ORIGINAL

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF SOUTH HARRISON WATER CORPORATION, A NOT-FOR-PROFIT CORPORATION, FOR APPROVAL OF A CHANGE IN RATES AND CHARGES.	)))))	CAUSE NO. 43850 APPROVED: SEP 08 2010

BY THE COMMISSION:
Larry S. Landis, Commissioner
David E. Veleta, Administrative Law Judge

On January 26, 2010, South Harrison Water Corporation ("South Harrison") filed with the Indiana Utility Regulatory Commission ("Commission") a Petition seeking a change to its existing rates and charges. On March 2, 2010, South Harrison prefiled the Direct Testimony and Exhibits of Scott A. Miller, CPA, and David Dahl, P.E. South Harrison also filed on April 9, 2010, the Supplemental Testimony and Exhibits of Scott Miller. On June 2, 2010, the Office of the Utility Consumer Counselor ("OUCC") filed its Prefiled Direct Testimony and Exhibits. On June 28, 2010, the parties filed their Joint Stipulation and Settlement Agreement ("Settlement Agreement") with Proposed Order. In support of the Settlement Agreement, the OUCC prefiled the Settlement Testimony of Roger A. Pettijohn and South Harrison prefiled the settlement testimony of Scott Miller.

Pursuant to notice as prescribed by law, the Commission conducted an evidentiary hearing in this Cause on July 13, 2010, at 10:00 a.m. in Room 222 of PNC Center, Indianapolis, Indiana. At the hearing, South Harrison and the OUCC offered their respective testimony and exhibits which were admitted into the record without objection. No members of the public attended or participated in the evidentiary hearing. On July 16, 2010, South Harrison filed its Motion to Late-File Information Responsive to Question from the July 13, 2010 Hearing ("Motion"). On July 29, 2010, the Presiding Officers granted South Harrison's Motion.

Based upon the applicable law and the evidence herein, the Commission now finds that:

1. **Statutory Notice and Commission Jurisdiction.** Due, legal, and timely notice of these proceedings was given as required by law. South Harrison is a "public utility" as defined in Indiana Code § 8-1-2-1, *et seq*. Accordingly, the Commission has jurisdiction in this matter.

2. **South Harrison's Characteristics.** South Harrison is a nonprofit, rural water utility organized and existing under the laws of the State of Indiana. South Harrison began providing water service in the early 1970s, and now serves approximately 3,100 customers in Harrison and Floyd Counties, Indiana. In serving its customers, South Harrison utilizes wells, a treatment plant, elevated and ground storage facilities, and more than 300 miles of water

transmission and distribution facilities. South Harrison maintains its office in New Middletown, Harrison County, Indiana.

3. **Existing Rates, Proposed Relief, and Test Year.** South Harrison seeks approval in this matter to adjust its rates and charges for water service. South Harrison's existing rates and charges were established by Final Order issued by this Commission on June 19, 1991, in Cause No. 39134. Assuming a test year ending September 30, 2009, South Harrison proposed to adjust its rates to produce a total net revenue of $1,658,524.

4. **South Harrison's Prefiled Direct Evidence.**

A. **Scott Miller.** Mr. Miller presented testimony and exhibits supporting South Harrison's proposal to adjust its rates and charges. He testified that his accounting firm had been retained to assist South Harrison and its consulting engineers with the development of a cost of service study to be used as a basis to make recommendations for changes in South Harrison's present schedule of rates and charges. Mr. Miller reduced his recommendations to a written accounting report that was attached to his testimony as Exhibit 3.

Mr. Miller presented South Harrison's operation and maintenance expenses, the estimated cost of South Harrison's proposed capital improvements, and South Harrison's annual revenue requirement and available revenues. The accounting report shows that after deducting revenues from penalties, interest income, and other operating income, South Harrison's total net revenue requirement is $1,613,669. Based on South Harrison's revenues under existing rates, Mr. Miller recommends a 28.8% increase to rates to meet the utility's net revenue requirement.

Mr. Miller calculates South Harrison's rates based upon the cost of serving each class of customers. Mr. Miller also presented a comparison of the present and proposed monthly bills at selected usage amounts and a schedule of proposed rates and charges. If approved, the rates proposed by Mr. Miller would result in an overall rate increase of 28.8%.

The accounting report included the balance sheet, a comparative statement of income and retained earnings, the schedule of operating expenses, the comparative statement of cash flows, and a schedule showing the minimum account balances required. In addition, Mr. Miller set forth schedules showing the outstanding indebtedness of the utility, along with amortization schedules.

