

FILED
January 20, 2026
**INDIANA UTILITY
REGULATORY COMMISSION**

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**PETITION OF MAPLETURN UTILITIES,)
INC FOR A NEW SCHEDULE OF RATES)
AND CHARGES FOR WASTEWATER) CAUSE NO. 46292-U
SERVICE)**

PUBLIC EXHIBIT NO. 2

TESTIMONY OF KRISTEN WILLOUGHBY

ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

January 20, 2026

TESTIMONY OF OUCC WITNESS KRISTEN WILLOUGHBY
CAUSE NO. 46292-U
MAPLETURN WASTEWASTEWATER UTILITIES INC.

I. INTRODUCTION

1 **Q: Please state your name and business address.**

2 A: My name is Kristen Willoughby, and my business address is 115 West Washington
3 Street, Suite 1500 South, Indianapolis, Indiana 46204.

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

5 A: I am employed by the Indiana Office of Utility Consumer Counselor (“OUCC”) as
6 a Utility Analyst in the Water/Wastewater Division. I described my qualifications
7 and experience in Appendix A.

8 **Q: What is the purpose of your testimony?**

9 A: I make recommendations on Mapleturn Utilities Inc.’s (“Mapleturn Wastewater”
10 or “Applicant”) periodic maintenance revenue requirement, extensions and
11 replacements (“E&R”) revenue requirement, and projects to be financed.

12 **Q: What did you do to prepare your testimony?**

13 A: I reviewed Mapleturn Wastewater’s Small Utility Rate Application
14 (“Application”). I reviewed the Indiana Utility Regulatory Commission’s
15 (“Commission” or “IURC”) Final Order in Cause No. 45843-U issued February 1,
16 2016, which established Mapleturn Wastewater’s current rates and charges. I
17 reviewed Mapleturn Wastewater’s annual reports to the IURC for years 2020
18 through 2024. I wrote data request questions and reviewed Mapleturn Wastewater’s
19 responses. I also spoke with Mapleturn’s Mr. Kent Garrison several times regarding
20 various maintenance items, capital projects, and costs. I reviewed monthly reports

1 of operation Mapletown Wastewater filed with the Indiana Department of
2 Environmental Management (“IDEM”) and its 2024 and 2025 IDEM inspection
3 reports.¹

4 **Q: If you do not address a specific item, should that be construed to mean you or**
5 **the OUCC agree with Applicant’s proposal?**

6 A: No. The scope of my testimony is limited to the specific items addressed herein.

7 **Q: What attachments are included with your testimony?**

8 A: My testimony includes the following attachments:

- 9 • OUCC Attachment KW-01: Pump Quote.
- 10 • OUCC Attachment KW-02: Water Meter Quote.
- 11 • OUCC Attachment KW-03: SCADA Quote.

II. APPLICANT’S CHARACTERISTICS

12 **Q: Please describe Applicant’s characteristics.**

13 A: Applicant is a not-for-profit utility providing wastewater service to 673 customers
14 in Morgan County.² Applicant relies on one sewage treatment plant to treat its
15 wastewater. Applicant’s collection system consists of fifteen lift stations, an
16 estimated 84,800 feet of collection mains, and an estimated 10,500 feet of force
17 mains.³

¹ IDEM Virtual File Cabinet available at <https://vfc.idem.in.gov/DocumentSearch.aspx>

² 2024 Annual Report, page S-1, Year End Customer Numbers.

³ 2024 Annual Report page S-6. Collection Mains and Force Mains.

III. PERIODIC MAINTENANCE

1 **Q: What is Mapletown Wastewater's proposed adjustment to Periodic**
2 **Maintenance expense?**

3 A: During the test year, Applicant spent \$15,591 on periodic maintenance. As a *pro*
4 *forma* revenue requirement, Mapletown Wastewater proposes to increase these
5 expenditures to \$95,591, which is an increase of \$79,504 over test year expense.

