

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF COMMUNITY UTILITIES OF)
INDIANA, INC. FOR APPROVAL OF (1))
EXPENDITURES FOR CONSTRUCTION OF)
ADDITIONS AND IMPROVEMENTS TO) CAUSE NO. 45342
PETITIONER'S WATER UTILITY PROPERTIES)
AND (2) THE INCLUSION OF SUCH NEW)
FACILITIES IN PETITIONER'S RATE BASE IN)
FUTURE CASES.)

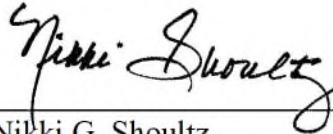
LAKES OF THE FOUR SEASONS PROPERTY OWNERS' ASSOCIATION'S
STATEMENT OF EVIDENCE AND SUBMISSION OF EVIDENCE TO BE SUBMITTED
AT JULY 10, 2020 EVIDENTIARY HEARING

Lakes of the Four Seasons Property Owners' Association, Inc. ("LOFS") intends to submit the following at the Webex evidentiary hearing scheduled for July 10, 2020:

1. Intervenor LOFS Exhibit 1 – Public Testimony of Martin Wessler filed 5/19/20;
2. Intervenor LOFS Exhibit 1-C – Confidential Testimony of Martin Wessler filed 5/19/20;
3. Intervenor LOFS Exhibit 2 – CUII Data Responses to LOFS 2-2, 2-9, 2-10; and
4. Intervenor LOFS Exhibit 2-C – Confidential CUII Data Response Attachment 2-2.

In accordance with the Presiding Officers' July 7, 2020 docket entry, LOFS hereby submits Intervenor LOFS Exhibits 2 and 2-C, which have not previously been filed with the Commission. LOFS shall submit exhibit 2-C in a separate confidential submission. LOFS will provide hard copies of the exhibits within sixty (60) days of the evidentiary hearing or at such other time as ordered by the Commission.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel of record via electronic mail this 9th day of July, 2020, to:

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Nikki G. Shoultz, #1650941

Data Request LOFS DR 2-2:

Please provide all dates of and the corresponding reports and records for maintenance performed by Peerless Midwest on the CUII Twin Lakes water or wastewater system from January 1, 2017 to date. If no records exist for one or more dates on which Peerless Midwest performed maintenance, please explain why.

Objection:

CUII objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome, particularly to the extent the request seeks the production of “all” “reports and records” over a three-year period. Subject to and without waiver of the foregoing objection, CUII provides the following response.

Response:

Please see attached Response to LOFS DR 2-2 - CONFIDENTIAL for all reports and records of maintenance for the Twin Lakes water system. Maintenance completed since January 1, 2017 includes the following:

- Repair of Well 4 pump in July 2017 (invoice with work description attached, no formal report prepared)
- Repair of Well 9 column pipe in June 2017 (invoice with work description attached, full report not prepared by Peerless, submersible pump install report attached)
- Cleaning of Well 9 in 2018 (submersible pump install report attached)
- Cleaning of Well 6 in November 2019 (well cleaning and post-cleaning reports attached)
- Cleaning of Well 8 in November 2019 to December 2019 (well cleaning and post-cleaning reports attached)
- Emergency welding repairs on South Filter in October 2018 (invoice attached, no report prepared)
- Repairs and media install on South Filter in February and March 2017 (invoices attached, no formal report prepared)

In most cases, a formal report is not prepared for routine maintenance. If anything noteworthy or unusual is found, it is discussed with CUII staff at that time.

Data Request LOFS DR 2-9:

Referencing Q11/A11 of Mr. Carbonaro's direct testimony which mentions unbalanced flow from the north and south filters:

- a. Admit that none of the engineering reports attached to CUII's direct testimony mention unbalanced flow from the north and south filters. If your response is anything other than an unqualified admission, please provide the citation to the reference in CUII's direct testimony.
- b. Please identify when CUII documented unbalanced flow from the north and south filters and provide evidence of said documentation.
- c. Please state whether CUII performed any flow modeling to prove the existence of unbalanced flow from the north and south filters and if the response is affirmative, provide the data collected from said flow modeling.

Objection:

Response:

- a. Admit. The Company does not have a formal engineering report regarding unbalanced flow from the North and South Filters. This was an observation that the Company and LAN discussed during design that can be improved as part of the proposed project. Plans for WTP #1 were provided in Attachment to OUCC DR 3-8, showing that the High Service Pumps (HSPs) are located directly in front of the North Filter and approximately 14 feet away from the South Filter. The Company plans to locate the proposed Low Service Pumps evenly spaced between the North and South Filter.
- b. The Company has not formally documented the unbalanced flow for the North and South Filters. The Company has discussed the issue with LAN. The Company has observed that the North Filter requires backwashing twice as frequently as the South Filter (once per day versus every other day).
- c. The Company has not performed any flow modeling to prove the existence of unbalanced flow from the North and South Filters.

Data Request LOFS DR 2-10:

Referencing Q11/A11 of Mr. Carbonaro's direct testimony which states that turbulence in pumps has eroded their service life:

- a. Admit that none of the engineering reports attached to CUII's direct testimony mention that turbulence in pumps has eroded the pumps' useful life. If your response is anything other than an unqualified admission, please provide the citation to the reference in CUII's direct testimony.
- b. Please identify when CUII documented turbulence in pumps that was eroding the pumps' useful life and provide evidence of said documentation

Objection:

Response:

- a. Admit. The Company does not have a formal engineering report regarding turbulence in pumps eroding the pump's useful life. This was an observation that the Company and LAN discussed during design that can be improved as part of the proposed project.
- b. The Company has not formally documented that turbulence in pumps was eroding the pump's useful life. The Company has discussed the issue with LAN.