INDIANA
AMERICAN WATER

John J. Reichart
Corporate Counsel
727 Craig Road
Creve Coeur, Missouri 63141

T +1 314 996 2287
F +1 314 997 2451
E john.reichart@amwater.com
I www.amwater.com

October 21, 2009

Indiana Utility Regulatory Commission
Attention: Secretary of the Commission

Pursuant to 170 IAC 6-1-10 (c), Indiana American Water Company files this request for a variance from the meter inspection, test, and replacement schedule requirements set forth in 170 IAC 6-1-10 (b). 170 IAC 6-1-10 (c) states in relevant part; *If a utility can furnish evidence that the method outlined in subsection (b) is not necessary, an alternative testing method may be used is submitted to and approved by the commission through the commission's (30) day administrative filing procedure.* This submission is being made pursuant to 170 IAC 1-6-1 *et seq.*

Under the requirements of IAC 6-1-10 (b), the testing cycles for the various sized meters are based on volumetric usage and years of service. IAWC proposes to modify the years of service element of this meter testing cycle as follows:

SIZE	**CURRENT (per subpart (b)**	**PROPOSED CHANGE**[1]
5/8" meters	10 yrs or 100,000 ccf	15 yrs or 100,000 ccf
5/8 x 3/4"	10 yrs or 100,000 ccf	15 yrs or 100,000 ccf
3/4"	8 yrs or 150,000 ccf	12 yrs or 150,000 ccf
1"	6 yrs or 150,000 ccf	10 yrs or 150,000 ccf

It is the company's position that the method set forth in subsection (b) is not necessary. As evidenced by the information provided with this letter, meters utilized by IAWC, are of a type that has been shown to maintain reading accuracy for time periods consistent with IAWC proposal. Further, it is the position of the company that its requested change will result in investment efficiencies with no adverse impacts on customer service.

In support of this request, IAWC is providing the following documentation:

Attachment A1: The Final Order and Commission Docket number 08-0277. In this proceeding before the Illinois Commerce Commission, Illinois American Water Company was granted authority to extend its meter testing cycle from 10 to 15 years. Indiana American Water Company utilizes the same type of meters as those referenced in this proceeding.

Attachment A2: Direct Testimony of Barry Suits in ICC Docket 08-0277.

[1] IAWC is not proposing a change to the current volumetric usage measures.

Attachment B: The testimony of Indiana Office of Utility Consumer Counselor Witness Roger A. Pettijohn. Filed in Cause 43187.

Attachment C: The Company's verified statement proving notice as required by 170 IAC 1-6-6. The publisher affidavit will be provided when received.

If there are questions about this submission, please contact the following:

Stacy R Sagar
Director - Field Operations
Indiana American Water
555 E County Line Rd
Greenwood, Indiana 46143
Office: 317.885.2447
email: stacy.sagar@amwater.com

Respectfully submitted,

John J. Reichart

cc. Indiana Office of Utility Consumer Counselor

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois-American Water Company	:	
	:	
Petition for Review of the 15-Year	:	
Period for Meter Testing in Illinois-	:	**08-0277**
American Water Company's	:	
Champaign District.	:	

ORDER

By the Commission:

In this proceeding, Illinois-American Water Company ("Illinois-American," "Company" or "IAWC") filed, with the Illinois Commerce Commission ("Commission"), a verified petition requesting "that the Commission, in accordance with the Order entered in Docket 05-0691/06-0094/06-0095 (Cons.), initiate a review regarding whether the fifteen (15) year meter testing variance is appropriate for IAWC's Champaign District."

Pursuant to due notice, hearings were held in this matter before a duly authorized administrative law judge of the Commission at its offices in Springfield, Illinois. Appearances were entered by respective counsel for IAWC and the Commission ("Staff"). No other appearances were entered at the hearings and no intervening petitions were filed.

IAWC presented the testimony of Rich Kerckhove, Manager, Rates and Regulations, and Barry Suits, Operations Manager of the Champaign District. William H. Atwood, Jr., a Water Engineer in the Water Department of the Commission's Financial Analysis Division, testified on behalf of the Staff. At the conclusion of the hearings, the record was marked "Heard and Taken."

Applicable Authority

83 Illinois Administrative Code 600 ("Part 600") contains standards of service for water utilities. Section 600.340, "Frequency of Tests," provides in part:

> Unless otherwise approved by the Commission, each service water meter shall be periodically inspected and tested in accordance with the following schedule, or as often as the results may warrant, to insure that the meter accuracy is maintained within the limits set out in Section 600.310:
>
> ⅝ inch meter – 10 years or for each 100,000 cubic feet registered
> ¾ inch meter – 6 years or for each 300,000 cubic feet registered

1 inch meter – 6 years or for each 300,000 cubic feet registered
Meter 1½ inch and over – 4 years

Section 600.60, "Modification or Exemption from Rules," provides as follows:

> If hardship results from the application of any rule herein prescribed, or if unusual difficulty is involved in complying with any rule or otherwise upon good cause shown, a formal application or written request, as may be appropriate under the circumstances, may be made to the Commission for the modification of the particular rule or for an exemption from its provision. Upon good cause shown the Commission may then modify that rule or provide an exemption for that utility.

Background; IAWC Proposals

Illinois-American is an Illinois corporation and a public utility within the meaning of Section 3-105 of the Act. Illinois-American provides water service in various communities in Illinois, including the Champaign area in Champaign County.

In Docket No. 76-0491, the Commission authorized IAWC's predecessor in the Champaign service area, Northern Illinois Water Corp., to test its 5/8-inch meters every 15 years instead of every 10 years as provided under Section 600.340. Since then, IAWC has followed a 15-year cycle for its 5/8-inch meters in the Champaign District. IAWC states that the Champaign District's current practice is to replace 5/8-inch customer meters instead of testing them and returning them to service.

In its Order in Dockets 05-0681/06-0094/06-0095 (Cons.), the Commission ordered IAWC "to file a petition with the Commission (within one year from the date of this order) to enable the Commission to review whether the fifteen (15) year meter testing period variance is appropriate for IAWC's Champaign Division." The Commission added, "The evidence is clear that [this and other] improvements are necessary to ensure compliance with the Commission's rules."

The instant petition in 08-0277 "requests that the Commission, in accordance with the Order entered in Docket 05-0691/06-0094/06-0095 (Cons.), initiate a review regarding whether the fifteen (15) year meter testing variance is appropriate for IAWC's Champaign District."

In the current proceeding, IAWC proposes that it be allowed to "continu[e] the 15 year variance." IAWC also requests that it "be given the option, at 15 years of service, to choose to replace all meters removed with new meters (without a requirement to test each meter unless requested to do so by the customer) versus the policy stated in the current variance of testing all meters removed prior to reconditioning and returning them to service."

With regard to whether 15-year testing intervals are appropriate, IAWC states that it conducted a random test of 5/8-inch and 5/8-inch x 3/4-inch meters to determine their accuracy, utilizing a statistical sampling testing methodology. In all, 293 meters were tested, 123 of which were 15 years old.

The 5/8-inch x ¾-inch water meters are the same as 5/8-inch water meters, but have ¾-inch inlet and outlet diameters that allow direct connection to ¾-inch in diameter plumbing pipes. These sizes are typically used for residential users and constitute the majority of the water meters in water distribution systems serving municipalities. (Staff Ex. 1.0 at 4)

As explained by IAWC witness Mr. Suits, Attachment "A" to IAWC Exhibit BS-1.0 contains the results for each test. He testified that all meters tested for this study were manufactured by the same company and were the same model used currently in the Champaign District. Mr. Suits also stated that the random test eliminates any geographic bias in the group of meters tested. He said the water supplied to the distribution system in the Champaign District currently is supplied by two water treatment plants, and that both plants use water from the same ground water sources, treat the water in a similar process, and produce finish water of similar water quality parameters. As such, Mr. Suits asserted that any differential effect of water quality on meter accuracy is geographically insignificant.

Mr. Suits stated that the tests were conducted in accordance with Section 600.310, "Test and Allowable Error," of Part 600. He said each meter was tested in accordance with the standards for testing Cold Water Meters as prescribed in American Water Works Association Standard C705-60 by comparing the actual amount of water passing through the meter with that indicated on the dial for the three specific flow ranges (minimum, intermediate, and maximum). In addition, since the tests were for the purpose of determining the condition of a meter upon removal from service in a customer's premise, the order of the tests were minimum flow, intermediate flow, and maximum flow. The meter's test results were analyzed against the accuracy ranges in Section 600.310 for repaired meters (the accuracy requirement to place meters back in service). Mr. Suits further stated that all meters tested had been removed from service in a customer's premise, randomly selected and tested by IAWC employees with the meter test equipment at the Champaign Division facility.

The data is summarized on page six of the meter test results and purports to show that the tests for meters less than 15 years in age reflected no failures. Of the 123 meters that were 15 years old, Mr. Suits said that five, or about 4% of the total, failed the minimum flow test, while all 15-year meters passed the maximum and intermediate flow tests. Figure 1 of Attachment A graphically depicts these results. Tests for older meters demonstrate an increase in the percentages of failed tests over time. However, he stated, the data is generally consistent and generates slightly better results for the 2007/2008 data as compared with data from the 1974/1975 study. Figures 2, 3, and 4 of Attachment A to IAWC Exhibit 1.0 depict these results graphically.