B. **David Dahl.** Mr. Dahl presented testimony and exhibits describing South Harrison's current water supply and distribution system and its anticipated capital needs to meet the continuing demand for water supply in its service area.

i. **Existing Facilities.** Mr. Dahl specifically described how South Harrison relies upon two sources of water supply, a Ranney well located along the Ohio River that was constructed in the 1960s and a gravel packed well that was placed in service in 1974. Presently, water from the well field is pumped northward approximately four miles through parallel 8" and 12" raw water mains to the water treatment plant. At the plant, the water is

softened, filtered, disinfected, and fluoridated. From the plant, water is pumped to two water storage tanks and then out into South Harrison's system. Mr. Dahl described in some detail each of South Harrison's storage tanks and booster stations located throughout its system. Finally, Mr. Dahl explained that many of South Harrison's distribution lines are 6" or smaller in diameter and were installed more than thirty (30) years ago as part of South Harrison's initial system. Over the years, South Harrison has made significant upgrades to its system by using cash on hand, contributions from local government derived from fees paid by a local riverboat, and loans from the Farmers Home Administration Rural Development.

ii. Capital Improvements. Mr. Dahl outlined a number of capital improvements, including the Lake Road Project, which must be completed to ensure that South Harrison can continue to provide safe, efficient service to its customers. Specifically, Mr. Dahl testified that the Lake Road Project needed to be completed in the relatively near future. At present, South Harrison is utilizing five miles of 6" main that were installed as part of South Harrison's initial water project in the early 1970s. In recent years, South Harrison has experienced a number of leaks and repairs on this portion of its system, especially during peak usage times in the summer. The small diameter 6" main causes increased pumping velocities and subsequent pressure surges. In its Lake Road Project, South Harrison will increase the size of the 6" main to a 12" main which should allow South Harrison to reduce pumping costs, increase reliability, and move water throughout its system with less difficulty. Mr. Dahl estimated that the cost of the Lake Road Project would be $1,180,000. Mr. Dahl also described the need for other water transmission projects, including the Fogel–Shiloh Road Project, Office to St. Peter's Church Road Project, Corydon-New Middletown Road Project, and a new office and warehouse.

C. Supplemental Testimony of Scott Miller. In his supplemental testimony, Witness Miller indicated that during the discovery process with the OUCC, it came to light that South Harrison's initially filed accounting report contained two inadvertent errors. First, the amount substracted for test year painting and maintenance expense was overstated. Second, an estimated *pro forma* well cleaning expense for South Harrison's conventional well was omitted. Mr. Miller explained that test year painting and maintenance expense should have been $126,277, not $162,380 as listed in his prefiled testimony. Due to the understating of the test year expense, the amount of the adjustment for tank painting and maintenance was actually greater than originally estimated in South Harrison's original prefiled direct testimony and exhibits. Similarly, South Harrison's total expense for well cleaning should be increased from $106,300 to $114,800 per year. With the addition of the correct expenses, South Harrison's proposed increase to its rates and charges could be as much as 31.9%.

5. OUCC's Prefiled Direct Evidence.

A. Harold H. Riceman. Mr. Riceman presented testimony and exhibits regarding South Harrison's proposed rate increase and specific revenue requirements. Mr. Riceman initially proposed an upward adjustment to revenues of $3,600 to include rental payments from Portative Technologies. Witness Riceman also presented a number of adjustments for periodic maintenance, IRA contributions, purchased power, health insurance, rate case expense, IURC fees, and certain non-allowed costs. Based on his adjustments, Mr. Riceman proposed that South Harrison's operating expenses be increased from South Harrison's

original proposal of $135,774 to $147,104. Mr. Riceman also proposed to increase South Harrison's annual working capital revenue requirement from $34,227 to $35,093.

In conjunction with Mr. Kaufman's testimony, Mr. Riceman proposed that South Harrison use its cash on hand and debt service reserve funds to pay off its 1991 A Bonds. By paying off the 1991 A Bonds, South Harrison could then reduce its revenue requirement for debt service by $114,350 (from $322,718 to $208,368). In addition, Mr. Riceman proposed that South Harrison's rates include $20,837 per year to fund its debt service reserve. After considering all his adjustments, Mr. Riceman recommended that South Harrison be authorized to increase its rates by 21.8%, which would generate an additional $275,925 in annual revenues.

