

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**PETITION OF COMMUNITY UTILITIES OF)
INDIANA, INC. FOR: AUTHORITY TO)
INCREASE ITS RATES AND CHARGES FOR)
WATER AND WASTEWATER UTILITY)
SERVICE; APPROVAL OF NEW SCHEDULES)
OF RATES AND CHARGES APPLICABLE)
THERE TO; AUTHORITY TO RECOVER)
CERTAIN COSTS INCURRED IN)
CONNECTION WITH CAUSE NOS. 44724,)
45342 AND 45389; AUTHORITY TO RECOVER)
COSTS INCURRED AND DEFERRED IN)
CONNECTION WITH THE COVID-19)
PANDEMIC; APPROVAL OF A NEW)
RESIDENTIAL LOW-INCOME RATE FOR)
WATER AND WASTEWATER SERVICE; AND)
OTHER APPROPRIATE RELIEF)**

CAUSE NO. 45651

NOTICE OF CORRECTIONS

Petitioner Community Utilities of Indiana, Inc. (“CUII”) hereby submits this Notice of Corrections to the following testimony and attachments. Petitioner will formally make these changes at the evidentiary hearing for this Cause. Please note that strikethroughs reflect deletions and underscores reflect additions.

Direct Testimony of Shawn EliceGUI

- Page 1, lines 6-8, edit as follows: I also am the Corporate Secretary for ~~a member of the~~ Corix Regulated Utilities (US) Inc. (f/k/a Utilities, Inc.) (“Corix Regulated Utilities Inc.”) ~~board of directors, as well as Corix Regulated Utilities Inc.’s Corporate Secretary.~~
- Page 13, line 20: remove “Audit” and replace with “Business Planning and Growth.”

Direct Testimony of Loren Grosvenor

- Page 19, lines 15-16: remove Level 1 and Level 2” and replace with “Level 4 and Level 5”

Rebuttal Testimony of Steven Lubertozzi

- Page 14, line 16: remove “15.3” and replace with “less than 25”

Rebuttal Testimony of Sean O'Dell

- Page 16, line 15: change the word “Stands” to “Strands”

Rebuttal Testimony of Amanda Streicher

- Page 3, line 17: change “CUII witness Holden” to “LOFS witness Holden”
- Page 16, line 15: add an ellipsis between “system” and “until”

Rebuttal Testimony of Carl Fischer

- Page 10, line 5 should read, “largely the same design”
- Page 11, line 4: change the period after “built” to a comma
- Page 21, line 5: replace “design” with “concept”

Rebuttal Testimony of Loren Grosvenor


- Please see attached, Revised Attachment LG-R6. All corrections were made in “actual” and “variance” columns for 2020 YTD. These corrections are consistent with filings previously made by Petitioner in Cause No. 44724.

Rebuttal Testimony of James Kilbane

- Page 6, line 5, edit as follows: “Our current estimated rate case expense is ~~\$400,280~~ \$401,513.” This correction is consistent with the amounts and calculations shown in Attachment JK-R1, Rate Case Expense Estimate.

Respectfully submitted,

317-236-2208 Pashos Telephone
317-592-4676 Pashos Facsimile
kay.pashos@icemiller.com
317-236-2294 Krohne Telephone
317-592-4212 Krohne Facsimile
steve.krohne@icemiller.com
317-236-2263 Alson Telephone
317-592-4698 Alson Facsimile
mark.alson@icemiller.com
317-221-2819 Beyrer Telephone
317-592-4693 Beyrer Facsimile
kelly.beyrer@icemiller.com



Kay E. Pashos, Atty. No. 11644-49
Steven W. Krohne, Atty. No. 20969-49
Mark R. Alson, Atty. No. 27724-64
Kelly M. Beyrer, Atty. No. 36322-49
Ice Miller LLP
One American Square, Suite 2900
Indianapolis, IN 46282-0200

Attorneys for Community Utilities of Indiana, Inc.

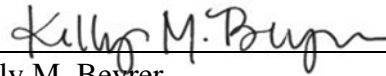
CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on June 24, 2022, by electronic transmission to the following counsel:

Lorraine Hitz, Deputy Consumer Counsel
Daniel Le Vay, Deputy Consumer Counselor
Indiana Office of Utility Consumer Counselor
PNC Center
115 W. Washington St., Suite 1500 South
Indianapolis, IN 46204
LHitz@oucc.IN.gov
dlevay@oucc.in.gov
infomgt@oucc.IN.gov

Nikki G. Shoultz
Bose McKinney & Evans LLP
111 Monument Circle, Ste. 2700
Indianapolis, IN 46204
nshoultz@boselaw.com

Lee Lane
Genetos Lane & Buitendorp LLP
7900 Broadway
Merrillville, IN 46410
lee@glblegal.com



