Wastewater-Information/wise-water-use.

About Indiana American Water

Indiana American Water, a subsidiary of American Water (NYSE: AWK), is the largest investor-owned water utility in the state, providing high-quality and reliable water and wastewater services to approximately 1.32 million people. For more information, visit https://amwater.com/inaw/ and follow Indiana American Water on Twitter and Facebook.

About American Water

With a history dating back to 1886, American Water (NYSE: AWK) is the largest and most geographically diverse U.S. publicly traded water and wastewater utility company. The company employs approximately 6,500 dedicated professionals who provide regulated and regulated-like drinking water and wastewater services to an estimated 14 million people in 24 states. American Water provides safe, clean, affordable, and reliable water services to our customers to help keep their lives flowing. For more information, visit amwater.com and diversityataw.com. Follow American Water on Twitter, Facebook, and LinkedIn.

Media Contacts

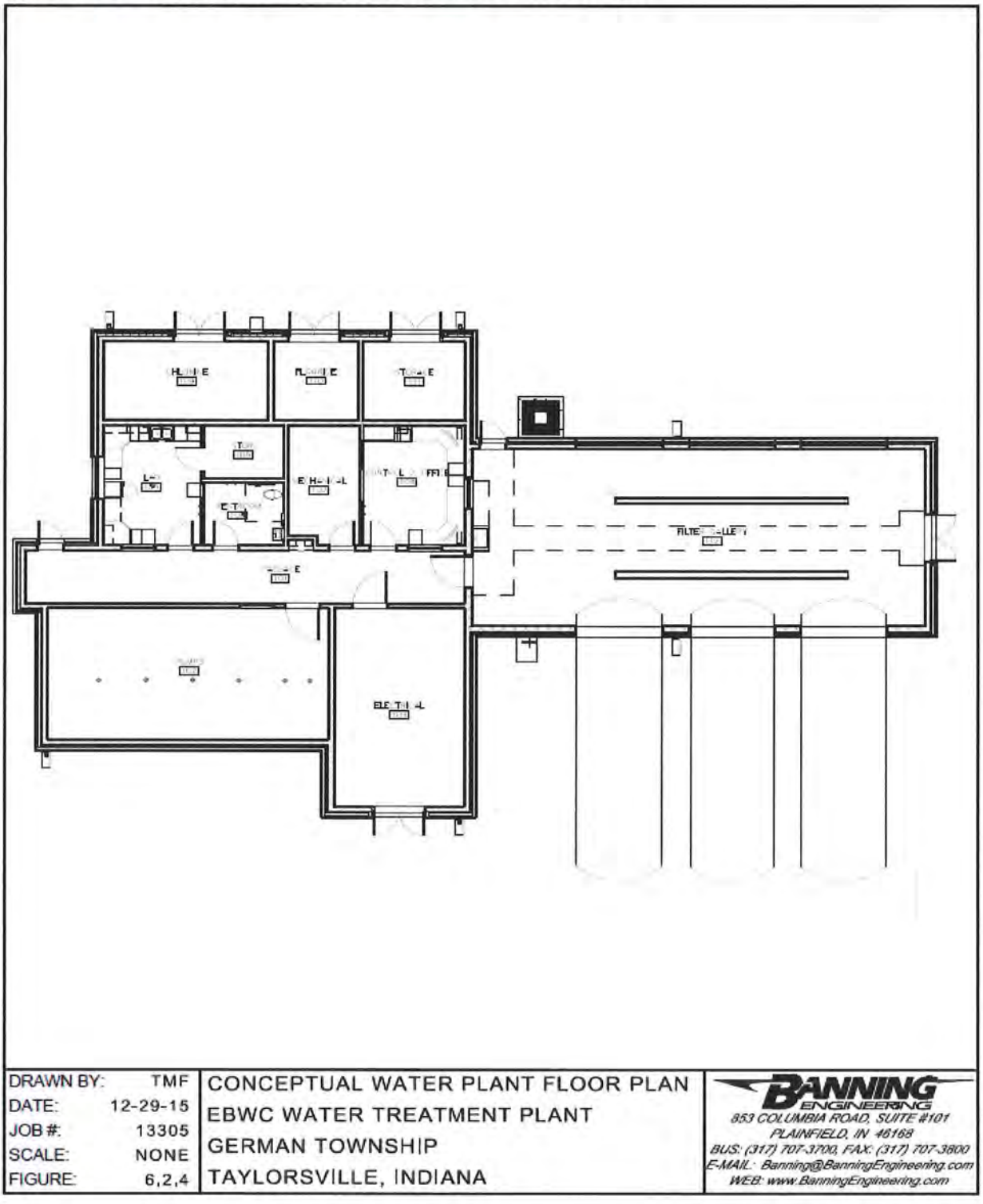
Joe Loughmiller
External Affairs Manager
317.885.2434
joe.loughmiller@amwater.com

Eastern Bartholomew Water Corporation – 3.5 MGD Groundwater Filtration Plant

In service date 500K Concrete Clearwell: 07/31/2018

In service date WTP: 08/15/2019. Cost: $6,879,710.

Figure 6.2.4 – CONCEPTUAL WATER PLANT FLOOR PLAN



DRAWN BY:	TMF	CONCEPTUAL WATER PLANT FLOOR PLAN EBWC WATER TREATMENT PLANT GERMAN TOWNSHIP TAYLORSVILLE, INDIANA	BANNING ENGINEERING 853 COLUMBIA ROAD, SUITE #101 PLAINFIELD, IN 46168 BUS: (317) 707-3700, FAX: (317) 707-3800 E-MAIL: Banning@BanningEngineering.com WEB: www.BanningEngineering.com
DATE:	12-29-15		
JOB #:	13305		
SCALE:	NONE		
FIGURE:	6.2.4		

Figure 6.2.3 – CONCEPTUAL ELEVATION PLAN

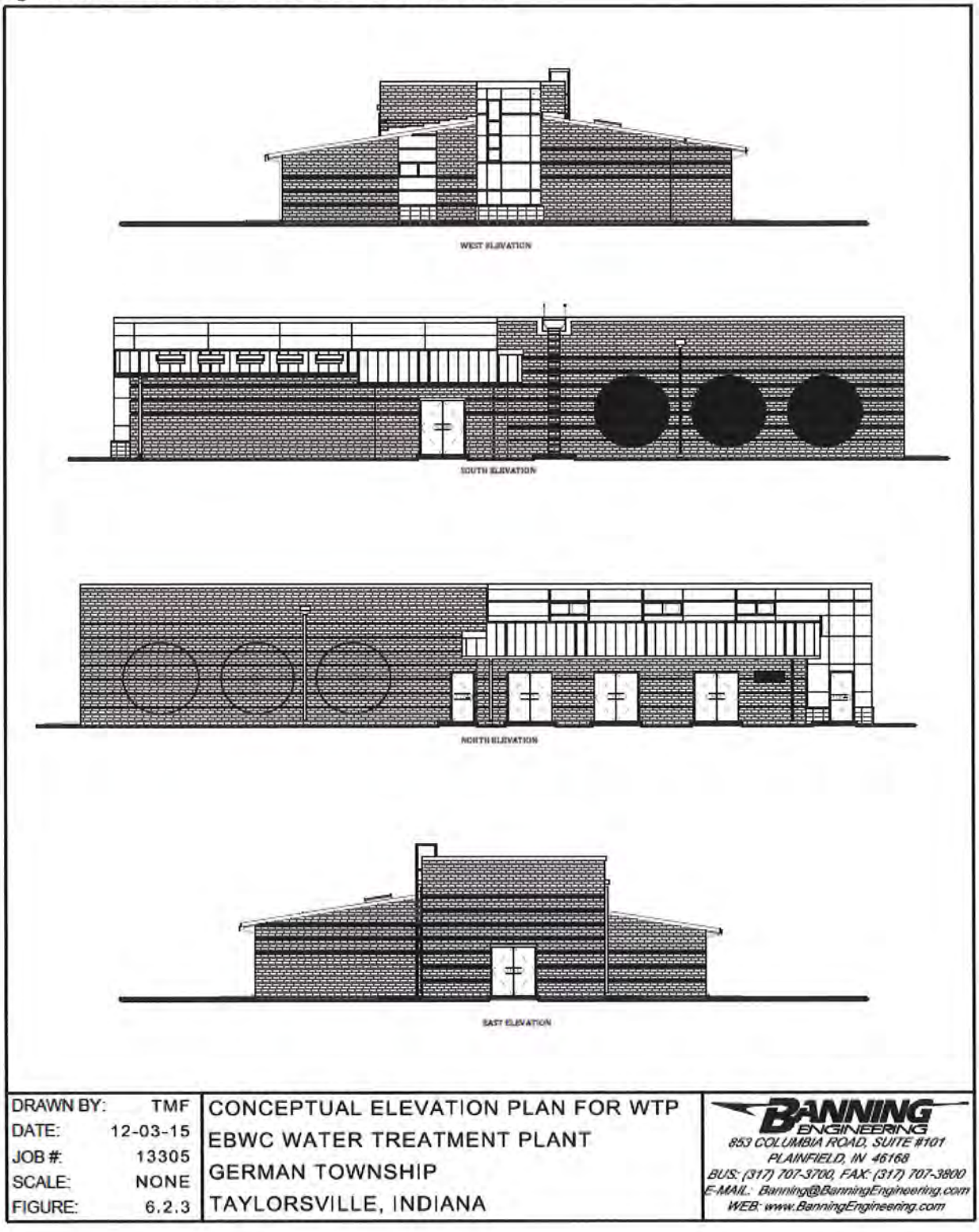


Table 6.4.1 – Summary of Estimated Construction Costs

ITEM NO.	ITEM	UNITS	QTY.	UNIT PRICE	TOTAL PRICE
1	40,000 GALLON DETENTION TANKS	EACH	2	$300,000.00	$600,000.00
2	815 GPM HORIZONTAL LOW PRESSURE FILTERS	EACH	3	$200,000.00	$600,000.00
3	3,150 GPM AERATOR	EACH	1	$140,000.00	$140,000.00
4	600 GPM HIGH SERVICE PUMP & MOTOR	EACH	1	$17,500.00	$17,500.00
5	1,200 GPM HIGH SERVICE PUMP & MOTOR	EACH	1	$30,000.00	$30,000.00
6	1,600 GPM HIGH SERVICE PUMP & MOTOR	EACH	2	$50,000.00	$100,000.00
7	STEEL PUMP CAN	EACH	5	$12,000.00	$60,000.00
8	2,700 GPM FILTER BACKWASH WATER PUMP	EACH	1	$25,000.00	$25,000.00
9	LOW PRESSURE SEWER SYSTEM	LUMP SUM	1	$75,000.00	$75,000.00
10	CHLORINATION SYSTEM	EACH	1	$30,000.00	$30,000.00
11	CHLORINE LEAK DETECTOR	EACH	1	$15,000.00	$15,000.00
12	AUTOMATIC HALOGEN SHUT-OFFS	EACH	2	$7,500.00	$15,000.00
13	CHLORINE AIR SCRUBBER UNIT	EACH	1	$35,000.00	$35,000.00
14	STANDBY POWER GENERATOR PLANT	EACH	1	$150,000.00	$150,000.00
15	MOTOR CONTROL CENTER	EACH	1	$200,000.00	$200,000.00
16	AUTOMATIC CONTROL CIRCUITS	LUMP SUM	1	$125,000.00	$125,000.00
17	YARD PIPING AND VALVES	EACH	1	$400,000.00	$400,000.00
18	PRE-ENGINEERED STEEL & MASONRY BUILDING	LUMP SUM	1	$1,025,000.00	$1,025,000.00
19	WATER PLANT PIPING AND VALVES	EACH	1	$610,000.00	$610,000.00
20	SITE GRADING	LUMP SUM	1	$100,000.00	$100,000.00
21	DRIVES AND SIDEWALKS	LUMP SUM	1	$150,000.00	$150,000.00
22	LABORATORY EQUIPMENT	LUMP SUM	1	$15,000.00	$15,000.00
23	COMPRESSED AIR PIPING	LUMP SUM	1	$25,000.00	$25,000.00
24	SCADA	LUMP SUM	1	$130,000.00	$130,000.00
25	PAINTING	LUMP SUM	1	$150,000.00	$150,000.00
26	SECURITY SYSTEM	LUMP SUM	1	$50,000.00	$100,000.00
27	750,000 GALLONS CLEAR WELL	LUMP SUM	1	$730,000.00	$730,000.00
28	FLUORIDE FEED	LUMP SUM	1	$10,000.00	$10,000.00
29	FILTERED WATER MAG METERS	LUMP SUM	1	$30,000.00	$15,000.00
30	FINISHED WATER MAG METERS	LUMP SUM	1	$30,000.00	$15,000.00
32	BACKWASH WATER YARD PIPING	LUMP SUM	1	$40,000	$40,000
33	STORAGE BUILDING	LUMP SUM	1	$470,000	$470,000
ESTIMATED CONSTRUCTION COST					$6,182,500.00
10% CONSTRUCTION CONTINGENCY					618,250.00
TOTAL ESTIMATED CONSTRUCTION COST					6,800,750.00

Total estimated project costs include the cost of construction plus the non-construction expenses. Non-construction costs include items such as engineering, construction observation, contract administration, legal, accounting, administrative, and miscellaneous items of cost. Table 6.4.2 provides the selected plan cost summary which includes estimated non-construction costs. The estimated total project cost for the selected project is $7,670,000.00.

Table 6.4.2 – Summary of Estimated Total Project Costs

ITEM	TOTAL COST
NON-CONSTRUCTION COSTS	
ENGINEERING - SURVEY, DESIGN, BIDDING & CA	$465,435.00
ENGINEERING - CONSTRUCTION OBSERVATION	$180,000.00
FINANCIAL ADVISORY	$89,500.00
LEGAL	$108,909.00
LABOR STANDARDS AMINISTRATION	$10,000.00
CONTINGENCIES	$15,406.00
NON-CONSTRUCTION COSTS SUBTOTAL	**$869,250.00**
CONSTRUCTION COSTS SUBTOTAL	**$6,800,750.00**
TOTAL ESTIMATED PROJECT COST	**$7,670,000.00**

6.5 PROJECT SCHEDULE

EBWC wishes to move forward with this project as soon as possible. The public hearing for presentation of the Preliminary Engineering Report (PER) is scheduled for June 16th, 2016. The anticipated project schedule is provided in Table 6.5.1.

UMBAUGH

H. J. Umbaugh & Associates
Certified Public Accountants, LLP
8365 Keystone Crossing
Suite 300
Indianapolis, IN 46240-2687
Phone: 317-465-1500
Fax: 317-465-1550
www.umbaugh.com

January 12, 2018

Board of Directors
Eastern Bartholomew Water Corporation
2413 W. 700 N.
P.O. Box 487
Taylorsville, IN 47280-0487

In connection with the true-up report as required in this Cause No. 44903, we have, at your request, prepared this special purpose report for submission to the Indiana Utility Regulatory Commission.

This report including the following schedules has been prepared for the purpose of providing the true-up information resulting from the sale of the Secured Notes, Series 2017 to the Indiana Utility Regulatory Commission and should not be used for any other purpose.

In the preparation of these schedules, assumptions were made as noted regarding certain future events. As is the case with such assumptions regarding future events and transactions, some or all may not occur as expected, and the resulting differences could be material. We have not examined the underlying assumptions nor have we audited or reviewed the historical data. Consequently, we express no opinion thereon, nor do we have a responsibility to prepare subsequent reports.

EASTERN BARTHOLOMEW WATER CORPORATION

TWO PHASE TRUE-UP FILING RATIONALE

Pursuant to the Settlement Agreement filed in Cause No. 44903, which was approved by the Indiana Utility Regulatory Commission on November 21, 2017, a true-up report shall be filed by the Eastern Bartholomew Water Corporation ("EBW") within thirty (30) days of closing on the Secured Notes, Series 2017 ("2017 Notes"). The closing took place on December 14, 2017. The 2017 Notes were sold to the Indiana State Revolving Loan Fund Program, which is a drawdown loan and the interest paid during construction will be calculated based on the drawdowns.

The Phase I rates and initial true-up report assume the interest due during construction is based on the full amount of the loan drawn at closing to ensure there are adequate funds to pay the interest payments. The amount of principal drawn and interest paid will depend on the timing of actual construction draws which are not fully known by the time the initial true-up report is due and the actual amount of interest paid during the first year will be less than fully drawndown amount. Therefore, a subsequent and final true-up report will be filed by November 15, 2018 in order for the final rates to be in place when the full debt service transfers need to start on January 1, 2019 which will incorporate the known construction draws at that time and estimates of the remaining draws. The amount of reduction in interest due based on the actual drawdowns will be applied to the debt service reserve fund by reducing the amount of each remaining monthly transfer for the Phase II rates. The Phase II rates and final true-up report will incorporate the full average annual debt service on the loan post construction and will also reflect the reduction in interest paid in Phase I based on the principal drawdowns applied to the debt service reserve fund.

(Subject to the attached letter of Umbaugh dated January 12, 2018)

EASTERN BARTHOLOMEW WATER CORPORATION

SCHEDULE OF PROJECT COSTS AND FUNDING
(Per Bids Received and Consulting Engineer)

PROJECT COSTS	Per IURC Order (11/21/17)	Bond Sale Adjustment	Debt Service True-Up (12/14/17)
Construction Costs and Contingencies:			
New water treatment plant	$4,982,500	$34,358 (1)	$5,016,858
Water storage tank	747,000	(7,900) (1)	739,100
Maintenance building	300,000	(300,000) (1)	-
Construction contingencies	498,250	88,857	587,107
Total Construction Costs and Contingencies	6,527,750	(184,685)	6,343,065
Non-Construction Costs:			
Engineering services - survey, design and bidding	465,435	25,235	490,670
Engineering services - construction observation	180,000	-	180,000
Interest on interim loan	-	25,134 (2)	25,134
Allowance for legal, accounting & financial advisory, administrative, general project contingencies and rounding	238,815	134,316	373,131
Total Non-Construction Costs	884,250	184,685	1,068,935
Total Project Costs	$7,412,000	$0	$7,412,000
PROJECT FUNDING			
Secured Notes, Series 2017	$7,412,000		$7,412,000

(1) Based on the results of the construction bids received. The maintenance building bids came in too high and were removed from the project budget. The Corporation plans to re-bid and move forward with the maintenance building if there is enough funds left in the contingencies once the project is completed.
(2) Accrued interest through December 14, 2017 on interim loan with First Financial Bank paid by SRF.

(Subject to the attached letter of Umbaugh dated January 12, 2018)

3.5 MGD rated capacity (all units in service) groundwater treatment plant and 0.75 MG clearwell.
Total cost of $7,412,000 per the true-up report, Cause No. 44903.

Eastern Bartholomew Water Corporation
NAME OF UTILITY

YEAR OF REPORT
December 31, 2019

ADDITIONS/(RETIREMENTS) DETAIL
Provide the following information for each addition or retirement greater than $10,000. Please insert additional rows where necessary.

ACCT. NO. (a)	FUNCTION BY SUB-ACCOUNT (b)	TOTAL ADDITIONS/ (RETIREMENTS) (c)	DESCRIPTION OR TYPE OF ASSET (d)	IN SERVICE DATE *(mm/dd/yyyy)* (e)	RETIREMENT DATE* *(mm/dd/yyyy)* (f)	AMOUNT (g)
301						
302						
303						
304		6,307,850	Water Treatment Plant	8/15/2019		6,879,710
305						
306						
307		(31,147)	Well #3		1/1/2019	(31,147)
308						
309						
		(1,106)				
310						
311						
320		(14,000)	Filter- Rebuild		12/31/2019	(14,000)
330						
331						
		188,498	Line Extension	12/31/2019		184,660
333						
334						
		43,276	New Meter Installations- 19	7/1/2019		10,402
		(91,604)	Meter Change outs- 189	7/1/2019		32,874
			M&I Pre 1988	1/1/2019		(31,776)
			M&I 1990	1/1/2019		(10,733)
			Meters & Installs 2011	1/1/2019		(15,829)
335						
336						
339						
340		52,475	2020 CUSI Software	12/31/2019		52,475
341		40,132	2019 Toyota Tundra	9/30/2019		40,132
		(39,173)	2017 Toyota Tundra	9/30/2019		(39,173)
342						
343						
344						
345						
346						
347						
348						
		$6,455,201				$7,057,595

*Please provide the reason for an asset retirement, if it occurred prior to its expected useful life.
NOTE: In-service dates for each retirement should be provided.

No assurance is provided on these financial statements or supplementary information.

Batesville 3.0 MGD Ion Exchange Groundwater Softening Plant*

November 5, 2020 aerial photo

October 3, 2022 aerial photo

*Rated capacity - all three 700 gpm softening units in operation.