With regard to the statistical validity of the sample size of 15-year meters, IAWC presented the testimony of Mr. Kerckhove, IAWC Exhibit 2.0. Based on his calculations, a sample size of 110 randomly-selected meters was purportedly necessary to provide a margin of error of 0.05. He said the actual sample size of 15-year meters is 123, greater than the number required for a 0.05 margin of error. The sample sizes for the other age groups of meters were not tested for margin of error, as the purpose of this study was to provide data on 15-year meters to allow a review of the appropriateness of the current variance.

In this proceeding, IAWC also requests that it be given the option, at 15 years of service, to choose to replace all meters removed with new meters (without a requirement to test each meter unless requested to do so by the customer) versus the policy stated in the current variance of testing all meters removed prior to reconditioning and returning them to service. Mr. Suits explained that the price of new meters and the costs of returning existing meters to service vary over time. In addition, the pace of improvements in technology has increased over recent decades and may result in an advantage from replacing 15-year old meters with new models, as opposed to reconditioning old meters and returning them to service. Mr. Suits further stated that the option of replacing the meter versus instead of reconditioning it would allow IAWC to choose the better alternative, based upon the current business environment at that time. (IAWC Ex. 1.0 at 5-6)

Staff Position

With respect to IAWC's use of a statistical sampling testing methodology, Staff witness Mr. Atwood stated that there are no guidelines or requirements in the Public Utilities Act or Part 600 regarding the use of statistical sampling for the selection of water meters for testing. However, he noted that 83 Ill. Adm. Code Parts 500 and 400 do allow for the statistical sampling of gas meters, in Section 500.215, and for electric meters in Section 410.180. In addition, he stated, AWWA M6 (AWWA M6, pp. 59-167 60) suggests the use of statistical sampling for water meter testing programs. (Staff Ex. 1.0 at 7)

Regarding sample size, Mr. Atwood believes the population size of 123 water meters tested by the Company is adequate based on guidelines contained in Military Standard 105-D "Sampling Procedures and Table for Inspection by Attributes" ("Mil Std 105"). The use of Mil Std 105 is required for sampling gas meters by Sections 500.215 (b) and (c) of Part 500; and is allowed for sampling of electric meters in Section 410.180 (a)(4) of Part 400. According to the Company's 2007 Annual Report, the number of 5/8-inch water meters in the Company's Champaign District is 47,257. Using a 15-year testing frequency, the average annual water meter population eligible for testing would be 3,150 5/8-inch water meters. Sections 500.215 (b) and (c) of Part 500 require the use of Inspection Level II of Mil Std 105. Inspection Level II is considered by Mil Std 105 to be the level normally used. The resulting sample size required by a single sampling plan at Inspection Level II for a population of 3,150 water meters is 125 water meters. Mr. Atwood does not consider the difference of the actual sample size of 123

water meters to the 125 water meter sample size required by gas meter testing standards to be significant. (Staff Ex. 1.0 at 8)

Regarding the meter testing results for 15-year old meters, Mr. Atwood said there are no guidelines or requirements in the Act or Title 83 of the Illinois Administrative Code regarding an acceptable rate of passing for water meter testing. AWWA M6 (AWWA M6, p 59) suggests a water meter passing rate of 95% for the minimum and intermediate flow tests is acceptable. For gas meters, using Mil Std 105 as required by Title 83 Ill. Adm. Code, Section 500.215, the allowable number of defective meters for a sample size of 125 meters used is 14.

Mr. Atwood indicated that the pass rates for the 15-year old meters in the Company's study were 96%, 98% and 100% for the minimum, intermediate and maximum flow tests, respectively. He concluded the Company should be allowed to continue to use a 15-year frequency of testing for the 5/8-inch water meters in its Champaign District.

Mr. Atwood also addressed, and agreed with, the Company's proposal that it have the option of replacing 5/8-inch water meters with 15 years of service with new meters, without testing the meters being replaced (unless requested by the customer). (Staff Ex. 1.0 at 11) He noted IAWC's contention that replacement with new water meters can be more cost-effective than testing, reconditioning, and returning the existing water meters to service.

Commission Conclusions, Findings and Ordering Paragraphs

Having reviewed the record, the Commission agrees with Staff that IAWC's statistical sampling testing methodology was acceptable, and that the test results support the continued use of 15-year testing intervals for 5/8-inch water meters in the Champaign District rather than the 10-year intervals provided in Section 600.340 of Part 600.

The Commission also agrees that IAWC should be permitted to replace 5/8-inch water meters after 15 years of service, without testing the meters being replaced unless requested by the customer.

Accordingly, IAWC should be granted a variance from 83 Ill. Adm. Code 600.340 whereby IAWC will be permitted to either test or replace the 5/8-inch meters after 15 years in service, and after each 15-year interval thereafter.

The findings and relief granted herein create no presumptions with respect to the reasonableness of meter testing or replacement costs for ratemaking purposes.

The Commission, having considered the entire record, is of the opinion and finds that:

(1) Illinois-American is a corporation engaged in the business of furnishing water and sanitary sewer service to the public in portions of the State of Illinois and is a public utility within the meaning of Section 3-105 of the Act;

(2) the Commission has jurisdiction over Illinois-American and the subject matter of this proceeding;

(3) the facts recited and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings herein;

(4) the request by IAWC for a variance from certain requirements of 83 Ill. Adm. Code 600.340 should be granted as hereinafter set forth.

IT IS THEREFORE ORDERED that Illinois-American Water Company is granted a variance from 83 Ill. Adm. Code 600.340 whereby it is hereby authorized to test or replace its 5/8-inch water meters in its Champaign District on a 15-year cycle, subject to the conditions set forth above.

IT IS FURTHER ORDERED that subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By order of the Commission this 4th day of August, 2009.

(SIGNED) CHARLES E. BOX

Chairman

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 08-0277

IAWC EXHIBIT NO. 1.0

DIRECT TESTIMONY OF

BARRY SUITS

ILLINOIS-AMERICAN WATER COMPANY

DIRECT TESTIMONY OF BARRY SUITS **IAWC EXHIBIT 1.0**

Q. Please state your name.

A. Barry Suits.

Q. Please state your business address.

A. 201 Devonshire Drive, Champaign, Illinois, 61820.

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

A I am employed by Illinois-American Water Company ("IAWC" or the "Company") as the Operations Manager in IAWC's Champaign County District ("Champaign District"). The Champaign District includes the cities of Champaign and Urbana, and the villages of Savoy, Bondville, Pesotum, and St. Joseph.

Q. How long have you been employed by IAWC?

A. I became an employee of the Company in 1999 when the Company acquired Northern Illinois Water Corporation. Although I left the Company in 2004, I subsequently returned to employment with the Company in 2005.

Q. Please discuss your educational and business background.

A. I am a graduate of the University of Illinois with a Bachelor of Science Degree in Civil Engineering. I worked as a Resident Engineer for the Illinois Department of Transportation District 5 and as a Civil Engineer for State Farm Insurance Companies prior to joining Northern Illinois Water Corporation in 1993 as a Project Engineer. In October 1994, I was promoted to the position of Engineering Supervisor. In September 1999, I was promoted to the position of Operations Manager for the Champaign District, a position I held until my

resignation in July 2004. I returned to the Company in July 2005 in my current position of Operations Manager in the Champaign District.

Q. Please generally describe the business and service areas of the Company.

A. The Company is a corporation organized and existing under the laws of the State of Illinois with its principal office in the City of Belleville, Illinois. IAWC is the largest investor-owned water utility in the state, providing high-quality and reliable water and/or wastewater services to more than 1.2 million people. It currently owns, operates, and maintains potable water production, treatment, storage, transmission and distribution systems, and wastewater collection, pumping, and/or treatment systems for the purpose of furnishing water and wastewater service for residential, commercial, industrial, and governmental users in its various districts. IAWC's districts include Alton, Cairo, Champaign, Chicago Metro, Interurban, Lincoln, Pekin, Peoria, Pontiac, South Beloit, Sterling, and Streator. IAWC is a wholly-owned subsidiary of American Water Works Company, Inc., which employs more than 7,000 dedicated professionals who provide drinking water, wastewater and other related services to approximately 15 million people in 32 states and Ontario, Canada.

Q. Have you testified before any regulatory agencies with respect to regulatory matters?

A. Yes. I have testified several times before the Illinois Commerce Commission ("Commission").

Q. Are you familiar with the Petition which has been filed in this proceeding?

A. Yes, I am.

Q. Please describe the review of the current meter testing program in the Champaign District.

A. IAWC conducted a review and analysis of its current meter testing program for 5/8" customer meters to provide data to allow the Commission to determine whether the 15-year meter testing period variance (as originally authorized in Docket No. 76-0491) is appropriate for IAWC's Champaign District. IAWC met with the Commission Staff on September 25, 2008, to discuss the initial data, testing process, and analysis. Several additional telephone conversations with Staff occurred in follow-ups to this meeting.

Q. After your review, do you believe a 15-year meter testing period variance for the Champaign District is justified?

A. Yes, I do.

Q. What evidence are you relying upon to support this conclusion?

A. IAWC conducted a random test of a total of 293 - 5 / 8" and 5 / 8" X 3 / 4" meters to determine their accuracy. Attachment "A" to this testimony contains the results for each test. All meters tested for this study were manufactured by the same company and the same model. The random test eliminates any geographic bias in the group of meters tested. Further, the water supplied to the distribution system in the Champaign District currently is supplied by two water treatment plants. However, both plants utilize water from the same ground water sources, treat the water in a similar process, and produce finished water of similar water quality parameters. As such, any differential effect of water quality on meter accuracy is geographically insignificant. The data is summarized on page six of

the meter test results in Attachment "A" and shows that the tests for meters less than 15 years in age showed no failures. Of the total of 123 meters that were 15 years old, only five, or about 4% of the total, failed the minimum flow test. **However, all 15-year meters passed the maximum and intermediate flow tests.** Figure 1 of Attachment "A" graphically depicts these results. Tests for older meters demonstrate an increase in the percentages of failed tests over time. However, the data is generally consistent and demonstrates slightly better results for the 2007/08 data as compared with data from the 1974/75 study. Figures 2, 3, and 4 of Attachment "A" depict these results graphically.

