

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) CAUSE NO. 45870
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.)

PUBLIC'S EXHIBIT NO. 10

TESTIMONY OF CARL N. SEALS

ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

July 21, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the *Public's Exhibit No. 10 OUCC's Testimony of Carl N. Seals 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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TESTIMONY OF OUCC WITNESS CARL N. SEALS
CAUSE NO. 45870
INDIANA AMERICAN WATER COMPANY, INC.

I. INTRODUCTION

1 **Q: Please state your name and business address.**

2 A: My name is Carl N. Seals, and my business address is 115 West Washington Street, Suite
3 1500 South, Indianapolis, Indiana 46204.

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

5 A: I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as
6 Assistant Director in the Water/Wastewater Division. My qualifications and experience are
7 set forth in Appendix A.

8 **Q: What is the purpose of your testimony?**

9 A: The purpose of my testimony is to discuss and analyze the following issues: 1) an increase
10 in non-revenue water; 2) a potential lack of fire service audits to identify non-revenue
11 water; 3) changes to the number of field service orders; and 4) customer comments.

12 **Q: What have you done to prepare your testimony?**

13 A: I reviewed Indiana American Water Company's ("Indiana American" or "Petitioner")
14 Petition and the testimonies submitted in this case. I reviewed previous orders and
15 testimony from other Indiana American cases. I gathered data from annual reports to
16 prepare a dashboard showing general operating statistics over a ten-year period. I
17 researched documents filed with the Indiana Department of Environmental Management
18 ("IDEM"). I prepared discovery requests and reviewed Petitioner's responses. I performed
19 analyses on the results of Indiana American's responses and on prefiled testimony.

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

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

II. NON-REVENUE WATER

5 **Q: What is non-revenue water?**

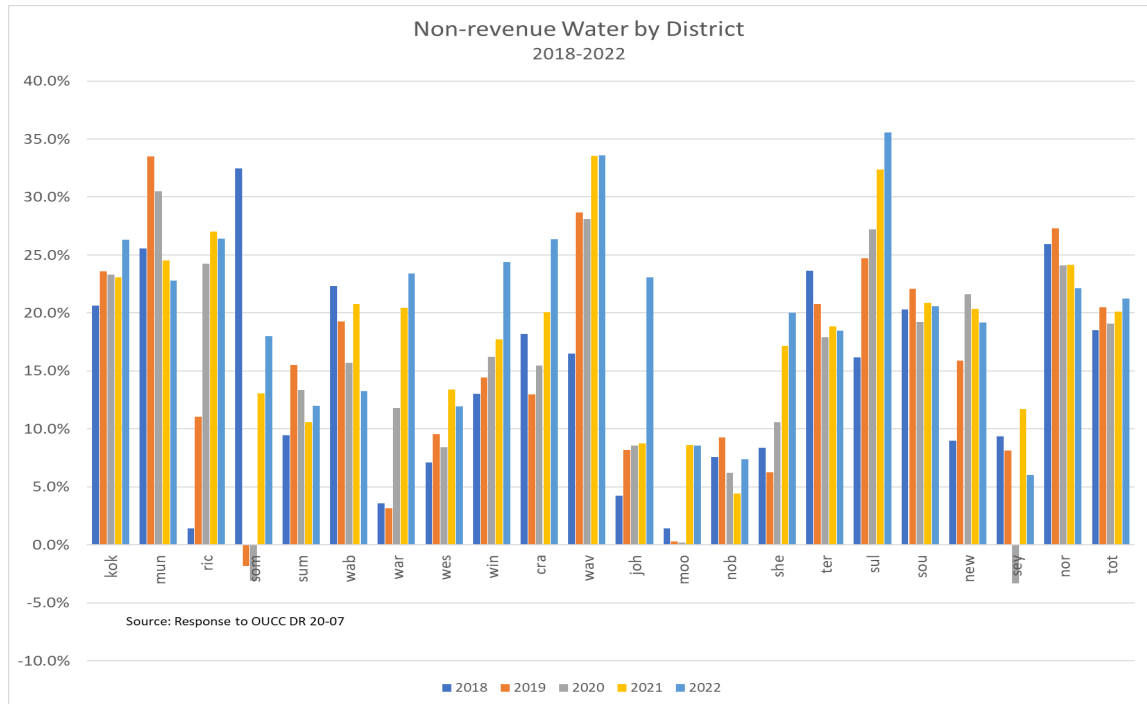
6 A: According to The Water Dictionary, Second Edition,¹ non-revenue water is water that is
7 used or lost from a system for which no payment is received. Non-revenue water can
8 include water used for firefighting, water lost through main leaks and breaks, and water
9 lost through unmetered connections (e.g. fire service connections). This is similar, but not
10 identical, to the “water loss” measured and reported in IURC Annual Reports.

11 **Q: What are Indiana American’s current and historical levels of non-revenue water?**

12 A: According to Indiana American’s response to OUCC Data Request 20-007, total company
13 non-revenue water in 2022 was 21.2%, an increase from the previous year at 20.1%, and
14 from 2018 at 18.5%.² Historical total company and individual district levels of non-revenue
15 water appear below.

¹ A Comprehensive Reference of Water Terminology, 2010, American Water Works Association.

² OUCC Attachment CNS-1, Indiana American’s Response to OUCC DR 20-007.



1 As this chart shows, while the level of non-revenue water appears to be decreasing
2 in a few districts (Muncie, Summitville, Wabash, Terre Haute, Northwest). However, most
3 are increasing or showing mixed results over the five-year period. A few districts are
4 inexplicably showing negative non-revenue levels for certain years. But company-wide,
5 non-revenue water increased over the past five years, with four districts experiencing
6 greater than 30% non-revenue water during the five-year period.

Table 1

| Non-revenue water | | | | |
|--|-------|-------|-------|-------|
| 2018 | 2019 | 2020 | 2021 | 2022 |
| 18.5% | 20.5% | 19.1% | 20.1% | 21.2% |
| Source: INAWC response to OUCC DR 20-007 | | | | |

7 **Q: Why is the level of non-revenue water important?**

8 **A:** Non-revenue water is water that is extracted, treated, transported, and stored for use by the
9 utility on behalf of ratepayers *at some cost of production*. In the case of leaks, this water

1 never reaches the customer(s). Where water is received by some entity (customer) without
2 remuneration (intentionally or not), other customers are essentially subsidizing the non-
3 paying customer. That non-revenue water is increasing company-wide while the cost of
4 water is also increasing (to the ratepayers) is further cause for concern, particularly for a
5 large, technologically sophisticated utility like Indiana American.

6 **Q: What is Indiana American doing to reduce its levels of non-revenue water?**

7 A: According to Indiana American witness Kari Britto, Indiana American is accelerating the
8 replacement of aging infrastructure, enhancing leak detection efforts, testing large meters
9 (treatment plants and customers), installing AMI meters, monitoring consecutive meter
10 estimates and zero-usage reads and conducting fire service audits.³ Indiana American
11 further noted in responses to OUCC Data Requests 07-031 and 38-007 that it was “utilizing
12 water audits that are completed and filed with the Indiana Finance Authority.”⁴

13 **Q: Do you agree with the steps Indiana American is proposing to reduce non-revenue**
14 **water?**

15 A: Yes, all the items mentioned above are effective first steps toward reducing non-revenue
16 water. However, I recommend increased emphasis and resources utilized on addressing
17 non-revenue water, especially on leak detection and on fire service audits given the
18 increase in non-revenue water. Indiana American should also investigate other means of
19 measuring and reducing non-revenue water, such as establishing district-metered areas,
20 especially as it transitions towards Advanced Metering Infrastructure (“AMI”). Finally,
21 while the water audits provide useful information, recommendations contained therein

³ Petitioner's Exhibit No. 4, Direct Testimony of Kari Britto, p. 22, line 10 to p. 24, line 9.

⁴ OUCC Attachment CNS-2, Indiana American's Response to OUCC DRs 07-031 & 38-007.