B. Roger A. Pettijohn. In his testimony, Mr. Pettijohn briefly described South Harrison and its service area and facilities. Witness Pettijohn also discussed South Harrison's proposed capital improvements and certain operation and maintenance practices. Mr. Pettijohn explained that South Harrison has been able to extend and improve service through borrowing, grants, funds from the nearby riverboat casino, and consistent customer growth. Mr. Pettijohn agreed that South Harrison's proposed capital improvement projects are reasonable and should be completed. Mr. Pettijohn, however, proposed a ten-year tank refurbishment plan rather than the eight-year plan originally presented by South Harrison in Mr. Miller's testimony. Mr. Pettijohn also believed that South Harrison should receive $48,000 annually for pump and motor maintenance, which had not originally been requested by South Harrison, and thought that the annual funding to replace South Harrison's media and its treatment plant be adjusted from $2,440 to $4,880. Mr. Pettijohn's proposed adjustments were incorporated into Mr. Riceman's accounting schedules.

C. Edward R. Kaufman. Mr. Kaufman testified regarding South Harrison's proposed debt service and debt service reserve. Specifically, Witness Kaufman disagreed with South Harrison's proposal to include the cost of South Harrison's 1991 Capital A Bonds in its proposed rates. Mr. Kaufman proposed that since South Harrison had only two payments remaining on the 1991 Capital A Bonds, South Harrison should use its cash on hand to make its 2010 payment and then use the funds in its debt service reserve to make the 2011 payment. Under Mr. Kaufman's proposal, South Harrison would reduce its annual revenue requirement by an amount equal to the proposed payment (i.e. $114,350) on the 1991 Bond. In addition, Mr. Kaufman proposed that South Harrison include $20,837 to fully fund its debt service reserve for the 2004 Rural Development loan. The results of Mr. Kaufman's debt service and debt service reserve recommendations were incorporated into the accounting schedules prepared by Mr. Riceman.

D. John C. Dahlstrom. Mr. Dahlstrom discussed in his testimony the cost of service and rate design proposals submitted by South Harrison's witness, Scott A. Miller. Witness Dahlstrom indicated that he had concerns with the potential rate impact on South Harrison's wholesale customers. Although he voiced concerns, Mr. Dahlstrom agreed with South Harrison's methodology for allocating tranmission and distribution costs for wholesale customers and South Harrison's approach for determining normalized sales to be used in cost

allocations. Mr. Dahlstrom testified that South Harrison's proposed rate structure is cost based and is intended to recover its costs for providing service to each class of customers.

6. Settlement Testimony of OUCC and South Harrison.

A. Roger A. Pettijohn. The OUCC filed the Settlement Testimony of Roger A. Pettijohn. The purpose of Mr. Pettijohn's Settlement Testimony was to support the Joint Stipulation and Settlement Agreement ("Settlement Agreement") and explain the agreed upon adjustment between the settling parties. Mr. Pettijohn stated that in the Settlement Agreement, South Harrison agreed to all the adjustments proposed by the OUCC except for South Harrison's proposed budget for extensions and replacements. During discovery in this case and the negotiation process, Witness Pettijohn believed that it was appropriate for South Harrison to utilize its five-year historical average for extensions and replacements (i.e. $133,622) rather than the amount (i.e. $118,000) set forth in its capital improvement plan. With this adjustment, and after including all of the OUCC's adjustments, the parties agreed that South Harrison should increase its rates and charges by 23.1% which would allow for an increase in annual operating revenues of $291,564.

B. Scott A. Miller. South Harrison filed the Settlement Testimony of Scott A. Miller. In his Settlement Testimony, Mr. Miller echoed Witness Pettijohn's support of the Settlement Agreement. Mr. Miller also described how South Harrison addressed the OUCC's concerns regarding hydrant fees paid by the South Harrison Middle School and South Harrison High School. Specifically, Mr. Miller stated that South Harrison had previously refunded the overcharged fees to both schools.