INDIANA DRINKING WATER STATE REVOLVING FUND (DWSRF) LOAN PROGRAM
2019 Project Priority List, April 1, 2019, 4th Quarter DRAFT *
Projects Applying for Financial Assistance In State Fiscal Year 2019 (July 1, 2018- June 30, 2019)

Preliminary Engineering Reports

PPL Rank [1]	PPL Score	Participant	MHI [2, 3]	Population Served	PWSID #	SRF Project No.	Project Description	EPA's Sustainability Policy Category [4]	Estimated Green Project Reserve Cost	Green Project Reserve Category [5]	Current User Rate (per 4,000 gallons)[2]	Estimated Post-Project User Rate (per 4,000 gallons)[2]	Estimated Total Project Cost	Cumulative Total
1	90	Fort Wayne	$45,853	250,000	5202020	DW190202 04	Plant, Storage, Distribution System Improvements	1, 2	TBD	TBD	$22.78	$30.32	$36,252,000	$36,252,000
2	47	Lizton	$60,089	TBD	TBD	DW180632 01	New Distribution System and Connection to New Provider	1	TBD	TBD	$0.00	$57.05	$3,770,000	$40,022,000
3	41	Crown Point	$69,471	30,000	5245008	DW180445 01	New Storage and Distribution System Improvements	1, 2, 3	TBD	TBD	$38.13	$50.74	$12,000,000	$52,022,000
4	41	Andrews	$37,344	1,149	5235001	DW160935 01	Plant Replacement	1	TBD	TBD	$29.60	$67.20	$2,139,000	$54,161,000
5	39	Glenwood	$46,875	305	5270002	DW181470 02	New Wells and Plant Improvements	1, 2	TBD	TBD	$45.00	$50.00	$688,900	$54,849,900
6	38	Lawrence	$50,107	46,100	5249005	DW170149 01	Plant, Storage and Distribution System Improvements	1, 2, 3	TBD	TBD	$22.41	$44.65	$10,486,500	$65,336,400
7	27	BBP Water Corporation	$38,598	9,903	5260001	DW171060 02	Storage and Distribution System Improvements	1	TBD	TBD	$37.88	$51.00	$10,316,000	$75,652,400
8	25	Monroe	$53,611	872	5201004	DW190101 01	Water Treatment Plant and Distribution System Improvements	1, 2, 3	TBD	TBD	$35.28	$61.85	$2,452,000	$78,104,400
9	22	Huntingburg	$48,984	6,100	5219007	DW181519 02	Plant and Distribution System Improvements	1, 2	TBD	TBD	$37.94	TBD	$6,744,000	$84,848,400
10	20	Chandler	$49,160	18,000	5287002	DW181987 02	Distribution System Improvements	1, 2	TBD	TBD	$25.93	$38.87	$29,294,000	$114,142,400
11	20	Evansville	$36,956	173,000	5282002	DW181282 01	Distribution System Improvements	1, 2, 3	TBD	TBD	$18.97	$27.86	$20,000,000	$134,142,400
12	19	Carmel	$109,201	86,672	5229004	DW181129 01	Plant, Storage and Distribution System Improvements	1, 2, 3	TBD	TBD	$23.83	$26.04	$51,059,319	$185,201,719
13	18	Prince's Lakes	$65,650	3,945	5241007	DW181803 03	Storage and Distribution System Improvements	1, 2	TBD	TBD	$25.34	$35.79	$5,369,700	$190,571,419
14	17	Batesville	$53,344	6,600	5269001	DW170569 01	New Wells, Plant and Transmission Main	1	TBD	TBD	$25.40	$40.89	$15,363,300	$205,934,719
15	17	Shirley	$44,554	960	5233013	DW150330 01	Distribution System Improvements	1, 2	TBD	EE, GI	$21.67	$31.02	$721,855	$206,656,574
16	16	Gibson Water, Inc.	$63,056	4,390	5226009	DW180826 01	Distribution System Improvements	1, 2	TBD	TBD	$29.88	$36.68	$2,580,000	$209,236,574
17	16	Delphi	$44,556	3,200	5208002	DW181708 01	Supply, Plant, Storage and Distribution System Improvements	1	TBD	TBD	$22.73	$55.00	$6,100,000	$215,336,574
18	16	Greensburg	$50,781	12,000	5216002	DW170716 03	Plant Replacement	1, 2, 3	TBD	TBD	$20.29	$29.75	$18,036,000	$233,372,574
19	16	Pittsboro	$72,955	3,470	5232019	DW170832 02	New Plant and Distribution System Improvements	1, 2, 3	TBD	TBD	$32.32	$43.61	$6,780,300	$240,152,874
20	15	Peru Utilities	$34,991	11,417	5252016	DW170652 02	Distribution System Improvements	1, 2, 3	TBD	TBD	$28.03	$28.03	$1,100,000	$241,252,874
21	9	Mount Vernon	$53,750	8,912	5265006	DW150165 02	Distribution System Expansion	2	TBD	TBD	$28.16	$28.16	$5,537,000	$246,789,874

TOTAL PRELIMINARY ENGINEERING REPORTS SUBMITTED **$246,789,874**

Applications Only: Not Scored or Ranked

PPL Rank [1]	PPL Score	Participant	MHI [2, 3]	Population Served	PWSID #	SRF Project No.	Project Description	EPA's Sustainability Policy Category [4]	Estimated Green Project Reserve Cost	Green Project Reserve Category [5]	Current User Rate (per 4,000 gallons)[2]	Estimated Post-Project User Rate (per 4,000 gallons)[2]	Estimated Total Project Cost	Cumulative Total
Application Only	--	Centerville	$42,703	2,533	5289003	DW190689 03	Distribution System Improvements	1, 2, 3	TBD	TBD	$34.22	$34.22	$1,499,303	$1,499,303
Application Only	--	Clinton County	$51,659	16,422	5212003	DW190512 01	Distribution System Expansion	1	TBD	TBD	$17.18	$17.18	$4,000,000	$5,499,303
Application Only	--	Indiana-American Water Company	Various	Various	Various	DW182141 09	Lead Service Line Replacement	1	TBD	TBD	TBD	TBD	$26,520,000	$32,019,303
Application Only	--	North Salem Water Corporation	$41,413	504	5232017	DW190332 01	New Plant, Storage and Source Water Improvements	1	TBD	TBD	$36.00	TBD	$1,800,000	$33,819,303
Application Only	--	Washington	$36,411	13,425	5214007	DW190414 01	Distribution System Improvements	1, 2, 3	TBD	TBD	$28.24	$33.90	$3,267,063	$37,086,366
Application Only	--	Whiteland	$70,455	4,346	5241009	DW182041 01	Distribution System Expansion	1	TBD	TBD	$31.48	$31.48	$2,500,000	$39,586,366

TOTAL APPLICATIONS ONLY SUBMITTED **$39,586,366**

Continued on Page 2

TOTAL PRELIMINARY ENGINEERING REPORTS and APPLICATIONS SUBMITTED **$286,376,240**

DWSRF Participant: Batesville			
SRF Project #:	DW17056901	DWSRF Pooled Loan:	$ 18,770,000
DWSRF Loan Closed:	November 12, 2019	Principal Forgiveness:	$ 0
Affected Population:	6,600	Total Loan and Principle Forgiveness:	$ 18,770,000
Loan Term:	35 years	NIMS Categories:	
		Treatment:	$ 6,053,911
Interest Rate:	3.22%	Transmission & Distribution:	$ 10,569,578
		Source:	$ 2,146,510
Equivalency Amount:	$ 0	Estimated SRF Savings:	$ 4,837,676

This Project: Assists a compliant system to maintain compliance.

Project Description:

The Batesville Water Utility relied on four reservoirs for water, which left the Town reliant on rainfall for a water supply. There was concern that sufficient supply would not be available to the community in the event of a long term drought.

To address this concern, the Batesville Water Utility project includes:

- Construction of a new water supply well field with three new wells;
- Construction of a new water softening treatment plant, including chemical feed components, and all necessary site work and buildings; and
- Construction of approximately 16 miles of new raw water transmission main from the proposed wellfield to the proposed water treatment plant.

The proposed project provides additional supply and improves the climate resiliency of the Batesville Water Utility.

This project includes raw water transmission main, which have a long useful life. These factors meet the policy guidelines of the Indiana Extended Term Program, and qualifies for a loan term of 35 years.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Eric J. Holcomb, *Governor*
Bruno Pigott, *Commissioner*

PERMIT FOR PUBLIC WATER SUPPLY CONSTRUCTION

Eric Laker, Water Utility Manager
Batesville Water Works
7 North Eastern Avenue
Batesville, IN 47006

WS-12023	October 9, 2019	Matt Prater Drinking Water Branch Chief Office of Water
Permit Number	Date Issued	

You are hereby notified that the Office of Water Quality has approved the general design of plans and specifications of water works improvements to the Batesville Water Works public water system (PWSID 5269001). This Permit allows for water treatment plant improvements including water main, well, pumping, chemical addition and treatment construction for the Batesville Water Works public water system located in Franklin and Ripley Counties, Indiana. This Permit is issued under provisions of Indiana Code (IC) 13-15, IC 13-18-16, 327 Indiana Administrative Code (IAC) 8-3, and 327 IAC 8-4-1.

Pursuant to IC 13-15-5-3 and IC 4-21.5-3-4(d), this Permit is effective on the date issued.

The project consists of the construction of approximately 86,288 feet of 20 inch ductile iron pipe, 230 feet of 8 inch ductile iron pipe, and 230 feet of 6 inch ductile iron pipe, a new 2,100 gallons per minute cation exchange softening plant, one million gallon clearwell, three 20 inch steel, approximately 100 feet deep tubular wells, a raw water transmission main, booster pumps, and chemical addition units for gas chlorine, fluorosilicic acid 23-25%, and WSU 318 phosphate solution, together with all the necessary appurtenances.

This Permit is issued with the following conditions:

1. That the permittee notify, in writing, Liz Melvin, Capacity Development, Operator Certification and Permits Chief, a minimum of ten (10) days, excluding Saturdays, Sundays, and State of Indiana holidays, before exercising a permit issued in accordance with 327 IAC 8-3. The notification may be via email

CITY OF BATESVILLE, INDIANA
WATERWORKS IMPROVEMENTS
DIV. I - WATER SUPPLY WELLS
BID TABULATION - BASE BID

ITEM NO.	ITEM	UNITS	QTY.	BASTIN LOGAN WATER SERVICES, INC.		NATIONAL WATER SERVICES, LLC	
				UNIT PRICE	TOTAL PRICE	UNIT PRICE	TOTAL PRICE
1	20" DIAMETER GRAVEL WALL WATER SUPPLY WELLS (three wells)	LUMP SUM	1	$ 203,072.00	$ 203,072.00	$ 330,709.00	$ 330,709.00
2	20" DIA. STEEL WELL CASING, 0.375" WALL THICKNESS. THREE WATER SUPPLY WELLS	LUMP SUM	1	$ 39,000.00	$ 39,000.00	$ 31,285.71	$ 31,285.71
3	20" DIA. STAINLESS STEEL WIRE WOUND WELL SCREEN (THREE AT 20' EACH)	Lump Sum	1	$ 24,000.00	$ 24,000.00	$ 22,475.00	$ 22,475.00
4	VERTICAL TURBINE PUMP 700 GPM @ 524' TDH	EACH	3	$ 10,500.00	$ 31,500.00	$ 53,528.66	$ 160,585.98
5	8" X 8" X 16.5", 250 # FLANGE, PUMP DISCHARGE HEAD	EACH	3	$ 8,125.00	$ 24,375.00	$ 12,500.00	$ 37,500.00
6	200 H.P. VFD MOTOR STARTER (INSTALLATION; EQUIPMENT BY SCADA PROVIDER)	EACH	3	$ 14,700.00	$ 44,100.00	$ 1,876.00	$ 5,628.00
7	8" SCH. 80 STEEL COLUMN PIPE AND S.S. SHAFTING (three wells)	LUMP SUM	1	$ 50,000.00	$ 50,000.00	$ 69,174.99	$ 69,174.99
8	8" PROPELLER WATER METER METERS (three wells)	LUMP SUM	1	$ 19,500.00	$ 19,500.00	$ 25,995.00	$ 25,995.00
9	DISCHARGE PIPING, CHECK VALVE, PLUG VALVE, DRAINBACK (three wells)	LUMP SUM	1	$ 124,500.00	$ 124,500.00	$ 143,148.20	$ 143,148.20
10	PRESSURE GAUGE AND SAMPLE COCK (all locations)	LUMP SUM	1	$ 1,000.00	$ 1,000.00	$ 700.00	$ 700.00
11	WELL TOWER, GRATING AND CONCRETE SEAL	EACH	3	$ 25,000.00	$ 75,000.00	$ 15,671.00	$ 47,013.00
12	PRECAST CONCRETE VAULT, ALUMINUM LADDER, & ALUMINUM HATCH	EACH	3	$ 13,500.00	$ 40,500.00	$ 9,676.00	$ 29,028.00
13	STEP RATE PUMPING TEST	EACH	3	$ 2,000.00	$ 6,000.00	$ 3,675.00	$ 11,025.00
14	CONSTANT RATE PUMPING TEST (three wells)	LUMP SUM	1	$ 18,000.00	$ 18,000.00	$ 10,800.00	$ 10,800.00
15	SITE WORK AT WELL FIELD	LUMP SUM	1	$ 89,940.00	$ 89,940.00	$ 129,000.00	$ 129,000.00
16	8" D.I.M.J. RAW WATER MAIN FROM WELL VALVE VAULTS TO CONNECTION (three locations)	LUMP SUM	1	$ 4,000.00	$ 4,000.00	$ 6,900.00	$ 6,900.00
17	WATER ANALYSIS (three wells)	LUMP SUM	1	$ 7,800.00	$ 7,800.00	$ 3,600.00	$ 3,600.00
18	AIR & VACUUM RELEASE VALVE	EACH	3	$ 2,400.00	$ 7,200.00	$ 643.50	$ 1,930.50
19	PAINTING THREE WELL TOWERS, PIPES, FITTINGS AND VALVES	LUMP SUM	1	$ 12,000.00	$ 12,000.00	$ 6,875.00	$ 6,875.00
20	SUBMERSIBLE WATER LEVEL & TEMPERATURE SENSOR WELLS 1-3	EACH	3	$ 2,860.00	$ 8,580.00	$ 1,566.67	$ 4,700.00
21	WELL CONTROL BUILDING SITE WORK	LUMP SUM	1	$ 74,600.00	$ 74,600.00	$ 145,000.00	$ 145,000.00
22	SEPTIC SYSTEM COMPLETE	LUMP SUM	1	$ 19,690.00	$ 19,690.00	$ 21,000.00	$ 21,000.00
23	WATER SERVICE LINE TO BUILDING	LUMP SUM	1	$ 1,650.00	$ 1,650.00	$ 1,500.00	$ 1,500.00
24	WELL CONTROL BUILDING STONE DRIVE	LUMP SUM	1	$ 149,716.00	$ 149,716.00	$ 93,000.00	$ 93,000.00
25	WELL CONTROL BUILDING & SIDEWALKS COMPLETE	LUMP SUM	1	$ 270,490.00	$ 270,490.00	$ 8,363.00	$ 8,363.00
26	ELECTRICAL, COMPLETE (entire project)	LUMP SUM	1	$ 246,404.00	$ 246,404.00	$ 401,859.88	$ 401,859.88
27	SERVICE ENTRANCE CONDUCTORS & METERING	LUMP SUM	1	$ 29,532.00	$ 29,532.00	$ 25,112.00	$ 25,112.00
28	AUTOMATIC TRANSFER SWITCH FOR EMERGENCY GENERATOR	LUMP SUM	1	$ 19,800.00	$ 19,800.00	$ 20,000.00	$ 20,000.00
29	EMERGENCY STANDBY GENERATOR	LUMP SUM	1	$ 83,025.00	$ 83,025.00	$ 93,000.00	$ 93,000.00
30	MOTOR CONTROL CENTER	LUMP SUM	1	$ 38,500.00	$ 38,500.00	$ 30,000.00	$ 30,000.00
31	ELECTRICAL CONDUCTORS TO WELL 1 (BASE BID COPPER)	LUMP SUM	1	$ 115,092.00	$ 115,092.00	$ 108,145.00	$ 108,145.00

CITY OF BATESVILLE, INDIANA
WATERWORKS IMPROVEMENTS
DIV. I - WATER SUPPLY WELLS
BID TABULATION - BASE BID

ITEM NO.	ITEM	UNITS	QTY.	BASTIN LOGAN WATER SERVICES, INC. UNIT PRICE	BASTIN LOGAN WATER SERVICES, INC. TOTAL PRICE	NATIONAL WATER SERVICES, LLC UNIT PRICE	NATIONAL WATER SERVICES, LLC TOTAL PRICE
32	ELECTRICAL CONDUCTORS TO WELL 2 (BASE BID COPPER)	LUMP SUM	1	$ 90,069.00	$ 90,069.00	$ 87,048.00	$ 87,048.00
33	ELECTRICAL CONDUCTORS TO WELL 3 (BASE BID COPPER)	LUMP SUM	1	$ 53,672.00	$ 53,672.00	$ 52,976.00	$ 52,976.00
34	WELL CONTROL BUILDING AIR CONDITIONING & HEATING UNITS	LUMP SUM	1	$ 6,009.00	$ 6,009.00	$ 5,692.00	$ 5,692.00
35	WELL CONTROL BUILDING LIGHTING AND CIRCUITS	LUMP SUM	1	$ 53,993.00	$ 53,993.00	$ 7,945.00	$ 7,945.00
36	SCADA INSTRUMENTATION & CONTROLS PACKAGE, COMPLETE	**ALLOWANCE**	1	$ 252,350.00	$ 252,350.00	$ 225,305.00	$ 225,305.00
37	SOIL EROSION CONTROL	LUMP SUM	1	$ 19,250.00	$ 19,250.00	$ 14,000.00	$ 14,000.00
	TOTAL BASE BID AMOUNT				**$ 2,353,909.00**		**$ 2,418,019.26**

BID TABULATION - ALTERNATE BID NO. 1: ALUMINUM CONDUCTORS TO WELLS IN LIEU OF COPPER CONDUCTORS

ITEM NO.	ITEM	UNITS	QTY.	BASTIN LOGAN WATER SERVICES, INC. TOTAL	NATIONAL WATER SERVICES, LLC TOTAL
A	ELECTRICAL CONDUCTORS TO WELL 1: ALUMINUM IN LIEU OF COPPER*	LUMP SUM	1	$ 54,611.00	**$ 44,226.00**
B	ELECTRICAL CONDUCTORS TO WELL 2: ALUMINUM IN LIEU OF COPPER*	LUMP SUM	1	$ 49,695.00	$ 27,202.00
C	ELECTRICAL CONDUCTORS TO WELL 3: ALUMINUM IN LIEU OF COPPER*	LUMP SUM	1	$ 28,235.00	$ 19,773.00
	TOTAL ALTERNATE BID #1 AMOUNT FOR ALUMINUM CONDUCTORS TO WELLS	**DEDUCT**		**$ 132,541.00**	**$ 91,201.00**

I, LORI A. YOUNG, P.E., HEREBY CERTIFY THAT THIS IS A TRUE AND ACCURATE TABULATION OF THE BIDS RECEIVED BY THE CITY OF BATESVILLE ON THURSDAY, AUGUST 29, 2019, FOR THE WATERWORKS IMPROVEMENTS PROJECT, DIVISION I - WATER SUPPLY WELLS. ALL BIDS WERE RESPONSIVE AND RESPONSIBLY SUBMITTED WITH THE REQUIRED BID BOND (5%), LETTER OF SURETY, BID FORM 96 WITH ATTACHMENT, AND ACKNOWLEDGED ADDENDA 1 - 3.

Lori A. Young

8/30/2019

CITY OF BATESVILLE, INDIANA
DIVISION II - 20" RAW WATER MAIN
BID TABULATION SUMMARY

BID COMPONENT	BRACKNEY, INC.	HOWELL CONTRACTORS, INC.	MAC CONSTRUCTION & EXCV.	LYKINS CONTRACTING	REYNOLDS CONSTRUCTION	GARNEY COMPANIES, INC.
BASE BID	**$ 9,024,524.55**	**$ 9,953,111.00**	**$ 10,100,000.00**	**$ 10,497,963.00**	**$ 10,824,061.10**	**$ 11,416,637.00**
ALTERNATE BID#1: OPEN CUT WATER MAIN INSTALLATION AT PIPE CREEK	$ (43,080.00)	$ 38,200.00	$ (166,800.00)	$ (151,475.00)	$ (356,400.00)	$ (50,000.00)
ALTERNATE BID #2: C905 PVC WATER MAIN PIPE IN LIEU OF PC 250 D.I., STATION 7+15 TO 115+00	$ (82,264.00)	$ (84,504.00)	$ (110,833.00)	$ (88,984.00)	$ (115,167.80)	$ (80,344.00)
ALTERNATE BID #3: C905 PVC WATER MAIN PIPE IN LIEU OF PC 250 D.I., PLAN SHEETS 1 - 56	$ (509,323.00)	$ (528,538.00)	$ (692,789.10)	$ (575,068.00)	$ (727,762.85)	$ (492,853.00)
ALTERNATE BID #4: THREE YEAR MAINTENANCE BOND	$ 45,000.00	$ 10,000.00	$ 12,000.00	$ 34,200.00	$ 14,500.00	$ 36,000.00
BASE BID + ALTERNATES 1 AND 4	$ 9,026,444.55	$ 10,001,311.00	$ 9,945,200.00	$ 10,380,688.00	$ 10,482,161.10	$ 11,402,637.00
BASE BID + ALTERNATES 1, 3 AND 4	$ 8,517,121.55	$ 9,472,773.00	$ 9,252,410.90	$ 9,805,620.00	$ 9,754,398.25	$ 10,909,784.00

BID COMPONENT	CUMBERLAND PIPELINE, LLC	CLEARY CONSTRUCTION, INC.	TRIBUTE CONTRACTING & CONSULTANTS, LLC	SMITH CONTRACTORS, INC.	INFRASTRUCTURE SYSTEMS, INC.
BASE BID	$ 11,599,249.49	$ 11,857,839.75	$ 12,243,533.85	$ 12,476,709.00	$ 12,981,639.25
ALTERNATE BID#1: OPEN CUT WATER MAIN INSTALLATION AT PIPE CREEK	$ (163,080.00)	$ (113,600.00)	$ (27,200.00)	$ 7,600.00	$ (72,200.00)
ALTERNATE BID #2: C905 PVC WATER MAIN PIPE IN LIEU OF PC 250 D.I., STATION 7+15 TO 115+00	$ (129,725.45)	$ (115,070.00)	$ (138,519.00)	$ (17,932.00)	$ (99,313.00)
ALTERNATE BID #3: C905 PVC WATER MAIN PIPE IN LIEU OF PC 250 D.I., PLAN SHEETS 1 - 56	$ (799,871.70)	$ (1,003,174.00)	$ (869,168.00)	$ (55,649.00)	$ (581,941.00)
ALTERNATE BID #4: THREE YEAR MAINTENANCE BOND	$ 100,000.00	$ 200,000.00	$ 100,000.00	$ 500,000.00	$ 35,000.00
BASE BID + ALTERNATES 1 AND 4	$ 11,536,169.49	$ 11,944,239.75	$ 12,316,333.85	$ 12,984,309.00	$ 12,944,439.25
BASE BID + ALTERNATES 1, 3 AND 4	$ 10,736,297.79	$ 10,941,065.75	$ 11,447,165.85	$ 12,928,660.00	$ 12,362,498.25

I, LORI A. YOUNG, P.E., HEREBY CERTIFY THAT THIS IS A TRUE AND ACCURATE TABULATION OF THE BIDS RECEIVED BY THE CITY OF BATESVILLE ON THURSDAY, AUGUST 29, 2019, FOR THE WATERWORKS IMPROVEMENTS PROJECT, DIVISION II - 20" RAW WATER MAIN. ALL BIDS WERE RESPONSIVE AND RESPONSIBLY SUBMITTED WITH THE REQUIRED BID BOND (5%), LETTER OF SURETY, BID FORM 96 WITH ATTACHMENT, AND ACKNOWLEDGED ADDENDA 1 - 4. ALL BIDS EXCEPT FOR HOWELL CONTRACTORS INCLUDED THE OEE-1 AND OEE-2 FORMS.