1 must be acted upon for improvements to be achieved. Obviously, the completion of an
2 audit does not correct the underlying problems.

3 **Q: What level (percentage) of non-revenue water does Indiana American believe to be**
4 **acceptable?**

5 A: The OUCC asked this question in Data Request 38-008. We received the following
6 response:

7 There will always be a level of NRW in any system; this is due to such
8 things as leaks, flushing of the system, billing adjustments and *fire services*
9 *usage*. Indiana American uses the AWWA water audits turned in to the
10 Indiana Finance Authority to monitor water loss numbers in the various
11 districts as well as overall accounted and unaccounted water numbers by
12 district. Indiana American does not have an “acceptable” number for NRW,
13 as it is continuously being analyzed and evaluated for what can be done to
14 drive the number down. *IDEM does use a figure of 25% as the unaccounted*
15 *water numbers the Company cannot exceed to ensure it does not get a*
16 *deficiency. (Emphasis added.)*⁵

17 **Q: What does this response suggest to you?**

18 A: It suggests to me that Indiana American may not be concerned with non-revenue water as
19 long as it remains below the 25% level used by IDEM as an exceedance level for
20 unaccounted for water. This is concerning again because customers (ratepayers) are paying
21 to produce significantly more water than they are actually receiving/using.

22 **Q: Has Indiana American received any significant deficiencies from IDEM?**

23 A: Yes, as noted in its 2022 respective Consumer Confidence Reports,⁶ Indiana American
24 received significant deficiencies during regulatory inspections at its Georgetown, Lowell,
25 Mecca and Sullivan operations during 2021, all for water loss greater than 25%.

⁵ OUCC Attachment CNS-3, Indiana American's Response to OUCC DR 38-008.

⁶ OUCC Attachment CNS-4, pages from 2022 Consumer Confidence Reports.

1 **Q: What do you recommend?**

2 A: As I previously mentioned, I recommend Indiana American increase its efforts to reduce
3 the rising levels of non-revenue water to include additional leak-detection activities,
4 metering of all private fire services within five years, increased fire service audits and
5 explore district-metering in problematic areas. Finally, assessing and acting upon
6 recommendations from water audits should be part of Indiana American's toolbox.

III. FIRE SERVICE AUDITS

7 **Q: Please describe private fire services.**

8 A: A private fire service is a "connection to a water distribution system to provide water for a
9 private fire sprinkler or fire protection system."⁷ Private fire services enable industrial or
10 commercial customers to install fire protection systems such as overhead sprinklers or
11 private fire hydrants within their internal property.

12 **Q: Are private fire services metered for water usage?**

13 A: In response to OUCC Data Request 38-002, Indiana American indicated that 36% of
14 private fire services are metered.⁸ A meter on a fire service line is a small, bypass meter
15 used to measure only low flows. At high demands, e.g., in event of a fire, the larger,
16 unmetered adjacent line is used to allow greater flow. Metering these large fire flows would
17 be expensive and restrict flows.

18 **Q: Why do unmetered fire services present a problem?**

19 A: Unmetered fire services can be problematic for a couple of reasons. First, there is the
20 expected, unmetered usage for water used in regular testing of internal sprinkler systems,
21 and perhaps private hydrants. Next, there are potential leaks on these internal private fire

⁷ A Comprehensive Reference of Water Terminology, 2010, American Water Works Association.

⁸ OUCC Attachment CNS-5, Indiana American's Response to OUCC DR 38-002.

1 systems, which may cause a continuous, unmetered flow of water through the system.

2 Finally, in some cases, customers may unintentionally tap into these fire service lines and

3 use them for other, non-fire service purposes. The potential problem is highlighted in

4 Petitioner's complete response to OUCC Data Request 07-036:

5 Information Requested:

6 When unauthorized usage is detected on a fire service line, what if any
7 efforts does INAWC make to recover the cost of water used?
8

9 Information Provided:

10 The Company would first conduct an audit to understand where the
11 unauthorized usage is coming from. Once discovered, a conversation with
12 the customer on correcting the issue (i.e., corrections in the case of a leak
13 or conversations on next steps if theft of service is discovered) occurs.
14 While it can be difficult to collect and recover the cost of the lost water since
15 many fire services don't include meters, Indiana American has at times,
16 while working with the customer, estimated the water that was used. In
17 some larger audits where the company uncovered the customer filling up
18 tanks, Indiana American identified the actual usage amount and billed the
19 customer. In addition, Indiana American has, on occasion, ultimately
20 decided to add a meter in front of the domestic and fire service split and
21 meter all water in instances where the customer refuses to correct the issues
22 with their plumbing.⁹

23 **Q: Is the non-revenue water impact of unmetered private fire services known?**

24 A: No, since these services are frequently unmetered and therefore unbilled, any water lost
25 through private fire services simply appears as non-revenue water.

26 **Q: How can the problem of unmetered fire services be addressed?**

27 A: This problem can be addressed in two ways: 1) conducting regular fire service audits
28 throughout the systems; and 2) metering all private fire service lines. Indiana American

⁹ OUCC Attachment CNS-6, Indiana American's Response to OUCC DR 07-036.

1 appears to be at least *considering* the installation of detector check meters, as seen in
2 response to OUCC Data Request 07-034:

3 Information Requested:

4 Reference Ms. Britto's direct testimony at page 23, does INAWC have any
5 plans to install detector check meters on fire service lines where they do not
6 currently exist? Please explain.

7 Information Provided:

8 INAWC has been having active conversations on the value of adding
9 detector meters, but no final decisions have been made. INAWC is also
10 exploring different types of technology that may be able to be used, such as
11 strap on/clamp on meter.¹⁰

12 **Q: What are your recommendations with regard to private fire services?**

13 A: I recommend that the Commission order Indiana American to begin, over a five-year
14 period, to meter all of its private fire services and conduct private fire service audits of all
15 fire service lines at a minimum five-year interval.

IV. FIELD SERVICE ORDERS

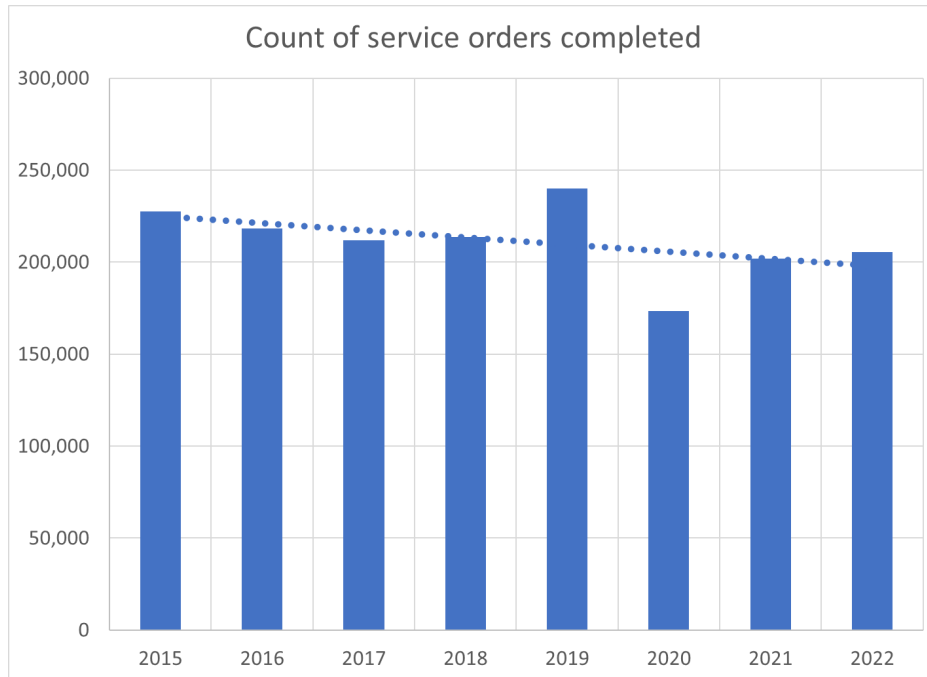
16 **Q: Ms. Britto states at page 24 of her testimony that field service orders are increasing.**
17 **Do you agree?**

18 A: From my review, field service orders do not appear to be increasing. In response to OUCC
19 Data Request 07-037, Indiana American provided a count of field service orders completed
20 for the 2015-2022 timeframe.¹¹ This data suggests that field service orders have
21 cumulatively trended downward, as depicted in Table 2.