Kelly M. Beyrer

Community Utilities of Indiana, Inc. - Twin Lakes - Performance Plan

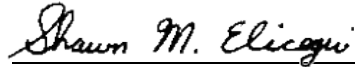
Mission		Objectives	Objective Measure	2018 Target	2018 Actual	2018 Variance	2019 YTD Target	2019 YTD Actual	2019 Variance	2020 Target	2020 YTD Actual	2020 Variance	2021 Target	2021 Actual	2021 Variance	2022 Target	2022 Actual	2022 Variance
Implement and Develop System Improvement Plan Focused on "Three Key Aspects" of Service Quality	Comprehensive Inflow and Infiltration Program Development to (1) Decrease total incidences of wastewater backups in homes and (2) Decrease total incidences of manhole overflows	Decrease Total Incidences of Wastewater Backups in Homes	Incidences of wastewater backups in homes	8	4	-4	6	1	-5	4	3	-1	0	1	1	0	0	
		Decrease Total Incidences of Manhole Overflows	Incidences of manhole overflows	8	5	-3	6	3	-3	4	3	-1	0	0	0	0	0	
		Work with LOFS to Eliminate Prohibited Drainage Connections - Home Inspection Program	Home inspections, percent complete	10%	6.50%	-3.50%	10.0%	13%	3%	10%	0.2%	-9.8%	10%	0.0%		10%	2.50%	
			Residences smoke tested, number	640	905	265	2560	2560	0	320	0	-320	320	0	-320	320		
			Laterals televised, number	80	0	-80	0	90	90		93							
			Dyewater flooding, number	5	0	-5	21	4	-17									
			Approval of rules tariff granting authority to enforce residential compliance	Yes	Yes		0	0	0									
			Elimination of prohibited connections within 60 days of notification ¹	100%	100%	0	100%	100%	0	100%	N/A	N/A	100%	N/A	N/A	100%	100%	
			Information Meetings with residents to discuss Sanitary Sewer Overflow Program	1	1	0	2	2	0	2	0	-2	2	0	-2	2		
		Utilize AMP to Decrease Infiltration into Manholes and Collection Mains	Percentage of manholes inspected, annually	10%	25%	15%	10%	29%	19%	10%	17.8%	7.8%	10%	20%	10%	10%	4%	
			Manholes remedied, as a percentage of those found with high priority defects	100%	100%	0	100%	100%	0	100%	0%	-100%	100%	0	-100%	100%		
			Sewer clean and televise, percent per year	10%	9.7%	-0.30%	10%	11%	1%	10%	9.7%	-0.3%	10%	9.50%	-0.50%	10%		
			Level 5 structural defect collection mains replaced or relined, percentage	100%	100%	0	100%	0	-100%	100%	36%	-64%	100%	164%	64%	100%		
			Level 4 structural defect collection mains replaced or relined, percentage				0%	0	0	100%	36%	-64%	100%	64%	-36%	100%		
		Utilize AMP to Handle Inflow into Collection System and Central Treatment Plant	Filing and Approval of Collection System Expansion under IN Code 8-1-2-23				2	0	-2	2	1	-1	2	0	-2			
			Progress on collection system expansion (Phase 1), cumulative percentage complete	5%	0%	-5%	15%	4.3%	-11%	100%	6.39%	-93.6%						
			Progress on collection system expansion (Phase 2), cumulative percentage complete				10%	0	-10%	36%	0%	-36%	100%	0%	-100%			
			Progress on collection system expansion (Phase 3), cumulative percentage complete				0%	0	0	15%	0%	-15%	58%	0%	-58%	100%	79%	
			Filing and Approval of Central Plant Expansion under IN Code 8-1-2-23				2	0	-2									
			Progress on central plant expansion, cumulative percentage complete	3%	0%	-3%	9%	4.5%	-5%	70%	5.5%	-64.1%	100%	5.60%	-94.40%			
	Multi-Faceted Program Development to (3) Decrease total complaints of discoloration of drinking water	Decrease Total Complaints of Discoloration of Drinking Water	Number of verified residential water discoloration complaints ¹	20	5	-15	16	0	-16	12	1	-11	8	0	-8	4		
		Utilize AMP to prudently maintain, repair, flush and replace water infrastructure	System flushing	2	1	-1	2	2	0	2	2	0	2	2	0	2		
			Valves exercised	100%	100%	0	100%	81%	-19%	100%	100%	0%	100%	50%	-50%	100%		
			Polyethylene service lines replaced, count of homes				60	60	0	60	21	-39	60	61	1	60		
			Watermain condition assessment and prioritization	Yes	Yes		Yes	Yes		Yes	Yes		Yes	Yes		Yes		
			Watermain replaced as percentage identified as priority				100%	68%	-32%	100%	0%	-100%	100%	100%	0	100%		
			Iron Filter condition assessment	2	1	-1	0	0	0									
			Filing and Approval of Iron Filter Replacement and Re-pipe under IN Code 8-1-2-23				2	0	-2									
			Iron Filter replacement, percentage complete	5%	0%	-5%	100%	7.6%	-92%									
		Communicate with LOFS regarding causes, steps taking to decrease complaints and how residents can prevent discolored water	Develop instructional/troubleshooting videos for household water complaints	2	2	0	2	0	-2									
			Communication to customers for known issues or maintenance, which may cause discoloration	100%	100%	0	100%	100%	0	100%	100%	0%	100%	100%	0	100%		
			Information Meetings with residents to discuss Water Discoloration Mitigation Program	1	1	0	2	2	0	2	0	-2	2	0	-2	2		

¹Omits double counting from same complaint address for same disturbance

VERIFICATION

I hereby verify under the penalties of perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Date: June 24, 2022



Shawn M. Elicegui
Chief Legal Officer, EVP Risk and Corporate Secretary
Corix Infrastructure Inc.

VERIFICATION

I hereby verify under the penalties of perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Date: 6/24/2022



James Kilbane
Finance and Analysis Manager
Corix Regulated Utilities



JANET E. PACIOREK
NOTARY PUBLIC
STATE OF OHIO
Comm. Expires
10-26-2022
Recorded in
Cuyahoga County

Janet E. Paciorek
06-24-2022