SEE ATTACHED FULL BID TABULATION WITH ALL INDIVISUAL ITEMS.

Lori A. Young

8/30/2019

CURRY & ASSOCIATES, INC.
CONSULTING ENGINEERS & ARCHITECTS

CITY OF BATESVILLE, INDIANA
WATERWORKS IMPROVEMENTS, DIVISION III
2,100 GPM ION EXCHANGE WATER SOFTENING PLANT
BID TABULATION- BASE BID

ITEM NO.	ITEM	UNITS	REYNOLDS CONSTRUCTION	GRAVES CONSTRUCTION SERVICES, INC.	SMITH CONTRACTORS, INC.	MITCHELL & STARK CONSTRUCTION CO. INC.	DAVE O'MARA CONTRACTOR, INC.
1	SITE WORK, GRADING AND STORMWATER DETENTION, COMPLETE	LUMP SUM	$250,000.00	$362,500.00	$200,000.00	$218,000.00	$180,000.00
2	SITE IMPROVEMENTS, ASPHALT PAVEMENT & CONCRETE WALKS, COMPLETE	LUMP SUM	$150,000.00	$171,163.00	$80,000.00	$194,000.00	$216,000.00
3	SITE PIPING & VALVES, COMPLETE	LUMP SUM	$415,000.00	$263,449.00	$400,000.00	$319,000.00	$365,000.00
4	700 GPM ION EXCHANGE SOFTENERS, COMPLETE	LUMP SUM	$876,535.00	$851,830.00	$1,000,000.00	$920,000.00	$870,000.00
5	BULK SALT STORAGE/BRINE TANKS, COMPLETE	LUMP SUM	$150,000.00	$181,496.00	$300,000.00	$265,000.00	$175,000.00
6	WATER PLANT PIPING & VALVES, COMPLETE	LUMP SUM	$175,000.00	$303,464.00	$300,000.00	$418,000.00	$214,000.00
7	HVAC, AIR HANDLING & DEHUMIDIFICATION SYSTEMS, COMPLETE	LUMP SUM	$90,000.00	$62,797.00	$200,000.00	$123,000.00	$130,000.00
8	CHEMICAL FEED SYSTEMS, COMPLETE	LUMP SUM	$250,000.00	$295,440.00	$300,000.00	$299,000.00	$280,000.00
9	WATER ANALYZERS, CHLORINE, pH, TEMPERATURE AND TURBIDITY, COMPLETE	LUMP SUM	$20,000.00	$58,860.00	$100,000.00	$20,000.00	$38,000.00
10	WATER TREATMENT PLANT BUILDING, COMPLETE	LUMP SUM	$800,000.00	$852,376.00	$950,000.00	$857,000.00	$995,000.00
11	HIGH SERVICE PUMPS, COMPLETE	LUMP SUM	$85,000.00	$101,372.00	$100,000.00	$137,000.00	$102,000.00
12	SOFTENER BACKWASH WASTE TANK, PUMPS AND PIPING, COMPLETE	LUMP SUM	$350,000.00	$202,838.00	$300,000.00	$279,000.00	$336,000.00
13	WATER PLANT FLOW METERS, COMPLETE	LUMP SUM	$85,000.00	$104,625.00	$100,000.00	$109,000.00	$103,600.00
14	ELECTRICAL, COMPLETE	LUMP SUM	$350,000.00	$460,000.00	$400,000.00	$430,000.00	$400,000.00
15	EMERGENCY STANDBY GENERATOR, COMPLETE	LUMP SUM	$105,000.00	$97,179.00	$100,000.00	$140,000.00	$112,000.00
16	SCADA SYSTEM, COMPLETE	ALLOWANCE	$382,965.00	$382,965.00	$382,965.00	$382,965.00	$395,000.00
17	1,000,000 GALLON CLEARWELL TANK, COMPLETE	LUMP SUM	$900,000.00	$930,000.00	$900,000.00	$1,127,000.00	$1,395,000.00
18	MOBILIZATION AND DEMOBILIZATION, COMPLETE	LUMP SUM	$285,000.00	$300,000.00	$200,000.00	$240,000.00	$260,000.00
19A	CHEMICAL STABILIZATION OF SUBGRADE (BASED ON QUANTITY OF 300 SQUARE YARDS)	LUMP SUM	$500.00	$3,000.00	$3,000.00	$19,000.00	$9,000.00
19B	UNDERCUT OF UNSUITABLE SOILS & BACKFILL WITH COMPACTED GRANULAR (BASED ON QUANTITY OF 100 CUBIC YARDS)	LUMP SUM	$3,000.00	$2,300.00	$6,000.00	$10,000.00	$6,800.00
	TOTAL BASE BID AMOUNT		**$5,723,000.00**	**$5,987,654.00**	**$6,321,965.00**	**$6,506,965.00**	**$6,582,400.00**

CITY OF BATESVILLE, INDIANA
WATERWORKS IMPROVEMENTS, DIVISION III
2,100 GPM ION EXCHANGE WATER SOFTENING PLANT
BID TABULATION - ALTERNATE BIDS

NO.	ITEM	UNITS	REYNOLDS CONSTRUCTION	GRAVES CONSTRUCTION SERVICES, INC.	SMITH CONTRACTORS, INC.	MITCHELL & STARK CONSTRUCTION CO. INC.	DAVE O'MARA CONTRACTOR, INC.
	ALTERNATE BID		ADD/DEDUCT AMOUNT	ADD/DEDUCT AMOUNT	ADD/DEDUCT AMOUNT	ADD/DEDUCT AMOUNT	ADD/DEDUCT AMOUNT
1	1,000,000 GALLON GLASS-COATED BOLTED STEEL CLEARWELL TANK	LUMP SUM	($217,000.00)	($202,020.00)	($100,000.00)	($175,000.00)	($220,000.00)
2	ALTERNATE ION-EXCHANGE SOFTENER EQUIPMENT MFGR.	LUMP SUM	NO BID	NO BID	NO BID	$85,000.00	$250,000.00
3	ALTERNATE CONTROL VALVES MFGR. (BUTTERFLY VALVES AND ACTUATORS)	LUMP SUM	NO BID	NO BID	NO BID	NO BID	NO BID
4	STAINLESS STEEL BOLTS WITH NEVER GALL COATING	LUMP SUM	$30,000.00	$77,777.00	$100,000.00	$65,000.00	$88,000.00
5	ADD 3 YEAR MAINTENANCE BOND	LUMP SUM	$15,000.00	$25,000.00	$1,000,000.00	$55,000.00	$30,000.00

I, LORI A. YOUNG, P.E., HEREBY CERTIFY THAT THIS IS A TRUE AND ACCURATE TABULATION OF THE BIDS RECEIVED BY THE CITY OF BATESVILLE ON THURSDAY, AUGUST 29, 2019, FOR THE WATERWORKS IMPROVEMENTS PROJECT, DIVISION III - 2,100 GPM WATER SOFTENING PLANT. ALL BIDS WERE RESPONSIVE AND RESPONSIBLY SUBMITTED WITH THE REQUIRED BID BOND (5%), LETTER OF SURETY, BID FORM 96 WITH ATTACHMENT, AND ACKNOWLEDGED ADDENDA 1 - 3.

CURRY & ASSOCIATES, INC.
CONSULTING ENGINEERS & ARCHITECTS

Lori A. Young

8/30/2019

MONTHLY REPORT OF OPERATION
BATESVILLE WATER SOFTENING PLANT

I.D.E.M. FIELD REP. ANGIE WILLOUGHBY
SIGNED, ERIC LAKER
PUBLIC WATER SUPPLY I.D. #5269001

I certify,under penalty of law, by this signature that this document was prepared by me, or under my direction, and the information submitted is to the best of my knowledge and belief, true, accurate and complete.I am also aware that there are significant penalties for submitting false information.

MONTH OF 6-01-2021 TO 6-30-2021

TITLE: WATER UTILITY MANAGER
CERTIFICATION NUMBER WT210029

	ALKALINITY		PH		HARDNESS		IRON		MANGANESE		PHOSPHATE	FLUORIDE		
DATE	RAW	FIN	RAW	FIN	RAW	FIN	RAW	FIN	RAW	FIN	FIN	FIN	CL2	TEMP-F
1	316	325	7.5	7.6	247	112					0.50	0.8	1.40	61.8
2	320	340	7.4	7.6	320	114					0.75	0.8	1.45	62.1
3	324	338	7.5	7.5	316	120					0.60	0.9	1.38	62.3
4	309	316	7.4	7.4	325	109					0.58	0.8	1.31	61.9
5														
6														
7	315	311	7.4	7.4	300	98					0.57	0.8	1.22	61.5
8	312	313	7.4	7.5	310	109					0.59	0.7	1.27	61.7
9	318	324	7.4	7.4	315	118					0.60	0.7	1.38	61.8
10	316	322	7.4	7.5	312	112					0.54	0.8	1.40	61.4
11	324	318	7.4	7.4	320	100					0.52	0.9	1.29	61.2
12														
13														
14	319	317	7.5	7.4	324	107					0.61	0.8	1.33	62.4
15	320	314	7.3	7.5	331	113					0.57	0.9	1.40	62.1
16	331	309	7.4	7.5	327	118					0.62	0.8	1.31	61.3
17	356	307	7.4	7.5	298	95					0.77	0.8	1.47	61.6
18	312	316	7.5	7.4	342	102					0.63	0.8	1.51	61.7
19														
20														
21	308	316	7.4	7.5	335	118					0.62	0.9	1.55	61.6
22	304	312	7.6	7.5	342	107					0.58	0.8	1.38	61.5
23	310	313	7.4	7.5	338	127					0.59	0.8	1.34	61.1
24	315	313	7.4	7.7	316	128					0.66	0.9	1.23	62.8
25	324	315	7.4	7.6	315	120					0.57	0.8	1.29	62.8
26														
27														
28	313	311	7.3	7.4	330	118	0.00	0.02	0.020	0.017	0.59	0.8	1.20	62.6
29	315	309	7.4	7.5	296	140					0.63	0.8	1.29	62.8
30	310	309	7.3	7.5	282	119					0.57	0.8	1.42	62.4
31														

DATE	H2O TREATED	CHEMICALS USED-POUNDS					CHLORINE RESIDUAL				REMARKS
					SOFTENER	WASH X	PLANT TAP		D.S.		
	GAL. X1000	CL\2	F-	PHOS-PHATE	RUN HR.'S	1000 GAL.	FREE	TOTAL	FREE	TOTAL	
1	203	3	5	20	4	0	1.33	1.40	1.04	1.32	
2	509	6	13	43	11	12	1.45	1.45	1.07	1.22	
3	709	8	20	65	15	12	1.34	1.38	0.98	1.11	
4	229	3	6	22	19	14	1.26	1.31	1.20	1.29	
5	0	0	0	0	0	0			1.33	1.38	
6	0	0	0	0	0	0			1.07	1.18	
7	29	0	1	4	1	0	1.20	1.22	0.97	1.21	
8	0	0	0	0	0	0	1.25	1.27	1.03	1.24	
9	62	0	2	9	2	13	1.32	1.38	1.08	1.24	
10	0	0	0	0	0	0	1.30	1.40	0.86	1.04	
11	52	0	1	7	1	0	1.22	1.29	0.97	1.22	
12	0	0	0	0	0	0			1.03	1.23	
13	0	0	0	0	0	0			0.90	1.07	
14	0	0	0	0	0	0	1.27	1.33	0.92	1.01	
15	234	3	6	34	7	5	1.34	1.40	0.89	1.08	
16	228	3	6	30	7	0	1.29	1.31	0.70	0.96	
17	339	6	8	48	9	0	1.40	1.47	0.86	1.13	
18	222	4	6	32	7	0	1.31	1.51	0.60	0.90	
19	0	0	0	0	0	0			0.80	0.96	
20	0	0	0	0	0	0			0.79	1.00	
21	715	10	18	70	14	0	1.47	1.55	0.85	1.07	
22	550	10	14	56	11	23	1.35	1.38	0.78	0.93	
23	512	9	13	72	11	10	1.30	1.34	1.25	1.26	
24	580	6	14	82	12	0	1.16	1.23	1.05	1.22	
25	369	6	10	53	7	0	1.19	1.29	1.10	1.09	
26	0	0	0	0	0	0			1.01	1.10	
27	0	0	0	0	0	0			0.98	1.21	
28	616	7	13	87	12	0	1.17	1.20	0.98	1.16	
29	772	10	19	68	16	25	1.29	1.29	0.79	0.87	
30	804	10	23	100	16	0	1.33	1.42	1.12	1.14	
31	0	0	0	0	0	0					

MONTHLY WATER TREATMENT	
TOTAL GAL.	7,734,000
MAX. DAY	804,000
MIN. DAY	0
AVG. DAY	257,800

BATESVILLE WATER WORKS
PUBLIC WATER SUPPLY I.D. #5269001
MONTH OF 6-01-2021 TO 6-30-2021

SIGNED: Eric Sale
TITLE: WATER UTILITY MANAGER
CERT. # WT210029

I certify,under penalty of law, by this signature that this document was prepared by me, or under my direction, and the information submitted is to the best of my knowledge and belief, true, accurate and complete.I am also aware that there are significant penalties for submitting false information.

OUCC 20-018

06/05/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

For the Winchester Major Project, please provide the following:

a. Design year for the project

b. Estimated population that will be served in the design year.

c. Projected average and maximum daily demands, including fire flow (please also indicate the fire flow).

d. Forecasted or assumed service lives of critical structures/equipment such as the aerator, detention tank, filters, backwash system, chemical feed systems, clearwell, high service pumps, and transmission main.

e. Cost details for the construction cost including budgetary and contracted costs for but not limited to structures, major equipment, pumps, piping, electrical, and controls, etc.

f. Listing of the non-construction component costs, description of their purpose and who will provide the service, supporting data and basis for the non-construction costs.

Objections:

Petitioner objects to the Request on the grounds and to the extent the request seeks information which is trade secret or other proprietary, confidential and competitively sensitive business information of Petitioner, its customers or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

06/05/2023

a. 2023

b. 4,933

c.

- Average demand of 0.55 MGD
- Maximum Daily Demand of 1.0 MGD
- Fireflow capacity is a function of distribution storage and not production as it relates to this project.

d.

- Aerator – 45 years
- Detention Tank – 45 years
- Filters – 45 years
- Chemical Feed Systems – 45 years
- High Service Pumps – 36 years

e. The Opinion of Cost provided by the selected Design-Build Team is shown on Pgs. 75-76 of Attachment MHH-11 CONFIDENTIAL, Design-Build Proposal – Bowen, as listed on Table 1 of Mr. Hobbs's Testimony.

f. Refer to Attachment MHH-13 CONFIDENTIAL listed on Table 1 of Mr. Hobbs's Testimony. For purposes of the non-construction costs provided in the referenced attachment, please note that the Company considers Design, Property Purchases, AFUDC, Indirect Overhead, Company Labor and Company Labor Overhead as Non-Construction Costs.

OUCC 48-018

07/10/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Reference Petitioner's response to OUCC DR 30-4, which indicated the Strategic Capital Expenditure Plan ("SCEP") included as Attachment MHH-2 (2023-2027) to Mr. Hobbs' Direct was finalized on April 29, 2022. Please provide a copy of Petitioner's most recent SCEP from 2023.

Objections:

Petitioner objects to the Request on the grounds and to the extent the request seeks information, which is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner, its customers, or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers, or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

Refer to OUCC 48-018_Attachment - CONFIDENTIAL for the Company's most recent 5-Year Capital Plan for 2024 through 2028, finalized on April 12, 2023.

Attachment:

OUCC 48-018_Attachment - CONFIDENTIAL

OUCC 30-004

06/20/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Reference Mr. Hobbs testimony on pages 6-7 regarding Petitioner's five-year Strategic Capital Expenditure Plan ("SCEP") which reads in part: "The prioritization of capital investment projects is a key input in developing and updating the SCEP on an annual basis. The Company's current SCEP is included as Attachment MHH-2."

Please answer the following:

a. State the date that the current SCEP was finalized.
b. Provide copies of the previous five Annual SCEP Updates.
c. State the dates that the five previous Annual SCEP Updates were finalized.

Objections:

Indiana American objects to the Request on the grounds and to the extent the request seeks information, which is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner, its customers or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objections, Indiana American is providing the following:

a. The SCEP included as MHH-2 (2023-2027) was finalized on April 29, 2022
b. Copies of the previous five 5-Year Capital Plans are attached as:
    - 2022-2026 5-Year Capital Plan – OUCC 30-004_Attachment 1 - CONFIDENTIAL
    - 2021-2025 5-Year Capital Plan – OUCC 30-004_Attachment 2 - CONFIDENTIAL
    - 2020-2024 5-Year Capital Plan – OUCC 30-004_Attachment 3 - CONFIDENTIAL
    - 2019-2023 5-Year Capital Plan – OUCC 30-004_Attachment 4 - CONFIDENTIAL
    - 2018-2022 5-Year Capital Plan – OUCC 30-004_Attachment 5 - CONFIDENTIAL
c. The dates that the previous five 5-Year Capital Plans were finalized are as follows:
    - 2022-2026 5-Year Capital Plan: April 23, 2021
    - 2021-2025 5-Year Capital Plan: April 27, 2020
    - 2020-2024 5-Year Capital Plan: April 22, 2019

- 2019-2023 5-Year Capital Plan: April 20, 2018
- 2018-2022 5-Year Capital Plan: May 5, 2017

Attachments:

OUCC 30-004_Attachment 1 - CONFIDENTIAL
OUCC 30-004_Attachment 2 - CONFIDENTIAL
OUCC 30-004_Attachment 3 - CONFIDENTIAL
OUCC 30-004_Attachment 4 - CONFIDENTIAL
OUCC 30-004_Attachment 5 – CONFIDENTIAL

Cause No. 45870

OUCC 30-004_Attachment 5 - CONFIDENTIAL
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Confidential Per Access to Court Records Rule 5