¹⁰ OUCC Attachment CNS-7, Indiana American's Response to OUCC DR 07-034.

¹¹ OUCC Attachment CNS-8, Indiana American's Response to DR 07-037.

Table 2



1 **Q: Why is this trend of decreasing service orders important?**

2 A: A trend of decreasing service orders suggests that less time will be spent in the future
3 processing service orders in the field. This will free up field service employees that would
4 otherwise be operating a service truck to visit customers and enable them to perform other
5 functions, such as locating leaks and conducting fire service audits.

6 **Q: Besides the reduction in field service orders, what other activities will be changing to
7 reduce the demand for local field service personnel?**

8 A: The transition to AMI meters should further improve the efficiency of local field service
9 employees. Because these AMI meters will be able to be read remotely by Indiana
10 American staff without manual contact, meter-reading functions will be largely eliminated.
11 Service truck rolls should be reduced as customer service representatives should be able to
12 remotely access instantaneous meter information without the need of a visit to the premise.

1 There will be more time to flush and maintain hydrants, exercise valves, maintain treatment
2 plants, perform leak detection, and fire service audits.

V. CUSTOMER COMMENTS

3 **Q: Did the OUCC receive any customer comments regarding Indiana American's**
4 **proposed rate increase?**

5 A: Yes. These comments are included as Public's Exhibit No. 12.

6 **Q: Please provide excerpts of some of the more concerning comments.**

7 A: Excerpts from the most troublesome comments appear below.

8 "Raising water rates 30% is outrageous when we already pay the highest rates." – Gary
9 customer

10 "I just think that someone needs to think about the working population who don't qualify
11 for low income help." – unknown location

12 "I can't count the water boils we've had since you guys taking over. Half of them with no
13 notice until after the fact or no notice at all." – Lowell customer

14 "This bill is regularly one of the higher utility bills our family bill's..." – West Lafayette
15 customer

16 "Since AIW took over, I have paid for 3,250 gallons not used. Hardly fair or conducive to
17 encouraging conservation. NIPSCO charges a flat "Customer Charge" to cover the fixed
18 costs and then bills for actual consumption of gas and electricity. AIW should be required
19 to bill in this manner also." – Lowell customer

20 "We should not have to pay any improvements that does not directly impact our supply."
21 – unknown location

22 "The Town of Lowell recently sold this utility and immediately after increase our sewer
23 rates, which will double. – Lowell customer

24 "We attended an event this weekend that wanted us to donate to their cause. When we saw
25 that Indiana American Water had sponsored the event, we didn't donate. Why should we
26 subsidize a company that gives away our money?" – Terre Haute customer

27 "We are very water conscious since we do not use water to water our lawns or fill out any
28 pools or to wash our cars. Our water bill still ends up being around \$40 to \$50 a month,
29 and not because of our water usage but because of the extra charges and fees." – Kokomo
30 customer

31 "The people of Indiana should NOT have to cover the cost of Indiana American Water
32 buying up smaller utility companies." – unknown location

1 “Part of the proposal references the cost of acquisitions of competitors, and the citizens of
2 Indiana should not be responsible for subsidizing the cost of one company further
3 monopolizing the market.” – Hamilton county customer

4 “AARP Indiana applauds the company’s concern for low-income customers, by proposing
5 a 30 to 80 percent discount...but while considering the challenges that low-income
6 customers may face, the best way to help customers is to not increase rates 30% in the first
7 place. Then a new rate discount would not be needed.” – Jason Tomcsi, Communications
8 Director, AARP Indiana

9 **Q: Are there any common threads throughout the comments that you have reviewed?**

10 A: Aside from the concerns expressed about rates, I was somewhat surprised to see customer
11 comments addressing the perceived impact of acquisitions by Indiana American and
12 apparent operational issues as exemplified by reference to the boil orders in Lowell.

13 **Q: Did you follow up on any of the expressed concerns?**

14 A: Yes. Given the comment about boil orders in Lowell, I researched the issue. The Lowell
15 system was acquired by Indiana American in 2021 and approved in Cause No. 45550. It
16 has 4,273 customers¹² with approximately 69 miles¹³ of main. Based upon a review of
17 records located on the IDEM Virtual File Cabinet,¹⁴ I was able to determine that Lowell
18 has experienced 28 boil advisories just since January 1, 2023.¹⁵ According to records
19 submitted by Indiana American to IDEM, twelve of these were caused by water main
20 breaks or service line leaks involving as many as 102 customers per occurrence (see Table
21 3 below), while remaining boil advisories appeared to be part of planned work by the utility
22 including water main tie-ins, and valve or fire hydrant replacements or repairs. 521

¹² KCB-2.

¹³ OUCC Attachment CNS-9, Indiana American’s Response to OUCC Data Request 07-005 included electronically (Excel worksheet).

¹⁴ IDEM Virtual File Cabinet found at:

https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_DOC_PAGE&Action=GetTemplatePage&Page=STANDARD_QUERY_PAGE, using the “Alt ID #” of 109133.

¹⁵ OUCC Attachment CNS-10, Lowell boil advisories January 1, 2023 through June 30, 2023.

1 customers, or approximately 12%¹⁶ of Indiana American's Lowell customers, were
2 impacted by main breaks during this six-month period.

Table 3

| Date Issued | Time Issued | Reason | Customers Affected | Area Affected |
|-------------|-------------|------------------|--------------------|---|
| 1/10/2023 | 2:00p | water main break | 25 | Woodland Dr., and Woodland Cir. |
| 1/10/2023 | 4:00p | water main break | 102 | Castle St., Michigan Ave., Burnham St., North St., North Ave., W 177th Ave., Susan Ln., Brookwood Dr., Anne Ave., N Viant St., and Indiana Ave. |
| 1/24/2023 | 6:00p | water main break | 93 | W Commercial Ave, S. Nichols St., N Liberty St., S Liberty St., Parkview Ave., Wood St., E Oakley Ave., Harding Dr., and Washington St |
| 1/31/2023 | 1:45a | water main break | 14 | E Hilltop Ct and Hilltop Ct |
| 1/31/2023 | 6:15p | water main break | 8 | Anne Ave |
| 2/6/2023 | 11:40a | water main break | 63 | North and South Liberty, W Oakley, W Commercial, Parkview Ave, Wood St, Harding Dr, and Washington Street |
| 3/16/2023 | 3:00a | water main break | 84 | Joe Martin Rd., Crestwood Dr., Driftwood Dr., Driftwood Cir., Driftwood Ct., Eastwood Dr., Northwood Dr. |
| 4/4/2023 | 10:45a | water main break | 18 | Flowerhill Dr and East St. |
| 5/9/2023 | 3:30p | service leak | 13 | Lakeland Dr and Jeffrey Dr. |
| 5/10/2023 | 2:15a | water main break | 86 | N Nichols, W & E Main, Liberty, Washington and Commanche |
| 5/15/2023 | 10:30a | water main break | 12 | Halstead St |
| 5/30/2023 | 2:00p | service leak | 3 | 123 S Fremont, 127 S Fremont and 502 E Commercial Ave |

3 **Q: Does the number of boil advisories experienced by Lowell customers appear unusual?**

4 A: Yes, especially for a system of this size. By comparison, over the same period, Wabash, a
5 similarly sized Indiana American system serving 5,051 customers with approximately 80
6 miles of main issued three boil advisories, all for main breaks. Finally, I was unable to find
7 *any* boil water advisories reported to IDEM during the January through June 2020 period,
8 prior to Indiana American acquiring the Lowell system.