Q. What type of tests did you perform?

A. The tests were conducted in accordance Illinois Administrative Code Title 83, Chapter I, Subchapter e, Part 600.310 – Test and Allowable Error. Each meter was tested in accordance with the standards for testing Cold Water Meters as prescribed in American Water Works Association (AWWA C705-60) by comparing the actual amount of water passing through the meter with that indicated on the dial for the three specific flow ranges (minimum, intermediate, and maximum). In addition, since the tests were for the purpose of determining the condition of a meter upon removal from service in a customer's premise, the order of the tests were minimum flow, intermediate flow, and maximum flow. Each meter's test results were analyzed against the accuracy ranges in Section 600.310 for repaired meters (the accuracy requirement to place meters back in service). All meters tested had been removed from service and from the

customers' premises, then randomly selected and tested by IAWC employees with the meter test equipment at the Champaign District facility.

Q. **How can you be sure the test results for the size of the sample of meters tested can be used with confidence to predict the actual overall population of 5 / 8" and 5 / 8" X 3 / 4" water meters in service?**

A. Rich Kerckhove, Manager, Rates & Regulations, filed testimony in this case in IAWC Exhibit 2.0 supporting the statistical validity of the sample size of 15-year meters. Based upon his calculations, a sample size of 110 randomly-selected meters was necessary to provide a margin of error of 0.05. Our actual sample size of 15-year meters is 123, greater than the number required for a 0.05 margin of error. The sample sizes for the other age groups of meters were not tested for margin of error, as the purpose of this study was to provide data on 15-year meters to allow a review of the appropriateness of the current variance.

Q. **Based upon your analysis, are there any modifications you would recommend to the current variance granted in Docket 76-0491?**

A. Yes. I recommend that an option be added giving IAWC the choice to replace all 5/8" and 5/8 " X 3 /4" meters removed after 15 years of service with new meters (without a requirement to test each meter unless requested to do so by the customer).

Q. **Why would IAWC rather have the option to replace the meters?**

A. The price of new meters and the costs of returning existing meters to service vary over time. In addition, the pace of improvements in technology has increased over recent decades and may result in an advantage to replace 15-

year meters with new models as opposed to reconditioning old meters and returning them to service. Currently, IAWC finds replacement with new meters to be more cost-effective than testing, reconditioning and returning the older meters to service. The option to replace the meter versus reconditioning it would allow IAWC to choose the best option based upon the current environment.

Q. Is there any support outside of your analysis for this approach?

A. Yes. For example, the Rhode Island Division of Public Utilities in Docket No. D-07-35 completed a general rewrite of its water rules and adopted a meter testing rule, which states that 5 / 8" and 5 / 8" X 3 / 4" (this rule actually applies from meters this size to 2" in size) meters will be tested or replaced at a maximum interval of 20 years. Meters that are replaced are not required to be tested. The new rules became effective in February of last year. Pennsylvania rules require 5/8" meters to be tested that have been in service for more than 20 years. (52 PA ADC Sec. 65.8). New York requires 5/8" meters that are in service to be tested every 15 years. (16 NY ADC 500.1).

Q. Do you believe it is in the best interest of the Company and the best interest of the public that the 15-year meter testing period variance described herein be found appropriate with the recommended modifications and further authorized by the Illinois Commerce Commission?

A. Yes. The test data demonstrates that the insignificant increase in meter accuracy would not support the additional costs resulting from a more frequent meter testing or change out policy. In addition, the majority of these meters are

located inside of the customers' premises which require customers to be present when the meters are tested or changed out. The 15-year variance would result in less inconvenience to these customers than the Commission's 10-year rule.

Q. Does this conclude your testimony?

A. Yes, it does.

IAWC ATTACHMENT "A" TO EXHIBIT NO. IAWC-1.0

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 08-0277

IAWC ATTACHMENT "A" TO EXHIBIT NO. IAWC-1.0

BARRY SUITS

ILLINOIS-AMERICAN WATER COMPANY

Contents

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 6/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
1	11/6/2007	11/8/2007	T-10	100.0%	100.0%	98.0%	X	6
2	12/18/2007	12/27/2007	T-10	100.0%	100.0%	100.0%	X	6
3	10/19/2007	10/29/2007	T-10	100.4%	100.0%	100.0%	X	9
4	11/14/2007	11/28/2007	T-10	99.9%	100.0%	100.0%	X	9
5	12/27/2007	1/2/2008	T-10	101.1%	100.0%	101.0%	X	10
6	10/13/2007	10/18/2007	T-10	99.5%	100.0%	99.0%	X	11
7	12/10/2007	12/14/2007	T-10	99.7%	100.0%	99.0%	X	11
8	9/5/2008	9/24/2008	T-10	100.1%	100.0%	96.0%	X	11
9	9/20/2008	9/24/2008	T-10	99.9%	100.0%	97.0%	X	11
10	9/23/2008	9/24/2008	T-10	99.5%	99.9%	96.0%	X	11
11	12/20/2007	12/27/2007	T-10	99.6%	100.0%	98.0%	X	12
12	9/18/2008	9/24/2008	T-10	100.1%	100.0%	98.0%	X	12
13	9/17/2008	9/24/2008	T-10	99.9%	100.0%	98.0%	X	13
14	9/23/2008	9/24/2008	T-10	99.9%	100.0%	99.0%	X	13
15	10/17/2007	10/18/2007	T-10	99.8%	100.0%	97.0%	X	14
16	1/5/2008	1/28/2008	T-10	100.0%	101.0%	100.0%	X	14
17	9/9/2008	9/24/2008	T-10	100.0%	100.0%	98.0%	X	14
18	9/12/2007	10/18/2007	T-10	99.9%	100.0%	100.0%	X	15
19	10/6/2007	10/18/2007	T-10	99.4%	99.0%	98.0%	X	15
20	10/18/2007	10/18/2007	T-10	98.8%	100.0%	98.0%	X	15
21	10/18/2007	10/20/2007	T-10	99.5%	100.0%	98.0%	X	15
22	11/1/2007	11/8/2007	T-10	99.9%	100.0%	98.0%	X	15
23	11/3/2007	11/8/2007	T-10	99.9%	100.0%	99.0%	X	15
24	12/26/2007	1/2/2008	T-10	99.3%	100.0%	98.0%	X	15
25	1/5/2008	1/28/2008	T-10	99.3%	100.0%	100.0%	X	15
26	7/2/2008	11/6/2008	T-10	99.7%	100.0%	96.0%	X	16
27	7/3/2008	11/6/2008	T-10	99.9%	100.0%	97.0%	X	16
28	7/3/2008	11/6/2008	T-10	99.8%	100.0%	98.0%	X	16
29	7/8/2008	11/4/2008	T-10	99.8%	100.0%	98.0%	X	15
30	7/8/2008	11/4/2008	T-10	99.8%	100.0%	98.0%	X	15
31	7/9/2008	11/14/2008	T-10	99.2%	100.0%	99.0%	X	15
32	7/9/2008	11/14/2008	T-10	99.3%	100.0%	99.0%	X	15
33	7/9/2008	11/4/2008	T-10	98.9%	100.0%	97.0%	X	15
34	7/12/2008	11/14/2008	T-10	99.4%	100.0%	99.0%	X	15
35	7/14/2008	11/4/2008	T-10	99.8%	100.0%	96.0%	X	15
36	7/16/2008	11/14/2008	T-10	98.9%	100.0%	99.0%	X	15
37	7/16/2008	11/6/2008	T-10	99.1%	100.0%	95.0%	X	15
38	7/16/2008	11/4/2008	T-10	100.0%	100.0%	99.0%	X	15
39	7/16/2008	11/4/2008	T-10	98.9%	100.0%	98.0%	X	15
40	7/16/2008	11/4/2008	T-10	99.1%	100.0%	98.0%	X	15
41	7/16/2008	11/6/2008	T-10	99.5%	100.0%	99.0%	X	16
42	7/16/2008	11/6/2008	T-10	99.4%	100.0%	96.0%	X	15
43	7/22/2008	11/14/2008	T-10	99.6%	100.0%	99.0%	X	15
44	7/25/2008	9/24/2008	T-10	99.9%	99.9%	98.0%	X	15
45	7/26/2008	9/24/2008	T-10	99.0%	100.0%	96.0%	X	15
46	7/28/2008	11/6/2008	T-10	99.2%	100.0%	99.0%	X	15
47	7/30/2008	9/24/2008	T-10	99.2%	100.0%	99.0%	X	15
48	7/30/2008	11/14/2008	T-10	99.2%	100.0%	100.0%	X	15
49	7/30/2008	11/14/2008	T-10	99.2%	100.0%	98.0%	X	15
50	7/31/2008	9/24/2008	T-10	99.6%	100.0%	96.0%	X	15
51	7/31/2008	11/14/2008	T-10	99.3%	100.0%	100.0%	X	15
52	8/1/2008	9/24/2008	T-10	99.5%	100.0%	96.0%	X	15
53	8/4/2008	11/6/2008	T-10	99.4%	100.0%	96.0%	X	15
54	8/7/2008	9/24/2008	T-10	99.5%	100.0%	95.0%	X	15
55	8/8/2008	9/24/2008	T-10	99.2%	100.0%	97.0%	X	15
56	8/8/2008	9/24/2008	T-10	99.4%	99.0%	95.0%	X	15
57	8/9/2008	9/24/2008	T-10	99.8%	100.0%	98.0%	X	15

