

FILED
March 24, 2021
INDIANA UTILITY
REGULATORY COMMISSION

PETITIONER'S EXHIBIT NO. 6

IURC
PETITIONER'S
EXHIBIT NO. 6
4-22-21
DATE REPORTER LR

AMERICAN SUBURBAN UTILITIES, INC.

IURC CAUSE NO. 44676 S1

RESPONSIVE TESTIMONY

OF

ELTON A. WAGNER

SPONSORING ATTACHMENTS EAW-1 THROUGH EAW-3

**RESPONSIVE TESTIMONY
OF
ELTON A. WAGNER**

CAUSE NO. 44676 S1

Q. Please state your name and business address.

Elton A. Wagner, Schomburg & Schomburg Construction, Incorporated (Schomburg), 923
North Collett Street, Danville, Illinois 61832.

Q. Please describe Schomburg.

A. Schomburg was founded in 1979 by Richard and Barbara Schomburg. The company has
been sold in 2013 to Julie Buesing 57% and Wesley Burris 43% prior to the Schomburgs'
retirement. The company has operated as a female-owned minority business from this
point until the current day. We are a full-service construction manager, design-builder, and
general contractor specializing in construction services for a broad range of projects,
including churches, educational, financial, industrial, manufacturing facilities, as well as
renovation projects. Our work includes:

- Demolition
- Hydro Excavation and Concrete
- 24-Hour Crane Service (60-Mile Radius)
- Earthwork and Foundations
- Carpentry
- Machine Rigging and Moving
- Millwright Service

PETITIONER'S EXHIBIT NO. 6

- Storm and Sanitary Sewers
- Wastewater Treatment Plants
- Water Treatment Plants
- Precision Laser Alignment
- Steel Erection
- Detention Ponds
- Erosion Control
- Solar Equipment Installation (State-Certified Solar DG Installer)
- Civil Work for Ameren Illinois (Power Company)

Q. What is your relationship with Schomburg?

A. I am independent contractor. I generally submit the bids and manage the construction on the wastewater treatment plants and solar projects.

Q. What is your professional background?

A. I earned a degree in Civil Engineering from the University of Illinois in 1961. I have been engaged as a construction contractor my entire adult life. My experience in construction began as a teenager working for my father's construction contracting firm. That was 70 years ago.

Q. What is the purpose of your testimony in this proceeding?

A. I will sponsor a bid that I have prepared for Schomburg for a wastewater treatment plant expansion for American Suburban Utilities, Inc. ("ASU").

PETITIONER'S EXHIBIT NO. 6

1 **Q. Have you or Schomburg ever done work for ASU?**

2 A. We have never done any construction work for ASU. I did submit a bid for construction
3 work for a wastewater treatment plant in 2017. I sent another bid for construction work in
4 November, 2020. These two attachments are Attachments EAW-2 and EAW-3.

5 **Q. Do you know how ASU found you?**

6 A. I bid on and was awarded the bid on the construction of a wastewater plant to serve a school
7 in Tippecanoe County, Indiana. Ed Serowka was the design engineer. He contacted me
8 about submitting bids for the ASU work.

9 **Q. Please identify Attachment EAW-1.**

10 A. This is bid that I submitted on March 16, 2021.

11 **Q. How was this prepared?**

12 A. The original bid was submitted from plans labeled “Water Reclamation Project”, Project
13 13-021, dated November 20, 2013 on a bidding program called “The Construction Link”.
14 The revised bid was submitted using “As Built” drawings labeled “Phase 1,2,3
15 Construction – Wastewater Treatment Plant”, Project 20-005. Dated September 28, 2020
16 on a bidding program called “The Construction Link”

17 **Q. Would Schomburg have been willing to build the plant that is depicted in the**
18 **engineering drawings you have identified for the amount that is set forth in the bid**
19 **you have prepared?**

20 A. Yes, had we been given the opportunity. The plant has already been built, however.

PETITIONER'S EXHIBIT NO. 6

1 **Q.** **What is the difference between Attachments EAW-1 and Attachments EAW-2 and**
2 **EAW-3?**

3 A. Attachment EAW-2 is the bid from 2017, and this is for a different plant design. This bid
4 was submitted before the plant was built, and we were prepared to build pursuant to this
5 bid. Attachment EAW-3 is largely for the same plant as Attachment EAW-1. Some sizes
6 were changed as a result of an error in my original bid. In addition, I did not include the
7 tertiary (polishing) lagoon removal in the first estimate. This was the most expensive one
8 to remove because it had apparently been out of service for over 20 years. This was the
9 largest dollar value difference. Otherwise, they are very similar.

