



Citizens Gas | Citizens Thermal | Citizens Resources
2020 N. Meridian St. | Indianapolis, IN | 46202-1393
www.citizensenergygroup.com

Korlon L. Kilpatrick
Director, Regulatory Affairs
Office: (317) 927-4592
kkilpatrick@citizensenergygroup.com

August 1, 2014

VIA ELECTRONIC FILING

Brenda A. Howe
Secretary of the Commission
Indiana Utility Regulatory Commission
101 West Washington St., Suite 1500 E
Indianapolis, IN 46204

Re: Thirty – Day Filing for CWA Authority, Inc., Pursuant to 170 IAC 1-6

Dear Ms. Howe:

CWA Authority, Inc. (“the Authority”) is requesting Commission approval of this filing under the Commission’s Thirty-Day Administrative Filing Procedures and Guidelines (“Guidelines”) pursuant to 170 IAC 1-6 in order to be effective on or after August 18, 2014. This filing is an allowable request under 170 IAC § 1-6-3(2), (3), and/or (7) of the Guidelines.

Enclosed for your review and approval by the Commission, please find the following:

First Revised Page No. 101A Sewer Rate No. 1 – Nonindustrial Sewage Disposal Service.

Also attached is Exhibit A, a copy of the public notice.

On April 16, 2014, Commission staff issued a letter to the Authority indicating that it had questions about the Authority’s estimating methodology for non-metered wastewater customers as provided in Rule 9.5.2 of the Authority’s terms and conditions, and that rate information for such non-metered customers should be included in “Sewer Rate No. 1” of the Authority’s tariff. Following a meeting with staff from the Commission and the Office of Utility Consumer Counselor on May 9, 2014, the Authority provided a set of informal responses to questions that were raised at that meeting. On June 6, 2014, the Authority received a letter from Commission staff stating that the Authority’s methodology of billing non-metered wastewater customers based on number of occupants appeared to be reasonable, based in part, on the Authority’s willingness to modify the customer letter and to modify its tariff to identify the unmetered customer charges through a 30-day filing. Although the Authority is not seeking approval of the customer letter, a copy is attached for informational purposes as Exhibit B. Commission staff recommended that the Authority change the volume of water assigned to each occupant from 2,250 gallons of consumption, or 9,000 gallons for a four-person household to 1,800 gallons per occupant or 7,200 gallons for a four-person household. Pursuant to IAC 1-6-5(a)(4), Exhibit C

is attached to show the impact of the requested volume reduction on the Authority's revenue. Commission staff stated it appeared that, "It would be reasonable to make this change in a 30-day filing." The purpose of this filing is to modify the Authority's Sewer Tariff No. 1 to include information on the estimating methodology used for non-metered wastewater customers and incorporate the volume changes for individual occupants and households as recommended by Commission staff. The proposed modification will impact non-metered wastewater customers.

The Authority affirms that a notice regarding the filing in the form attached hereto as Exhibit A was published on August 1, 2014 in the Indianapolis Star, a newspaper of general circulation in the Indianapolis metropolitan area, where the largest number of the Authority's customers is located. The Authority also affirms that this notice has been posted on the Authority's website and in its customer service lobby.

Upon approval of the enclosed tariff sheet, please return one (1) file-marked and approved stamped copy of the Sewer Rate No. 1 tariff sheet to me for our files. Any questions concerning this submission should be directed to:

Korlon L. Kilpatrick II
Director, Regulatory Affairs
2020 N. Meridian Street
Indianapolis, In
Email: kkilpatrick@citizensenergygroup.com
Phone/Fax: 317-927-4592

Sincerely,

/s/Korlon L. Kilpatrick II
Korlon L. Kilpatrick II
Director, Regulatory Affairs

KLK/jlb
Enclosures

cc: Office of the Utility Consumer Counselor

EXHIBIT A

LEGAL NOTICE

PUBLIC NOTICE is hereby given that on or about August 1, 2014, CWA Authority, Inc. ("CWA"), as owner of the sewer system intends to file with the Indiana Utility Regulatory Commission ("Commission") a proposed change to its Terms and Conditions for sewage disposal service ("Terms and Conditions for Service") as approved by the Commission. CWA's Terms and Conditions for Service permit it to estimate bills for non-metered wastewater customers, but do not contain information about the actual method used by CWA to bill those customers. CWA currently bills non-metered wastewater customers on a per occupant basis. Based upon recommendation of Commission staff, CWA is proposing to amend its Terms and Conditions for Service to include such rate information, including the volumes used for bill calculations. The proposed change to CWA's Terms and Conditions for Service will impact non-metered wastewater customers and be eligible for approval by the Commission on or after September 1, 2014. This notice is provided to the public pursuant to 170 IAC 1-6-6. Contact information, to which an objection should be made, is as follows:

Secretary
Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street
Suite 1500 E
Indianapolis, Indiana 46204
Telephone: (317) 232-2701
Facsimile: (317) 232-6758

Office of Utility Consumer Counselor
PNC Center
115 W. Washington St.
Suite 1500 South
Indianapolis, Indiana 46204
Telephone: (317) 232-2494
Toll Free: (888) 441-2494
Facsimile: (317) 232-5923

Date:

EXHIBIT B



2020 North Meridian St. | Indianapolis, IN | 46202

CitizensEnergyGroup.com

May 13, 2014



Re: [REDACTED]

Dear Customer,

A recent review of our billing system indicated your property located at [REDACTED] has an unmetered sewer service. Our records further indicate that you have not been billed for this service.

Please note Citizens will begin billing for this service immediately. The sewer billing will be reflected on the next monthly statement you receive from Citizens Energy Group. Based on our property research, your first statement with sewer service will show charges from MM/DD/YYYY to present. The monthly sewer rate will be based on four (4) household occupants according to our established tariff.

If you have questions, disagree with the number of occupants, or would like to discuss a payment arrangement, please contact us by email at CustomerCare@CitizensEnergyGroup.com or by telephone at 924-3311. Our hours of operation are 7:00 AM to 7:00 PM Monday thru Friday and 9:00AM to 1:00PM Saturday.

Sincerely,

Revenue Assurance Department

Revenue Impact of Volume Reduction

			A	B	C	D
			Number of Occupants			
Number of gallons per customer			2	3	4	
1	2,250		4,500	6,750	9,000	
Volume by Tier						
2	Tier 1	5.1336	4,500	6,750	7,500	
3	Tier 2	5.8551	-	-	1,500	
4	Monthly Charge	\$	23.10	\$ 34.65	\$	47.28
5	1,800		3,600	5,400	7,200	
Volume by Tier						
6	Tier 1	5.1336	3,600	5,400	7,200	
7	Tier 2	5.8551	-	-	-	
8	Monthly Charge	\$	18.48	\$ 27.72	\$	36.96
9	Difference	\$	4.62	\$ 6.93	\$	10.32
10	Number of customers		1,952	412	2,154	
11	Monthly Revenue	\$	9,018.71	\$ 2,855.31	\$	22,235.16
12	Annualized Revenue	\$	108,224.50	\$ 34,263.70	\$ 266,821.93	\$ 409,310.13