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 5/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
58	8/9/2008	9/24/2008	T-10	99.2%	100.0%	98.0%	X	15
59	8/21/2008	9/24/2008	T-10	99.6%	100.0%	98.0%	X	15
60	8/21/2008	9/24/2008	T-10	100.1%	100.0%	99.0%	X	15
61	8/25/2008	11/14/2008	T-10	98.9%	99.9%	99.0%	X	15
62	8/27/2008	11/14/2008	T-10	98.9%	100.0%	99.0%	X	15
63	8/27/2008	11/14/2008	T-10	99.4%	100.0%	99.0%	X	15
64	8/28/2008	11/14/2008	T-10	99.5%	100.0%	99.0%	X	15
65	8/29/2008	9/24/2008	T-10	99.6%	100.0%	99.0%	X	15
66	9/2/2008	9/24/2008	T-10	99.6%	99.9%	97.0%	X	15
67	9/3/2008	11/14/2008	T-10	99.1%	100.0%	99.0%	X	15
68	9/5/2008	9/24/2008	T-10	99.9%	100.0%	97.0%	X	15
69	9/5/2008	9/24/2008	T-10	100.1%	101.0%	98.0%	X	15
70	9/5/2008	9/24/2008	T-10	99.4%	101.0%	97.0%	X	15
71	9/5/2008	9/24/2008	T-10	99.4%	100.0%	95.0%	X	15
72	9/8/2008	9/24/2008	T-10	99.4%	99.9%	97.0%	X	15
73	9/8/2008	9/24/2008	T-10	99.2%	99.9%	94.0%	X	15
74	9/8/2008	11/14/2008	T-10	99.2%	100.0%	99.0%	X	15
75	9/9/2008	9/24/2008	T-10	99.4%	100.0%	96.0%	X	15
76	9/10/2008	9/24/2008	T-10	100.0%	100.0%	97.0%	X	15
77	9/11/2008	9/24/2008	T-10	99.9%	100.0%	98.0%	X	15
78	9/11/2008	9/24/2008	T-10	99.8%	100.0%	96.0%	X	15
79	9/11/2008	9/24/2008	T-10	99.8%	100.0%	90.0%	X	15
80	9/11/2008	11/14/2008	T-10	98.8%	100.0%	99.0%	X	15
81	9/11/2008	11/14/2008	T-10	99.2%	100.0%	100.0%	X	15
82	9/13/2008	11/14/2008	T-10	98.6%	100.0%	94.0%	X	15
83	9/13/2008	11/14/2008	T-10	98.9%	100.0%	99.0%	X	15
84	9/18/2008	9/24/2008	T-10	100.0%	100.0%	97.0%	X	15
85	9/18/2008	11/14/2008	T-10	99.2%	100.0%	99.0%	X	15
86	9/18/2008	11/14/2008	T-10	99.3%	100.0%	98.0%	X	15
87	9/18/2008	11/14/2008	T-10	98.8%	100.0%	98.0%	X	15
88	9/19/2008	9/24/2008	T-10	99.7%	99.9%	98.0%	X	15
89	9/19/2008	9/24/2008	T-10	100.0%	100.0%	97.0%	X	15
90	9/24/2008	11/4/2008	T-10	99.6%	100.0%	98.0%	X	15
91	9/24/2008	11/4/2008	T-10	99.6%	100.0%	97.0%	X	15
92	9/25/2008	11/14/2008	T-10	99.2%	100.0%	99.0%	X	15
93	9/29/2008	11/14/2008	T-10	99.4%	100.0%	98.0%	X	15
94	10/1/2008	11/14/2008	T-10	99.6%	100.0%	99.0%	X	15
95	10/2/2008	11/6/2008	T-10	99.8%	100.0%	99.0%	X	15
96	10/2/2008	11/14/2008	T-10	99.6%	100.0%	98.0%	X	15
97	10/2/2008	11/14/2008	T-10	99.4%	100.0%	98.0%	X	15
98	10/2/2008	11/14/2008	T-10	99.7%	100.0%	98.0%	X	15
99	10/3/2008	11/4/2008	T-10	99.8%	100.0%	98.0%	X	15
100	10/3/2008	11/14/2008	T-10	99.6%	100.0%	92.0%	X	15
101	10/6/2008	11/14/2008	T-10	99.9%	100.0%	98.0%	X	15
102	10/6/2008	11/14/2008	T-10	99.9%	101.0%	97.0%	X	15
103	10/7/2008	11/14/2008	T-10	99.0%	100.0%	98.0%	X	15
104	10/7/2008	11/6/2008	T-10	99.6%	100.0%	97.0%	X	15
105	10/8/2008	11/6/2008	T-10	99.6%	100.0%	99.0%	X	15
106	10/8/2008	11/6/2008	T-10	99.5%	100.0%	96.0%	X	15
107	10/8/2008	11/6/2008	T-10	100.0%	100.0%	96.0%	X	15
108	10/9/2008	11/14/2008	T-10	99.9%	100.0%	97.0%	X	15
109	10/9/2008	11/6/2008	T-10	99.9%	100.1%	98.0%	X	15
110	10/10/2008	11/14/2008	T-10	99.1%	100.0%	98.0%	X	15
111	10/11/2008	11/14/2008	T-10	99.6%	100.0%	98.0%	X	15
112	10/13/2008	11/14/2008	T-10	99.5%	100.0%	96.0%	X	15
113	10/13/2008	11/6/2008	T-10	99.4%	100.0%	98.0%	X	15
114	10/13/2008	11/6/2008	T-10	99.6%	100.0%	99.0%	X	15

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 5/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
115	10/14/2008	11/14/2008	T-10	98.9%	100.0%	98.0%	X	15
116	10/14/2008	11/14/2008	T-10	99.0%	100.0%	97.0%	X	15
117	10/14/2008	11/6/2008	T-10	99.5%	100.0%	97.0%	X	15
118	10/14/2008	11/14/2008	T-10	100.0%	100.0%	98.0%	X	15
119	10/14/2008	11/14/2008	T-10	99.8%	100.0%	98.0%	X	15
120	10/15/2008	11/14/2008	T-10	98.9%	100.0%	97.0%	X	15
121	10/15/2008	11/6/2008	T-10	99.4%	100.0%	98.0%	X	15
122	10/16/2008	11/14/2008	T-10	98.9%	100.0%	95.0%	X	15
123	10/17/2008	11/6/2008	T-10	99.5%	100.0%	98.0%	X	15
124	10/20/2008	11/4/2008	T-10	99.8%	100.0%	97.0%	X	15
125	10/21/2008	11/14/2008	T-10	99.5%	100.0%	98.0%	X	15
126	10/21/2008	11/6/2008	T-10	100.0%	100.0%	94.0%	X	15
127	10/22/2008	11/14/2008	T-10	99.8%	100.0%	98.0%	X	15
128	10/23/2008	11/14/2008	T-10	99.8%	100.0%	97.0%	X	15
129	10/23/2008	11/6/2008	T-10	99.5%	100.0%	97.0%	X	15
130	10/23/2008	11/4/2008	T-10	99.9%	100.0%	98.0%	X	15
131	10/25/2008	11/14/2008	T-10	99.5%	100.0%	99.0%	X	15
132	10/30/2008	11/14/2008	T-10	99.6%	100.0%	99.0%	X	15
133	11/3/2008	11/6/2008	T-10	99.6%	100.0%	98.0%	X	15
134	11/3/2008	11/6/2008	T-10	99.8%	100.0%	97.0%	X	15
135	11/8/2008	11/14/2008	T-10	99.6%	100.0%	98.0%	X	15
136	9/6/2007	10/18/2007	T-10	99.9%	100.0%	100.0%	X	16
137	9/8/2007	10/18/2007	T-10	100.0%	100.0%	100.0%	X	16
138	9/24/2007	10/1/2007	T-10	100.0%	100.0%	98.0%	X	16
139	9/24/2007	10/18/2007	T-10	100.0%	100.0%	100.0%	X	16
140	9/28/2007	10/18/2007	T-10	100.0%	100.0%	100.0%	X	16
141	10/10/2007	10/18/2007	T-10	99.5%	100.0%	98.0%	X	16
142	10/11/2007	10/18/2007	T-10	99.9%	100.0%	99.0%	X	16
143	10/11/2007	10/18/2007	T-10	100.7%	100.0%	100.0%	X	16
144	10/11/2007	10/29/2007	T-10	98.6%	100.0%	98.0%	X	16
145	10/16/2007	10/18/2007	T-10	100.0%	100.0%	99.0%	X	16
146	10/16/2007	10/18/2007	T-10	98.9%	100.0%	96.0%	X	16
147	10/17/2007	10/18/2007	T-10	99.5%	100.0%	98.0%	X	16
148	10/18/2007	10/20/2007	T-10	100.4%	100.0%	99.0%	X	16
149	10/18/2007	10/20/2007	T-10	99.8%	100.0%	99.0%	X	16
150	10/24/2007	10/29/2007	T-10	100.3%	100.0%	98.0%	X	16
151	10/25/2007	10/29/2007	T-10	100.0%	100.0%	99.0%	X	16
152	10/25/2007	11/30/2007	T-10	100.0%	100.0%	98.0%	X	16
153	10/30/2007	11/3/2007	T-10	99.6%	100.0%	99.0%	X	16
154	11/2/2007	11/8/2007	T-10	100.0%	100.0%	100.0%	X	16
155	11/7/2007	11/28/2007	T-10	100.2%	100.0%	95.0%	X	16
156	11/8/2007	11/28/2007	T-10	99.8%	100.0%	100.0%	X	16
157	11/9/2007	11/27/2008	T-10	99.5%	100.0%	99.0%	X	16
158	11/14/2007	11/27/2007	T-10	100.2%	100.0%	99.0%	X	16
159	11/14/2007	11/27/2007	T-10	99.6%	100.0%	99.0%	X	16
160	11/14/2007	11/28/2007	T-10	99.2%	100.0%	99.0%	X	16
161	11/29/2007	11/30/2007	T-10	99.4%	100.0%	99.0%	X	16
162	12/6/2007	12/7/2007	T-10	100.3%	100.0%	99.0%	X	16
163	12/12/2007	12/14/2007	T-10	99.8%	100.0%	99.0%	X	16
164	12/20/2007	12/27/2007	T-10	100.0%	100.0%	99.0%	X	16
165	12/21/2007	12/27/2007	T-10	100.0%	100.0%	99.0%	X	16
166	12/29/2007	1/2/2008	T-10	100.0%	100.0%	100.0%	X	16
167	12/29/2007	1/2/2008	T-10	100.0%	100.0%	99.0%	X	16
168	9/6/2007	10/18/2007	T-10	99.8%	100.0%	99.0%	X	17
169	9/8/2007	10/18/2007	T-10	99.6%	100.0%	99.0%	X	17
170	9/13/2007	10/1/2007	T-10	99.9%	100.0%	97.0%	X	17
171	9/21/2007	10/18/2007	T-10	100.0%	100.0%	99.0%	X	17