2018 to 2022 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

5-May-17

Budget Type	Description	2018	2019	2020	2021	2022	TOTAL	In-Service Date
DV	**Developer Funded**	5,743,518	5,915,824	6,093,298	6,276,097	6,464,380	30,493,117	
IP	**Investment Projects**							
I10000001	Post Acquisition Lake Station and Charlestown	4,091,085	2,770,348	1,305,697	1,323,756	650,000	10,140,886	20221230
I10000002	Post Acquisition Sheridan	1,292,744	2,012,260	462,632	467,152	223,194	4,457,982	20221230
I10000003	Post Acquisition Georgetown	250,000	150,000	150,000	150,000	150,000	850,000	20221230
I10010012	CORP INAW Office Building	8,000,000	-	-	-	-	8,000,000	20180630
I10100007	KOK Wellfield Improvements (Wells and Mains)	2,867,545	3,136,000	-	-	-	6,003,545	20191130
I10100013	KOK Recycle Improvements	2,320,087	-	-	-	-	2,320,087	20180928
I10100016	KOK UV, Lime, Chlorine, Improvements	1,572,126	1,838,585	1,096,267	-	-	4,506,978	20200430
I10150010	MUN Plant Improvements Phase 2	4,604,008	22,464,723	1,050,340	-	-	28,119,071	20200430
I10250009	RIC Main Station PS, Trans Main, & Middle Fork WTF Impr	5,580,215	21,877,116	5,479,391	-	-	32,936,722	20200430
I10250011	RIC REL US27 & US40	181,775					181,775	20181101
I10250012	RIC National Road Booster Station	333,158	655,041	-	-	-	988,198	20190430
I10500002	CRW Chlorine Improvements	1,301,815	401,460	-	-	-	1,703,275	20190430
I10500003	CRW SOS Property Acquisition	99,654	-	-	-	-	99,654	20181130
I10550005	JCO Marlin & Orme Chlorine Improvements	1,978,394	1,000,764	-	-	-	2,979,159	20190430
I10550014	JCO REP West Tank Pump Station	798,541	170,617	-	-	-	969,158	20190430
I10550015	JCO Marlin Wells - Retire #1 & #2, Install #3 & #4	1,389,891	-	-	-	-	1,389,891	20181030
I10550017	JCO SOS Property Acquisition	1,599,438	-	-	-	-	1,599,438	20181130
I10550018	JCO London Rd - OSG Unit & Hypo Tank Repl	969,527	-	-	-	-	969,527	20181130
I10580002	MOR Wells - Retire #2, Install #6	300,161	-	-	-	-	300,161	20181130
I10600006	NOB Wayne St. Chlorine Improvements	411,191	262,908	-	-	-	674,099	20190430
I10600015	NOB WRN Wells - Retire #2 , Install #9 (Completed in 2017)	-	-	-	-	-	-	20170831
I10600016	NOB Forest Park Wells - Retire #3, Install #5 & #6, One well completed in 2017. Other well and Raw Water Main remain	-	1,145,793	-	-	-	1,145,793	20191031
I10600017	NOB ARWTF filtration, backwash recycle, HS pumping	510,851	7,428,143	4,015,380	-	-	11,954,374	20200430
I10600018	NOB SOS Property Acquisition	1,702,449	-	-	-	-	1,702,449	20181130
I10700007	TER Filtration Improvements	2,196,980	452,738	-	-	-	2,649,717	20190430
I10700011	TER Electric Gear and HSP 14 Replacement	102,879	728,399	719,942	-	-	1,551,220	20200430
I10700012	TER Well #8	399,307	-	-	-	-	399,307	20181031
I10750013	SIO REP Michigan Rd. Tank & Pump Station	767,474	2,508,800	-	-	-	3,276,274	20190930
I10750014	SIO Plant Recycle Improvements	101,633	683,407	10,964	-	-	796,004	20200330
I10800004	NBG NTOC & Vanada Treatment Consolidation	101,633	2,377,617	564,673	-	-	3,043,923	20200430
I10900034	NWI REI 49th Ave, 3600 ft, 16" Main	-	-	-	-	-	-	20200430
I10900035	NWI REI US Hwy 12, 3300 ft 36" Main	-	-	-	-	-	-	20231031
I10900049	NWI BP Chlorine Improvements	138,155	3,808,524	1,212,976	-	-	5,159,655	20200430
I10900050	NWI BP Electric Gear Replacement	697,185	-	-	-	-	697,185	20181031
I10900051	NWI Service Center Building and Site Improvements	855,484	-	-	-	-	855,484	20181031
I10900052	NWI REP Frontage Road Booster	418,234	432,000	-	-	-	850,234	20190430
I10900053	NWI BP Backwash Supply Improvements	2,940,632	12,000	-	-	-	2,952,632	20181031
TOTAL IP		50,874,250	76,317,244	16,068,261	1,940,908	1,023,194	146,223,857	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5
5-May-17

2018 to 2022 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

Budget Type	Description	2018	2019	2020	2021	2022	TOTAL	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	1,573,736	792,021	1,534,500	745,500	1,032,900	5,678,657	
RP-B	Mains - Replaced/Restored	26,573,700	39,228,300	52,428,100	69,830,446	69,332,650	257,393,196	
RP-C	Mains - Unscheduled	1,303,318	1,341,101	1,379,826	1,411,536	1,457,223	6,893,004	
RP-D	Mains - Relocated	6,250,000	6,250,000	6,500,000	6,500,000	7,020,000	32,520,000	
RP-E	Hydrants, Valves, Manholes - New	210,739	139,833	215,926	136,561	221,546	924,604	
RP-F	Hydrants, Valves, Manholes - Rep	2,055,176	2,105,284	2,138,530	2,172,605	2,252,205	10,723,800	
RP-G	Services & Laterals - New	2,605,328	2,728,344	2,882,041	2,969,848	3,122,565	14,308,125	
RP-H	Services & Laterals - Rep	4,275,363	5,761,720	5,862,039	5,964,640	6,060,973	27,924,735	
RP-I	Meters - New	1,668,271	1,666,723	1,701,339	1,770,356	1,709,696	8,516,384	
RP-J	Meters - Replaced	4,852,022	4,694,503	5,845,746	6,767,099	7,594,826	29,754,196	
RP-K1	ITS Equip & Systems	1,124,043	591,273	662,890	665,169	890,842	3,934,216	
RP-K3	ITS Centrally Sponsored	5,167,307	5,705,150	5,909,261	6,262,714	4,188,935	27,233,367	
RP-L	SCADA Equip & Systems	2,099,784	2,323,514	1,037,008	1,087,654	800,456	7,348,416	
RP-M	Security	664,690	460,635	125,000	125,000	125,000	1,500,325	
RP-N	Offices & Operations Centers	1,067,768	294,324	286,482	203,638	143,862	1,996,074	
RP-O	Vehicles	2,254,114	1,989,170	1,442,888	1,421,408	1,416,908	8,524,489	
RP-P	Tools & Equipment	1,104,513	729,035	659,670	592,240	646,249	3,731,708	
RP-Q	Process Plant - Fac & Equip	6,459,645	4,452,099	4,506,433	4,846,508	4,752,044	25,016,729	
RP-R	Tank Painting & Rehabilitation	500,000	1,500,000	-	1,800,000	-	3,800,000	
RP-S	Engineering Studies	30,000	30,000	30,000	60,000	60,000	210,000	
TOTAL RP		71,839,515	82,783,028	95,147,680	115,332,922	112,828,881	477,932,026	
TOTAL GROSS		**128,457,283**	**165,016,096**	**117,309,239**	**123,549,927**	**120,316,455**	**654,649,001**	
	Advances	(5,743,518)	(5,915,824)	(6,093,298)	(6,276,097)	(6,464,380)	(30,493,117)	
	Contributions (CF/SDC) ON RP-G	(3,821,274)	(3,842,673)	(3,864,192)	(3,885,831)	(3,907,592)	(19,321,562)	
	Refunds	2,350,373	2,363,535	2,376,770	2,390,080	2,403,465	11,884,223	
TOTAL NET		**121,242,864**	**157,621,134**	**109,728,520**	**115,778,079**	**112,347,948**	**616,718,544**	
TOTAL NET WITHOUT ITS (K3)		116,075,557	151,915,984	103,819,259	109,515,365	108,159,013	**589,485,177**	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5

2019 to 2023 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

20-Apr-18

Budget Type	Description	2019	2020	2021	2022	2023	TOTAL	In-Service Date
DV	**Developer Funded**	6,486,526	6,681,122	6,881,555	7,088,002	7,300,642	34,437,848	
IP	**Investment Projects**							
I10000001	Post Acquisition Georgetown - Moved to SIO RP Lines	6,345	-	-	-	-	6,345	
I10010013	Statewide Chlorine Conversions	-	-	-	10,000,000	16,000,000	26,000,000	20230930
I10100007	KOK Wellfield Improvements (Wells and Mains)	3,591,704	-	-	-	-	3,591,704	20191130
I10100013	KOK WCWTF Recycle Improvements	1,589,454	-	-	-	-	1,589,454	20190401
I10100016	KOK UV, Lime, Chlorine, Improvements	1,469,655	-	-	-	-	1,469,655	20190430
I10150010	MUN Plant Improvements Phase 2	12,986,602	445,264	-	-	-	13,431,866	20191130
I10250009	RIC Main Station PS, Trans Main, & Middle Fork WTF Impr	25,996,829	1,655,404	-	-	-	27,652,233	20191230
I10250012	RIC National Road Booster Station	934,528	-	-	-	-	934,528	20190430
I10250014	RIC US 27 Northbound Main REL	-	1,639,208	805,231	-	-	2,444,439	20210830
I10450003	WAB Phosphate Feed @ Mullins & Smith	214,542	-	-	-	-	214,542	20191231
I10470006	WLF Westwood Consolidation	1,200,000	600,000	-	-	-	1,800,000	20200430
I10500002	CRW Chlorine Improvements	269,011	-	-	-	-	269,011	20190228
I10550005	JCO Marlin & Orme Chlorine Improvements	1,123,346	-	-	-	-	1,123,346	20190430
I10550014	JCO REP West Tank Pump Station	339,010	-	-	-	-	339,010	20190430
I10550015	JCO Marlin Wells - Retire #1 & #2, Install #3 & #4	-	-	-	-	-	-	20181030
I10550017	JCO SOS Property Acquisition	530,500	-	-	-	-	530,500	20181130
I10550020	JCO Generators for Sugar Creek & Orme	1,057,238	-	-	-	-	1,057,238	20191031
I10580002	MOR Wells - Retire #2, Install #6	350,130	-	-	-	-	350,130	20190329
I10600006	NOB Wayne St. Chlorine Improvements	277,317	-	-	-	-	277,317	20190430
I10600017	NOB ARWTF filtration, backwash recycle, HS pumping	14,114,769	3,084,756	-	-	-	17,199,524	20200430
I10600018	NOB SOS Property Acquisition	-	-	-	-	-	-	20191127
I10650009	SHL REI Hospital	500,000	1,000,000	-	-	-	1,500,000	20200331
I10700007	TER Filtration Improvements	61,511	-	-	-	-	61,511	20181123
I10700011	TER Electric Gear and HSP 14 Replacement	617,476	616,177	-	-	-	1,233,653	20200229
I10700012	TER Well #8	-	-	-	-	-	-	20181130
I10750013	SIO REP Michigan Rd. Tank & Pump Station	2,313,796	-	-	-	-	2,313,796	20191130
I10750014	SIO Plant Recycle Improvements	-	-	-	-	-	-	20200330
I10800004	NBG NTOC & Vanada Treatment Consolidation	3,026,625	792,960	-	-	-	3,819,586	20200430
I10800006	NBG REI Lincoln Ave	200,000	400,000	-	-	-	600,000	20200430
I10900035	NWI REI US Hwy 12, 36" Main	-	-	-	-	-	-	20241031
I10900049	NWI BP Chlorine Improvements	2,731,837	1,164,846	-	-	-	3,896,683	20200430
I10900050	NWI BP Electrical Gear Replacement	457,853	-	-	-	-	457,853	20190331
I10900051	NWI Service Center Bldg & Site Impr	1,089,647	-	-	-	-	1,089,647	20191031
I10900052	NWI REP Frontage Road Booster	173,345	-	-	-	-	173,345	20190430
I10900053	NWI BP Backwash Supply Improvements	3,774,550	-	-	-	-	3,774,550	20190430
I10900054	NWI REP 8500 ft 36-in Main 13th Ave Ga	-	-	-	-	-	-	20180731
I10900055	NWI REP 10500 ft 20-in main Hwy 30 Hob	3,301,467	-	-	-	-	3,301,467	20171130
I10900057	NWI REI Chesterton Damon Run	650,000	-	-	-	-	650,000	20191030
I10900058	NWI BP Structural Improv Ph 2	-	-	-	-	1,000,000	1,000,000	20230930
I10900059	NWI Chesterton EST	-	-	-	500,000	4,500,000	5,000,000	20231031
TOTAL IP		84,949,088	11,398,615	805,231	10,500,000	21,500,000	129,152,934	

Cause No. 45870

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2019 to 2023 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

20-Apr-18

Budget Type	Description	2019	2020	2021	2022	2023	TOTAL	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	1,624,100	1,682,600	650,600	669,000	2,309,750	6,936,050	
RP-B	Mains - Replaced/Restored	11,622,000	39,087,500	48,220,000	47,090,000	34,021,250	180,040,750	
RP-C	Mains - Unscheduled	1,462,827	1,506,076	1,550,620	1,596,481	1,645,472	7,761,475	
RP-D	Mains - Relocated	7,500,000	7,500,000	7,500,000	7,500,000	7,500,000	37,500,000	
RP-E	Hydrants, Valves, Manholes - New	111,665	112,084	113,943	118,775	122,803	579,270	
RP-F	Hydrants, Valves, Manholes - Rep	2,518,247	2,596,575	2,667,723	2,764,203	2,773,768	13,320,517	
RP-G	Services & Laterals - New	3,113,611	3,278,841	3,417,445	3,501,952	3,797,318	17,109,168	
RP-H	Services & Laterals - Rep	14,595,758	16,385,509	18,242,826	19,795,205	21,552,295	90,571,594	
RP-I	Meters - New	1,829,812	1,904,614	1,974,101	1,997,373	2,070,983	9,776,884	
RP-J	Meters - Replaced	6,637,365	7,487,289	8,365,930	9,063,958	10,153,139	41,707,681	
RP-K1	ITS Equip & Systems	605,171	660,295	810,440	889,895	859,631	3,825,432	
RP-K3	ITS Centrally Sponsored	8,532,000	6,825,600	6,754,500	6,663,492	6,399,000	35,174,592	
RP-L	SCADA Equip & Systems	3,205,334	1,905,040	1,231,575	1,062,520	1,366,744	8,771,213	
RP-M	Security	415,000	85,000	75,000	75,000	180,000	830,000	
RP-N	Offices & Operations Centers	986,869	478,135	305,506	325,753	247,955	2,344,218	
RP-O	Vehicles	2,300,000	1,442,888	1,421,408	1,916,908	2,000,000	9,081,205	
RP-P	Tools & Equipment	1,067,480	595,663	529,537	845,132	759,867	3,797,679	
RP-Q	Process Plant - Fac & Equip	6,077,062	4,875,207	5,014,222	4,737,309	4,145,123	24,848,924	
RP-R	Tank Painting & Rehabilitation	982,800	1,747,200	2,073,600	2,203,200	1,645,200	8,652,000	
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000	
TOTAL RP		75,237,101	100,206,116	110,968,978	112,866,156	103,600,300	502,878,650	
TOTAL GROSS		**166,672,715**	**118,285,853**	**118,655,764**	**130,454,158**	**132,400,942**	**666,469,431**	
	Advances	(6,486,526)	(6,681,122)	(6,881,555)	(7,088,002)	(7,300,642)	(34,437,848)	
	Contributions (CF/SDC) ON RP-G	(3,965,109)	(4,004,760)	(4,044,808)	(4,085,256)	(4,126,109)	(20,226,042)	
	Refunds	2,373,876	2,397,615	2,421,591	2,445,807	2,470,265	12,109,155	
TOTAL NET		**158,594,956**	**109,997,586**	**110,150,992**	**121,726,707**	**123,444,456**	**623,914,696**	
TOTAL NET WITHOUT ITS (K3) & POST ACQUISITION		150,056,611	103,171,986	103,396,492	115,063,215	117,045,456	**588,733,759**	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5

2020 to 2024 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

22-Apr-19

Budget Type	Description	2020	2021	2022	2023	2024	TOTAL	In-Service Date
DV	**Developer Funded**	8,047,575	8,289,002	8,537,672	8,793,802	9,057,616	42,725,666	
IP	**Investment Projects**							
I10010013	Statewide Chlorine Conversions (NWI-OD, TER, JCO-SC, RIC-4th, KOK-Rus, NOB-WRN, SHL, SOM, MER, SUL, SUM)	-	-	500,000	8,000,000	9,500,000	18,000,000	04/01/25
I10100017	KOK Sheridan Water Treatment Plant Impr			199,234	3,994,405	647,304	4,840,942	04/01/24
I10110001	KOKWW Sheridan WW Treatment Plant Impr	2,867,957	373,415				3,241,371	12/31/20 10/31/21
I10250009	RIC Main Station PS, Trans Main, & Middle Fork WTF Impr	1,632,738	-	-	-		1,632,738	04/01/20
I10250012	RIC National Road Booster Station	6,709	104,443	1,015,000	-		1,126,152	11/01/22
I10250015	RIC Reservoir Improvements **(USE I10-250004)**				222,606	1,328,089	1,550,696	
I10470006	WLF Westwood Consolidation	31,244	-	-	-		31,244	11/01/19
I10480002	WIN Chemical Bldg and Residuals Impr	-	-	52,240	1,246,914	136,620	1,435,774	04/01/24
I10580002	MOR Wells - Retire #2, Install #6	234,904	-	-	-		234,904	11/01/20
I10580004	MOR Filtration Plant	197,483	210,535	2,589,834	9,846,203	1,928,791	14,772,846	04/01/24
I10600017	NOB ARWTF filtration, backwash recycle, HS pumping	2,178,923	-	-	-		2,178,923	04/01/20
I10650010	SHL NE Pressure Zone Improvements	5,635,995					5,635,995	11/30/19
I10700011	TER Electrical Gear & Generator	-	-		-	1,077,760	1,077,760	04/01/25
I10700013	TER Merom EST	-	75,000	200,000	800,000	-	1,075,000	10/01/23
I10750012	SIO SIOTC Chlorine Improvements	-	-	-	-	1,620,000	1,620,000	04/01/25
I10750015	SIO Charlestown Transmission Main Reinforcement	804,940	5,195,061				6,000,000	10/01/20
I10800004	NBG NTOC & Vanada Treatment Consolidation	114,740	-	-	-	-	114,740	04/01/20
I10900049	NWI BP Chlorine Improvements	-	-	646,348	4,000,000	-	4,646,348	12/01/23
I10900050	NWI BP Electrical Gear Replacement	-	400,000	532,000			932,000	04/01/22
I10900058	NWI BP Structural Improv Ph 2	-	-	-	1,000,000	-	1,000,000	12/01/23
I10900059	NWI Chesterton EST	-	-	500,000	4,500,000	-	5,000,000	10/01/23
I10900061	NWI Winfield EST and Pump Station	200,000			100,000	4,700,000	5,000,000	10/01/24
I10900062	NW Portage CR 550 N Pressure Zone Impr PS	751,740	-	-	-	-	751,740	11/01/20
TOTAL IP		14,657,372	6,358,454	6,234,655	33,710,128	20,938,565	81,899,175	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5

2020 to 2024 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

22-Apr-19

Budget Type	Description	2020	2021	2022	2023	2024	TOTAL	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	836,350	558,225	699,000	3,461,750	1,277,000	6,832,325	
RP-B	Mains - Replaced/Restored	27,004,300	25,023,750	28,399,413	25,507,841	35,315,689	141,250,992	
RP-C	Mains - Unscheduled	1,888,681	1,933,277	1,980,904	2,036,847	2,087,648	9,927,356	
RP-D	Mains - Relocated	9,400,000	9,400,000	9,400,000	9,400,000	9,400,000	47,000,000	
RP-E	Hydrants, Valves, Manholes - New	123,084	124,927	130,013	134,564	123,902	636,489	
RP-F	Hydrants, Valves, Manholes - Rep	3,071,109	3,192,507	3,316,296	3,458,809	3,115,863	16,154,584	
RP-G	Services & Laterals - New	3,394,073	3,504,441	3,696,268	3,843,431	3,996,882	18,435,095	
RP-H	Services & Laterals - Rep	14,256,634	11,584,258	15,712,497	22,129,774	22,205,521	85,888,685	
RP-I	Meters - New	1,960,164	2,053,711	2,148,760	2,162,362	2,288,651	10,613,647	
RP-J	Meters - Replaced	8,556,832	10,068,784	11,203,217	11,732,567	11,547,633	53,109,033	
RP-K1	ITS Equip & Systems	1,000,603	1,516,623	719,069	1,078,900	1,456,565	5,771,761	
RP-K3	ITS Centrally Sponsored	8,075,000	8,550,000	9,025,000	8,550,000	8,550,000	42,750,000	
RP-L	SCADA Equip & Systems	2,294,940	1,257,050	1,045,910	1,104,516	1,165,344	6,867,760	
RP-M	Security	266,820	296,820	205,000	170,000	275,000	1,213,640	
RP-N	Offices & Operations Centers	1,203,370	1,093,950	1,439,000	361,955	278,000	4,376,275	
RP-O	Vehicles	2,469,764	2,573,263	2,606,496	2,638,849	2,642,532	12,930,902	
RP-P	Tools & Equipment	889,148	462,637	448,718	804,941	713,988	3,319,432	
RP-Q	Process Plant - Fac & Equip	6,348,419	5,612,962	4,632,457	4,327,984	3,707,883	24,629,705	
RP-R	Tank Painting & Rehabilitation	1,747,200	2,073,600	2,203,200	2,000,200	2,000,000	10,024,200	
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000	
TOTAL RP		94,836,491	90,930,785	99,061,217	104,955,290	112,198,100	501,981,881	
TOTAL GROSS		**117,541,437**	**105,578,241**	**113,833,544**	**147,459,220**	**142,194,280**	**626,606,722**	
	Advances	(8,047,575)	(8,289,002)	(8,537,672)	(8,793,802)	(9,057,616)	(42,725,666)	
	Contributions (CF/SDC) ON RP-G	(4,512,403.17)	(4,200,000.00)	(4,100,000.00)	(4,100,000.00)	(4,100,000.00)	(21,012,403)	
	Refunds	2,330,860	2,354,168	2,377,710	2,401,487	2,425,502	11,889,728	
TOTAL NET		**107,312,320**	**95,443,407**	**103,573,582**	**136,966,905**	**131,462,166**	**574,758,380**	
TOTAL NET WITHOUT ITS (K3)		99,237,320	86,893,407	94,548,582	128,416,905	122,912,166	**532,008,380**	