9 **Q: Do you have any recommendations regarding the apparent problems in the Lowell**
10 **system?**

11 A: Yes. I recommend that the Commission order Indiana American to evaluate the repeated
12 main failures and resultant boil orders, and provide the Commission with a report as to
13 proposed solutions within 90 days.

¹⁶ 521 / 4,273 = 0.122

VI. RECOMMENDATIONS

1 **Q: Please provide a summary of your recommendations.**

2 A: I recommend that Indiana American do the following:

3 1) increase leak detection efforts throughout its systems, especially in those districts where

4 non-revenue water appears to be increasing;

5 2) begin a program to meter all its fire services, to be completed within five years;

6 3) begin a program to ensure that all private fire services receive fire service audits at least

7 once every five years; and

8 4) evaluate the Lowell system main failures and provide a report to the Commission with

9 proposed solutions.

10 **Q: Does this conclude your testimony?**

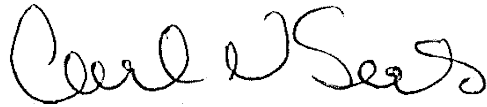
11 A: Yes.

APPENDIX A

1 **Q: Please describe your educational background and experience.**
2 A: In 1981 I graduated from Purdue University, where I received a Bachelor of Science degree
3 in Industrial Management with a minor in Engineering. I was recruited by the Union Pacific
4 Railroad, where I served as mechanical and maintenance supervisor and industrial engineer
5 in both local and corporate settings in St. Louis, Chicago, Little Rock and Beaumont,
6 Texas. I then served as Industrial Engineer for a molded-rubber parts manufacturer before
7 joining the Indiana Utility Regulatory Commission (“IURC”) as Engineer, Supervisor and
8 Analyst for more than ten years. It was during my tenure at the IURC that I received my
9 Master of Health Administration degree from Indiana University and began volunteer and
10 part-time work as Firefighter and Emergency Medical Technician in Marion County. After
11 the IURC, I worked at Indiana-American Water Company, initially in their rates
12 department, then managing their Shelbyville operations for eight years, and later served as
13 Director of Regulatory Compliance and Contract Management for Veolia Water
14 Indianapolis. I joined Citizens Energy Group as Rate & Regulatory Analyst following the
15 October 2011 transfer of the Indianapolis water utility and joined the Office of Utility
16 Consumer Counselor in April of 2016. In March 2020 I was promoted to my current
17 position of Assistant Director of the Water and Wastewater Division. In summary, in
18 addition to working in manufacturing and transportation, I have been working in or with
19 utilities since 1988, more than 35 years.

AFFIRMATION

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

A handwritten signature in black ink, appearing to read "Carl N. Seals", written over a horizontal line.

By: Carl N. Seals
Cause No. 45870
Office of Utility Consumer Counselor (OUCC)

Date: July 21, 2023

Cause No. 45870
OUCC 20-007 Attachment

| 2018 (000's gallons) | | | | | | | | | | | | | | |
|----------------------|-------------------------------|---|-------------------------------------|----------------------------|------------------------------|-------------------|------------------------|---|-----------------------|---------------------------------------|------------------|-----------------|--------------------------|-------|
| District | a. Water Purchased for Resale | b. Water pumped from sources other than purchased water | c. Total Water Pumped and Purchased | d. Water Sold to Customers | e. Total Non - Revenue Water | f. Bachwash Water | g. Main Flushing Water | h. Street Cleaning/Sewer Flushing Water | i. Firefighting Water | j. Other Authorized Consumption Water | k. Water Loss | l. Water Loss % | m. Non - Revenue Water % | |
| Kokomo | | 2,528,919 | 2,528,919 | 2,007,081 | 521,838 | | 12,671 | 9,672 | | 1,512 | 497,983 | 19.7% | 20.6% | |
| Muncie | | 2,812,359 | 2,812,359 | 2,093,219 | 719,140 | | | 14,592 | | 5,587 | 84,061 | 614,900 | 21.9% | 25.6% |
| Richmond | | 1,740,168 | 1,740,168 | 1,715,167 | 25,001 | | | 15,979 | 12 | 434 | 2,615 | 5,961 | 0.3% | 1.4% |
| Somerset | | 6,800 | 6,800 | 4,592 | 2,208 | 45 | | | | | 2 | 2,161 | 31.8% | 32.5% |
| Summitville | | 21,290 | 21,290 | 19,278 | 2,012 | 345 | | | | | 662 | 1,005 | 4.7% | 9.5% |
| Wabash | | 729,216 | 729,216 | 566,593 | 162,623 | 19,080 | | 1,498 | 24 | 24 | 133 | 141,864 | 19.5% | 22.3% |
| Warsaw | | 1,024,952 | 1,024,952 | 988,289 | 36,663 | | | 1,410 | 710 | 700 | 1,117 | 32,726 | 3.2% | 3.6% |
| West Lafayette | | 1,392,380 | 1,392,380 | 1,293,226 | 99,154 | | | 358 | | | 8,399 | 90,397 | 6.5% | 7.1% |
| Winchester | | 194,545 | 194,545 | 169,262 | 25,283 | | | 434 | | 78 | 64 | 24,707 | 12.7% | 13.0% |
| Crawfordsville | | 690,254 | 690,254 | 564,785 | 125,469 | | | 186 | | 35 | 2,535 | 122,713 | 17.8% | 18.2% |
| Waveland | | 15,311 | 15,311 | 12,786 | 2,525 | | | 10 | | | 144 | 2,371 | 15.5% | 16.5% |
| Johnson County | | 3,228,521 | 3,228,521 | 3,091,182 | 137,339 | | | 5,343 | | 966 | 3,583 | 127,447 | 3.9% | 4.3% |
| Mooresville | | 328,179 | 328,179 | 323,541 | 4,638 | | | 1,749 | | 67 | 180 | 2,642 | 0.8% | 1.4% |
| Noblesville | | 1,639,419 | 1,639,419 | 1,515,681 | 123,738 | | | 9,809 | | | 370 | 113,559 | 6.9% | 7.5% |
| Shelbyville | | 1,059,823 | 1,059,823 | 970,942 | 88,881 | | | 1,179 | | 334 | 2,558 | 84,810 | 8.0% | 8.4% |
| Terre Haute | | 3,066,222 | 3,066,222 | 2,341,072 | 725,150 | | | 13,438 | | 1,023 | 36,810 | 673,879 | 22.0% | 23.6% |
| Sullivan | | 203,076 | 203,076 | 170,289 | 32,787 | | | 3,074 | | 55 | 819 | 28,839 | 14.2% | 16.1% |
| Southern IN | 105,872 | 5,318,045 | 5,423,917 | 4,324,180 | 1,099,737 | | | 19 | | 30,000 | 37,893 | 1,031,825 | 19.0% | 20.3% |
| Newburgh | 45,676 | 593,229 | 638,905 | 581,589 | 57,316 | 29,384 | | 9,696 | | 66 | 4,450 | 13,720 | 2.1% | 9.0% |
| Seymour | | 918,554 | 918,554 | 832,527 | 86,027 | 21 | | | 252 | 99 | 682 | 84,973 | 9.3% | 9.4% |
| Northwest | | 14,027,437 | 14,027,437 | 10,388,992 | 3,638,445 | | | 19 | | 29,649 | 17,169 | 3,591,608 | 25.6% | 25.9% |
| Total State | 151,548 | 41,538,699 | 41,690,247 | 33,974,272 | 7,715,975 | 61,546 | 88,465 | 998 | 69,117 | 205,758 | 7,290,091 | 17.5% | 18.5% | |