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

11 A. Yes, at this time.

I, Elton A. Wagner, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Elton A. Wagner", with a stylized, flowing script.

March 23, 2021

Elton A. Wagner

Proposal

From: Schomburg & Schomburg Const. Co. Inc.
923 Collett Street
Danville
Illinois, 61832 USA
Contact: Al Wagner
Email: alwagner@schomburginc.com

Project: AMERICAN SUBURBAN UTILITIES 10
15 20
Description: Up grade existing WWTP

ITEM	DESCRIPTION	BID QTY	U/M	UNIT BID	AMOUNT
1	Mobilization & Demobilization	1.000	ls	\$771,883.22	\$771,883.22
2	Inflow Auxillary MH	1.000	ls	\$111,602.77	\$111,602.77
3	Influent Pump Station Complete	1.000	ls	\$596,952.50	\$596,952.50
4	Clean & Repair existing lift Station	1.000	ls	\$82,619.51	\$82,619.51
5	Macerator Structure	1.000	ls	\$223,080.90	\$223,080.90
6	Influent Flow Meter	1.000	ls	\$75,606.52	\$75,606.52
7	CSBR Concrete Tanks & Equipment	2.000	each	\$1,860,248.58	\$3,720,497.16
8	UV Chamber & Equipment	1.000	ls	\$331,474.21	\$331,474.21
9	Post Air Tank	1.000	ls	\$124,383.38	\$124,383.38
10	Flow Meter Structure	1.000	ls	\$82,353.82	\$82,353.82
11	Aerobic Digesters 1,2,3,4	1.000	ls	\$1,774,607.09	\$1,774,607.09
12	Rehab Existing Aerobic Digesters to Sludge holding tanks	1.000	ls	\$59,113.22	\$59,113.22
13	Supernatant Lift Station & Equipment	1.000	ls	\$211,559.54	\$211,559.54
14=1	Rehab Old Control Building	1.000		\$93,265.00	\$93,265.00
15	Chem Feed Lines to CSBR & Mascerator	1.000	ls	\$150,984.65	\$150,984.65
16	New Chem Feed Building & Equipment	1.000	ls	\$120,672.26	\$120,672.26
17	Rehab Existing Blower Building, Furnish New Blowers	1.000	ls	\$634,831.69	\$634,831.69
18	Convert existing Control Building into Main Electrical, Control Building	1.000	ls	\$14,914.58	\$14,914.58
19	Clean & Fill Sludge holding Lagoons 1 & 2	1.000	ls	\$804,672.51	\$804,672.51
20	Yard Piping	1.000	ls	\$2,683,905.41	\$2,683,905.41
21	Restoration & Seeding	1.000	ls	\$73,390.14	\$73,390.14
22	Electrical	1.000	ls	\$2,173,500.00	\$2,173,500.00
23	Existing SRB Tank Rehab	1.000	ls	\$59,081.48	\$59,081.48
				TOTAL BID:	\$14,974,951.56

Proposal

Project Comments

Signature: _____

Elton A Wagner

PROPOSAL (OR BID)

**OWNER: American Suburban Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47905**

Made this 13 day of March 2017.

By: Schomburg & Schomburg Construction Co, Inc.

Business Address: 923 North Collett Street,
Danville, Illinois 61832

The bidder declares that the only person, firm or corporation or persons, firms or corporations, that has or have any interest in this proposal, or in the Contract or Contracts proposed to be taken, is of or are the undersigned; that this proposal is made without any connection or collusion with any person, firm or corporation making a proposal for the same work; that the attached and/or referenced Contract Documents and drawings therein referred to, have been carefully examined and are understood; that as careful an examination has been made as is necessary to become informed as to the character and extent of the work to contract with the owner in the form of Contract hereto attached, to do the required work in the manner set forth in the Contract documents and as shown by the drawings.