Cause No. 45870

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27-Apr-20

2021 to 2025 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

Budget Type	Description	2021	2022	2023	2024	2025	TOTAL 2021-2025	In-Service Date
DV	**Developer Funded**	5,050,459	5,050,459	5,050,459	5,050,459	5,050,459	25,252,297	
IP	**Investment Projects**							
I10-010013	Statewide Chlorine Conversions (NWI-OD, TER, JCO-SC, RIC-4th, KOK-Rus, NOB-WRN, SHL, SOM, MER, SUL, SUM)	-	-	-	-	5,000,000	5,000,000	Multiple: Nov 30, 2025, and Nov 30 of subsequent years
I10-110001	KOKWW Sheridan WW Treatment Plant Impr	1,417,412					1,417,412	June 30 2021
I10-110002	KOKWW Sheridan 6th St Lift Station Repl						-	
I10-250012	RIC National Road Booster Station	-	-	113,996	1,295,230	-	1,409,226	November 30 2024
I10-250015	RIC Reservoir Improvements	-	221,749	1,343,001	-	-	1,564,750	November 30 2023
I10-250016	RIC Gallery Improvements Phase 1	499,629	-	-	-	-	499,629	November 30 2021
I10-250017	RIC WIN Chemical Bldg and Residuals Impr	-	-	-	-	-	-	
I10-450004	WAB Walnut St. Standpipe Replacement	-	997,869	3,049,899	-	-	4,047,768	November 30 2023
I10-450005	WAB Smith Plant Additlon of Second Filter						-	
I10-470007	WLF Elevated Storage Tank	-	150,000	4,700,000	200,000		5,050,001	November 30 2023
I10-470008	WLF Rt. 231 & Cumberland Ave Tmain related to new EST.	-	100,000	1,000,000	-		1,100,000	November 30 2023
I10-470009	WLF Salisbury Standpipe replacement	-					-	
I10-500003	CRW SOS Test and Property Acquisition	787,208	-	-	-	-	787,208	November 30 2021
I10-500005	CRW Montgomery Co Trans Main Ph 2	4,000,258	-	-	-	-	4,000,258	September 30 2021
I10-500006	CRW Montgomery Co Trans Main Ph 3						-	
I10-580004	MOR Filtration Plant	11,826,767	6,186,260	-	-	-	18,013,027	April 30 2022
I10-580005	MOR Indiana St & Route 267 from Harrison St to Pleiades Dr	1,202,356	497,644	-	-	-	1,700,000	April 30 2022
I10-650010	SHL NE Pressure Zone Improvements	3,938,838	-	-	-	-	3,938,838	November 30 2021
I10-700011	TER Electrical Gear & Generator	-	-	672,354	1,563,044		2,235,398	November 30 2024
I10-700013	TER Merom EST	189,817	809,827	-	-	-	999,644	November 30 2022
I10-700014	TER Mecca East Pressure Zone Impr - New Booster Station and 8,600 ft. of main	969,640	1,901,696	-	-	-	2,871,336	June 30 2022
I10-750012	SIO SIOTC Chlorine Improvements	-	-	-	103,943	1,797,845	1,901,789	November 30 2025
I10-750014	SIO Plant Filter Improvements	3,305,196	-	-	-	-	3,305,196	May 30 2021
I10-750015	SIO Charlestown Transmission Main Reinforcement	9,339,138	-	-	-	-	9,339,138	November 30 2021
I10-750018	SIO REP/REI 3,000' of 36" on Marlow Dr & Byron Dr	-	235,536	3,398,531	-	-	3,634,067	November 30 2023
I10-850007	SEY Water Treatment Improvements	-	-	-	-	-	-	
I10-900049	NWI BP Chlorine Improvements	799,485	3,899,580	-	-	-	4,699,066	November 30 2022
I10-900050	NWI BP Electrical Gear Replacement	1,247,195	-	-	-	-	1,247,195	November 30 2021
I10-900059	NWI Chesterton EST and pipeline	-	-	500,281	4,498,411	101,234	5,099,925	November 30 2024
I10-900061	NWI Winfield EST and Pump Station	-	97,380	499,348	4,495,028	100,000	5,191,756	November 30 2024
TOTAL IP		39,522,940	15,097,543	15,277,411	12,155,656	6,999,079	89,052,629	

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Confidential Per Access to Court Records Rule 5
27-Apr-20

2021 to 2025 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

Budget Type	Description	2021	2022	2023	2024	2025	TOTAL 2021-2025	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	768,910	736,567	344,872	348,305	356,811	2,555,465	
RP-B	Mains - Replaced/Restored	20,000,000	39,000,000	28,000,000	31,000,000	37,000,000	155,000,000	
RP-C	Mains - Unscheduled	2,182,323	2,276,965	2,378,128	2,477,980	2,589,897	11,905,292	
RP-D	Mains - Relocated	10,000,000	9,400,000	9,400,000	9,400,000	9,400,000	47,600,000	
RP-E	Hydrants, Valves, Manholes - New	192,761	198,211	210,353	216,632	230,232	1,048,188	
RP-F	Hydrants, Valves, Manholes - Rep	2,848,816	2,888,171	2,953,856	3,075,118	3,195,451	14,961,413	
RP-G	Services & Laterals - New	3,840,955	4,021,146	4,208,114	4,431,430	4,665,403	21,167,048	
RP-H	Services & Laterals - Rep	4,516,464	4,680,024	4,863,847	5,058,759	5,295,617	24,414,711	
RP-H LSLR	Services & Laterals - LSLR Cust & Comp	5,963,483	12,000,000	12,000,000	13,000,000	14,524,284	57,487,767	
RP-I	Meters - New	1,962,552	1,878,664	1,896,832	2,039,428	2,126,701	9,904,177	
RP-J	Meters - Replaced	11,074,662	12,541,147	13,002,360	12,925,278	11,841,581	61,385,029	
RP-K1	ITS Equip & Systems	1,676,294	888,760	954,861	1,426,820	1,081,833	6,028,568	
RP-K3	ITS Centrally Sponsored	8,024,000	6,519,500	6,519,500	6,519,500	6,519,500	34,102,000	
RP-L	SCADA Equip & Systems	1,137,050	1,015,910	1,014,516	1,130,344	1,108,162	5,405,982	
RP-M	Security	504,000	531,000	542,000	555,000	520,000	2,652,000	
RP-N	Offices & Operations Centers	873,635	704,377	517,568	456,493	526,194	3,078,267	
RP-O	Vehicles	3,084,800	3,137,304	3,186,460	3,154,866	3,206,854	15,770,284	
RP-P	Tools & Equipment	991,481	748,532	1,000,190	879,763	837,571	4,457,537	
RP-Q	Process Plant - Fac & Equip	6,129,012	4,967,402	4,451,989	4,159,321	5,034,331	24,742,054	
RP-R	Tank Painting & Rehabilitation	2,246,400	2,203,200	1,645,200	3,000,000	3,000,000	12,094,800	
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000	
TOTAL RP		88,067,597	110,386,881	99,140,646	105,305,039	113,110,421	516,010,583	
TOTAL GROSS		**132,640,996**	**130,534,883**	**119,468,516**	**122,511,154**	**125,159,960**	**630,315,509**	
DV	Advances	(5,050,459)	(5,050,459)	(5,050,459)	(5,050,459)	(5,050,459.30)	(25,252,297)	
RP-G	Contributions (CF/SDC)	(4,435,650)	(5,027,070)	(5,027,070)	(5,027,070)	(5,027,070.00)	(24,543,930)	
DV	Refunds	1,744,161	1,482,537	1,482,537	1,482,537	1,482,536.67	7,674,307	
TOTAL NET		**124,899,048**	**121,939,890**	**110,873,523**	**113,916,161**	**116,564,967**	**588,193,590**	
TOTAL NET WITHOUT ITS (K3)		**116,875,048**	**115,420,390**	**104,354,023**	**107,396,661**	**110,045,467**	**554,091,590**	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5
23-Apr-21

2022 to 2026 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

	Description	2022	2023	2024	2025	2026	TOTAL	In-Service Date
DV	**Developer Funded**	10,757,004	11,079,720	11,412,107	11,754,471	12,107,105	57,110,407	
IP	**Investment Projects**							
I10-010013	Statewide Chlorine Conversions (See note to right)	-	-	1,050,989	7,309,715	13,853,206.68	22,213,911	11/30/25&11/30/26
I10-110002	KOKWW Sheridan 6th St Lift Station REP	125,296	124,891	926,640	824,595	-	2,001,422	04/30/25
I10-250012	RIC National Road Booster Station	1,206	118,872	1,356,828	-	-	1,476,906	11/30/24
I10-250015	RIC Reservoir Improvements	239,049	1,401,961	-	-	-	1,641,010	11/30/23
I10-250016	RIC Gallery Improvements Phase 1	471,936	-	-	-	-	471,936	11/30/22
I10-250018	RIC WIN Plant Improvements (A1,A2,A3,B1,B2,B4)	-	301,138	5,500,053	1,000,008	-	6,801,198	04/30/25
I10-250019	RIC REL US 27 Northbound Ph 1 & 2	555,668	-	-	-	-	555,668	11/30/21&11/30/22
I10-450004	WAB Walnut St. Standpipe Replacement	-	-	-	-	994,400	994,400	11/30/27
I10-470007	WLF Elevated Storage Tank	396,356	4,262,134	207,055	-	-	4,865,545	11/30/23
I10-470008	WLF Rt 231 & Cumberland Ave Tmain for new EST	102,725	1,051,410	-	-	-	1,154,135	11/30/23
I10-500003	CRW SOS Test and Property Acquisition	618,802	-	-	-	-	618,802	04/30/22
I10-500005	CRW Montgomery Co Trans Main Ph 2+ and EST	233,414	12,870	-	-	-	246,284	11/30/23
I10-550022	JCO London Road Well #5	998,944	-	-	-	-	998,944	10/30/22
I10-580004	MOR Filtration Plant	10,420,852	-	-	-	-	10,420,852	04/30/22
I10-600020	NOB Wayne St Residuals Tank Replacement	760,180	4,302	-	-	-	764,482	04/30/22
I10-650011	SHL Blue River Well #5, Retire #4	-	97,779	897,001	-	-	994,779	10/30/24
I10-700011	TER Electrical Gear, VFDs, & Generator	1,997	649,298	1,629,470	-	-	2,280,765	04/30/24
I10-700013	TER Merom EST	1,039,771	2,260	-	-	-	1,042,031	11/30/22
I10-700014	TER Mecca East Pressure Zone Impr (Booster Sta+8600' m	999,821	1,971,900	-	-	-	2,971,721	06/30/23
I10-750012	SIO SIOTC Chlorine Improvements	-	-	1,000,001	800,000	-	1,800,001	04/30/25
I10-750018	SIO REP & REI - 36" Marlow Dr & Byron Dr	236,410	3,472,356	-	-	-	3,708,765	11/30/23
I10-750020	SIO Charlestown WTF Improvements	7,690,131	-	-	-	-	7,690,131	06/22/22
I10-800007	NBG Yankeetown Raise EST / Boonville Pump REP	-	-	-	103,007	935,839	1,038,847	11/30/26
I10-900049	NWI BP Chlorine Improvements	2,326,725	-	-	-	-	2,326,725	06/30/22
I10-900050	NWI BP Electrical Gear Replacement	1,194,324	-	-	-	-	1,194,324	03/31/22
I10-900059	NWI Chesterton EST and Water Main	-	511,183	4,596,441	103,440	-	5,211,064	11/30/24
I10-900061	NWI Winfield EST and Pump Station	97,741	509,542	4,653,011	103,440	-	5,363,734	11/30/24
I10-900066	NWI REP Gary 6th Ave WM Trans Ph 1	7,857,581	4,804,293	-	-	-	12,661,874	12/31/22 & 12/31/23
TOTAL IP		36,368,928	19,296,190	21,817,486	10,244,206	15,783,446	103,510,256	

Cause No. 45870

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Confidential Per Access to Court Records Rule 5

2022 to 2026 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

23-Apr-21

	Description	2022	2023	2024	2025	2026	TOTAL	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	1,535,085	451,112	1,243,565	714,311	709,100	4,653,173	
RP-B	Mains - Replaced/Restored	25,000,000	28,000,000	26,152,772	32,000,000	34,000,000	145,152,772	
RP-C	Mains - Unscheduled	2,195,230	2,307,445	2,413,926	2,532,990	2,633,394	12,082,985	
RP-D	Mains - Relocated	8,844,334	9,400,000	9,400,000	9,400,000	9,400,000	46,444,334	
RP-E	Hydrants, Valves, Manholes - New	202,052	215,757	221,677	236,089	246,386	1,121,962	
RP-F	Hydrants, Valves, Manholes - Rep	3,167,474	3,293,290	3,379,850	3,541,469	3,584,419	16,966,501	
RP-G	Services & Laterals - New	4,549,645	4,760,537	4,977,767	5,195,874	5,308,025	24,791,847	
RP-H	Services & Laterals - Rep	4,232,068	4,422,588	4,562,454	4,784,092	4,931,737	22,932,940	
RP-H LSLR	Services & Laterals - LSLR Cust & Comp	11,999,988	15,000,003	16,999,978	17,999,988	18,000,005	79,999,962	
RP-I	Meters - New	2,247,347	2,308,970	2,483,408	2,599,461	2,435,697	12,074,882	
RP-J	Meters - Replaced	14,532,965	15,686,884	16,089,177	14,811,753	15,002,195	76,122,974	
RP-K1	ITS Equip & Systems	692,170	994,297	1,301,936	1,347,629	545,953	4,881,986	
RP-K3 (T10)	ITS Centrally Sponsored	6,545,500	6,545,500	6,545,500	6,545,500	6,545,500	32,727,500	
RP-L	SCADA Equip & Systems	1,339,112	1,034,587	1,434,437	1,120,288	1,043,333	5,971,757	
RP-M	Security	526,000	455,000	467,000	385,000	520,000	2,353,000	
RP-N	Offices & Operations Centers	873,751	670,795	566,887	637,683	590,360	3,339,476	
RP-O	Vehicles	3,514,000	3,477,350	3,476,350	3,441,350	3,345,000	17,254,050	
RP-P	Tools & Equipment	760,411	933,243	870,703	832,445	563,221	3,960,024	
RP-Q	Process Plant - Fac & Equip	6,487,796	4,990,912	4,912,595	5,354,822	5,197,694	26,943,819	
RP-R	Tank Painting & Rehabilitation	3,034,000	1,645,200	3,000,000	3,000,000	3,000,000	13,679,200	
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000	
TOTAL RP		102,328,929	106,643,470	110,549,982	116,530,745	117,652,017	553,705,144	
TOTAL GROSS		**149,454,861**	**137,019,379**	**143,779,575**	**138,529,423**	**145,542,568**	**714,325,807**	
DV	Advances	(10,757,004)	(11,079,720)	(11,412,107)	(11,754,471)	(12,107,105)	(57,110,407)	
RP-G	Contributions (CF/SDC)	(5,984,400)	(5,984,400)	(5,984,400)	(5,984,400)	(5,984,400)	(29,922,000)	
DV	Refunds	2,499,303	2,574,283	2,651,511	2,731,056	2,812,988.01	13,269,141	
TOTAL NET		**135,212,760**	**122,529,542**	**129,034,579**	**123,521,608**	**130,264,051**	**640,562,541**	
TOTAL NET WITHOUT CS (K3)		**128,667,260**	**115,984,042**	**122,489,079**	**116,976,108**	**123,718,551**	**607,835,041**	

Cause No. 45870, 03/31/2023

Indiana American Water Company
Attachment MHH-2 - Strategic Capital Expenditure Plan 2023 to 2027 04/29/2022

Project	Description	2023	2024	2025	2026	2027	Total
DV	Developer Funded	$ 11,625,216	$ 11,973,973	$ 12,333,192	$ 12,703,188	$ 13,084,283	61,719,852
RP-A	Mains - New	1,726,887	910,565	919,311	914,100	923,355	5,394,218
RP-B	Mains - Replaced/Restored	12,151,680	16,158,426	41,872,597	44,839,537	44,828,517	159,850,757
RP-C	Mains - Unscheduled	2,911,988	3,010,801	3,114,164	3,227,725	3,322,266	15,586,944
RP-D	Mains - Relocated	9,400,000	9,400,000	9,400,000	9,406,000	9,994,000	47,600,000
RP-E	Hydrants, Valves, Manholes - New	224,415	230,597	244,804	255,669	264,455	1,219,940
RP-F	Hydrants, Valves, Manholes - Rep	3,716,655	3,959,038	4,153,097	4,251,268	4,002,805	20,082,863
RP-G	Services & Laterals - New	4,791,867	5,084,355	5,254,095	5,585,952	5,777,854	26,494,123
RP-H	Services & Laterals - Rep	5,030,965	5,272,963	5,517,085	5,686,666	5,846,737	27,354,416
RP-H LSLR	Services & Laterals - LSLR	13,418,140	14,377,412	19,358,752	21,872,230	21,999,999	91,026,532
RP-I	Meters - New	2,925,245	3,229,434	3,390,001	3,579,178	3,648,263	16,772,121
RP-J	Meters - Replaced	17,627,613	18,011,628	18,342,995	17,801,181	16,950,492	88,733,910
RP-K1	ITS Equip & Systems	1,535,545	1,516,608	1,760,974	1,121,877	1,877,386	7,812,389
RP-K3 (T10)	ITS Centrally Sponsored	7,133,000	7,133,000	7,133,000	5,834,794	5,884,725	33,118,519
RP-L	SCADA Equip & Systems	1,474,793	2,004,392	1,483,835	1,199,463	1,572,941	7,735,423
RP-M	Security	1,550,000	560,000	540,000	520,000	520,000	3,690,000
RP-N	Offices & Operations Centers	767,281	722,464	775,477	701,848	854,160	3,821,230
RP-O	Vehicles	4,052,350	3,814,350	3,599,350	3,582,000	3,535,000	18,583,050
RP-P	Tools & Equipment	1,062,373	926,046	880,833	762,971	734,036	4,366,258
RP-Q	Process Plant - Fac & Equip	6,409,508	6,083,050	5,952,857	5,916,779	5,923,544	30,285,738
RP-R	Tank Painting & Rehabilitation	1,500,000	3,600,000	3,200,000	2,500,000	2,500,000	13,300,000
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000
Total RP		111,085,521	118,029,100	149,276,418	152,312,427	154,094,817	684,798,283
							-

Cause No. 45870, 03/31/2023

Indiana American Water Company
Attachment MHH-2 - Strategic Capital Expenditure Plan 2023 to 2027 04/29/2022

Project	Description	2023	2024	2025	2026	2027	Total
I10-010013	CL2 Conv: TER, NWI OD (incl REP of other bulk tanks)			-	-	-	-
I10-010014	CL2 Conv: NOB WRN, SHL JCO SC			-	-	-	-
I10-010015	CL2 Conv: KOK-RUS, SOM W/WW, SUM, SHR WW			494,381	4,500,616	-	4,994,997
I10-010016	CL2 Conv: MER, SUL, LOW			-	475,915	4,524,085	5,000,000
I10-100018	KOK Sheridan REP WTP and REP Well 4	11,234,346	17,730,953	454,046	-	-	29,419,344
I10-100019	KOK Sheridan Tmain - SHR to Baker's Corner	4,081,711	5,156,590	-	-	-	9,238,301
I10-100020	KOK Sheridan Property Acquisition for New Well or Wells	779,566	-	-	-	-	779,566
I10-110002	KOKWW Sheridan 6th St Lift Station REP	382,248	1,019,766	812,639	-	-	2,214,653
I10-110003	KOKWW Sheridan Maple Run Lift Station Improvement	1,218,992					1,218,992
I10-110004	KOKWW Force Main Rerouting	943,511					943,511
I10-250004	RIC Reservoir Improvements	1,448,278	-				1,448,278
I10-250012	RIC National Road Booster Station	165,621	1,030,743	700,000	-	-	1,896,364
I10-250016	RIC Gallery Improvements Phase 1	479,700	-	-	-		479,700
I10-250018	RIC WIN Plant Improvements (A1,A2,A3,B1,B2,B4)	896,007	14,737,847	3,000,000	-	-	18,633,854
I10-250020	RIC South 4th St. Treatment Improvements			2,888,415	3,386,974	-	6,275,389
I10-250021	RIC MF High Service Pump Station and Clearwell			2,000,000	-	-	2,000,000
I10-250022	RIC Garwood Chlorine and Ammonia Booster			750,000	3,250,000	-	4,000,000
I10-450004	WAB Walnut St. REP Standpipe with EST, Piping, and Pump St. Impr.			-	200,000	2,000,000	2,200,000
I10-450006	SUM Property Acquisition & Well Replacement			-	-	-	-
I10-470007	WLF 1.0 MG Elevated Storage Tank	3,247,464	4,028,113				7,275,576
I10-470008	WLF Rt 231 & Cumberland Ave Tmain for new EST	1,181,940	-				1,181,940
I10-470009	WLF DF WTF Auto Transfer Switch Upgrade	10,376	422,710				433,086
I10-500003	CRW SOS Test and Property Acquisition	556,083	258,557				814,640
I10-500005	CRW Montgomery Co Trans Main Ph 2+ and EST		-	-	-	-	-
I10-500007	CRW Production Well & Raw Water Main			-	-	-	-
I10-550022	JCO London Road New Wells 5 and 6, Backup power for wellfield	2,867,106	-	-	-	-	2,867,106
I10-550025	JCO London Road Backup power for wellfield	765,442	648,897	-	-	-	1,414,339
I10-550026	JCO SC WTF Chlorine Conversion	2,245,051	728,982				2,974,033
I10-550023	JCO New Backup Power, Underground Electrical for WRE Wellfield			1,510,735	3,402,577	-	4,913,312
I10-550024	JCO Sloan Dr. Booster Station			-	-	300,000	300,000
I10-600020	NOB Wayne St Residuals Tank Replacement	2,085,184	-	-	-	-	2,085,184
I10-600021	NOB 1.5 MG EST, Tmain, boosters REP elect. and pumps	5,330,954	8,432,154	-	-	-	13,763,107
I10-600022	NOB Operations Center at Allisonville Rd.	1,001,344	2,850,500	-	-	-	3,851,844
I10-600023	NOB WRN WTF Chlorine Conversion	2,245,326	729,045				2,974,371
I10-600024	NOB Hamilton Co SOS Property Purchase	225,749	2,036,407				2,262,156
I10-650011	SHL Blue River Well #5 & #6, Retire #1 & #4	1,367,623	-	-	-	-	1,367,623
I10-650013	SHL BR WTF Chlorine Conversion	2,863,521	268,407				3,131,927
I10-700011	TER Electrical Gear, VFDs, & Generator	401,630	1,501,552	1,100,000	-	-	3,003,182