6 Applicants' Schedule 6(f) shows how this amount will be expended:

Periodic Maintenance Item	Annual Amount
Televising 10% per year	\$38,095
Three 15 hp Pumps	\$21,000
Three 20 hp Pumps	\$21,000
Three 7.5 hp Pumps	\$15,000
Total	\$95,095
Less test year amount	(\$15,591)
Increase	\$79,504

7 **Q: Is it reasonable for Applicant to incur expenses to perform periodic**
8 **maintenance?**

9 A: Yes. Wastewater utilities need to perform periodic maintenance on their capital
10 assets. Periodic maintenance will allow Mapletown Wastewater to continue to
11 operate its facilities and prevent early termination of assets.

12 **Q: Did you request additional information regarding each of its proposed**
13 **projects?**

14 A: Yes. I sought and received additional information on the maintenance expenses
15 through informal data requests.

16 **Q: Do you accept Applicant's periodic maintenance expense for nine pumps of**
17 **various sizes?**

18 A: No. Mapletown Wastewater requests a total of \$57,000 for nine pumps of various
19 sizes. (See Schedule 6(f) of its Application.) This cost is not for the maintenance of
20 these pumps but the replacement of them. Therefore, this is not a periodic

1 maintenance expense and should be included in the E&R revenue requirement. I
2 discuss this item below.

3 **Q: Did Mapleturn Wastewater provide additional cost support for its televising**
4 **expense in its case-in-chief?**

5 A: Yes. The televising quote for \$38,095 per year was included with Mapleturn
6 Wastewater's workpapers.

7 **Q: What do you recommend for *pro forma* periodic maintenance expense?**

8 A: I recommend the Commission approve \$38,095 per year in *pro forma* Periodic
9 Maintenance expense so Mapleturn Wastewater can televise 10% of its collection
10 system each year.

IV. EXTENSIONS AND REPLACEMENTS

11 **Q: Has Mapleturn Wastewater proposed an extensions and replacements revenue**
12 **requirement?**

13 A: Yes. According to Indiana Code § 8-1-2-125(c), which applies to not-for-profit
14 utilities, a reasonable and just charge for wastewater service is a charge that will
15 produce sufficient revenue to pay all legal and other necessary expense incident to
16 the operation of the not-for-profit utility's system including "provision for making
17 extensions and replacements." IC § 8-1-2-125(c)(7).

18 **Q: What has Mapleturn Wastewater proposed for its extensions and**
19 **replacements revenue requirement?**

20 A: Mapleturn Wastewater requests \$107,868 per year for its extensions and
21 replacements ("E&R") revenue requirement. (See Schedule 7 of its Application.)
22 This revenue will allow Mapleturn Wastewater to set aside funds for the cleaning
23 and relining of 1,500 feet of sewer main. Most of Applicant's sewage passes

1 through this segment of sewer main which includes two 8” diameter mains located
2 under a canal and one 12” diameter main.

3 **Q: Does Applicant still intend to fund the sewer main cleaning and relining**
4 **project through E&R?**

5 A: No. Mapletown Wastewater has decided to finance this project as discussed by
6 OUCC witness Shawn Dellinger. Therefore, I removed the cost of this project from
7 my calculation of the E&R revenue requirement I recommend.

8 **Q: Does Mapletown Wastewater have any other projects that should be funded**
9 **through its E&R revenue requirement?**

10 A: Yes. As discussed above, Mapletown Wastewater requests \$57,000 for nine
11 replacement pumps of various sizes.⁴ Pump replacement costs have been moved
12 from Period Maintenance to the E&R revenue requirement. Additionally,
13 Mapletown Water began replacing water meters with funds from its last rate case,
14 Cause No. 45842-U. Approximately half of Mapletown Water’s meters have been
15 replaced. Applicant has requested that funds needed to replace the remaining meters
16 be added to its E&R revenue requirement. Because the water meters are used to
17 determine the usage for both the Water and Wastewater utilities, the costs
18 associated with them are split between the two utilities.