The Base Bid or Alternate Bid and unit prices on the attached and signed proposal forms are to include and cover the furnishings of all materials and labor requisite and proper and the providing of all necessary machinery, tools, apparatus and means for performing the work, and the doing of all the above-mentioned work, in the manner set forth, described and shown in the Contract Documents and on the Contract drawings, within the prescribed time. If this proposal shall be accepted by the Owner and the undersigned shall refuse or neglect, within 15 days after receiving the Contract for execution, to execute the same and to give the stipulated bond, then said Owner may at its option, determine that the bidder has abandoned the Contract, and thereupon the proposal and the acceptance thereof shall be forfeited to and become the property of said Owner.

Note: The bidder or bidders must sign and the address for each must be given. In the case of firms, the firm's name, must be signed and subscribed to by at least one member. In the case of corporations, the corporate name must be signed by some authorized officer or agent thereof, who shall also subscribe his name and office. If practicable, the seal of the corporation shall be affixed.

Bidder hereby agrees to commence work under this Contract within ten (10) days after service of a written "Notice to Proceed" from the Owner and to complete the work fully within 270 calendar days after the date of said service.

Having carefully examined the Specifications and Special Provisions for the work hereinbefore named, and in conformity with the Specifications, I/We hereby certify that I/We am/are the only persons or persons interested in this proposal as principals, that it is made without collusion with any person, firm or corporation; that an examination has been made of the Specifications and the Contract Documents, including the Special Provisions contained herein, and of the site of the work, and propose to furnish all necessary machinery, plant, equipment, tools, labor and other means of construction, and furnish all materials specified, in the manner and at the times prescribed, and perform all work as follows:

Date: March 13, 2017

Bidder: Schomburg & Schomburg Construction Company Inc.

Business Address: 923 North Collett Street

Danville, Illinois 61832

Signature: _____

Phone: 217-442-3081

BASE BID:

One (1) Carriage Estates II Wastewater Treatment Plant Expansion from 1.50 MGD to 3.0 MGD complete with the following: new headworks manholes; macerator structure; new submersible lift station with valve pit; cleaning and repairs of existing lift station; influent flow monitor; two (2) CSBR concrete tanks with equipment; CSBR decanter tank; UV channel disinfection system; post air tank; effluent flow meter; new aerobic digester systems with four concrete tanks; conversion of existing four CSBR tank to aerobic digesters; cleaning and repair of two existing circular aerobic digesters; supernatant decanting tank conversion; supernatant return lift station; new CSBR and aerobic digester aeration blowers; repair of existing control building and blower building; a new aerobic digester blower building; CSBR blowers/UV control building; and a control/laboratory building will be included. The work will also include excavating, backfilling, earthwork, regrading, piping and valves, electrical control panels, instrumentation as well as all other related work and appurtenances necessary to make the plant fully operational.

TOTAL FOR PROPOSAL (BASE BID):

\$ 14,498,331.88

(Written in Figures)

Fourteen Million Four Hundred Ninety Eight Thousand Three Hundred Thirty One Dollars & 88/100

(Written in Words)

THE CONTRACTOR SHALL COMPLETE THE BASE BID CONTRACT IN 730 CALENDAR DAYS FROM THE DATE OF THE NOTICE TO PROCEED. IT IS THE INTENT OF AMERICAN SUBURBAN UTILITIES, INC. TO ASSESS LIQUIDATED DAMAGES IN THE AMOUNT OF \$500.00 FOR EACH CALDENDAR DAY THE CONTRACTOR IS DELINQUENT IN COMPLETING THE CONTRACT.

Conditions:

1. Award will be made on the total of the Base Bid.

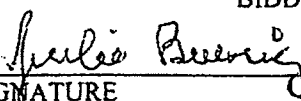
BIDDER CERTIFICATION OF WORK CAPACITY

This certifies that the undersigned guarantees all of the work performed under this contract to be done in accordance with the Specifications and Special Provisions in a good workmanlike manner and to renew or repair any work which may be rejected due to defective workmanship or materials, prior to final completion and acceptance of the work. Also, we have the equipment, labor, supervision, and financial capacity to perform this Contract either with our organization or with subcontractors.

Schomburg & Schomburg Construction Company, Inc.