Cause No. 45870, 03/31/2023

Indiana American Water Company
Attachment MHH-2 - Strategic Capital Expenditure Plan 2023 to 2027 04/29/2022

Project	Description	2023	2024	2025	2026	2027	Total
I10-700013	TER Merom EST	1,854,303	-	-	-	-	1,854,303
I10-700014	TER Mecca East Pressure Zone Impr (Booster Sta+8600' main)	1,197,331	1,184,150	-	-	-	2,381,481
I10-700015	TER WTF Chlorine Conversion	1,922,977	405,469				2,328,445
I10-700016	TER REI Airport Main	793,329	1,200,533				1,993,862
I10-720001	RIL WW Plant Improvements	22,400					22,400
I10-750012	SIO SIOTC Chlorine Improvements			-	-	-	-
I10-750018	SIO REP & REI - 36" Marlow Dr & Byron Dr	3,194,213	5,375,660	-	-	-	8,569,873
I10-750020	SIO Charlestown WTF Improvements	881,467	-				881,467
I10-750021	SIO REP Veterans Parkway Ph 2	1,294,401					1,294,401
I10-750022	SIO Ops & Trtmt Cnter Chlorine Conv	1,250,028	543,724				1,793,752
I10-800007	NBG Yankeetown Raise EST / Boonville Pump REP			369,416	1,020,584	-	1,390,000
I10-850007	SEY Water Treatment Improvements			9,934,824	-	-	9,934,824
I10-850008	SEY Low Head Dam (Expenditure expected to be nearly all CORs)	49,709	-	-	-	-	49,709
I10-850009	SEY REP Freeman Field Pump Station			931,993	528,108	-	1,460,101
I10-900049	LAS and Flouride Bulk Tank REP	447,854	-				447,854
I10-900050	NWI REP BP Electrical Gear	1,880,175	-				1,880,175
I10-900059	NWI Chesterton EST and Water Main			102,420	-	-	102,420
I10-900061	NWI Winfield EST and Pump Station	2,764,823	5,478,285	98,968	-	-	8,342,075
I10-900062	NWI Portage CR-550 Pump Station	221,502	-				221,502
I10-900067	NWI REP Gary 6th Ave WM Trans Ph 1	635,656	-	-	-	-	635,656
I10-900069	NWI OD WTF Chlorine Conversion	4,390,370	1,088,097				5,478,467
I10-900070	NWI Ogden Dunes Low Service Pump Replacement	227,411	756,591				984,002
I10-900071	NWI Ogden Dunes High Service Pump Replacement	126,640	266,901				393,541
I10-900072	NWI Office Upgrades	228,664	1,969,593				2,198,258
I10-920001	LOW WTF Chlorine Conversion	2,264,902	1,597,796				3,862,698
Total IP		73,672,929	81,448,022	25,147,835	16,764,775	6,824,085	203,857,646
Gross Total		**$ 184,758,449**	**$ 199,477,122**	**$ 174,424,253**	**$ 169,077,201**	**$ 160,918,902**	**$ 888,655,928**
	Advances	(11,625,216)	(11,973,973)	(12,333,192)	(12,703,188)	(13,084,283)	
	Contributions (CF/SDC)	(9,605,100)	(7,180,100)	(7,249,000)	(7,399,000)	(7,386,500)	
	Refunds	2,567,929	2,644,967	2,724,316	2,806,045	2,890,226.34	
Net Total		**166,096,062**	**182,968,016**	**157,566,377**	**151,781,059**	**143,338,345**	801,749,858
Net Total without Centrally Sponsored Projects		**158,963,062**	**175,835,016**	**150,433,377**	**145,946,265**	**137,453,620**	768,631,339

Case No. 45870
OUCC 48-018 Attachment CONFIDENTIAL
Confidential per Access to Court Records Rule 5

2024 to 2028 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

	Description	2024	2025	2026	2027	2028	TOTAL	In-Service Date
DV	**Developer Funded**	13,466,555	13,870,552	14,286,669	14,715,269	15,156,727	71,495,771	
IP	**Investment Projects**							
I10-100018	KOK Sheridan WTF Improvements	19,876,026	13,272	-	-	-	19,889,298	08/31/24
I10-100019	KOK Sheridan Tmain - SHR to Baker's Corner	5,065,466	-	-	-	-	5,065,466	09/30/24
I10-110002	KOKWW Sheridan 6th St Lift Station REP	1,019,450	55,330	-	-	-	1,074,779	03/31/25
I10-250012	RIC National Road PS Replacement	1,012,284	351,239	-	-	-	1,363,523	02/28/25
I10-250018	RIC WIN Plant Improvements (A1,A2,A3,B1,B2,B4)	14,479,084	9,292,314	-	-	-	23,771,398	04/30/25
I10-250020	RIC South 4th St. Treatment Improvements	318,815	2,913,912	3,426,115	-	-	6,658,842	10/31/26
I10-250021	RIC MF High Service Pump Station and Clearwell	-	-	65,637	2,515,102	5,126,758	7,707,497	05/30/28
I10-250022	RIC Garwood Chlorine and Ammonia Booster	-	-	756,756	3,288,210	-	4,044,966	10/31/27
I10-450004	WAB Walnut St. REP Standpipe with EST, Piping, and Pump St. Impr.	-	-	203,604	2,036,036	3,440,977	5,680,617	11/30/28
I10-450007	SUM Property Acquisition & Well Replacement	600,692	-	-	-	-	600,692	03/31/24
I10-470007	WLF 1.0 MG Elevated Storage Tank	3,953,802	-	-	-	-	3,953,802	11/30/24
I10-470009	WLF DF WTF Auto Transfer Switch Upgrade	415,209	-	-	-	-	415,209	11/30/24
I10-500003	CRW SOS Test and Property Acquisition	254,097	-	-	-	-	254,097	06/30/24
I10-500007	CRW Production Well & Raw Water Main	-	2,375,962	1,466,335	-	-	3,842,297	10/31/26
I10-550025	JCO London Road Backup power for wellfield	2,576,693	-	-	-	-	2,576,693	10/31/24
I10-550026	JCO SC WTF Chlorine Conversion	720,037	-	-	-	-	720,037	02/29/24
I10-550023	JCO New Backup Power, Underground Electrical for WRE Wellfield	-	-	-	-	88,464	88,464	09/30/29
I10-550024	JCO Sloan Dr. Booster Station	-	-	-	274,923	40,482	315,405	12/31/28
I10-600021	NOB 1.5 MG EST, Tmain, boosters REP elect. and pumps	8,283,683	-	-	-	-	8,283,683	11/30/24
I10-600022	NOB Operations Center at Allisonville Rd.	2,850,500	-	-	-	-	2,850,500	12/31/24
I10-600023	NOB WRN WTF Chlorine Conversion	720,718	-	-	-	-	720,718	02/29/24
I10-600024	NOB Hamilton Co SOS Property Purchase	1,991,407	-	-	-	-	1,991,407	09/30/24
I10-650013	SHL BR WTF Chlorine Conversion	1,231,933	-	-	-	-	1,231,933	04/30/24
I10-700011	TER Electrical Gear, VFDs, & Generator	1,747,118	1,108,569	-	-	-	2,855,687	03/31/25
I10-700014	TER Mecca East Pressure Zone Impr (Booster Sta+8600' main)	664,088	-	-	-	-	664,088	05/31/24
I10-700015	TER WTF Chlorine Conversion	312,866	-	-	-	-	312,866	04/30/24
I10-700016	TER REI Airport Main	1,178,412	-	-	-	-	1,178,412	03/31/24
I10-750018	SIO REI 36" Veterans Parkway to Blackiston Mill	5,306,196	567,575	-	-	-	5,873,771	02/28/25
I10-750022	SIO SIOTC Chlorine Improvements (was I10-750012 in LYP)	810,995	-	-	-	-	810,995	02/29/24
I10-800007	NBG Yankeetown Raise EST / Boonville Pump REP	-	372,744	1,038,802	-	-	1,411,546	10/31/26
I10-850007	SEY Water Treatment Improvements	1,459,363	10,641,399	20,192,346	-	-	32,293,108	09/30/26
I10-850009	SEY REP Freeman Field Pump Station	-	-	-	-	970,610	970,610	04/30/29
I10-900059	NWI Chesterton EST and Water Main	-	-	-	-	4,950,000	4,950,000	11/30/27
I10-900061	NWI Winfield EST and Pump Station	5,352,411	92,960	-	-	-	5,445,371	11/30/24
I10-900069	NWI OD WTF Chlorine Conversion	1,052,451	-	-	-	-	1,052,451	02/29/24

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Confidential per Access to Court Records Rule 5

2024 to 2028 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

	Description	2024	2025	2026	2027	2028	TOTAL	In-Service Date
I10-900070	NWI OD Low Service Pump REP	743,134	-	-	-	-	743,134	11/30/24
I10-900071	NWI OD High Service Pump REP	262,164	-	-	-	-	262,164	11/30/24
I10-900072	NWI Office Upgrades	1,934,480	710,777	-	-	-	2,645,257	03/31/25
I10-920001	LOW WTF Chlorine Conversion	1,016,054	-	-	-	-	1,016,054	04/30/24
I10-850010	SEY Construct Replacement Wells	-	-	-	451,846	28,154	480,000	11/30/27
I10-800008	NBG Elevated Storage Tank	-	-	-	-	5,000,000	5,000,000	12/31/28
I10-800009	NBG Aeration/Detention Tank	-	-	-	-	1,170,000	1,170,000	12/31/28
I10-100021	KOK Philip St Well REP & Addition	970,000	-	-	-	-	970,000	12/31/24
I10-100022	KOK Philip St WTP Improvement	2,000,000	1,950,000	-	-	-	3,950,000	09/30/25
I10-100023	KOK Main WTP Flood Protection - Doors and Windows	-	-	-	-	480,000	480,000	09/30/28
I10-500008	CRW I74 GST Pump Station Standby Power	-	-	-	-	290,000	290,000	09/30/28
I10-550027	JCO London Rd WTP Additional Filter	-	-	-	-	4,950,000	4,950,000	12/31/28
I10-650014	SHL Install Blue River Well #7	-	-	500,000	-	-	500,000	12/31/26
I10-900073	NWI 39th & Willow Booster Stat Pump & Elec Upgrades	480,000	-	-	-	-	480,000	12/31/24
I10-900074	NWI 49th & I65 Booster Station Safety Impr	-	-	-	-	1,018,220	1,018,220	09/30/29
I10-750023	SIO Binford Gradient Elevated Storage Tank	-	-	-	-	4,950,000	4,950,000	12/31/28
I10-250023	RIC Middle Fork Low Svc Pump Stat Impr	-	-	-	-	720,000	720,000	09/30/28
I10-250024	RIC Ohio BS Backup Power	-	-	-	-	480,000	480,000	09/30/28
I10-450008	WAB Smith WTP 2nd Filter, Backwash, HSP	-	-	-	300,000	570,000	870,000	05/31/28
I10-500009	CRW WAV Filter Capacity Impr	-	-	-	-	2,950,000	2,950,000	12/31/28
I10-550028	JCO London Road OSHG to Bulk Hypo Conv	180,000	-	-	-	-	180,000	02/29/24
I10-460002	WAR Hidden Lake OSHG to Bulk Hypo Conv	-	-	-	480,000	-	480,000	12/31/27
I10-470010	WLF Happy Hollow OSHG to Bulk Hypo Conv	-	-	-	480,000	-	480,000	12/31/27
I10-470011	WLF Davis Ferry OSHG to Bulk Hypo Conv	-	-	-	480,000	-	480,000	12/31/27
I10-100024	KOK RUS Chlorine Conversion	-	-	-	-	350,000	350,000	09/30/28
I10-450009	WAB SOM Chlorine Conversion	-	-	-	-	350,000	350,000	09/30/28
I10-450010	WAB SUM Chlorine Conversion	-	-	-	-	2,950,000	2,950,000	12/31/28
I10-700017	TER SUL Chlorine Conversion	-	-	-	-	355,000	355,000	09/30/28
I10-700018	TER SUL MER Chlorine Conversion	-	-	-	-	355,000	355,000	09/30/28
I10-900075	NWIO Lake Station Chlorine Conversion	-	-	-	-	450,000	450,000	09/30/28
I10-100025	KOK Sheridan WWTP Chlorine Conversion	-	-	-	-	950,000	950,000	09/30/28
I10-450011	WAB Mullins Trtmt for Emerging Contaminants	-	-	1,000,000	4,000,000	-	5,000,000	06/30/27
I10-750024	SIO CHT Trtmnt for Emerging Contaminants	33,143	1,966,857	-	-	-	2,000,000	09/30/25
I10-750025	SIOTC Trtmnt for Emerging Contaminants	-	1,780,318	8,219,682	-	-	10,000,000	11/30/26
I10-700019	TER Trtmnt for Emerging Contaminants	-	194,026	4,805,974	-	-	5,000,000	11/30/26
I10-550029	JCO Marlin Trtmt for Emerging Contaminants	-	194,026	4,805,974	-	-	5,000,000	11/30/26
I10-800010	NBG Trtmnt for Emerging Contaminants	1,013,009	3,986,991	-	-	-	5,000,000	09/30/25
TOTAL IP		91,885,777	38,568,272	46,481,225	14,306,117	42,983,666	234,225,057	

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2024 to 2028 BUSINESS PLAN SUMMARY BY YEAR - INDIANA

	Description	2024	2025	2026	2027	2028	TOTAL	In-Service Date
RP	**Recurring Projects**							
RP-A	Mains - New	910,565	929,511	924,900	934,755	422,605	4,122,336	
RP-B	Mains - Replaced/Restored	15,158,265	41,872,722	34,839,694	44,828,501	44,834,017	181,533,199	
RP-C	Mains - Unscheduled	2,839,826	3,068,221	2,872,501	2,956,112	3,044,806	14,781,467	
RP-D	Mains - Relocated	9,400,049	9,399,762	9,400,097	9,399,986	9,399,976	46,999,870	
RP-E	Hydrants, Valves, Manholes - New	222,119	242,372	253,234	270,738	276,996	1,265,459	
RP-F	Hydrants, Valves, Manholes - Rep	4,458,253	4,980,887	5,068,850	5,209,930	5,454,356	25,172,276	
RP-G	Services & Laterals - New	5,567,980	6,206,651	6,539,265	6,795,366	7,120,532	32,229,794	
RP-H	Services & Laterals - Rep	5,949,133	6,624,042	6,864,897	7,098,787	7,256,339	33,793,198	
RP-H LSLR	Services & Laterals - LSLR Cust & Comp	12,283,670	19,327,575	21,839,216	21,966,985	21,898,694	97,316,139	
RP-I	Meters - New	3,927,436	4,123,773	4,310,192	4,497,694	4,399,933	21,259,028	
RP-J	Meters - Replaced	19,332,202	21,361,044	19,644,502	20,690,736	16,378,584	97,407,068	
RP-K1	ITS Equip & Systems	1,636,402	1,642,936	1,205,745	2,010,749	1,582,900	8,078,732	
RP-K3 (T10)	ITS Centrally Sponsored	7,133,000	7,133,000	5,834,794	5,884,725	5,884,725	31,870,244	
RP-L	SCADA Equip & Systems	2,042,311	1,654,235	1,483,663	1,775,142	992,082	7,947,433	
RP-M	Security	560,000	600,000	630,000	680,000	700,000	3,170,000	
RP-N	Offices & Operations Centers	1,318,188	1,298,455	1,186,856	843,160	862,350	5,509,009	
RP-O	Vehicles	4,009,700	4,161,350	4,048,350	4,104,000	4,057,000	20,380,400	
RP-P	Tools & Equipment	1,201,875	1,149,317	1,069,045	1,180,735	1,069,251	5,670,223	
RP-Q	Process Plant - Fac & Equip	7,499,670	7,239,635	6,686,872	6,972,884	6,803,512	35,202,573	
RP-R	Tank Painting & Rehabilitation	3,000,000	3,200,000	2,500,000	2,500,000	2,500,000	13,700,000	
RP-S	Engineering Studies	50,000	50,000	50,000	50,000	50,000	250,000	
TOTAL RP		108,500,645	146,265,487	137,252,674	150,650,984	144,988,658	687,658,447	
TOTAL GROSS		**213,852,977**	**198,704,311**	**198,020,567**	**179,672,370**	**203,129,050**	**993,379,276**	
DV	Advances	(13,466,555)	(13,870,552)	(14,286,669)	(14,715,269)	(15,156,727)	(71,495,771)	
RP-G	Contributions (CF/SDC)	(5,520,863)	(5,934,928)	(6,380,047)	(6,858,551)	(7,372,942)	(32,067,331)	
DV	Refunds	2,453,249	2,526,847	2,602,652	2,680,732	2,761,153	13,024,633	
TOTAL NET		**197,318,808**	**181,425,678**	**179,956,503**	**160,779,282**	**183,360,535**	**902,840,806**	
TOTAL NET WITHOUT CS (K3)		**190,185,808**	**174,292,678**	**174,121,709**	**154,894,557**	**177,475,810**	**870,970,562**	

Summary of Recommended Improvements for the Winchester System

List Number	CPS Project	District	Projects	Estimated Cost	Schedule
WIN - 1	A-01	Winchester	WTP Chemical Facility Improvements	$40,000	Beyond 5-yr plan
WIN - 2	A-02	Winchester	Install Well Flow Meters and Monitoring Equipment	$70,000	Beyond 5-yr plan
WIN - 3	A-03	Winchester	Construct Tank and Pump Station at WTP, 300 feet of 16" main	$1,450,000	Beyond 5-yr plan
WIN - 4	B-01	Winchester	Install 770' , 12" Main on 4th Street	$120,000	Beyond 5-yr plan
WIN - 5	B-02	Winchester	Install 1,800 ', 12" Main on South and Browne Streets	$270,000	Beyond 5-yr plan
WIN - 6	B-03	Winchester	Install 960', of 8" Main on Oak Street	$130,000	Beyond 5-yr plan
WIN - 7	B-4	Winchester	Install 3,500', 12" Main on South, West, Wall and Williams Street	$530,000	Beyond 5-yr plan
WIN - 8	B-05	Winchester	Install 1,370' of 8" Main on Will Street	$180,000	Beyond 5-yr plan
WIN - 9	B-06	Winchester	Install 1,870', 8" Main on South Street	$250,000	Beyond 5-yr plan
WIN - 10	B-07	Winchester	Install 1,740', 8"Main on Huntsville Pike and Beeson Street	$230,000	Beyond 5-yr plan

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Summary of Recommended Improvements for the Richmond System

District	Projects	Schedule
Richmond	Middle Fork WTF Improvements & Main Station WTF Retirement	Current
Richmond	US27 Northbound Main REL	Future
Richmond	National Road Booster Station	Current

Summary of Recommended Improvements for the Richmond System

District	Projects	Schedule
Richmond	Middle Fork WTF Improvements & Main Station WTF Retirement	Current
Richmond	US27 Northbound Main REL	Future
Richmond	National Road Booster Station	Future
Richmond	Reservoir Improvements	Future
Richmond	Winchester WTF Electrial System Improvements, High Service VFD's, and Backup Generator	Current
Richmond	Winchester Chemical Bldg and Residuals Improvements	Future
Richmond	4th Street WTP Chlorine Conversion	Future

Summary of Recommended Improvements for the Richmond System

District	Projects	Schedule
Richmond	National Road Booster Station	Future
Richmond	Reservoir Improvements	Future
Richmond	Winchester Chemical Bldg and Residuals Improvements	Future
Richmond	4th Street WTP Chlorine Conversion	Future

Summary of Recommended Improvements for the Richmond System

District	Projects	Schedule
Richmond	US27 Northbound Main REL	Current
Richmond	National Road Booster Station	Future
Richmond	Reservoir Improvements	Future
Richmond	4th Street WTP Chlorine Conversion	Future
Richmond	Winchester Plant Improvements	Future
Richmond	Gallery Improvements Phase 1	Future

Summary of Recommended Improvements for the Richmond System

District	Projects	Schedule
Richmond	US27 Northbound Main REL	Current
Richmond	National Road Booster Station	Future
Richmond	Reservoir Improvements	Future
Richmond	Winchester Plant Improvements	Future
Richmond	Gallery Improvements Phase 1	Future
Richmond	South 4th St. Treatment Improvements	Future
Richmond	MF High Service Pump Station and Clearwell	Future
Richmond	Garwood Chlorine and Ammonia Booster	Future

OUCC 20-013

06/05/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Please identify the dates of the last two Comprehensive Planning Studies prepared for each water and wastewater district and system, and the cost associated with each Study. Please also indicate the districts and systems that Petitioner plans to complete a new Comprehensive Planning Study over the next five years.

Objections:

Petitioner objects to the Request on the grounds and to the extent the request seeks information which is trade secret or other proprietary, confidential and competitively sensitive business information of Petitioner, its customers or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

See OUCC 20-013_Attachment - CONFIDENTIAL for the requested information.

Attachment:

OUCC 20-013_Attachment - CONFIDENTIAL

Comprehensive Planning Studies were received on 06/22/2023 as noted below. Indiana American provided the Draft Sheridan CPS on 06/30/2023 in response to follow-up OUCC DR 43-7.