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 5/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
172	9/29/2007	10/18/2007	T-10	99.5%	99.0%	98.0%	X	17
173	9/29/2007	10/18/2007	T-10	100.0%	100.0%	98.0%	X	17
174	10/2/2007	10/18/2007	T-10	99.5%	100.0%	100.0%	X	17
175	10/3/2007	10/18/2007	T-10	99.8%	100.0%	100.0%	X	17
176	10/3/2007	10/18/2007	T-10	99.3%	99.0%	98.0%	X	17
177	10/10/2007	10/18/2007	T-10	99.5%	100.0%	100.0%	X	17
178	10/10/2007	10/18/2007	T-10	100.0%	100.0%	100.0%	X	17
179	10/10/2007	10/18/2007	T-10	100.0%	100.0%	99.0%	X	17
180	10/11/2007	10/18/2007	T-10	99.4%	100.0%	99.0%	X	17
181	10/11/2007	10/18/2007	T-10	98.9%	100.0%	98.0%	X	17
182	10/12/2007	10/18/2007	T-10	98.8%	99.0%	96.0%	X	17
183	10/17/2007	10/18/2007	T-10	100.1%	100.0%	99.0%	X	17
184	10/17/2007	10/20/2007	T-10	99.8%	100.0%	97.0%	X	17
185	10/18/2007	10/20/2007	T-10	100.2%	100.0%	99.0%	X	17
186	10/18/2007	10/20/2007	T-10	99.2%	100.0%	99.0%	X	17
187	10/29/2007	11/3/2007	T-10	100.0%	100.0%	98.0%	X	17
188	10/30/2007	11/3/2007	T-10	99.0%	100.0%	98.0%	X	17
189	10/30/2007	11/3/2007	T-10	100.2%	99.0%	98.0%	X	17
190	11/1/2007	11/8/2007	T-10	100.0%	100.0%	99.0%	X	17
191	11/3/2007	11/8/2007	T-10	99.8%	99.0%	99.0%	X	17
192	11/7/2007	11/28/2007	T-10	99.5%	100.0%	99.0%	X	17
193	11/15/2007	11/27/2007	T-10	98.9%	99.0%	98.0%	X	17
194	11/19/2007	11/27/2007	T-10	98.8%	100.0%	96.0%	X	17
195	11/19/2007	11/28/2007	T-10	99.9%	100.0%	99.0%	X	17
196	11/20/2007	11/27/2007	T-10	100.0%	100.0%	98.0%	X	17
197	11/21/2007	11/27/2007	T-10	99.8%	100.0%	98.0%	X	17
198	11/21/2007	11/28/2007	T-10	100.0%	100.0%	98.0%	X	17
199	11/29/2007	12/7/2007	T-10	99.1%	99.0%	98.0%	X	17
200	12/3/2007	12/7/2007	T-10	99.5%	100.0%	98.0%	X	17
201	12/3/2007	12/7/2007	T-10	99.8%	100.0%	99.0%	X	17
202	12/5/2007	12/7/2007	T-10	99.8%	100.0%	98.0%	X	17
203	12/7/2007	12/14/2007	T-10	100.0%	100.0%	99.0%	X	17
204	12/10/2007	12/14/2007	T-10	99.5%	99.0%	99.0%	X	17
205	12/11/2007	12/14/2007	T-10	99.5%	100.0%	99.0%	X	17
206	12/13/2007	12/18/2007	T-10	100.2%	100.0%	99.0%	X	17
207	12/17/2007	12/18/2007	T-10	100.0%	100.0%	99.0%	X	17
208	12/18/2007	12/18/2007	T-10	99.8%	100.0%	98.0%	X	17
209	12/19/2007	12/27/2007	T-10	100.0%	100.0%	98.0%	X	17
210	12/19/2007	12/27/2007	T-10	100.0%	100.0%	99.0%	X	17
211	12/19/2007	12/27/2007	T-10	100.0%	100.0%	100.0%	X	17
212	12/19/2007	12/27/2007	T-10	100.0%	100.0%	94.0%	X	17
213	12/26/2007	1/2/2008	T-10	99.7%	100.0%	98.0%	X	17
214	12/26/2007	1/2/2008	T-10	99.3%	100.0%	98.0%	X	17
215	1/2/2008	1/28/2008	T-10	99.8%	101.0%	99.0%	X	17
216	1/2/2008	1/28/2008	T-10	99.1%	100.0%	100.0%	X	17
217	9/21/2007	10/18/2007	T-10	100.2%	100.0%	100.0%	X	17
218	10/30/2007	11/3/2007	T-10	99.9%	100.0%	99.0%	X	17
219	9/26/2007	10/18/2007	T-10	100.4%	100.0%	100.0%	X	18
220	10/20/2007	10/20/2007	T-10	100.0%	100.0%	99.0%	X	18
221	10/22/2007	10/29/2007	T-10	99.6%	100.0%	95.0%	X	18
222	11/13/2007	11/27/2007	T-10	98.6%	100.0%	96.0%	X	18
223	11/13/2007	11/27/2007	T-10	99.0%	100.0%	98.0%	X	18
224	11/19/2007	11/27/2007	T-10	99.6%	100.0%	99.0%	X	18
225	12/1/2007	12/7/2007	T-10	98.9%	99.0%	97.0%	X	18
226	12/3/2007	12/7/2007	T-10	99.9%	100.0%	97.0%	X	18
227	12/12/2007	12/14/2007	T-10	100.0%	100.0%	99.0%	X	18
228	12/21/2007	12/27/2007	T-10	99.9%	100.0%	99.0%	X	18