| 2019 (000's gallons) | | | | | | | | | | | | | | |
|----------------------|-------------------------------|---|-------------------------------------|----------------------------|------------------------------|-------------------|------------------------|---|-----------------------|---------------------------------------|------------------|-----------------------|--------------------------|-------|
| District | a. Water Purchased for Resale | b. Water pumped from sources other than purchased water | c. Total Water Pumped and Purchased | d. Water Sold to Customers | e. Total Non - Revenue Water | f. Bachwash Water | g. Main Flushing Water | h. Street Cleaning/Sewer Flushing Water | i. Firefighting Water | j. Other Authorized Consumption Water | k. Water Loss | l. Water Loss Percent | m. Non - Revenue Water % | |
| Kokomo | | 2,604,790 | 2,604,790 | 1,990,515 | 614,275 | | 15,330 | | | | 598,945 | 23.0% | 23.6% | |
| Muncie | | 2,953,892 | 2,953,892 | 1,964,237 | 989,655 | | 20,273 | | 65 | 95,442 | 873,875 | 29.6% | 33.5% | |
| Richmond | | 1,776,069 | 1,776,069 | 1,580,263 | 195,806 | | 14,640 | 25 | 153 | 307 | 180,681 | 10.2% | 11.0% | |
| Somerset | | 4,170 | 4,170 | 4,246 | (76) | 53 | | | | | (129) | -3.1% | -1.8% | |
| Summitville | | 21,290 | 21,290 | 17,987 | 3,303 | 285 | | 270 | | 160 | 648 | 1,770 | 8.3% | 15.5% |
| Wabash | | 686,295 | 686,295 | 554,236 | 132,059 | 20,041 | | 575 | 14 | 65 | 3,476 | 107,888 | 15.7% | 19.2% |
| Warsaw | | 1,012,256 | 1,012,256 | 980,286 | 31,970 | | 3,593 | 120 | | 660 | 3,364 | 24,233 | 2.4% | 3.2% |
| West Lafayette | | 1,435,722 | 1,435,722 | 1,298,784 | 136,938 | | 4,915 | | | 52 | 5,582 | 126,389 | 8.8% | 9.5% |
| Winchester | | 189,176 | 189,176 | 161,846 | 27,330 | | | 7 | | 84 | 510 | 26,729 | 14.1% | 14.4% |
| Crawfordsville | | 709,285 | 709,285 | 617,142 | 92,143 | | 953 | | | 14 | 691 | 90,485 | 12.8% | 13.0% |
| Waveland | | 16,578 | 16,578 | 11,827 | 4,751 | | 49 | | | | 2,061 | 2,641 | 15.9% | 28.7% |
| Johnson County | | 3,252,437 | 3,252,437 | 2,986,038 | 266,399 | | 23,569 | | 17,300 | 3,079 | 222,451 | 6.8% | 8.2% | |
| Mooresville | | 324,791 | 324,791 | 323,799 | 992 | | 1,732 | | 108 | 115 | (963) | -0.3% | 0.3% | |
| Noblesville | | 1,698,217 | 1,698,217 | 1,541,036 | 157,181 | | 13,450 | | 96 | 15 | 143,620 | 8.5% | 9.3% | |
| Shelbyville | | 1,035,604 | 1,035,604 | 970,684 | 64,920 | | 1,791 | | 300 | 143 | 62,686 | 6.1% | 6.3% | |
| Terre Haute | | 2,932,031 | 2,932,031 | 2,323,308 | 608,723 | | 13,112 | | 3,790 | 36,641 | 555,180 | 18.9% | 20.8% | |
| Sullivan | | 230,395 | 230,395 | 173,494 | 56,901 | | 420 | | 1,000 | 1,518 | 53,963 | 23.4% | 24.7% | |
| Southern IN | | 5,794,769 | 5,794,769 | 4,516,442 | 1,278,327 | | 54,358 | | | 50,530 | 1,173,439 | 20.2% | 22.1% | |
| Newburgh | 44,918 | 621,667 | 666,585 | 560,743 | 105,842 | 12,895 | | 1,964 | | 410 | 90,573 | 13.6% | 15.9% | |
| Seymour | | 926,228 | 926,228 | 850,687 | 75,541 | | 2,945 | | 6 | 25 | 8,150 | 64,415 | 7.0% | 8.2% |
| Northwest | | 13,836,232 | 13,836,232 | 10,056,901 | 3,779,331 | | 67,650 | | 1,443 | 66,158 | 3,644,080 | 26.3% | 27.3% | |
| Total State | 44,918 | 42,061,894 | 42,106,812 | 33,484,502 | 8,622,310 | 33,274 | 241,589 | 332 | 25,325 | 278,840 | 8,042,950 | 19.1% | 20.5% | |

*Somerset found a meter issue on the effluent meter when calibrating meters

Cause No. 45870
OUCC 20-007 Attachment

| 2020 (000's gallons) | | | | | | | | | | | | | | |
|----------------------|-------------------------------|---|-------------------------------------|----------------------------|------------------------------|-------------------|------------------------|---|-----------------------|---------------------------------------|------------------|-----------------------|--------------------------|-------|
| District | a. Water Purchased for Resale | b. Water pumped from sources other than purchased water | c. Total Water Pumped and Purchased | d. Water Sold to Customers | e. Total Non - Revenue Water | f. Bachwash Water | g. Main Flushing Water | h. Street Cleaning/Sewer Flushing Water | i. Firefighting Water | j. Other Authorized Consumption Water | k. Water Loss | l. Water Loss Percent | m. Non - Revenue Water % | |
| Kokomo | | 2,494,043 | 2,494,043 | 1,912,740 | 581,303 | | 20,506 | | 1,150 | 2,150 | 557,497 | 22.4% | 23.3% | |
| Muncie | | 2,833,384 | 2,833,384 | 1,969,465 | 863,919 | | 39,249 | | 223 | 55,328 | 769,119 | 27.1% | 30.5% | |
| Richmond | | 1,841,950 | 1,841,950 | 1,395,722 | 446,228 | | 11,682 | 23 | 572 | 3,042 | 430,909 | 23.4% | 24.2% | |
| Somerset | | 4,422 | 4,422 | 4,558 | (136) | 50 | | | | | (186) | -4.2% | -3.1% | |
| Summitville | | 20,354 | 20,354 | 17,636 | 2,718 | 420 | 130 | 220 | 330 | 729 | 889 | 4.4% | 13.4% | |
| Wabash | | 668,851 | 668,851 | 563,797 | 105,054 | 18,479 | 10,223 | 22 | 248 | 342 | 75,740 | 11.3% | 15.7% | |
| Warsaw | | 1,014,637 | 1,014,637 | 895,103 | 119,534 | | 700 | | 380 | 1,399 | 117,055 | 11.5% | 11.8% | |
| West Lafayette | | 1,498,969 | 1,498,969 | 1,372,551 | 126,418 | | 5,214 | | | 1,930 | 119,274 | 8.0% | 8.4% | |
| Winchester | | 183,967 | 183,967 | 154,107 | 29,860 | | 21 | 9 | 128 | 865 | 28,837 | 15.7% | 16.2% | |
| Crawfordsville | | 678,100 | 678,100 | 573,145 | 104,955 | 18,290 | 841 | | 31 | 5,244 | 80,549 | 11.9% | 15.5% | |
| Waveland | | 15,668 | 15,668 | 11,263 | 4,405 | 579 | 171 | | | 996 | 2,659 | 17.0% | 28.1% | |
| Johnson County | | 3,283,568 | 3,283,568 | 3,002,386 | 281,182 | | 26,555 | | 5,427 | 2,571 | 246,629 | 7.5% | 8.6% | |
| Mooreville | | 329,116 | 329,116 | 328,450 | 666 | | | | 23 | 249 | (2,110) | -0.6% | 0.2% | |
| Noblesville | | 1,695,806 | 1,695,806 | 1,590,337 | 105,469 | | 16,903 | | 326 | | 88,240 | 5.2% | 6.2% | |
| Shelbyville | | 1,138,069 | 1,138,069 | 1,017,753 | 120,316 | | 3,783 | | 25 | 42 | 116,466 | 10.2% | 10.6% | |
| Terre Haute | | 2,741,281 | 2,741,281 | 2,250,509 | 490,772 | | 3,588 | | 3,416 | 27,120 | 456,648 | 16.7% | 17.9% | |
| Sullivan | | 241,767 | 241,767 | 176,038 | 65,729 | | 310 | | 2,210 | 2,553 | 60,656 | 25.1% | 27.2% | |
| Southern IN | | 5,449,995 | 5,449,995 | 4,402,479 | 1,047,516 | | 15,049 | | 3,364 | 636 | 1,028,467 | 18.9% | 19.2% | |
| Newburgh | 46,604 | 661,581 | 708,185 | 554,995 | 153,190 | 3,073 | 666 | | | 7 | 149,444 | 21.1% | 21.6% | |
| Seymour | | 900,287 | 930,051 | (29,764) | | 26,472 | 6,839 | | | 44 | 129 | (63,248) | -7.0% | -3.3% |
| Northwest | | 13,525,719 | 13,525,719 | 10,266,275 | 3,259,444 | | 197,256 | | 176 | 89,178 | 2,972,834 | 22.0% | 24.1% | |
| Total State | 46,604 | 41,221,534 | 41,268,138 | 33,389,362 | 7,878,776 | 67,363 | 362,190 | 274 | 18,073 | 194,510 | 7,236,366 | 17.5% | 19.1% | |