7. Settlement Agreement. We begin with the general statement that settlements presented to the Commission are not ordinary contracts between private parties. *United States Gypsum, Inc. v. Indiana Gas Co.,* 735 N.E.2d 790, 803 (Ind. 2000). When the Commission approves a settlement, that settlement "loses its status as a strictly private contract and takes on a public interest gloss." *Id.,* quoting *Citizens Action Coalition v. PSI Energy,* 664 N.E.2d 401, 406 (Ind. Ct. App. 1996). Thus, the Commission "may not accept a settlement merely because the private parties are satisfied; rather [the Commission] must consider whether the public interest will be served by accepting the settlement." *Citizens Action Coalition,* 664 N.E.2d at 406. Examinations of the public interest may include the impact of a given decision on customers of various classes, the interests of the utility and its stakeholders, and the impact on the State. The interest of the State may be "more comprehensive and take a longer range view than any of the parties' interests." *Nextel West Corp. v. Ind. Util. Regulatory Comm'n,* 831 N.E.2d 134, 156-57 (Ind. App. 2005.)

The Commission is not required to accept a settlement simply because the parties have agreed to it, and agreements filed by some or all of the parties must still be supported by probative evidence. *Id.* Furthermore, any Commission decision, ruling, or order, including the approval of a settlement, must be supported by specific findings of fact and sufficient evidence. *United States Gypsum,* 735 N.E.2d at 795, *citing Citizens Action Coalition v. Public Service Co.,* 582 N.E.2d 330, 331 (Ind. 1991). The Commission's own procedural rules require that

settlements be supported by probative evidence. 170 I.A.C. 1-1.1-17(d). Therefore, before the Commission can approve any Settlement Agreement, we must determine whether the evidence in this Cause sufficiently supports the conclusions that the settlement is reasonable, just, and consistent with the purpose of Indiana Code § 8-1-2, and that such agreement serves the public interest.

On June 28, 2010, the parties filed a Settlement Agreement which was admitted into evidence on July 13, 2010, and settled all issues between South Harrison and the OUCC in this Cause. A copy of the Settlement Agreement is attached hereto as Exhibit A. The parties have requested that the Commission accept and use the Settlement Agreement as a basis for entering a final order. The Settlement Agreement reflects the agreement of the OUCC and South Harrison that South Harrison's revenue requirement should be increased by an average of 23.1% in order to produce $291,564 in additional operating revenues. The settling parties agreed that South Harrison should use money from its extensions and replacements budget and cash on hand to complete certain capital improvements that were identified in South Harrison's prefiled testimony.

8. Commission's Discussion and Findings. Based on the testimony presented in this Cause, we find that the Settlement Agreement represents a comprehensive resolution of the issues presented in this matter, is in the public interest, and should be approved. We find, therefore, that South Harrison's rates should be increased by an average of 23.1% so as to produce $291,564 in additional annual operating revenues and that South Harrison should meet all of its commitments under the Settlement Agreement. South Harrison's revenue requirements approved herein are summarized as follows:

Operation & Maintenance	$1,165,731
Taxes Other Than Income Taxes	29,178
Debt Service	208,368
Debt Service Reserve	20,837
Working Capital	35,093
Replacements and Improvements	133,622
Total Revenue Requirements	1,592,829
Less: Interest Income	2,135
Other Income	36,363
Total Net Revenue Requirements	1,554,331
Less: Revenues at Existing Rates	1,263,080
Revenue Increase Required	291,251
Add IURC Fee	313
Total Recommended Increase	291,564
Percentage Increase	23.1%

The parties agreed that the Settlement Agreement should not be used as precedent in any other proceeding or for any other purpose, except to the extent necessary to implement or enforce the terms. Consequently, with regard to future citation of the Settlement Agreement, the

Commission finds that our approval herein should be construed in a manner consistent with our finding in *Richmond Power & Light*, Cause No. 40434, (*Ind. Util. Reg. Comm'n*, March 19, 1997).

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION, that:

1. The Joint Stipulation and Settlement Agreement is hereby approved and the terms and conditions thereof are incorporated herein as part of this Order. The parties shall comply with the provisions of the Joint Stipulation and Settlement Agreement.

2. South Harrison is hereby authorized to increase its rates and charges 23.1% so as to produce $21,564 in additional operating revenues.

3. South Harrison shall file with the Commission's Water/Sewer Division within twenty-one (21) days of the date of this Order a new tariff setting forth, the rates and charges consistent with this Order. New rates and charges shall be effective on and after the date of filing the new tariff with the Water/Sewer Division.

4. This Order shall be effective on and after the date of its approval.

HARDY, ATTERHOLT, LANDIS, MAYS, AND ZIEGNER CONCUR:

APPROVED: SEP 08 2010

I hereby certify that the above is a true and correct copy of the Order as approved.