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 5/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
229	12/26/2007	1/2/2008	T-10	98.8%	100.0%	94.0%	X	18
230	10/17/2007	10/18/2007	T-10	99.4%	100.0%	96.0%	X	19
231	10/19/2007	10/20/2007	T-10	100.0%	100.0%	99.0%	X	19
232	10/26/2007	11/30/2007	T-10	99.8%	100.0%	97.0%	X	19
233	11/6/2007	11/8/2007	T-10	99.5%	99.0%	97.0%	X	19
234	11/14/2007	11/28/2007	T-10	100.2%	100.0%	96.0%	X	19
235	11/14/2007	11/28/2007	T-10	99.4%	100.0%	93.0%	X	19
236	11/26/2007	11/30/2007	T-10	99.8%	100.0%	97.0%	X	19
237	11/28/2007	11/30/2007	T-10	99.2%	100.0%	93.0%	X	19
238	11/29/2007	11/30/2007	T-10	99.6%	99.0%	99.0%	X	19
239	12/3/2007	12/7/2007	T-10	99.2%	100.0%	96.0%	X	19
240	12/11/2007	12/14/2007	T-10	98.8%	99.0%	96.0%	X	19
241	1/10/2008	1/28/2008	T-10	98.5%	100.0%	99.0%	X	19
242	1/16/2008	1/28/2008	T-10	99.8%	100.0%	97.0%	X	19
243	10/4/2007	10/18/2007	T-10	99.4%	100.0%	100.0%	X	20
244	10/12/2007	10/18/2007	T-10	99.8%	100.0%	97.0%	X	20
245	10/20/2007	10/20/2007	T-10	99.8%	100.0%	95.0%	X	20
246	11/6/2007	11/8/2007	T-10	100.0%	100.0%	96.0%	X	20
247	12/12/2007	12/14/2007	T-10	98.8%	100.0%	96.0%	X	20
248	12/13/2007	12/14/2007	T-10	99.2%	99.0%	98.0%	X	20
249	12/13/2007	12/14/2007	T-10	99.5%	100.0%	98.0%	X	20
250	12/14/2007	12/18/2007	T-10	100.0%	99.0%	98.0%	X	20
251	12/19/2007	12/27/2007	T-10	99.3%	100.0%	93.0%	X	20
252	12/27/2007	1/2/2008	T-10	98.9%	100.0%	98.0%	X	20
253	12/26/2007	1/2/2008	T-10	99.4%	100.0%	98.0%	X	20
254	10/11/2007	10/18/2007	T-10	99.0%	100.0%	0.0%		15
255	11/6/2007	11/8/2007	T-10	98.8%	99.0%	0.0%		15
256	8/26/2008	9/24/2008	T-10	99.8%	98.0%	85.0%		15
257	10/10/2008	11/14/2008	T-10	99.6%	100.0%	0.0%		15
258	11/5/2008	11/6/2008	T-10	98.6%	95.0%	78.0%		15
259	9/19/2007	10/18/2007	T-10	99.4%	100.0%	0.0%		16
260	11/15/2007	11/28/2007	T-10	97.5%	100.0%	94.0%		16
261	11/30/2007	11/30/2007	T-10	100.5%	92.0%	70.0%		16
262	1/26/2008	1/28/2008	T-10	99.5%	100.0%	89.0%		16
263	9/24/2007	10/18/2007	T-10	99.5%	100.0%	0.0%		17
264	9/27/2007	10/18/2007	T-10	99.8%	90.0%	0.0%		17
265	10/8/2007	10/18/2007	T-10	99.5%	100.0%	0.0%		17
266	10/19/2007	10/20/2007	T-10	98.5%	100.0%	0.0%		17
267	10/22/2007	10/29/2007	T-10	99.2%	99.0%	0.0%		17
268	10/30/2007	11/3/2007	T-10	99.1%	100.0%	0.0%		17
269	12/14/2007	12/18/2007	T-10	98.0%	100.0%	98.0%		17
270	12/15/2007	12/18/2007	T-10	99.0%	98.0%	97.0%		17
271	12/17/2007	12/18/2007	T-10	99.5%	100.0%	82.0%		17
272	12/18/2007	12/18/2007	T-10	100.9%	100.0%	0.0%		17
273	9/8/2007	10/1/2007	T-10	99.4%	97.0%	0.0%		17
274	9/11/2007	10/18/2007	T-10	97.0%	0.0%	0.0%		17
275	1/7/2008	1/28/2008	T-10	99.2%	101.0%	102.0%		17
276	9/13/2007	10/18/2007	T-10	98.4%	99.0%	86.0%		18
277	11/28/2007	11/30/2007	T-10	100.1%	100.0%	81.0%		18
278	12/1/2007	12/7/2007	T-10	98.9%	98.0%	98.0%		18
279	12/15/2007	12/18/2007	T-10	94.0%	99.0%	98.0%		18
280	1/15/2008	1/28/2008	T-10	98.2%	100.0%	100.0%		18
281	9/12/2007	10/18/2007	T-10	99.5%	92.0%	94.0%		19
282	10/24/2007	10/29/2007	T-10	98.9%	98.0%	93.0%		19
283	10/27/2007	10/29/2007	T-10	99.4%	100.0%	79.5%		19
284	11/3/2007	11/8/2007	T-10	99.0%	99.0%	0.0%		19
285	11/16/2007	11/27/2007	T-10	90.4%	99.0%	92.0%		19

ILLINOIS AMERICAN WATER COMPANY - CHAMPAIGN DISTRICT - METER TEST RESULTS

5/8" AND 5/8" X 3/4" METERS

				METER FLOW TEST RESULTS - % Acceptable Range for Test (Red is failure)				
				98.5%-101.5%	98.5%-101.5%	90% - 101.5%		
Test #	Date Pulled	Date Tested	Meter Type	Gearing	Intermediate	Minimum	Passed	Age
286	11/28/2007	11/30/2007	T-10	99.4%	98.0%	94.0%		19
287	11/28/2007	11/30/2007	T-10	98.6%	97.0%	86.0%		19
288	9/24/2007	10/1/2007	T-10	98.2%	99.0%	91.0%		20
289	10/12/2007	10/18/2007	T-10	99.0%	0.0%	0.0%		20
290	10/23/2007	10/29/2007	T-10	99.5%	98.0%	94.0%		20
291	10/26/2007	10/29/2007	T-10	99.6%	98.0%	95.0%		20
292	11/7/2007	11/8/2007	T-10	99.5%	100.0%	0.0%		20
293	12/29/2007	1/2/2008	T-10	98.9%	94.0%	69.0%		20

Meters < 15 Years Old

Average for 17 Meters that Passed	99.9%	100.1%	98.5%
Average for 0 Meters that Failed	0.0%	0.0%	0.0%
Average for 293 Meters Tested	99.5%	99.1%	91.8%
Number Failing this Test	0	0	0
% Failing this Test	0%	0%	0%

Meters 15 Years Old

Average for 118 Meters that Passed	99.5%	100.0%	97.5%
Average for 6 Meters that Failed	99.2%	98.4%	32.6%
Average for 293 Meters Tested	99.5%	99.1%	91.8%
Number Failing this Test	0	0	5
% Failing this Test	0%	0%	4%

Meters 16 Years Old

Average for 32 Meters that Passed	99.9%	100.0%	98.8%
Average for 4 Meters that Failed	99.2%	98.0%	63.3%
Average for 293 Meters Tested	99.5%	99.1%	91.8%
Number Failing this Test	1	1	3
% Failing this Test	3%	3%	8%

Meters 17 Years Old

Average for 51 Meters that Passed	99.7%	99.9%	98.4%
Average for 13 Meters that Failed	99.1%	91.2%	29.2%
Average for 293 Meters Tested	99.5%	99.1%	91.8%
Number Failing this Test	2	4	11
% Failing this Test	3%	6%	17%

Meters > 18 Years Old

Average for 35 Meters that Passed	99.6%	99.8%	97.2%
Average for 18 Meters that Failed	98.3%	92.6%	74.9%
Average for 293 Meters Tested	99.5%	99.1%	91.8%
Number Failing this Test	5	9	8
% Failing this Test	9%	17%	16%