19 **Q: Did Mapletown Wastewater provide cost support for the various pumps and**
20 **water meters?**

21 A: Yes. Upon request, Applicant provided copies of quotes for all projects. Based on
22 discussions with the Applicant and quotes provided, the number and size of the
23 various pumps have been revised as shown in the table below.⁵

⁴ Note: These replacement pumps are primarily for lift stations.

⁵ Pump Quote is included as OUCC Attachment KW-01.

Pump Size (HP)	Cost Per Pump	Number of Pumps	Total
15	\$11,057	2	\$22,114
20	\$16,084	2	\$32,168
7.5	\$10,077	2	\$20,154
5	\$6,644	4	\$26,576
Total Over 5 Years			\$101,012
Annual			\$20,202.40

1 The quote provided for the meters has the costs broken down into three
2 components, which total \$297.31 per meter.⁶ In order to complete the meter
3 replacement project, Mapletown Water plans to replace 70 meters per year in each
4 of the next five years.⁷ Therefore, the annual meter replacement program cost is
5 \$12,487.02.⁸

6 **Q: What do you recommend for the annual E&R revenue requirement?**

7 A: I recommend the Commission approve a \$32,700 annual E&R revenue
8 requirement based upon the following:

OUCR Recommended E&R Revenue Requirement	
Annual Pump Total	\$20,202.40
Meter Replacement Program (60% Wastewater Utility) ⁹	\$12,487.02
Total	\$32,689.42

V. FINANCED PROJECTS

9 **Q: Did Applicant provide information on the projects it proposes to finance?**

10 A: As discussed above, Mapletown Wastewater plans to finance cleaning and relining
11 1,500 feet of sewer main. A quote of \$37,005 for cleaning and \$502,337 for relining
12 1,500 feet of sewer main was included in the Applicant's workpapers.

⁶ Included as OUCR Attachment KW-02.

⁷ December 5, 2025 phone call with Kent Garrison.

⁸ $(70 \times \$297.31) \times 60\% = \$12,487.02$

⁹ $(70 \times \$297.31) \times 60\% = \$12,487.02$

1 **Q: Has Applicant decided to finance any other projects?**

2 A: Yes. Mapletum Wastewater needs to replace its existing SCADA system and has
3 been working with a vendor on this. The new SCADA system will be in service for
4 both its water operations and its wastewater operations. Therefore, the cost will be
5 split between the two operations.¹⁰ Mapletum Wastewater's portion of the new
6 SCADA system is \$77,500.¹¹

7 **Q: Do you agree the projects should be financed?**

8 A: Yes. I do not have any concerns with the projects discussed above and agree they
9 should be completed through financing. I recommend the Commission find
10 Petitioner's planned projects justify its requested level of borrowing.

VI. OUCC RECOMMENDATIONS

11 **Q: Please summarize your recommendations in this Cause.**

12 A: I recommend the Commission approve \$38,095 per year in *pro forma* Periodic
13 Maintenance expense. I recommend the Commission authorize an E&R revenue
14 requirement of \$32,700 per year. I recommend the Commission find Petitioner's
15 planned projects justify its requested level of borrowing.

16 **Q: Does this conclude your testimony?**

17 A: Yes.

¹⁰ See Ms. Sullivan's Testimony for more information about the split.

¹¹ SCADA Quote included as OUCC Attachment KW-03. Total Quote \$115,000 – Water Quote portion \$37,500 = \$77,500

APPENDIX A.