Sandra K. Gearlds

Sandra K. Gearlds
Acting Secretary to the Commission

FILED
June 28, 2010
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF SOUTH HARRISON WATER CORPORATION, A NOT-FOR-PROFIT CORPORATION, FOR APPROVAL OF A CHANGE IN RATES AND CHARGES.	)))))	**CAUSE NO. 43850**

JOINT STIPULATION AND SETTLEMENT AGREEMENT

This Joint Stipulation and Settlement Agreement ("Settlement Agreement") is entered into this 28th day of June, 2010, by and between South Harrison Water Corporation ("South Harrison") and the Office of the Utility Consumer Counselor ("OUCC"), who stipulate and agree for purposes of settling all matters in this Cause that the terms and conditions set forth below represent a fair and reasonable resolution of all issues in this Cause, subject to their incorporation in a final order of the Indiana Utility Regulatory Commission ("Commission").

Terms and Conditions of Settlement Agreement

1. **Requested Relief**. On January 26, 2010, South Harrison initiated this Cause by filing a Petition with the Commission requesting authority to change its existing rates and charges. South Harrison's existing rates were established by a Final Commission Order in Cause No. 39134, dated June 19, 1991.

2. **Prefiled Evidence of Parties**. In support of its Petition, South Harrison filed on March 2, 2010, the Prefiled Testimony and Exhibits of Scott A. Miller, C.P.A., and David Dahl, P.E., and the Supplemental Testimony and Exhibits of Scott Miller on April 9, 2010. On June 2, 2010, the OUCC prefiled the Testimony and Exhibits of Harold H. Riceman, Roger A. Pettijohn, Edward R. Kaufman, and John Dahlstrom. On June 28, 2010, the OUCC prefiled the Settlement Testimony of Mr. Pettijohn.

3. **Settlement**. Through analysis, discussion, and negotiation, as aided by their respective technical staff and experts, South Harrison and the OUCC have now agreed on

terms and conditions as described herein that resolve all issues between them in this Cause.

4. **Revenue Requirement, Rates, and Charges**. The parties agree that South Harrison should be authorized to increase its rates and charges for utility service to reflect ongoing net revenue requirements in the amount of $1,590,694, resulting in an annual increase of $291,564 or 23.1% over South Harrison's existing rates and charges. Attached to the Settlement Agreement as Exhibit A is a schedule that summarizes the agreed upon revenue requirement and resulting increase.

5. **Operation and Maintenance Adjustments**. After review and examination, South Harrison has agreed to the OUCC's proposed adjustments for wireless internet revenues, tank maintenance, filter media replacement, pump motor maintenance, employee benefits expense, purchased power expense, health insurance, certain non-allowed costs, working capital, and IURC expenses. South Harrison also agrees with the OUCC's proposal for fully funding South Harrison's debt service reserve and the adjustment to test year expense for debt service.

6. **Extensions and Replacements**. In its prefiled testimony, South Harrison proposed a budget for extensions and replacements of $118,000 per year. The proposed budget was based entirely on a $1,180,000 capital improvement project to be completed over a ten (10) year time frame. After reviewing the ongoing needs of the utility, South Harrison and the OUCC both agree that it is appropriate for South Harrison to include an amount in its revenue requirement for extensions and replacements that is equal to South Harrison's five (5) year historical average for extensions and replacements. The five (5) year historical average is $133,622 (as compared to the originally requested $118,000 for the capital improvement plan). This upward adjustment of $15,622 is reflected in Exhibit A attached hereto.

7. **Refund to Schools**. The parties agree that the fire hydrant charge referenced on page 9 of Witness Riceman's testimony was actually an annual, not monthly, fee. The parties further agree that South Harrison has made the appropriate refund to the school, and

this issue is no longer outstanding. Accordingly, no further action is necessary on this item.

8. **Cost of Service Study**. The parties agree that the cost of service study complies with the principles set forth in the *American Waterworks Association M-1 Manual* and establishes a reasonable, rational basis to allocate the cost of serving South Harrison's various classes of customers.

9. **Admissibility and Sufficiency of Evidence**. The parties hereby stipulate to the admission without objection of the Prefiled Testimony and Exhibits of Scott Miller and David Dahl, the Prefiled Testimony and Exhibits of Harold H. Riceman, Roger A. Pettijohn, Edward R. Kaufman, and John Dahlstrom, as well as the Settlement Testimony of Roger A. Pettijohn. The parties further agree that such evidence constitutes substantial evidence sufficient to support this Settlement Agreement and provides an adequate evidentiary basis upon which the Commission can make all findings of fact and conclusions of law necessary for the approval of this Settlement Agreement as filed.