*Somerset found a meter issue on the effluent meter when calibrating meters

| 2021 (000's gallons) | | | | | | | | | | | | | |
|----------------------|-------------------------------|---|-------------------------------------|----------------------------|------------------------------|-------------------|------------------------|---|-----------------------|---------------------------------------|------------------|-----------------------|--------------------------|
| District | a. Water Purchased for Resale | b. Water pumped from sources other than purchased water | c. Total Water Pumped and Purchased | d. Water Sold to Customers | e. Total Non - Revenue Water | f. Bachwash Water | g. Main Flushing Water | h. Street Cleaning/Sewer Flushing Water | i. Firefighting Water | j. Other Authorized Consumption Water | k. Water Loss | l. Water Loss Percent | m. Non - Revenue Water % |
| Kokomo | | 2,486,274 | 2,486,274 | 1,912,868 | 573,406 | - | 22,500 | | 1,450 | 1,625 | 547,831 | 22.0% | 23.1% |
| Muncie | | 2,443,539 | 2,443,539 | 1,844,555 | 598,984 | - | 36,161 | | 233 | 49,363 | 513,227 | 21.0% | 24.5% |
| Richmond | | 1,873,942 | 1,873,942 | 1,367,521 | 506,421 | - | 8,445 | | 10 | 639 | 497,327 | 26.5% | 27.0% |
| Somerset | | 5,238 | 5,238 | 4,553 | 685 | - | | | | | 685 | 13.1% | 13.1% |
| Summitville | | 20,108 | 20,108 | 17,985 | 2,123 | - | | | | | 2,123 | 10.6% | 10.6% |
| Wabash | | 768,478 | 768,478 | 608,773 | 159,705 | - | 1,123 | 50 | 300 | 1,000 | 157,232 | 20.5% | 20.8% |
| Warsaw | | 1,137,829 | 1,137,829 | 905,382 | 232,447 | - | 3,429 | | 300 | 1,936 | 226,782 | 19.9% | 20.4% |
| West Lafayette | | 1,590,510 | 1,590,510 | 1,377,150 | 213,360 | - | 8,194 | | | 1,807 | 203,359 | 12.8% | 13.4% |
| Winchester | | 178,592 | 178,592 | 146,944 | 31,648 | - | 200 | 5 | 89 | 75 | 31,279 | 17.5% | 17.7% |
| Crawfordsville | | 669,173 | 669,173 | 535,023 | 134,150 | - | 984 | | 120 | 611 | 132,435 | 19.8% | 20.0% |
| Waveland | | 17,610 | 17,610 | 11,706 | 5,904 | - | 278 | | | 608 | 5,018 | 28.5% | 33.5% |
| Johnson County | | 3,254,304 | 3,254,304 | 2,969,648 | 284,656 | - | 18,271 | 90 | 150 | 287 | 265,858 | 8.2% | 8.7% |
| Mooreville | | 315,133 | 315,133 | 287,965 | 27,168 | - | 3,415 | | | 20 | 23,733 | 7.5% | 8.6% |
| Noblesville | | 1,676,065 | 1,676,065 | 1,602,113 | 73,952 | - | 3,293 | | 59 | | 70,600 | 4.2% | 4.4% |
| Shelbyville | | 1,342,639 | 1,342,639 | 1,112,321 | 230,318 | - | 3,503 | | | 4,022 | 222,793 | 16.6% | 17.2% |
| Terre Haute | | 2,676,266 | 2,676,266 | 2,171,629 | 504,637 | - | 13,580 | | 652 | 45,971 | 444,434 | 16.6% | 18.9% |
| Sullivan | | 222,113 | 222,113 | 150,226 | 71,887 | - | 1,178 | | 45 | 20,670 | 49,994 | 22.5% | 32.4% |
| Southern IN | | 5,735,194 | 5,735,194 | 4,539,298 | 1,195,896 | - | 11,811 | | 3,600 | | 1,180,485 | 20.6% | 20.9% |
| Newburgh | 46,488 | 698,870 | 745,358 | 593,624 | 151,734 | - | 60 | | | 536 | 151,138 | 20.3% | 20.4% |
| Seymour | | 913,921 | 913,921 | 806,968 | 106,953 | - | 3,953 | 122 | 76 | | 102,802 | 11.2% | 11.7% |
| Northwest | | 13,337,002 | 13,337,002 | 10,116,542 | 3,220,460 | - | 202,422 | | 3,077 | | 3,014,961 | 22.6% | 24.1% |
| Lowell | | 2,467 | 2,467 | | 2,467 | - | | | | | 2,467 | 100.0% | 100.0% |
| Total State | 46,488 | 41,365,267 | 41,409,288 | 33,082,794 | 8,328,961 | - | 342,800 | 267 | 10,161 | 129,170 | 7,846,563 | 18.9% | 20.1% |