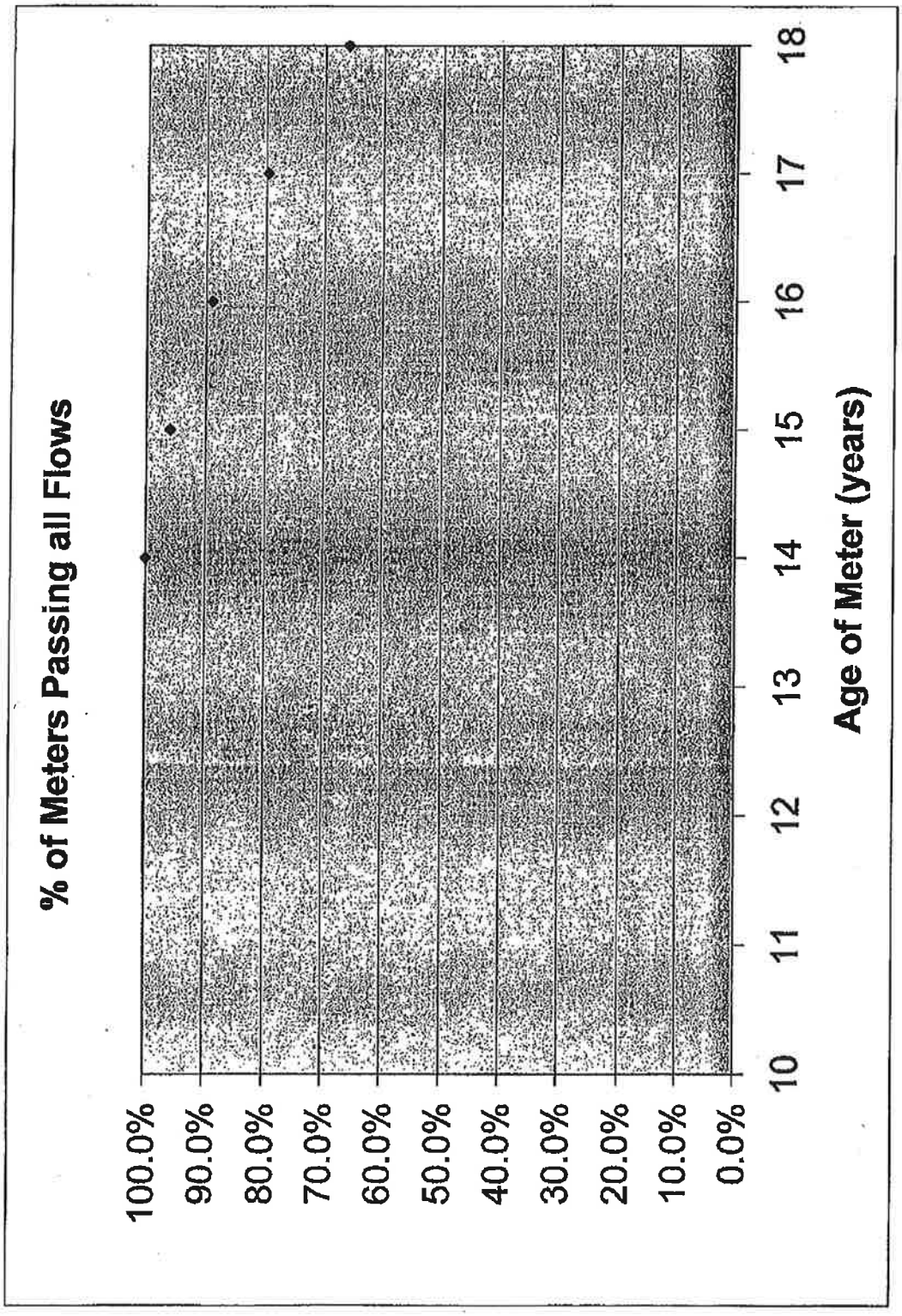

FIGURE 1
IAWC ATTACHMENT "A" TO EXHIBIT NO. BLS-1.0

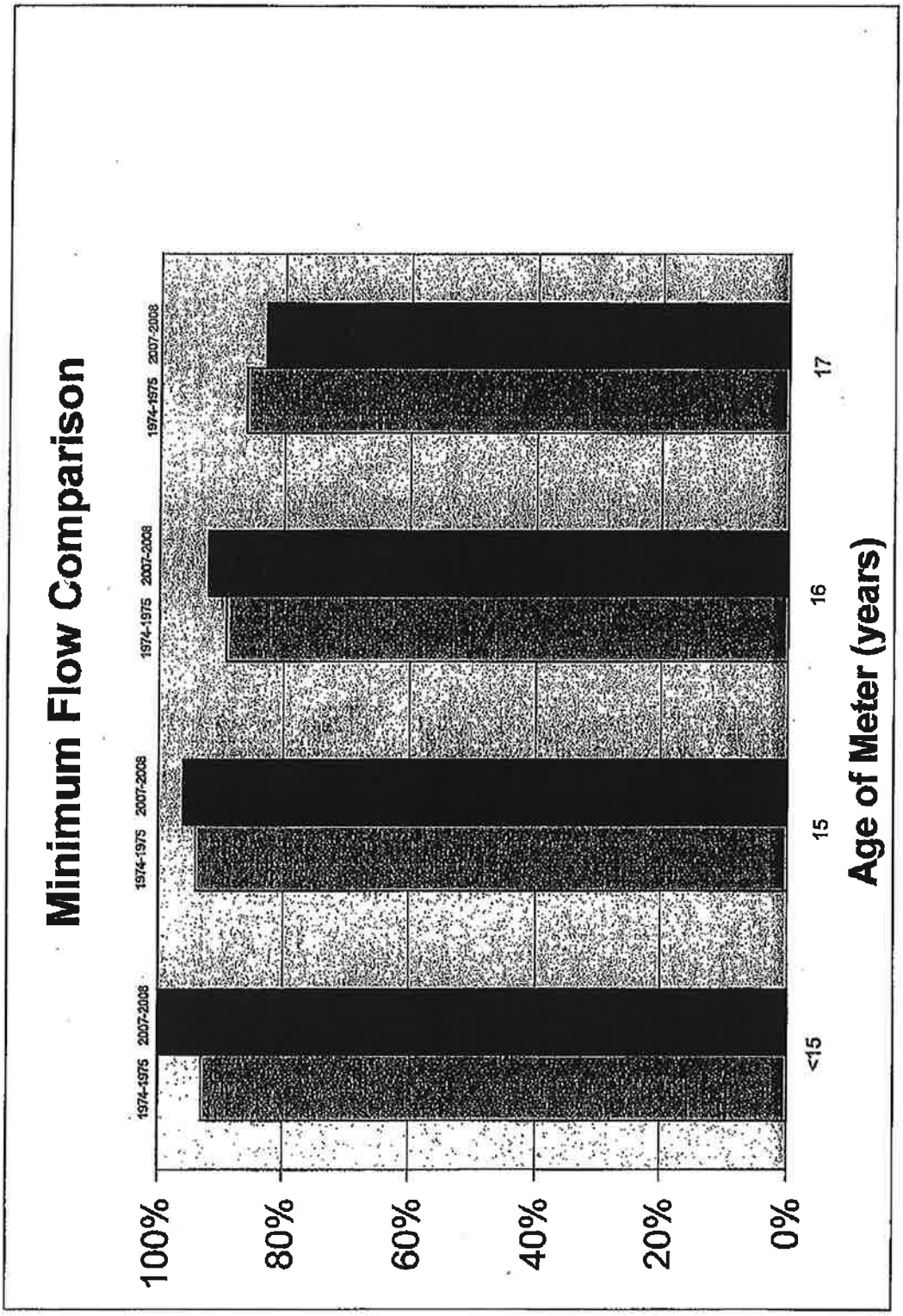

FIGURE 2
IAWC ATTACHMENT "A" TO EXHIBIT NO. BLS-1.0

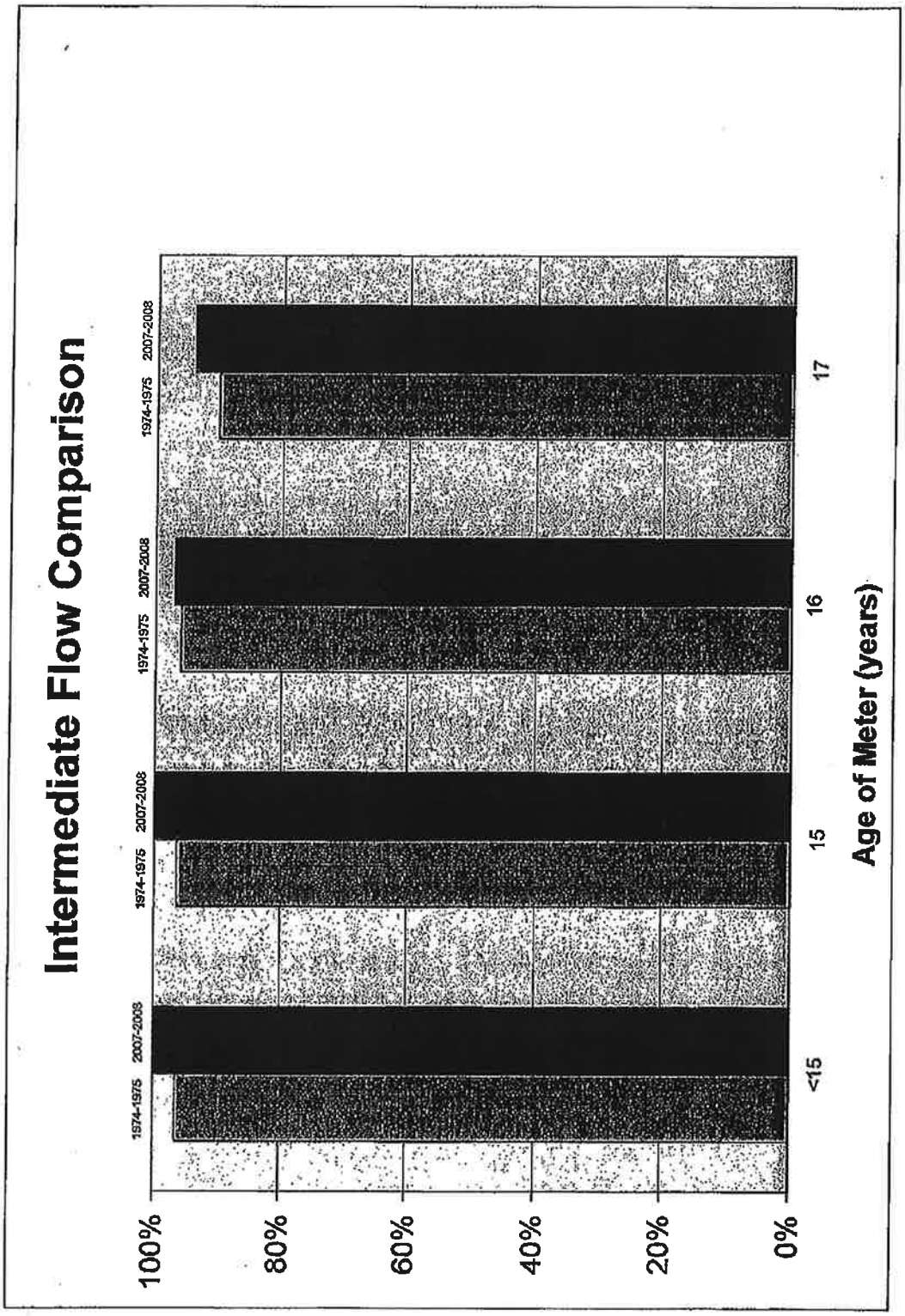

FIGURE 3
IAWC ATTACHMENT "A" TO EXHIBIT NO. BLS-1.0

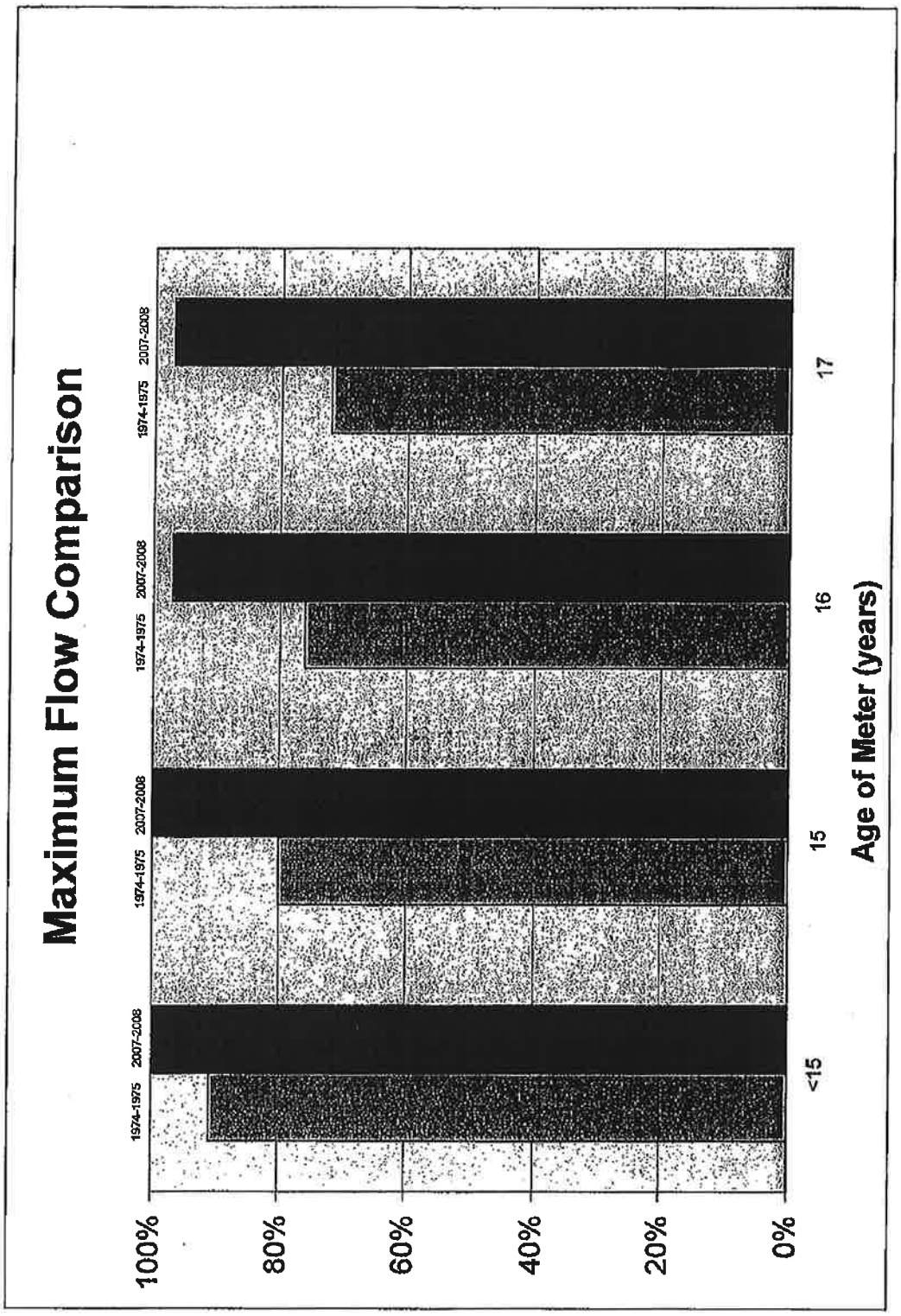

FIGURE 4
IAWC ATTACHMENT "A" TO EXHIBIT NO. BLS-1.0

Attachment B

COPY

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA-AMERICAN WATER COMPANY, INC. FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR WATER AND SEWER SERVICE, FOR APPROVAL OF NEW SCHEDULES OF RATES AND CHARGES APPLICABLE THERETO, AND FOR APPROVAL OF CERTAIN TARIFF CHANGES TO IMPLEMENT A TRACKING MECHANISM FOR PURCHASED POWER COSTS	CAUSE NO. 43187

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PREFILED TESTIMONY

VOLUME 3

ROGER A. PETTIJOHN – PUBLIC'S EXHIBIT #7

HAROLD L. REES – PUBLIC'S EXHIBIT #8

MAY 24, 2007

Respectfully submitted,

Daniel M. LeVay
Jeffrey M. Reed
Robert M. Endris

TESTIMONY OF ROGER A. PETTIJOHN
CAUSE NO. 43187
INDIANA AMERICAN WATER COMPANY, INC.

I. Introduction

Q: Please state your name and business address.

A: My name is Roger A. Pettijohn and my business address is Indiana Government Center North, 100 North Senate Avenue, Room N501, Indianapolis, Indiana 46204.

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

A: I have been employed by the Indiana Office of Utility Consumer Counselor (OUCC) since November of 2000 and currently function as a Senior Utility Analyst for the Water/Wastewater Division.

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

A: As a Senior Analyst for the OUCC Water/Wastewater Division, I am responsible for evaluating the condition, operation and project improvements proposed by investor owned, municipal and not-for-profit water and sewer utilities.

Q: What is your professional background and experience?

A: After teaching several years for the Department of Defense Dependents Schools, I accepted an administrative position as Utility Director for the City of Elwood, Indiana in 1976. Subsequently, I assumed the responsibilities of operator in charge of the water and wastewater facilities. In 1980, I accepted a position as

Consequently, the 1 inch meter can be expected to last longer.

Q: Should Petitioner be replacing ¾ and 1 inch meters on an 8 and 6 year basis respectively?

A: No. From my own experience and in talking with others in the industry, no one replaces meters of any size on this basis. With respect to 5/8th inch meters, testing is rarely done, except perhaps to check for high consumption, but rather these meters are routinely replaced in accordance to a scheduling policy. Labor and meter parts are prohibitively expensive and have reached a point wherein greater efficiency is gained by just replacing the meter. Labor cost involves not just testing the meter but also removal and installation. In any case, Petitioner should re-think its ¾ and 1 inch meter replacement policy or at least flow test the meters before scrapping.

Q: Do you have any comments regarding Table 1?

A: Yes. A 16.8% change-out rate of residential meters means Petitioner is actually using a six (6) year meter replacement program as opposed to the 10-year plan described in response to DR7-142 above. The disparity in replacement rates between regions seems extreme, with only a .87% replacement rate in the Northwest District as compared to a high of 24.8% in the Muncie District. One would expect more uniformity.

Q: Is a 6-year residential meter replacement rate reasonable for Petitioner?

A: No. As stated above, Petitioner's response to OUC DR 7-142 said it is using a 10-year rate. Furthermore, Petitioner's 2005 Depreciation Study set meter

depreciation at 17 years and a survival curve of 16 years. In other words, after a records review and in its expert judgment, Petitioner determined that its meters will last 16 years. In practice it is replacing meters on the order of every six (6) years. There is no consideration as to size or type of meter (See RAP Attachment 1).