1 **Q: Please describe your educational background and experience.**

2 A: I graduated from Indiana University with a Bachelor of Science degree in Biology
3 and a Master of Public Affairs (“MPA”) concentrating in Environmental
4 Management. My graduate coursework included studying how Wastewater
5 pollution affects aquatic ecosystems, environmental rules and regulations,
6 toxicology, risk analysis, epidemiology, finance and budgeting, economics,
7 statistics, public management, and other courses on how pollution affects human
8 health and the environment. After graduating with my MPA, I was hired as an
9 Environmental Manager (EM2) by the Indiana Department of Environmental
10 Management, Office of Air Quality, Permits Branch in 2006 where I analyzed
11 projects for a variety of industries, calculated the air emissions associated with
12 those projects, determined applicable state and federal rules, and drafted federally
13 enforceable air permits. I was promoted to a Senior Environmental Manager
14 (SEM1) about one year later. I held this position for more than ten years. As an
15 SEM1, I worked on complex permit projects, trained and mentored staff, reviewed
16 staff’s work, and developed templates, guidance, and training materials. Since
17 joining the OUCC in 2018, I have attended numerous utility related seminars and
18 workshops including the National Association of Regulatory Utility
19 Commissioners (“NARUC”) Western Utility Rate School.

AFFIRMATION

I affirm the representations I made in the foregoing testimony are true to the best of my knowledge, information, and belief.



By: Kristen Willoughby, Utility Analyst

Cause No. 46292-U

Date: January 20, 2026

Quotation

Quality Repair Service
411 Knight Drive
Greenwood, IN 46142
Ph: 317-881-0205
Fx: 317-881-0294

October 30, 2025

To: Kent Garrison Mapleturn Utilities RE: Hydromatic Pump Pricing	Submitted By: Sue Belser Email: suehgrs@aol.com
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Thank you for your inquiry.

We are pleased to quote you the following:

Item	Quantity	Description	Unit Price	Ext Cost
	1	Hydromatic Model S4P1500M3-4 15HP 3Ph 230V 35-ft Cable		\$11,057.00
	1	Hydromatic Model S4K2000M3-4 20HP 3Ph 230V 35-ft Cable		\$16,084.00
	1	Hydromatic Model S4N500M3-4 5HP 3Ph 230V 35-ft Cable		\$6,644.00
	1	Hydromatic Model S4M750M3-4 7.5HP 3Ph 230V 35-ft Cable		\$10,077.00
		Freight Additional		
		Estimated Delivery 6-8 weeks		

We will be happy to supply any further information you may need and trust that you call on us to fill your order, which will receive our prompt and careful attention.

NOTES:

- Further discount can be applied if all pumps are purchased on one order.
- Must advise required impeller diameter of each pump at time of order.

ACCEPTANCE OF PROPOSAL

THE ABOVE PRICES AND SPECIFICATIONS ARE SATISFACTORY AND ARE HEREBY ACCEPTED.

ACCEPTED: _____ DATE: _____ PO: _____

PLEASE RETURN SIGNED COPY OF THIS QUOTATION FOR OUR RECORDS



Corporate Office:
200 E. Franklin St.
P.O. Box 318
Edinburg, IL 62531-0318
Phone 800-634-4746
Fax 217-623-4216

Branch location:
1078 Wolverine Lane
Cape Girardeau, MO 63701
Phone 800-635-4746
Fax 573-334-0151

Branch location:
200 Commercial Drive
Flora, IN 46929
Phone 877-636-4746
Fax 574-967-4572

Website: www.midwest-meter.com

Quotation

DATE: 12/17/2025

FROM:

Rolland Vickrey
Midwest Meter, Inc.
200 Commercial Drive
Flora, IN 46929

Email: rvickrey@midwest-meter.com
Phone: (765) 720-0158
Toll Free: (877) 636-4746
Fax: (574) 967-4572

TO:

Mapleturn Utilities
ATTN: Steve Collins

Quantity	Description	Unit	Total
5	Orion M/E endpoints.	\$87.75	\$438.75
12	HRE-LCD encoders.	\$133.00	\$1,596.00
1	M25 5/8x3/4" Lead-free Bronze Bare Meter w/ polymer base.	\$76.56	\$76.56
1	M-170 (2") LF bare meter with test plug, HRE-LCD, Orion M/E In US gallons.	\$968.50	\$968.50
1	18x36 meter pit	\$62.25	\$62.25
1	Trumbull Meter pit frame	\$54.75	\$54.75
1	Trumbull Badger 1 hole lid.	\$33.75	\$33.75
1	Set of 2, 2" meter coupling to MIP (CF31-77-NL)	\$189.56	\$189.56

We thank you for giving us the opportunity to present this quotation. Prices are firm for 30 days unless otherwise stated.