*bills in Lowell did not go out until 2022

Cause No. 45870
OUCC 20-007 Attachment

| District | 2022 (000's gallons) | | | | | | | | | | | | |
|--------------------|-------------------------------|---|-------------------------------------|----------------------------|------------------------------|-------------------|------------------------|---|-----------------------|---------------------------------------|------------------|-----------------------|--------------------------|
| | a. Water Purchased for Resale | b. Water pumped from sources other than purchased water | c. Total Water Pumped and Purchased | d. Water Sold to Customers | e. Total Non - Revenue Water | f. Bachwash Water | g. Main Flushing Water | h. Street Cleaning/Sewer Flushing Water | i. Firefighting Water | j. Other Authorized Consumption Water | k. Water Loss | l. Water Loss Percent | m. Non - Revenue Water % |
| Kokomo | | 2,694,493 | 2,694,493 | 1,985,844 | 708,649 | - | 38,929 | | 9,210 | 18,000 | 642,510 | 23.8% | 26.3% |
| Muncie | | 2,481,945 | 2,481,945 | 1,916,920 | 565,025 | - | 16,485 | | 150 | 8,000 | 540,390 | 21.8% | 22.8% |
| Richmond | | 1,922,051 | 1,922,051 | 1,414,458 | 507,593 | - | 5,300 | 28 | 590 | | 501,675 | 26.1% | 26.4% |
| Somerset | | 6,050 | 6,050 | 4,963 | 1,087 | - | | | 30 | | 1,057 | 17.5% | 18.0% |
| Summitville | | 19,979 | 19,979 | 17,585 | 2,394 | - | 225 | | | | 2,169 | 10.9% | 12.0% |
| Wabash | | 697,284 | 697,284 | 604,769 | 92,515 | - | 3,215 | | 750 | | 88,550 | 12.7% | 13.3% |
| Warsaw | | 1,214,435 | 1,214,435 | 930,266 | 284,169 | - | 3,708 | | 650 | 5,130 | 274,681 | 22.6% | 23.4% |
| West Lafayette | | 1,600,938 | 1,600,938 | 1,410,133 | 190,805 | - | 108 | | 55 | 3,064 | 187,578 | 11.7% | 11.9% |
| Winchester | | 204,881 | 204,881 | 154,874 | 50,007 | - | | | | | 50,007 | 24.4% | 24.4% |
| Crawfordsville | | 701,518 | 701,518 | 516,678 | 184,840 | - | 1,038 | | 330 | 4,224 | 179,248 | 25.6% | 26.3% |
| Waveland | | 15,568 | 15,568 | 10,340 | 5,228 | - | 82 | | 189 | 955 | 4,002 | 25.7% | 33.6% |
| Johnson County | | 3,879,379 | 3,879,379 | 2,984,687 | 894,692 | - | 26,525 | | 515 | 1,500 | 866,152 | 22.3% | 23.1% |
| Mooresville | | 328,215 | 328,215 | 300,150 | 28,065 | - | 2,195 | 604 | 200 | | 25,066 | 7.6% | 8.6% |
| Noblesville | | 1,772,998 | 1,772,998 | 1,642,118 | 130,880 | - | 9,614 | 138 | | | 121,128 | 6.8% | 7.4% |
| Shelbyville | | 1,436,731 | 1,436,731 | 1,149,347 | 287,384 | - | 3,772 | | | 961 | 282,651 | 19.7% | 20.0% |
| Terre Haute | | 2,728,861 | 2,728,861 | 2,224,851 | 504,010 | - | 27,178 | | 662 | 37,808 | 438,362 | 16.1% | 18.5% |
| Sullivan | | 228,090 | 228,090 | 146,986 | 81,104 | - | 2,878 | | 40 | 19,028 | 59,158 | 25.9% | 35.6% |
| Southern IN | | 5,777,160 | 5,777,160 | 4,589,244 | 1,187,916 | - | 28,475 | | | | 1,159,441 | 20.1% | 20.6% |
| Newburgh | 50,007 | 697,285 | 747,292 | 603,959 | 143,333 | - | 2,257 | | | | 141,076 | 18.9% | 19.2% |
| Seymour | | 880,278 | 880,278 | 827,161 | 53,117 | - | 3,662 | 114 | 102 | | 49,239 | 5.6% | 6.0% |
| Northwest | | 12,989,322 | 12,989,322 | 10,116,758 | 2,872,564 | - | 41,534 | | 144 | 3,414 | 2,827,472 | 21.8% | 22.1% |
| Lowell | | 338,946 | 338,946 | 166,102 | 172,844 | - | 3,461 | 1,000 | | | 168,383 | 49.7% | 51.0% |
| Total State | 50,007 | 42,123,347 | 42,173,354 | 33,718,192 | 8,948,222 | - | 220,641 | 1,884 | 13,617 | 102,084 | 8,609,996 | 20.4% | 21.2% |

OUCC 07-031

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

Information Requested:

Reference Ms. Britto's direct testimony at page 22, beyond "mobile acoustic listening devices," what is INAWC doing to enhance its leak detection efforts?

Information Provided:

Leak detection efforts are limited due to limited staffing in INAWC's districts and other competing responsibilities, such as increased customer service orders and utility locates. INAWC also has limited employees with any familiarity with leak detection equipment and practices due to the inability to cross-train considering staffing levels. The Company plans to repurpose some of the work that will be contracted out for locates to focus on leak detection by training employees and conducting fire service audits as well as cross connection audits across the state. INAWC also plans to utilize GIS mapping to create zones in the system to focus in on specific areas with high water loss rates. INAWC plans to utilize water audits to focus on what areas need the most attention.

OUCG 38-007

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

Information Requested:

Please describe any plans Indiana American has to reduce the level of non-revenue water in its districts.

Information Provided:

Please refer to the testimony of Kari Britto starting on page 22, line 10. In addition, the Company is utilizing water audits that are completed and filed with the Indiana Finance Authority.

OUCC 38-008

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

Information Requested:

What level (percentage) of non-revenue water does Indiana American believe to be acceptable?

Information Provided:

There will always be a level of NRW in any system; this is due to such things as leaks, flushing of the system, billing adjustments and fire services usage. Indiana American uses the AWWA water audits turned in to the Indiana Finance Authority to monitor water loss numbers in the various districts as well as overall accounted and unaccounted water numbers by district. Indiana American does not have an “acceptable” number for NRW, as it is continuously being analyzed and evaluated for what can be done to drive the number down. IDEM does use a figure of 25% as the unaccounted water numbers the Company cannot exceed to ensure it does not get a deficiency.

Public Notification

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

ESTE INFORME CONTIENE INFORMACION MUY IMPORTANTE SOBRE SU AGUA DE BEBER. TRADUZCALO O HABLE CON ALGUIEN QUE LO ENTIENDA BIEN.

Significant Deficiency Received for the Georgetown Operations

Our water system received a significant deficiency during a regulatory inspection in 2022. Even though this is not an emergency, as our customers, you have a right to know what happened and what we did to correct this situation.

What happened?

As a public water system, we are required to maintain our water loss under 25%. It was determined during a February 17, 2022 inspection that our water loss was greater than 25%.

What's being done?

Georgetown Operations is taking the following steps to address our water loss issue:

- Regular system monitoring to detect leaks so that they may be addressed timely, thus reducing the amount of water loss.
- Continued change out of meters that are slowing or have completely stopped so that actual water usage is accurately recorded.
- Continued adherence to our length of service program (LOS), replacing meters as their age runs out and accuracy of water usage decreases.
- Continued identification of connections that are not being billed.
- Continued recording of all accounted for water loss including flushing, main breaks, known leaks, and fire usage.
- Continued monitoring of inactive with consumption on meters.
- Continued annual testing of flow meters at the plant to ensure the accurate account of water usage.
- Track Ramsey Water master meter flow data to make sure we keep accurate readings of the flow at our point of entry into the distribution system.

What should I do?

There is nothing you need to do at this time.

Public Notification

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

ESTE INFORME CONTIENE INFORMACION MUY IMPORTANTE SOBRE SU AGUA DE BEBER. TRADUZCALO O HABLE CON ALGUIEN QUE LO ENTIENDA BIEN.

Significant Deficiency Received for the Lowell Operations

While under the ownership of the Town of Lowell your water system received two significant deficiencies during a regulatory inspection in 2021. Even though this is not an emergency, as our customers, you have a right to know what happened and what is being done to correct this situation.

What happened?

All public water systems are required to maintain a water loss calculation of under 25%. It was determined during a June 10st, 2021 inspection that the Town of Lowell had a water loss of 31%.

What's being done?

Lowell Operations is taking the following steps to address the water loss issue:

- Regular system monitoring to detect leaks so that they may be addressed timely, thus reducing the amount of water loss.
- Continued change out of meters that are slowing or have completely stopped so that actual water usage is accurately recorded.
- Continued adherence to our length of service program (LOS), replacing meters as their age runs out and accuracy of water usage decreases.
- Continued identification of connections that are not being billed.
- Continued recording of all accounted for water loss including flushing, main breaks, known leaks, and fire usage.
- Continued monitoring of inactive with consumption on meters.
- Continued annual testing of flow meters at the plant to ensure the accurate account of treated water usage.

What should I do?

There is nothing you need to do at this time.

Public Notification

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

ESTE INFORME CONTIENE INFORMACION MUY IMPORTANTE SOBRE SU AGUA DE BEBER. TRADUZCALO O HABLE CON ALGUIEN QUE LO ENTIENDA BIEN.

Significant Deficiency Received for the Mecca Operations

Our water system received a significant deficiency during a regulatory inspection in 2021. Even though this is not an emergency, as our customers, you have a right to know what happened and what we did to correct this situation.

What happened?

As a public water system, we are required to maintain our water loss under 25%. It was determined during a March 1st, 2021 inspection that our water loss is 36%.

What's being done?