Q: What residential meter replacement rate do you recommend?

A: Meters and metering technology is improving and may well commonly reach an average longevity of 20 years at some point in the future. Consequently, the time frames of meter replacement programs should be increasingly extended. In this case, I recommend a replacement rate of 15 years. This percentage may not be the best number for all 22 operations in Indiana because of varying water qualities, mineral constituents, and network pressures. For example, Petitioner's source of supply for its Northwest Operation is Lake Michigan water whereas the Jeffersonville Operation is well water. A 15% replacement rate should be an underpinning figure from which Petitioner can refine.

Q: Why does a 15% residential meter replacement rate starting point make sense?

A: It is currently important to think of a meter as a part of a metering system. A metering system is made up of a meter, a transmitter with signaling capability or a touch pad sensor, and software and hardware applications for data collection and manipulation. These components have various functions with various warranties.

Petitioner is invested in Neptune metering systems thru Neptune Technology Group. Most of the components of this system, taken from Neptune literature, are shown and described in RAP Attachment 2. It is important to note that many of the components may last well beyond Petitioner's stated 5/8" meter 10-year replacement policy such as the Data Collector which has a warranty of 20 years and the brass meter body that has a lifetime warranty (See RAP Attachment 3).

The meter itself has a 10-year warranty. Therefore, the manufacturer expects the meter to last well beyond 10 years. A 15-Year replacement policy seems reasonable.

Q: What is Petitioner budgeting for its meter replacement program?

A: Mr. DeBoy shows, in his Exhibit AJD, that $23,943,000 has been budgeted for replacement meters over five (5) years.

Q: What are you proposing for the meter replacement 5-year budget?

A: Mr. DeBoy's 5-Year Meter Replacement Program budget should be reduced to reflect a 15 year service life for 5/8" meters. As mentioned earlier, this 15 year service life more closely represents the meter service lives approved in Petitioner's most recent depreciation study.

V. SIOTC High Service Pumping Capacity

Q: What is the issue regarding the SIOTC High Service pumping capacity in Jeffersonville?

A: Petitioner objects to the Commission's determination in Petitioner's last rate case

Attachment C

VERIFICATION

I, Joe Loughmiller, Manager, External Affairs, of Indiana American Water Company, affirm under penalty of perjury that customers affected by this filing were provided notice of this request as required by 170 IAC 1-6-1. Attached is a copy of said notice, which was published in The Times, 601 W. 45th Avenue, Munster, Indiana 46321.

Joe Loughmiller
Manager, External Affairs
Indiana American Water Company

LEGAL NOTICE

Notice is hereby given that on October 21, 2009, Indiana-American Water Company, Inc. filed a request with the Indiana Utility Regulatory Commission pursuant to 170 IAC 1-6-1 et seq., for a variance from the meter inspection, test, and replacement schedule requirements set forth in 170 IAC 6-1-10 (b). The proposed change would extend the meter testing periods for all customers utilizing 5/8, 3/4 and one inch meters.

The expected date of approval is 30 days from the date of filing or shortly thereafter. Any objection to the filing should be made to the secretary of the IURC, National City Center, 101 West Washington Street, Suite 1500 E, Indianapolis, Indiana 46204; phone: 1-800-851-4268; web: http://www.in.gov/iurc/ or to the Indiana Office of Utility Consumer Counselor, National City Center, 115 W. Washington St., Suite 1500 South, Indianapolis, Indiana 46204; phone: 1-888-441-2494 Toll Free, (317) 232-2494 Voice/TDD; web: http://www.in.gov/oucc/.