OUCC 20-014

06/05/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Please provide copies of the most recent Comprehensive Planning Studies ("CPS") (and prior studies as indicated), prepared by or on behalf of Indiana-American, for the following Indiana American Districts.

a. Charlestown (Missing)
b. Crawfordsville
c. Johnson County
d. Kokomo
e. Mooresville
f. Noblesville
g. Northwest Indiana
h. Richmond (also provide the prior CPS)
i. Sheridan (Missing) Follow-up DR 43-7
j. Southern Indiana
k. Terre Haute
l. West Lafayette
m. Winchester (also provide the prior CPS)

Objections:

Petitioner objects to the request on the grounds and to the extent that it seeks information that is confidential due to Homeland Security concerns. Petitioner further objects to the request on the grounds and to the extent that it seeks information that is trade secret or other proprietary, confidential and competitively sensitive business information of Indiana American. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding. Petitioner further objects to the Request on the separate and independent grounds and to the extent it is overbroad and unduly burdensome and seeks information beyond the scope of this proceeding.

Information Provided:

Subject to and without waiver of the foregoing objection, Indiana American is providing the following:

In accordance with the Stipulation and Settlement Agreement entered into in Cause No. 45142, Indiana American provided the relevant portions of the Comprehensive Planning Studies for the Winchester Operation and the Sheridan Operation in electronic form with its case-in-chief (*see* Attachment MHH-7 CONFIDENTIAL and Attachment MHH-14 CONFIDENTIAL) in addition to several Workpapers referencing

OUCC 43-007

06/05/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Reference Petitioner's response to DR 20-13 which indicated the Sheridan Comprehensive Planning Study is in progress. Please also reference Attachments MHH-14 and MHH-15 to Mr. Hobbs' Direct Testimony, which includes references to Sections 2.4 and 3.3 of an unnamed document. Please provide a complete copy of the unnamed document that includes these sections. Please also provide copies of the planning documents, calculations, data, and assumptions that were relied on by Petitioner to size the proposed Sheridan water treatment plant replacement and wells.

Objection:

Petitioner objects to the Request on the grounds and to the extent the request seeks information, which is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner, its customers, or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers, or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objection, Petitioner responds as follows:

Sections 2.4 and 3.3 referenced in Attachments MHH-14 and MHH 15 are sections from the DRAFT Sheridan CPS study. A printed copy of the DRAFT CPS will be made available to the OUCC. Please note that the CPS is in DRAFT form and is being provided to the OUCC for purposes of this case. The document is a working document and is not considered final at this time. All information contained in the DRAFT CPS is subject to change upon further review and revision by Indiana American.

Please refer to the draft Sheridan CPS study being provided as well as Attachment MHH-20 CONFIDENTIAL - Basis of Design Memo provided as part of the direct testimony of Matthew H. Hobbs II regarding the sizing of the Sheridan WTP and wells described above.

relevant portions of Comprehensive Planning Studies listed in Table 1 of Mr. Hobbs's direct testimony. However, due to the highly sensitive and confidential nature of the Comprehensive Planning Studies, Indiana American objects to providing complete copies of the Comprehensive Planning Studies in electronic form. Hard copies of the studies will be provided for review in the offices of Barnes & Thornburg subject to the Confidentiality Agreements entered into between Indiana American and the parties.

OUCC 27-006

06/15/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Did Petitioner certify that it had "prepared and completed a life cycle cost-benefit analysis, a capital asset management plan, and a cybersecurity plan" for the new Charlestown and Mooresville water treatment plants in accordance with Indiana Code ch. 13-18-26? Please provide copies of each life cycle cost-benefit analysis, capital asset management plan, and cybersecurity plan for both treatment plants.

Objections:

Petitioner objects to the request on the grounds and to the extent that it seeks information that is confidential due to Homeland Security concerns. Petitioner further objects to the Request on the grounds and to the extent the request seeks information, which is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). Any responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding. Petitioner further objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome. Indiana American has a statewide asset management program which includes multiple large database systems. The requested information would be unduly burdensome for Indiana American to produce as part of this response.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

Yes, as part of the IDEM permitting process, INAW certified that it met the requirements of Ind. Code ch. 13-18-26.

Note that the "life cycle cost-benefit analysis" definition in IC 13-18-26-3 does not describe an analysis that is limited to financial costs and benefits. Please refer to Cause No. 45609, the Direct Testimony of Stacy S. Hoffman on Service Enhancement Improvements, including associated attachments, for a discussion of the benefits and costs for the alternatives Indiana American considered with respect to the Charlestown and Mooresville water treatment plants. References to the Charlestown Facility begin on page 12 and references to the Mooresville facility begin on page 37 of Mr. Hoffman's Direct Testimony.

The requirement for an asset management plan and a cybersecurity plan in IC 13-18-26-4 and 5 does not mean an asset management plan or cybersecurity plan for each individual improvement. With respect to

the request for Indiana American's capital asset management plans for the Charlestown and Mooresville water treatment plants, Indiana American has a statewide asset management program and does not prepare asset management plans for individual districts or assets. The statewide asset management program is not a single document, but rather a compilation of Excel spreadsheets with embedded calculations that consider ages of assets, prior maintenance performed, life expectancy of assets, present conditions, and internal/regulatory guidelines to determine schedules for future maintenance or potential replacement. The program includes multiple large database systems which would be unduly burdensome to provide in a response. For example, Indiana American Water utilizes a Geographic Information System (GIS) as part of its asset management program, for the management of a statewide asset inventory and maps, and for the prioritization modeling of pipeline infrastructure replacements. The asset management program also includes other systems for the overall operational and financial management of Indiana American's assets.

With respect to Indiana American's cybersecurity plan, American Water has a Company-wide, cybersecurity program which applies to all of American Water's subsidiaries, including Indiana American Water. The program includes a comprehensive cybersecurity program which secures all enterprise-wide information assets, as well as a comprehensive data privacy program which secures all American Water employee, customer, vendor and contractor personally identifiable information against unauthorized use and disclosure. American Water's cybersecurity program consists of numerous cybersecurity practices and procedural documents governing the various components of American Water's cybersecurity program, including, access control, application security, asset management, data encryption, incident management, risk management, and many others.

American Water's comprehensive cybersecurity program includes highly confidential and competitively sensitive information regarding the specific policies, procedures, guidelines and standards American Water maintains to ensure the security of its assets and data. This information is not readily available in the public domain and American Water has taken steps to protect this information from public disclosure.

OUCC 27-007

06/15/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Has Petitioner "prepared and completed a life cycle cost-benefit analysis, a capital asset management plan, and a cybersecurity plan" for the proposed Sheridan and Winchester water treatment plants in accordance with Indiana Code ch. 13-18-26? If so, please provide copies of each life cycle cost-benefit analysis, capital asset management plan, and cybersecurity plan for both treatment plants. If all these plans are not yet completed, so state, and provide copies of the life cycle-benefit analysis for Sheridan and Winchester which Petitioner relied on to select the treatment option for each community.

Objections:

Petitioner objects to the request on the grounds and to the extent that it seeks information that is confidential due to Homeland Security concerns. Petitioner further objects to the Request on the grounds and to the extent the request seeks information, which is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). Any responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding. Petitioner further objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome. Indiana American has a statewide asset management program which includes multiple large database systems. The requested information would be unduly burdensome for Indiana American to produce as part of this response.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

An evaluation of the costs and benefits for the alternatives considered for the Sheridan and Winchester water treatment plants was performed as part of the CPS process. Relevant portions of those documents are provided with the Direct Testimony of Matthew H. Hobbs, II as part of the case-in-chief in this Cause, including, specifically, in CONFIDENTIAL Attachment MHH-7, CONFIDENTIAL Attachment MHH-14, and CONFIDENTIAL Attachment MHH-15.

With respect to the request for the capital asset management plan and cybersecurity plan, please see Indiana American's response to OUCC 27-006.

OUCC 20-011

06/05/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Reference Attachment MHH-8 to Mr. Hobbs' Direct Testimony, which is the 2020 Aeralator Inspection Report for Winchester prepared by Tank Industry Consultants ("TIC"). Please provide the list of repairs and estimated costs prepared by TIC based on inspection and recommendations.

Information Provided:

As evidenced by the "Objective" section at p. 2 of the Report, Indiana American engaged TIC to evaluate the condition of the Aeralator tank and to provide recommendations regarding the tank. *See* p. 2 of Attachment MHH-8 which states the purpose of the TIC evaluation was "to determine the condition of the tank interior, exterior, exposed foundation and accessories," as well as "to present the findings of the evaluation to identify sanitary and safety deficiencies, and to make recommendations for recoating, repairing, corrosion protection, and maintenance." The TIC recommendations are provided starting at p. 12 of Attachment MHH-8. Indiana American did not engage TIC to prepare a list of repairs and estimated costs based on its evaluation, and a list of repairs and estimated costs does not exist.

Indiana American Water Places Temporary Water Filtration Unit in Service in Charlestown, Indiana

Interim solution to reduce discolored water issues prior to construction of new treatment facility

JEFFERSONVILLE, Ind. (May 18, 2021) – Indiana American Water announced at a ribbon cutting today that it has placed a temporary water filtration unit in service in Charlestown, Ind. ahead of construction of a new water treatment facility that will be completed in mid-2022. The temporary filters will remove iron and manganese from the ground water source and provide some incremental improvement in water quality until the new treatment facility is in service.

“This interim solution will provide filtered water for Charlestown residents for the first time ever,” said Indiana American Water President Matt Prine. “We promised when we purchased this system in 2019 that we would address the long-standing issue of high manganese levels and discolored water, and this interim solution, along with the construction of a new water treatment facility that will get underway later this year, will help us to deliver on that commitment.

“We have already invested more than $4 million in the community’s aging water infrastructure, performed much needed maintenance, and made significant process improvements to the system,” said Prine. “While these improvements have helped enhance system reliability and reduce the frequency of discolored water, this filtration unit and the new water treatment facility will provide a long-term solution for providing high-quality water service to our customers here.

“Just as our Southern Indiana Operations and Treatment Facility in Jeffersonville addressed high iron and manganese levels when it was constructed more than two decades ago, these improvements will provide high-quality drinking water for our Charlestown customers,” said Prine.

The temporary filtration units, which utilize two 7,500-gallon pre-treatment tanks and a horizontal pressure filter to remove iron and manganese, were placed in service last week at the company’s existing treatment facility on Charlestown Landing Road in Charlestown. The temporary filter will be removed once the new water treatment facility is placed in service in mid-2022.

Design on the new water treatment plant project is underway and plans include adding filtration to the treatment process, improvements to pumping equipment to increase the flow of water to enhance fire protection capabilities, and switching from using gaseous chlorine to sodium hypochlorite, a much safer liquid disinfectant.

“These solutions are a significant part of Charlestown’s plans to ensure that we offer a high quality of life for our residents as we strive to meet our growth potential in the years ahead,” said Charlestown Mayor Treva Hodges. “Filtered water is the solution that we’ve been waiting for and I am excited that Indiana American Water has followed through on their commitment to address the long-standing issue of discolored water in Charlestown.”

The treatment plant project is utilizing a design-build concept, bringing together construction and design professionals in a collaborative effort to enhance the finished project, more effectively control project costs, and speed up the timeline for completion.

This major water quality improvement continues Indiana American Water’s commitment to improving the Charlestown water system that started in March 2019, when it acquired the system. Recent system enhancements include adding nine automatic flushing devices to improve water quality where dead-end mains are located in the system, upgrading electrical, chemical feed, and control

systems at the treatment facility, replacing or retiring more than 150 fire hydrants, and installing new backup power generating equipment that has already kept water flowing during several system power outages.

The company has also invested $1.4 million to replace or relocate 1.4 miles of water mains since acquiring the Charlestown system. Charlestown customers can expect additional ongoing system investments in the years ahead.

← PREVIOUS STORY (HTTPS://WWW.THE71PERCENT.ORG/INDIANA-AMERICAN-WATER-ANNOUNCES-2021-ENVIRONMENTAL-GRANT-PROGRAM-WINNERS/)
NEXT → (HTTPS://WWW.THE71PERCENT.ORG/INDIANA-AMERICAN-WATER-ACQUIRES-WASTEWATER-SYSTEMS-IN-SOUTHEAST-INDIANA/)

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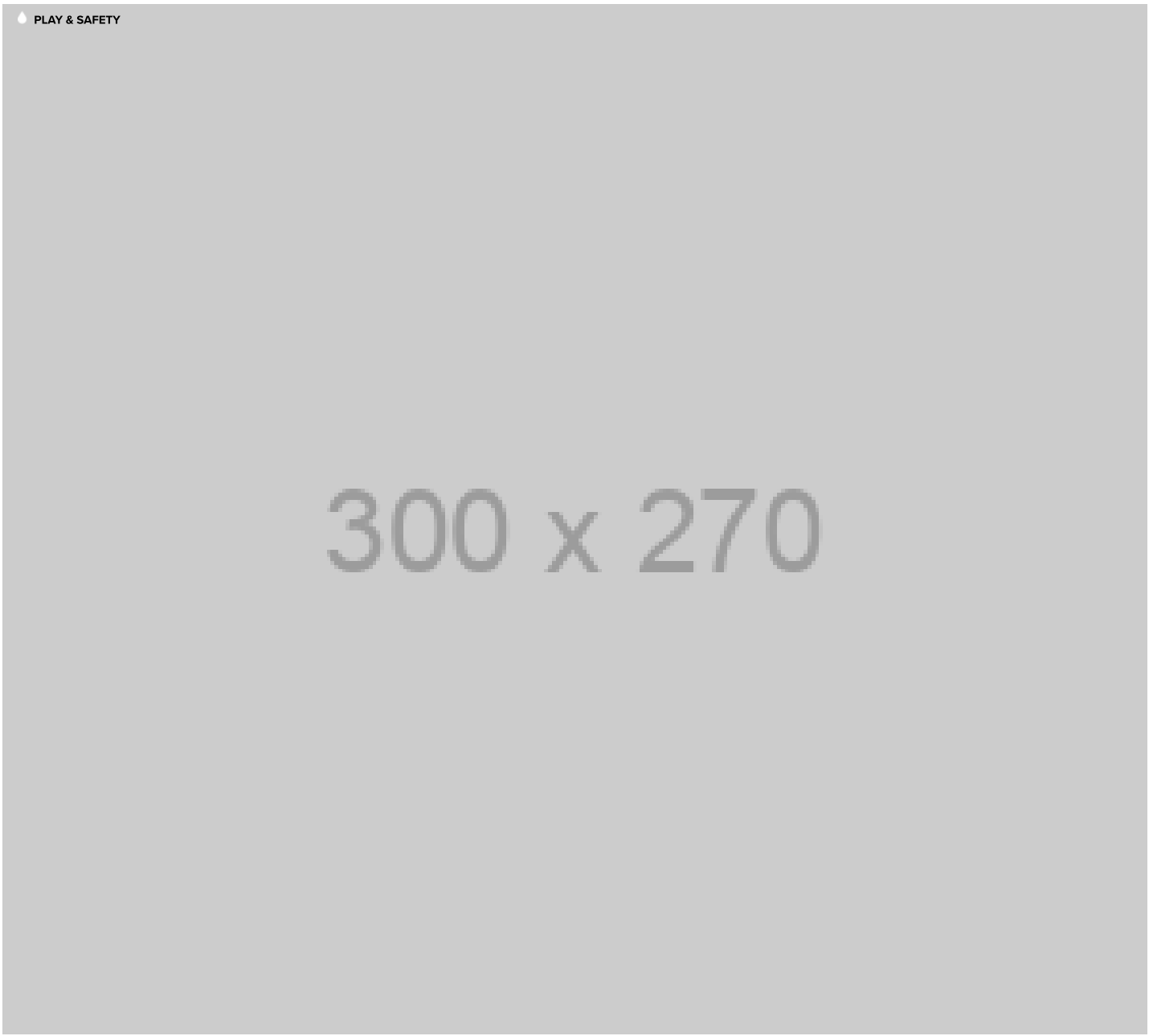

(https://www.the71percent.org/indiana-american-water-announces-2023-environmental-grant-program-winners/)

Indiana American Water Announces 2023 Environmental Grant Program Winners

(https://www.the71percent.org/indiana-american-water-announces-2023-environmental-grant-program-winners/)
GREENWOOD, Ind. (May 19, 2023) Indiana American Water today announced that it is awarding a total of $10,000 to four organizations across the state as part of its 2023 Environmental...

OUCC 20-019

DATA INFORMATION REQUEST 06/05/2023
Indiana-American Water Company
Cause No. 45870

Information Requested:

For the Sheridan water treatment plant Major Project, please provide the following:

a. Design year for the project

b. Estimated population that will be served in the design year.

c. Projected average and maximum daily demands, including fire flow (please also indicate the fire flow).

d. Forecasted or assumed service lives of critical structures/equipment such as the aerator, detention tank, filters, backwash system, chemical feed systems, clearwell, high service pumps, and transmission main.

e. Cost details for the construction cost including budgetary and contracted costs for but not limited to structures, major equipment, pumps, piping, electrical, and controls, etc.

f. Listing of the non-construction component costs, description of their purpose and who will provide the service, supporting data and basis for the non-construction costs.

Objections:

Petitioner objects to the Request on the grounds and to the extent the request seeks information which is trade secret or other proprietary, confidential and competitively sensitive business information of Petitioner, its customers or third parties. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers or third parties. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to the applicable non-disclosure agreements between Petitioner and the parties in connection with the current proceeding.

Information Provided:

Subject to and without waiver of the foregoing objections, Petitioner responds as follows:

a. 2022/2023

b. Estimated population 3,080

c. Projected average and maximum daily demands, including fire flow are as follows:
   - Average demand of 1.02 MGD
   - Maximum Daily Demand of 1.5 MGD
   - Fireflow capacity is a function of distribution storage and not production as it relates to this project.

d. Forecasted or assumed service lives are as follows:
   - Aerator – 45 years
   - Detention Tank – 45 years
   - Filters – 45 years
   - Chemical Feed Systems – 45 years
   - High Service Pumps – 36 years

e. The Target Cost provided by the selected Design-Build Team is provided in OUCC DR 20-019_Attachment 01 - CONFIDENTIAL.

f. Refer to Attachment MHH-23 CONFIDENTIAL listed on Table 1 of Mr. Hobbs's Testimony. For purposes of the non-construction costs provided in the referenced attachment, please note that the Company considers Design, Property Purchases, AFUDC, Indirect Overhead, Company Labor and Company Labor Overhead as Non-Construction Costs.

Attachment:

OUCC DR 20-019_Attachment 01 – CONFIDENTIAL

businesswire
A BERKSHIRE HATHAWAY COMPANY

Indiana American Water Acquires Lake Station Water System in Northwest Indiana

October 22, 2019 05:19 PM Eastern Daylight Time

GREENWOOD, Ind.--(BUSINESS WIRE)--Indiana American Water President Matt Prine today announced the company's acquisition of the City of Lake Station's water system in northwest Indiana. The purchase of the system adds more than 3,270 water customers, representing a population of more than 8,800 residents, to the company's customer base.

"Indiana American Water already provides water service to much of northwest Indiana, so this is a good fit for us," said Prine. "The acquisition provides access to operations and customer service professionals for Lake Station residents and broadens the footprint of Indiana American, allowing existing customers to benefit from efficiencies in delivering service and the ability to attract capital for investment in the system."

"Communities are looking for new and innovative ways to deal with challenges they're facing and hold the bottom-line on expenses," Prine continued. "This acquisition is a great solution for the City and its customers."

Lake Station Mayor Christopher Anderson also expressed his support of the acquisition.

"The acquisition of our water system by Indiana American Water has several benefits to our community, including additional local and property tax revenues, the expertise and resources to address system and aging infrastructure issues, and significant proceeds from the sale to help us address financial challenges and other pressing community needs," said Anderson. "This sale will position our community for continued growth and prosperity well into the future."

The acquisition of the Lake Station water system for approximately $20.68 million was approved by the Indiana Utility Regulatory Commission in August 2018 and closed by Indiana American Water and the City of Lake Station on Tuesday, October 22, 2019. The closing was delayed by appeals which have now been resolved. The Lake Station system will be incorporated into the company's Northwest Indiana Operations, which currently serves more than 250,000 residents.

About Indiana American Water

Indiana American Water, a subsidiary of American Water (NYSE: AWK), is the largest investor-owned water utility in the state, providing high-quality and reliable water and/or wastewater services to more than 1.3 million people. With a history dating back to 1886, American Water is the largest and most geographically diverse U.S. publicly traded water and wastewater utility company. The company employs more than 7,100 dedicated professionals who provide regulated and market-based drinking water, wastewater and other related services to more than 14 million people in 46 states. American Water provides safe, clean, affordable and reliable water services to our customers to make sure we keep their lives flowing. For more information, visit amwater.com and follow American Water on Twitter, Facebook and LinkedIn.

Contacts
Joe Loughmiller
Office 317-885-2434
Cell 317-903-7431
joe.loughmiller@amwater.com

Lake Station taps into new water supply

Lake Station began flushing and replacing all its hydrants Tuesday to rid the system of sediment that's causing brown tap water. This hydrant is on Central Avenue. (Carole Carlson / Post-Tribune)

By **Carole Carlson**
Post-Tribune

FEBRUARY 5, 2019, 3:30 PM

Lake Station shut down its water utility plant Tuesday and began supplying Lake Michigan water to residents from the Indiana-American Water Co.

City workers and Indiana-American Water also started a comprehensive flush of all the fire hydrants in the city to rid lines of sediment that's caused brown tap water.

Mayor Christopher Anderson said “glitches” in equipment at the $12 million plant at 2898 Union St. prompted the city to begin buying water wholesale from Indiana-American Water.

Anderson the plant was constructed in 2012 without the proper equipment to allow the use of phosphates in the water treatment to prevent corrosion.