Sincerely,

Rolland Vickrey
Midwest Meter Inc.
765-720-0158
rvickrey@midwest-meter.com

ELECTRICAL ENGINEERING & CONTRACTED SERVICES

OUCC Attachment KW-03

Cause No. 46292-U

Page 1 of 2

Rebco Inc., d.b.a. Berling Electric, Co.
Industrial-Commercial Installation and Maintenance
Systems Integration
664 W. Keller Hill Rd., PO Box 610 Mooresville, IN 46158
317-996-3898 Fax 317-996-4000

Mapleturn Utilities May 25, 2025
Water and Lift Station SCADA

Scope:

Replace the existing obsolete Zetron RTU SCADA system using radio modems, PLC(s) and Rockwell ME Station graphics software. Provide a Windows 10/11 refurbished computer and spare. System will control the wells and high service pumps to monitor and maintain tank fill, monitor (14) lift stations, and (1) sewer plant. Graphics will provide operational control and monitoring as the present system. Alarms will be provided using email, and/or (message text using a customer provided text service), or use the existing dialer per customers choice. The new HMI graphics, program control, monitoring, and alarms will be similar to the current system.

Included:

Use existing FCC license for the replacement SCADA system
New PLC controls at the tank and office. Repurpose the existing PLC at the filter plant.
Filter plant wiring for the filter system, NO CHANGES.
Tank level controls. NO CHANGES,
Lift station and sewer plant RTU(s) replaced with radio/modems and PLC(s)
Remove existing Zetron equipment and rewire SCADA controls for the new radio/modem interface. Removed RTU(s) retained by Rebco, Inc as trade-in.

Completion time 60-90 days.

We Propose hereby to furnish labor, material, and systems integration - complete in accordance with the above specifications as follows:

Base Quote: \$ 115,000.00 One Hundred Fifteen Thousand Dollars.

Terms: 25% deposit with order and Net due upon completion.

Rebco, Inc.

by: Robert E. Berling, President



Quote is subject to review after 30 days.

Rebco Inc., d.b.a. Berling Electric, Co.
Industrial-Commercial Installation and Maintenance
Systems Integration
664 W. Keller Hill Rd., PO Box 610 Mooresville, IN 46158
317-996-3898 Fax 317-996-4000

Mapleturn Utilities May 25, 2025
Water SCADA

Scope:

Replace the existing obsolete Zetron RTU **WATER** SCADA system using radio modems, PLC(s) and Rockwell ME Station graphics software. Provide a Windows 10/11 refurbished computer and spare. System will control the wells and high service pumps to monitor and maintain tank fill. Alarms will be provided using email, and/or (message text using customer provided text service), or existing dialer per customers choice. The new HMI graphics, program operation, and alarms will be similar to the current system.

Included:

New or updated existing FCC license for the system second frequency,
New PLC controls at the tank and office. Repurpose the existing PLC at the filter plant.
Filter plant wiring for the filter system, NO CHANGES.
Tank level controls. NO CHANGES,
Remove existing Zetron equipment and rewire SCADA water controls for the new radio/modem interface. Removed RTU(s) remain with Mapleturn as spares.

Completion time 60-90 days.

We Propose hereby to furnish labor, material, and systems integration - complete in accordance with the above specifications as follows:

Base Quote: \$ 37,500.00 Thirty Seven Thousand Five Hundred Dollars.

Terms: 25% deposit with order and Net due upon completion.

Rebco, Inc.

by: Robert E. Berling, President



Quote is subject to review after 30 days.