BIDDER

By:


SIGNATURE
Julie Buesing

President

TITLE

PROPOSAL (OR BID) ATTACHMENT ONE

SCHEDULE OF VALUES:

CONSTRUCTION DESCRIPTION:	CONSTRUCTION COST:
1. Mobilization & Demobilization, Insurance and Bonds, Project Administration.	817,598.66
2. Headworks Manholes including Auxiliary Manholes.	110,312.96
3. New Influent Lift Station Wet Well, Valve Pit and Equipment.	594,352.32
4. Cleaning and Repair of the Existing Lift Station Wet Well, Valve Pit and Equipment.	15,976.38
5. Macerator Structure and Equipment.	204,821.58
6. Influent Flow Meters.	60,868.44
7. Two (2) CSBR Concrete Tanks with Equipment.	3,790,561.20
8. UV Disinfection System with Concrete Channel and Equipment.	331,575.40
9. Post Aeration Tank with Equipment.	131,506.81
10. Effluent Flow Meter Structure with Equipment.	84,879.93
11. New four (4) Aerobic Digester Concrete Tanks with Equipment.	1,977,052.19
12. Conversion of Existing Chlorine Contact Tank to Supernatant Decanting System with Equipment.	307,574.42
13. Supernatant Return Lift Station Wet Well, Valve Pit and Equipment.	206,968.42
14. New Aeration Blower/UV Control Building with Equipment.	189,054.76
15. New Aerobic Digester Blower Building with Equipment.	201,235.30
16. New Control/Laboratory Building with Furnishing and Equipment.	132,436.67
17. Repair Existing Blower Building and Furnish New Aeration Blowers and Equipment.	119,606.97

18. Repair and Convert Existing Control Building to Main Electrical Control Building.	16,979.04
19. Remove and dispose of sludge from the existing two (2) sludge lagoons and fill them in.	114,775.25
20. Yard Piping.	2,851,477.76
21. Site work including driveway and sidewalks.	122,771.59
22. Electrical/Instrumentation.	2,115,945.83

Proposal

From: <Unknown> Project: AMERICAN SUBURBAN UTILITIES 10
15 20
Description: Up grade existing WWTP

ITEM	DESCRIPTION	BID QTY	U/M	UNIT BID	AMOUNT
1	Mobilization & Demobilization	1.000	ls	\$805,332.04	\$805,332.04
2	Inflow Auxillary MH	1.000	ls	\$114,576.63	\$114,576.63
3	Influent Pump Station Complete	1.000	ls	\$562,523.36	\$562,523.36
4	Clean & Repair existing lift Station	1.000	ls	\$9,682.40	\$9,682.40
5	Macerator Structure	1.000	ls	\$197,569.91	\$197,569.91
6	Influent Flow Meter	1.000	ls	\$58,765.84	\$58,765.84
7	CSBR Concrete Tanks & Equipment	2.000	each	\$1,825,040.17	\$3,650,080.34
8	UV Chamber & Equipment	1.000	ls	\$319,840.66	\$319,840.66
9	Post Air Tank	1.000	ls	\$127,103.38	\$127,103.38
10	Flow Meter Structure	1.000	ls	\$81,964.46	\$81,964.46
11	Aerobic Digesters 7 , 8, 9, & 10	1.000	ls	\$1,909,781.70	\$1,909,781.70
12	Rehab Existing SBR tanks to Aerobic Digesters	1.000	ls	\$59,119.64	\$59,119.64
13	Supernatant Lift Station & Equipment	1.000	ls	\$212,726.16	\$212,726.16
14	Rehab Old Control Building	1.000	la	\$193,018.38	\$193,018.38
15	Chem Feed Lines to CSBR & Mascerator	1.000	ls	\$149,631.01	\$149,631.01
16	Chem Feed Building & Equipment	1.000	ls	\$115,385.38	\$115,385.38
17	Rehab Existing Blower Building, Furnish New Blowers	1.000	ls	\$376,410.58	\$376,410.58
18	Convert existing Control Building into Main Electrical, Control Building	1.000	ls	\$15,453.96	\$15,453.96
19	Clean & Fill Sludge holding Lagoons 1 & 2	1.000	ls	\$110,768.51	\$110,768.51
20	Yard Piping	1.000	ls	\$2,717,176.74	\$2,717,176.74
21	Restoration & Seeding	1.000	ls	\$118,524.46	\$118,524.46
22	Electrical	1.000	ls	\$2,079,000.00	\$2,079,000.00
				TOTAL BID:	\$13,984,435.54

Signature: _____