Residents began complaining about brown tap water last year. Tests showed it’s not contaminated, city officials told residents at past meetings. Lake Station’s plant draws water from a series of wells.

Since the complaints intensified, the city has been meeting with Indiana-American Water Co. officials to have a backup water supply pipe repaired so the company could supply water.

Anderson said residents will continue to pay the same rate for water for the next couple months.

Indiana-American Water agreed to purchase the city’s water plant for $20.7 million, but the sale has been challenged and is under review by the Court of Appeals.

Anderson said at Tuesday’s Board of Works meeting the city is doing a financial analysis that compares the purchase of water wholesale versus the operation of its own plant again.

The hydrant flushing is expected to continue through Friday. Customers were warned to expect a drop in water pressure and possible temporary discoloration. They were advised not to do laundry while the flushing is taking place. If tap water is discolored, they should allow several cold water faucets to run until the water is clear.

Customers with questions about the flushing can call the city at 219-850-1316.

Carole Carlson is a freelance reporter for the Post-Tribune.

OUCC 27-010

06/15/2023

DATA INFORMATION REQUEST
Indiana-American Water Company
Cause No. 45870

Information Requested:

Please provide the annual cost incurred for each of the following: power, labor, chemicals, and well cleaning for the Lake Station water treatment plant and wells since they were acquired in late 2018 under Cause No. 45041.

Information Provided:

See the table below for the power costs of the Lake Station WTP that were obtained from invoices in the Company's system. Indiana American does not track power down to the plant level.

Sum of COST	Column Labels					
Row Labels	2019	2020	2021	2022	2023	Grand Total
Jan		5,856.02	6,448.65	8,087.32	6,715.29	27,107.28
Feb		6,244.76	8,064.92	7942.3	6,388.86	2,8640.84
Mar		4,303.44	4,832.37	5,629.03	5,791.04	20,555.88
Apr		3,225.55	2,916.03	4,166.31	2,614.87	12,922.76
May		1,366.95	1,524.02	1,502.28	1,254.42	5,647.67
Jun		842.7	1,173.76	843.45		2,859.91
Jul		816.45	919.46	1,048.77		2,784.68
Aug		770.35	968.75	946.88		2,685.98
Sep		862.57	681.58	895.95		2,440.10
Oct		1,541.92	1,624.89	1,409.22		4,576.03
Nov	5,093.18	3,192.75	4,966.23	4,910.35		18,162.51
Dec	5,393.48	6,365.12	6,945.84	7,594.95		26,299.39
Grand Total	**10,486.66**	**35,388.58**	**4,1066.50**	**44,976.81**	**22,764.48**	**154,683.03**

Labor is not tracked down to the plant level, it is tracked at a district level. There is no chemical or well cleaning costs.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
Northwest Regional Office • 330 W. US Highway 30, Suite F • Valparaiso, IN 46385
(888) 209-8892 • (219) 464-0233 • Fax (219) 464-0553 • www.idem.IN.gov
Eric J. Holcomb, *Governor*
Brian C. Rockensuess, *Commissioner*

May 10, 2023

VIA EMAIL

Mr. Brian Marciniak
Indiana American Water
650 Madison St.
Gary, IN 46402

Re: Inspection Summary Letter
Indiana American Water
INR000151225
Lake Station, Lake County

Dear Mr. Marciniak:

On 5/8/2023, a representative of the Indiana Department of Environmental Management, Northwest Regional Office, conducted an inspection of Indiana American Water, located at 2898 Union St, Lake Station, IN. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: No Violation(s) Discovered

Please direct any response to this letter and any questions to me at (219) 781-5400 or chbreite@idem.in.gov.

Sincerely,

Charles Breitenfeldt
Hazardous Waste Section
Northwest Regional Office

Enclosure
cc: Lake County Health Department

HAZARDOUS WASTE INSPECTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Charles Breitenfeldt
Others Present	
Date:	Monday, May 8, 2023
Time In:	8:45 AM
Time Out:	9:15 AM
Inspection Type	Compliance Evaluation Inspection

General Information

Facility Information

Facility Name	Indiana American Water – Lake Station
Facility Location	2898 Union St. Lake Station, IN 46405 Lake County
Facility Mailing Information	650 Madison St. Gary, IN 46402
Facility Contact	Same as Primary Facility Contact
Primary Facility Contact During Inspection	Brian Marciniak Supervisor of Water Quality and Environmental Compliance 219-880-2338 brian.marciniak@amwater.com

Other Facility Contact(s) During Inspection

Salutation	First Name	Last Name	Title	Phone Number	Email
Mr.	Pete	Harretos	Sr. Superintendent of Production	219-384-9509	pete.harretos@amwater.com

Facility ID

EPA ID Number	INR000151225	**NAICS Code**	221310

Facility Status

File Status	Small Quantity Generator	**Other Activities**	Episodic

Outstanding Issues

Last Inspection Date	
Previous Violations	○ Yes ◉ No
Details	

Inspection Narrative

This inspection was conducted as a routine compliance evaluation. IDEM staff arrived on site and found that this was an unmanned location. IDEM staff called Mr. Brian Marciniak, Supervisor of Water Quality and Environmental Compliance, and explained the nature and purpose of the call. Mr. Marciniak and Mr. Pete Harretos, Sr. Superintendent of Production, arrived a few minutes later. Upon their arrival, IDEM explain to Mr. Marciniak and Mr. Harretos the nature and purpose of the inspection.

Mr. Harretos explained to IDEM staff that this is an unmanned public drinking water plant. Indiana American Water bought the plant from the City of Lake Station in 2019 for use as an emergency pumping station. The plant can produce up to 1,000,000 gallons of drinking water a day, from a total of six (6) wells. The plant had a water softening system when they bought it from the City of Lake Station that consisted of a sand pressure filter, carbon dioxide and sodium hydroxide tanks. Indiana American Water made the decision to discontinue the use of the water softening process and abandoned the

tanks in place. As part of this process, they registered as a small quantity generator of hazardous waste and applied for an episodic generation event in 2022 to remove the sodium hydroxide from the plant.

The episodic event started on May 2, 2022, and ended on June 29, 2022. All the waste produced as a part of this event was shipped on July 1, 2022, to Tradebe Treatment and Recycling LLC in East Chicago, IN.

A facility tour was conducted and included: the water softening system room, sodium hydroxide tank room, storage area, sand pressure filter room, pumping room, and electrical room.

Following the facility tour, IDEM staff conducted a paperwork review and a closing conference.

No violations were discovered as a result of this inspection.

Regulatory Status			
Observed Activity	Non-Handler	**Other Activities**	
Documents Reviewed	Manifests Episodic Paperwork		
Comments			

Waste Management

Comments:

Waste Stream(s) Information

Waste Streams

(•) Yes ( ) No ( ) Not Inspected ( ) Not Applicable

List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)

EPA Waste Codes	Description	Source	Generation Rate	Disposition
D002	Sodium Hydroxide Solid	Episodic Tank Clean Out	600 pounds - one time	Tradebe Treatment and Recycling LLC, East Chicago, IN
D002	Sodium Hydroxide Solution	Episodic Tank Clean Out	330 gallons - one time	Tradebe Treatment and Recycling LLC, East Chicago, IN

Exempted/Excluded	( ) Yes (•) No ( ) Not Inspected ( ) Not Applicable
Explanation	

Waste Management Areas

Container Management Area(s)	( ) Yes (•) No ( ) Not inspected ( ) Not applicable
Satellite Area(s)	( ) Yes (•) No ( ) Not inspected ( ) Not applicable

Tanks, Restricted Waste Sites, and Other Regulated Units

( ) Yes (•) No ( ) Not inspected ( ) Not applicable

Environmental Releases	
Visible Releases/Contamination/Discharges	( ) Yes (•) No Release Observed

Compliance Assistance

P2 Information

The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at http://www.in.gov/idem/5298.htm for additional information.

Contact by IDEM OPPTA Requested	○ Yes ◉ No	
P2 Suggestions		

Guidance Materials

Guidance Materials Provided to Facility	

Checklist
(Checked box indicates a compliance concern)

Standards
- ☐ Hazardous Waste Determination
- ☐ Recordkeeping (SQG and LQG)
- ☐ Identifying Hazardous Waste Numbers (SQG and LQG)
- ☐ Generator Category Determination
- ☐ Notification (SQG, LQG, Transporter, TSDF)
- ☐ Release to the Environment, Disposal of Solid Waste
- ☐ Illegal Dumping
- ☐ Other Violation

TSDF Permit Requirements
- ☐ TSDF Permit Requirements
- ☐ Other Violation

LQG Hazardous Waste Standards
- ☐ Accumulate for 90 Days or Less
- ☐ Container Condition
- ☐ Compatibility of Waste with Container
- ☐ Containers Closed
- ☐ Container Handling
- ☐ Central Accumulation Area Inspection
- ☐ Ignitable or Reactive Wastes - Distance from Property Line
- ☐ Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs
- ☐ Conditions for Accumulation of Incompatible Wastes
- ☐ Container Labeled "Hazardous Waste"
- ☐ Container Marked with Indication of Hazards
- ☐ Containers Marked with Accumulation Start Date
- ☐ Tank Integrity Assessment
- ☐ Tank Containment and Detection of Releases

SQG Hazardous Waste Standards
- ☐ Accumulate for 180 Days or Less
- ☐ Accumulation Limit
- ☐ Container Condition
- ☐ Compatibility of Waste with Container
- ☐ Containers Closed
- ☐ Container Handling
- ☐ Central Accumulation Area Inspections
- ☐ Conditions for Accumulation of Incompatible Wastes
- ☐ Container Labeled "Hazardous Waste"
- ☐ Container Marked with Indication of Hazards
- ☐ Container Marked with Accumulation Start Date
- ☐ Tank Operating Conditions
- ☐ Tank Inspections
- ☐ Tank Labeled "Hazardous Waste"
- ☐ Tank Marked with Indication of Hazardous
- ☐ Tank Documentation for 180-Day Accumulation

- ☐ Tank General Operating Requirements
- ☐ Tank Inspections
- ☐ Tank Subpart BB - Monthly Pump and Valve Monitoring
- ☐ Tank Subpart CC - Annual Inspection/Monitoring
- ☐ Tank Labeled "Hazardous Waste"
- ☐ Tank Marked with Indication of Hazards
- ☐ Tank Documentation for 90-Day Accumulation
- ☐ Maintenance and Operation of Facility
- ☐ Required Equipment
- ☐ Testing and Maintenance of Equipment
- ☐ Aisle Space
- ☐ Arrangements with Local Authorities
- ☐ Arrangements with Local Authorities - Documentation
- ☐ Contingency Plan Developed
- ☐ Content of Contingency Plan
- ☐ Copies of Contingency Plan
- ☐ Contingency Plan Quick Reference Guide
- ☐ Emergency Coordinator
- ☐ Personnel Training Program
- ☐ Personnel Training - Complete Within Six Months
- ☐ Personnel Training Annual Review
- ☐ Personnel Training Documentation
- ☐ Personnel Training Record Retention
- ☐ Notification for Closure
- ☐ Land Disposal Restrictions
- ☐ Large Quantity Generator - Other Violations

- ☐ Land Disposal Restrictions
- ☐ Maintenance and Operation of Facility
- ☐ Required Equipment
- ☐ Testing and Maintenance of Equipment
- ☐ Access to Communications or Alarm System
- ☐ Aisle Space
- ☐ Arrangements with Local Authorities
- ☐ Arrangements with Local Authorities - Documentation
- ☐ Emergency Coordinator
- ☐ Emergency Information Posted
- ☐ Employee Training
- ☐ Other Small Quantity Generator Standards

VSQG Standards

- ☐ Hazardous Waste Generation Limit
- ☐ Hazardous Waste Accumulation Limit
- ☐ Hazardous Waste Determination
- ☐ Proper Disposal
- ☐ Prohibited Disposal of Liquids in Landfills

Satellite Accumulation – SQG and LQG

- ☐ Quantity Limits, Point of Generation, Under Control of Operator
- ☐ Container Condition
- ☐ Compatibility with Container
- ☐ Incompatible Wastes
- ☐ Containers Closed
- ☐ Container Labeled "Hazardous Waste"
- ☐ Container Marked with Indication of Hazards
- ☐ Preparedness and Prevention
- ☐ Excess Generation

Manifest and Recordkeeping - LQG and SQG

- ☐ Manifest General Requirements
- ☐ Use of the Manifest

Episodic Generation	Hazardous Secondary Materials
☐ Notification	☐ Reclaimed Under Control of the Generator
☐ EPA ID Number	☐ Contained
☐ Accumulate for 60 Days or Less	☐ Speculative Accumulation
☐ Accumulation Prohibitions	☐ Notice
☐ Container Labeling	☐ Documentation of Legitimacy Determination
☐ Tank Labeling and Recordkeeping	☐ Emergency Preparedness and Response
☐ Recordkeeping	☐ Emergency Procedures (Accumulates 6,000 kg or Less)
☐ Preparedness and Prevention	☐ Emergency Procedures (Accumulates Greater than 6,000 kg)
☐ Other Violation	☐ Other Violation

Solvent-Contaminated Wipes – Disposal	Solvent-Contaminated Wipes - Laundered or Dry Cleaned
☐ Container Management (Non-leaking containers)	☐ Container Management (Non-leaking containers)
☐ Closed Containers	☐ Closed Containers
☐ Labeling	☐ Labeling
☐ Accumulation Time	☐ Accumulation Time
☐ No Free Liquids	☐ No Free Liquids
☐ Free Liquids Management	☐ Free Liquids Management
☐ Documentation	☐ Documentation
☐ Final Disposition	☐ Clean Water Act

Universal Waste – All Facilities	Used Oil – All Facilities
☐ Universal Waste Labeling	☐ Rebuttable Presumption Applies
☐ Containers - Closed, Good Condition, No Evidence of Leaks	☐ Containers and Tanks in Good Condition
☐ Universal Waste - Bulb Crushing Prohibition	☐ Containers/Tank Labeling
	☐ Release Clean Up and Containment
	☐ Burning Restrictions - Generated On-site or DIY, .5M BTU

Description of Violation(s)

Inspection Documentation	
Photographs	○ Yes ◉ No
Map	○ Maps
GPS Location Collected	○ Yes ◉ No

Analytical Screening Conducted	○ Yes ◉ No	
Lab Sample	○ Yes ◉ No	

Inspection Results/Actions	
Comments:	
Inspection Results	
No Violation(s) Discovered	
Multi-Media Concerns	
No concerns noted	

Finalize Inspection		
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided	
Inspector Information	Printed/Typed Name	Charles Breitenfeldt
	Phone Number:	(219) 781-5400
	Email Address:	chbreite@idem.in.gov
	Signature:	Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name:	Brian Marciniak
	Signature:	Obtained on the Inspection Verification/Findings Form

INSPECTION VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603
Web Page: http://www.in.gov/idem/

On 5/8/23 an inspection of Indiana American Water - Lake Station was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- ☑ Routine Compliance Evaluation
- ☐ Follow Up Inspection
- ☐ Compliance Assistance Inspection
- ☐ Complaint
- ☐ Multi-Media Screening Evaluation
- ☐ Other: _____

Inspection Findings:
These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- ☑ No violations were discovered with respect to the particular items observed during the inspection.
- ☐ Violations were discovered but corrected during the inspection.
- ☐ Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
- ☐ Violations were discovered and may subject you to an appropriate enforcement response.
- ☐ Additional information/review is required to evaluate overall compliance.
- ☐ Other/Comments (attachment may be included): _____

****

Confidential Information
In accordance with 329 IAC 6.1 (http://www.in.gov/legislative/iac/T03290/A00061.PDF) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information. A person may request confidential treatment of information at the time the information is acquired through the actions of the department, such as inspections. The written claim for confidential treatment may be broad, but must be sufficiently clear to allow for accurate identification of the information claimed to be confidential. In accordance with 329 IAC 6.1-4-1(d), supporting information must be submitted to the commissioner within five (5) working days from the time the information claimed as confidential is acquired by the department. A person submitting a claim of confidentiality shall designate and segregate the information and the supporting information to which the claim applies in a manner that is sufficiently clear to allow the department to identify all confidential claim materials. Confidential information may include (but is not limited to) written or printed material, maps, charts, photographs, or samples (see definition of information at 329 IAC 6.1-2-8). The undersigned Owner/Representative has alleged information acquired during this inspection ☐ **does** ☑ **does not** (check one) contain confidential information. A check in the "does" box is not a written claim for confidential treatment of information acquired during this inspection.

Notice of Oral Report
In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department. The report does not include matters not evident to the IDEM representative or any fact that indicates an intentional, a knowing, or a reckless violation.

IDEM Representative:

Charles Breitenfeldt	Ch Breitenfeldt	5/8/23
Printed Name	Signature	Date
(219) 781-5400	chbreite@idem.IN.gov	8:45 / 9:15
Phone Number	Email	Time In/ Out

Owner/Representative:

Pete Hanetos		Sr. Supt. Ops
Printed Name	Signature	Title
(219) 384-9509	Pete.Hanetos@amwater.com	5/8/23
Phone Number	Email	Date

IDEM prefers to email your written report. Please check this box if you prefer to receive a copy of the inspection report via U.S. mail: ☐

5245027

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

January 9, 2020

66-34
Lake Station Water Department
Attn: Christina Gosnell
153 North Emerson Avenue
Greenwood, IN 46143

Re: Public Water System Inactivation
PWSID #5245027

Dear Ms. Gosnell:

The Indiana Department of Environmental Management's Drinking Water Branch has received information indicating your facility is connected to Indiana American Water - Northwest. Consequently, as of January 9, 2020, your public water system has been inactivated and added as inactive POE 04 under PWSID #5245015. Therefore, it is no longer required to comply with the federal and state drinking water testing requirements. **Please notify our office of any status changes regarding your facility or POE.** Your facility information will remain in our files for future reference, if necessary.

Please send or fax all report forms/correspondence to the following:

Indiana Department of Environmental Management
OWQ Drinking Water Compliance – Mail Code 66-34
100 North Senate Avenue, Room 1255
Indianapolis, Indiana 46204-2251
(FAX) (317) 234-7436

If you have any further questions regarding your system's inactivation, please contact Casey Davidson at (317) 234-7443, or your field inspector, Kevin Gaughan, at (219) 713-3428.

Sincerely,

Sara Pierson, Chief
Compliance Section
Drinking Water Branch
Office of Water Quality

SP/cd
cc: Lake County Health Department
Kevin Gaughan, Field Inspection Section

I - 1/9/20 - CD

System Basic Information Summary

IN5245027 LAKE STATION WATER DEPARTMENT

Activity	Activity Date	Source Type	System Type	Population	Total Population	Seasonal Dates	Service Area
A	1/1/1976	SWP	C	R 12572	12572	1 1 to 12 31	MUNICIPALITY OWNED UTILITIES
							MUNICIPALITY

Operator Class	Service Connections	Field Inspector
DLT3	3267	Kevin Gaughan

Contact Type Key

AC - Mailing Contact EC - Emergency Contact OW - Owner
FC - Financial Contact OP - Operator SA - Reminders
SC - SCADA Contact

Contact Information

Type		Contact Name	Street	City	State	Zip	Phone	Ext	Fax
AC	Mr.	ENGLAND, BILL (Chris Gosnell) bengland@utilityservicescorp.com	2501 E. CHICAGO ST.	VALPARAISO	IN	46383	219-286-5914 219-759-0193		
DO	Mr.	HEATH, HARRY hheath@lakestation-in.gov	2898 Union street	LAKE STATION	IN	46405	219-962-8511 219-841-2133		219-962-5769
EC	Mr.	GERTZEN, BOB bgertzen@utilityservicescorp.com	2501 Chicago Street, Suite 4	VALPARAISO	IN	46385	219-759-0193 219-309-6546		219-762-1978
FC	Mr.	VERA, ADRIAN avera@lakestation-in.gov	1969 Central Avenue	LAKESTATION	IN	46405	219-932-7508 219-973-9757		
OP	Mr.	ENGLAND, BILL bengland@utilityservicescorp.com	2501 E. CHICAGO ST.	VALPARAISO	IN	46383	219-286-5914 219-759-0193		
OW	Mr.	ANDERSON, CHRIS canderson@lakestation-in.gov	City of Lake Station, 1969 Central Ave	LAKE STATION	IN	46405	219-962-2081		
PL		PHYSICAL ADDRESS, IN5245027	1969 Central Avenue	LAKE STATION	IN	46405	219-962-7508 219-962-8512		

required by IN AM - NW (5245015)
added 28 600cy

SA	Mr.	ENGLAND, BILL bengland@utilityservicescorp.com	2501 E. CHICAGO ST.	VALPARAISO	IN	46383	219-286-5914 219-759-0193
SC	Mr.	ENGLAND, BILL bengland@utilityservicescorp.com	2501 E. CHICAGO ST.	VALPARAISO	IN	46383	219-286-5914 219-759-0193

"EXCLUDED FROM PUBLIC ACCESS PER ACCESS TO COURT RECORDS RULE 5."

CONFIDENTIAL

OUCC ATTACHMENT JTP-A

CAUSE NO. 45870

"EXCLUDED FROM PUBLIC ACCESS PER ACCESS TO COURT RECORDS RULE 5."

CONFIDENTIAL

OUCC ATTACHMENT JTP-B

CAUSE NO. 45870

"EXCLUDED FROM PUBLIC ACCESS PER ACCESS TO COURT RECORDS RULE 5."

CONFIDENTIAL

OUCC ATTACHMENT JTP-C

CAUSE NO. 45870

"EXCLUDED FROM PUBLIC ACCESS PER ACCESS TO COURT RECORDS RULE 5."

CONFIDENTIAL

OUCC ATTACHMENT JTP-D

CAUSE NO. 45870