10. **Non-Precedential Effect of Settlement**. The parties agree that the facts in this Cause are unique and all issues presented fact specific. Therefore, the Settlement Agreement shall not constitute nor be cited as precedent by any person or deemed an admission by any party in any other proceeding except as necessary to enforce its terms before the Commission or any court of competent jurisdiction. This Settlement Agreement is solely the result of compromise in the settlement process, except as provided herein, is without prejudice to and shall not constitute an admission or waiver of any position that either party may take with respect to any issue in any future regulatory or non-regulatory proceeding.

11. **Proposed Order**. South Harrison and the OUCC have agreed to the form of a final order ("Final Order"), a copy of which is attached hereto as Exhibit B.

12. **Authority to Execute**. The undersigned have represented and agreed that they are fully authorized to execute the Settlement Agreement on behalf of their designated clients who will hereafter be bound thereby.

13. **Approval of Settlement Agreement in Its Entirety**. As a condition of this settlement, the parties specifically agree that if the Commission does not approve this Joint Stipulation and Settlement Agreement in its entirety and incorporate it into the Final Order as provided above, the entire Settlement Agreement shall be null and void and deemed withdrawn, unless otherwise agreed to in writing by the parties. The parties further agree that in the event the Commission does not issue a Final Order in the form that reflects the Agreement described herein, the matter should proceed to be heard by the Commission as if no settlement had been reached unless otherwise agreed to by the parties in a writing that is filed with the Commission.

14. **No Other Agreements**. There are no agreements in existence between the parties relating to the matters covered by this Settlement Agreement that in any way affect this Settlement Agreement.

SOUTH HARRISON WATER CORP.

J. Christopher Janak
Attorney No. 18499-49
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, IN 46204
Phone: (317) 684-5000
Fax: (317) 684-5173

INDIANA OFFICE OF THE UTILITY CONSUMER COUNSELOR

Daniel M. LeVay, Attorney No. 22184-49
Assistant Consumer Counselor
Indiana Office of Utility Consumer Counselor
National City Center
115 W. Washington St., Suite 1500 South
Indianapolis, Indiana 46204
Phone: (317) 233-3237
Fax: (317) 232-5923

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Joint Stipulation and Settlement Agreement" was served upon the following by electronic mail this 28th day of June, 2010:

Daniel M. LeVay
Indiana Office of Utility Consumer Counselor
National City Center
115 W. Washington St., Suite 1500 South
Indianapolis, Indiana 46204
dlevay@oucc.in.gov

J. Christopher Janak

Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, IN 46204
(317) 684-5000

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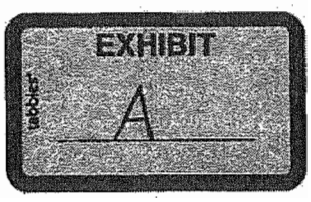
SOUTH HARRISON WATER CORPORATION

RATE IMPACT OF PROPOSED SETTLEMENT
Cause No. 43850

	Per Petitioner	Per OUCC	Proposed Settlement	
Operating expenses	$1,154,401	$1,165,731	$1,165,731	
Taxes other than income taxes	29,178	29,178	29,178	
Extensions and replacements	118,000	118,000	133,622	(1)
Working capital	34,227	35,093	35,093	
Debt service	322,718	208,368	208,368	
Debt service reserve		20,837	20,837	
Total revenue requirements	1,658,524	1,577,207	1,592,829	
Less interest income	(2,135)	(2,135)	(2,135)	
Net revenue requirements	1,656,389	1,575,072	1,590,694	
Less revenues at current rates subject to increase	(1,250,843)	(1,263,080)	(1,263,080)	
Less other revenues at current rates	(45,000)	(36,363)	(36,363)	
Net revenue increase required	360,546	275,629	291,251	
Add additional IURC fee		296	313	(2)
Recommended Increase	$360,546	$275,925	$291,564	
Recommended Percentage Increase	28.8%	21.8%	23.1%	

(1) To adjust the allowance for extensions and replacements to match average annual capital additions in lieu of the proposed capital improvement plan.

(2) To adjust for additional IURC fees based on increased operating revenue.