Mecca Operations is taking the following steps to address our water loss issue:

- Regular system monitoring to detect leaks so that they may be addressed timely, thus reducing the amount of water loss.
- Continued change out of meters that are slowing or have completely stopped so that actual water usage is accurately recorded.
- Continued adherence to our length of service program (LOS), replacing meters as their age runs out and accuracy of water usage decreases.
- Continued identification of connections that are not being billed.
- Continued recording of all accounted for water loss including flushing, main breaks, known leaks, and fire usage.
- Continued monitoring of inactive with consumption on meters.
- Continued annual testing of flow meters at the plant to ensure the accurate account of treated water usage.

What should I do?

There is nothing you need to do at this time.

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ESTE INFORME CONTIENE INFORMACION MUY IMPORTANTE SOBRE SU AGUA DE BEBER. TRADUZCALO O HABLE CON ALGUIEN QUE LO ENTIENDA BIEN.

Significant Deficiency Received for the Sullivan Operations

Our water system received a significant deficiency during a regulatory inspection in 2021. Even though this is not an emergency, as our customers, you have a right to know what happened and what we did to correct this situation.

What happened?

As a public water system, we are required to maintain our water loss under 25%. It was determined during a March 1st, 2021 inspection that our water loss was greater than 25%.

What's being done?

Sullivan Operations is taking the following steps to address our water loss issue:

- Regular system monitoring to detect leaks so that they may be addressed timely, thus reducing the amount of water loss.
- Continued change out of meters that are slowing or have completely stopped so that actual water usage is accurately recorded.
- Continued adherence to our length of service program (LOS), replacing meters as their age runs out and accuracy of water usage decreases.
- Continued identification of connections that are not being billed.
- Continued recording of all accounted for water loss including flushing, main breaks, known leaks, and fire usage.
- Continued monitoring of inactive with consumption on meters.
- Continued annual testing of flow meters at the plant to ensure the accurate account of treated water usage.

What should I do?

There is nothing you need to do at this time.

OUCC 38-002

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

Information Requested:

Reference Indiana American's response to OUCC Data Request 12-016, what percentage of INAWC's private fire services are metered?

Information Provided:

36%

OUCC 07-036

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

Information Requested:

When unauthorized usage is detected on a fire service line, what if any efforts does INAWC make to recover the cost of water used?

Information Provided:

The Company would first conduct an audit to understand where the unauthorized usage is coming from. Once discovered, a conversation with the customer on correcting the issue (i.e., corrections in the case of a leak or conversations on next steps if theft of service is discovered) occurs. While it can be difficult to collect and recover the cost of the lost water since many fire services don't include meters, Indiana American has at times, while working with the customer, estimated the water that was used. In some larger audits where the company uncovered the customer filling up tanks, Indiana American identified the actual usage amount and billed the customer. In addition, Indiana American has, on occasion, ultimately decided to add a meter in front of the domestic and fire service split and meter all water in instances where the customer refuses to correct the issues with their plumbing.

OUCC 07-034

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

Information Requested:

Reference Ms. Britto's direct testimony at page 23, does INAWC have any plans to install detector check meters on fire service lines where they do not currently exist? Please explain.

Information Provided:

INAWC has been having active conversations on the value of adding detector meters, but no final decisions have been made. INAWC is also exploring different types of technology that may be able to be used, such as strap on/clamp on meter.

OUCC 07-037

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

Information Requested:

Reference Ms. Britto's direct testimony at page 24, noting that field service orders have risen, "in part, because non-essential frontline service work was deferred from March 2020 through December 2021, please list the number of field service orders performed each year for the period 2015 - 2022.

Information Provided:

Please see completed service orders below.

| Years | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
|-----------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Count of Service orders completed | 227,616 | 218,143 | 211,761 | 213,489 | 239,987 | 173,312 | 201,869 | 205,317 |

Please note that these service orders do not include the increased locates that are also being performed. These are customer service/field service orders only.

*OUCC ATTACHMENT CNS-9
ARE FILED AS EXCEL DOCUMENTS*

Lowell Boil Advisories

1/1/23-6/30/23

| Date Issued | Time Issued | Reason | Customers Affected | Area Affected |
|-------------|-------------|------------------------------|--------------------|---|
| 1/3/2023 | 12:30p | water main tie-in | 31 | Kankakee Ave, Prairie St and Center St |
| 1/4/2023 | 1:45p | water main tie-in | 31 | Kankakee Ave, Prairie St and Center St |
| 1/6/2023 | 1:00p | water main tie-in | 12 | N Fremont St., E Commercial Ave, Jefferson Ave & E Main St |
| 1/9/2023 | 7:00p | water main tie-in | 93 | Burnham St. south of Michigan Ave, Circle Dr., Cottage Grove Ave., Kankakee Ave., Oak St., Harrison St., and everyone south of 238 and 233 N Viant St |
| 1/10/2023 | 2:00p | water main break | 25 | Woodland Dr., and Woodland Cir. |
| 1/10/2023 | 4:00p | water main break | 102 | Castle St., Michigan Ave., Burnham St., North St., North Ave., W 177th Ave., Susan Ln., Brookwood Dr., Anne Ave., N Viant St., and Indiana Ave. |
| 1/11/2023 | 1:30p | valve repair | 49 | Burnham St, Kankakee Ave |
| 1/11/2023 | 3:15p | water main tie-in | 82 | E Commercial Ave, North and South Union, Castle St, Lincoln Ave., Franklin St., Library Dr., E Oakley Ave. & S Fremont |
| 1/18/2023 | 12:20p | fire hydrant replacement | 4 | North Avenue and North Street |
| 1/23/2023 | 2:30p | planned outage | 121 | N. Nichols St, S. Nichols St., W Commercial Ave., N Liberty St., S Liberty St., Parkview Ave., Wood St., and E Oakley Ave |
| 1/24/2023 | 6:00p | water main break | 93 | W Commercial Ave, S. Nichols St., N Liberty St., S Liberty St., Parkview Ave., Wood St., E Oakley Ave., Harding Dr., and Washington St |
| 1/31/2023 | 11:45a | water main break | 14 | E Hilltop Ct and Hilltop Ct |
| 1/31/2023 | 6:15p | water main break | 8 | Anne Ave |
| 2/6/2023 | 11:40a | water main break | 63 | North and South Liberty, W Oakley, W Commercial, Parkview Ave, Wood St, Harding Dr, and Washington Street |
| 3/16/2023 | 3:00a | water main break | 84 | Joe Martin Rd., Crestwood Dr., Driftwood Dr., Driftwood Cir., Driftwood Ct., Eastwood Dr., Northwood Dr. |
| 3/21/2023 | 5:37p | hydrant & valve replacements | 24 | Cottage Grove Ave, E Main St., N Union St., & Castle St |
| 4/4/2023 | 10:45a | water main break | 18 | Flowerhill Dr and East St. |
| 4/12/2023 | 12:45p | hydrant & valve replacements | 14 | Lincoln, S Viant, E Commercial Ave |
| 5/9/2023 | 3:30p | service leak | 13 | Lakeland Dr and Jeffrey Dr. |
| 5/10/2023 | 2:15a | water main break | 86 | N Nichols, W & E Main, Liberty, Washington and Commanche |
| 5/11/2023 | 11:50a | water main tie-in | 27 | N Union St., Michigan Ave, Illinois Ave and Cottage Grove Ave |
| 5/15/2023 | 10:30a | water main break | 12 | Halstead St |
| 5/15/2023 | 3:00p | water main tie-in | 47 | E Main St., N Union St., Castle St., Cottage Grove Ave., Illinois Ave., and Michigan Ave. |
| 5/16/2023 | 1:50p | water main tie-in | 64 | W Main St., N Liberty St., Washington St |
| 5/30/2023 | 2:00p | service leak | 3 | 123 S Fremont, 127 S Fremont and 502 E Commercial Ave |
| 6/23/2023 | 11:00a | fire hydrant replacement | 2 | McConnell Ave |
| 6/28/2023 | 2:00p | fire hydrant replacement | 14 | Cherokee Dr |
| 6/26/2023 | 11:30a | fire hydrant replacement | 140 | Commercial Ave, Spring Run Estates |

Source: IDEM Virtual File Cabinet