

STATE of INDIANA

INDIANA UTILITY REGULATORY COMMISSION
101 WEST WASHINGTON STREET, SUITE 1500 EAST
INDIANAPOLIS, INDIANA 46204-3419



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VERIFIED JOINT PETITION OF DUKE ENERGY)
INDIANA, LLC, INDIANA GAS COMPANY D/B/A)
VECTREN ENERGY DELIVERY OF INDIANA, INC.,)
INDIANA MICHIGAN POWER COMPANY, INDIANA)
NATURAL GAS CORPORATION, INDIANAPOLIS)
POWER & LIGHT COMPANY, MIDWEST NATURAL)
GAS CORPORATION, NORTHERN INDIANA PUBLIC) CAUSE NO. 45377
SERVICE COMPANY, LLC, OHIO VALLEY GAS CORP.) (Consolidated under
AND OHIO VALLEY GAS, INC., SOUTHERN INDIANA) Cause No. 45380)
GAS & ELECTRIC COMPANY D/B/A VECTREN)
ENERGY DELIVERY OF INDIANA, INC., AND)
SYCAMORE GAS COMPANY FOR (1) AUTHORITY FOR)
ALL JOINT PETITIONERS TO DEFER AS A)
REGULATORY ASSET CERTAIN INCREMENTAL)
EXPENSE INCREASES AND REVENUE REDUCTIONS)
OF THE UTILITY ATTRIBUTABLE TO COVID-19; AND)
(2) THE ESTABLISHMENT OF SUBDOCKETS FOR)
EACH JOINT PETITIONER IN WHICH EACH JOINT)
PETITIONER MAY ADDRESS REPAYMENT)
PROGRAMS FOR PAST DUE CUSTOMER ACCOUNTS,)
APPROVAL OF NEW BAD DEBT TRACKERS, AND/OR)
DETAILS CONCERNING THE FUTURE RECOVERY OF)
THE COVID-19 REGULATORY ASSET)

PETITION OF INDIANA OFFICE OF UTILITY)
CONSUMER COUNSELOR FOR GENERIC)
INVESTIGATION INTO COVID-19 IMPACTS TO BE) CAUSE NO. 45380
CONDUCTED OVER TWO PHASES; EMERGENCY)
RELIEF PURSUANT TO IND. CODE § 8-1-2-113 TO)
RELIEVE INDIANA RATEPAYERS OF THE THREAT OF)
UTILITY SERVICE DISCONNECTION AND PAYMENT)
ARREARAGES DURING GLOBAL HEALTH AND)
ECONOMIC CRISIS)

You are hereby notified that on this date the Indiana Utility Regulatory Commission (“Commission”) has caused the following Entry to be made:

In accordance with 170 IAC 1-1.5-6, the Presiding Officers notify the parties that the attached communications, which address matters currently pending in this proceeding, are being tendered to the record.

IT IS SO ORDERED.



James F. Huston, Chairman



Loraine L. Seyfried, Chief Administrative Law Judge

June 26, 2020

Date

From: Steve M Lubertozzi [<mailto:Steve.Lubertozzi@uiwater.com>]
Sent: Tuesday, June 23, 2020 4:43 PM
To: Gassert, Curt <cgassert@urc.IN.gov>; Heater, Ryan J <RyHeater@urc.IN.gov>
Subject: RE: COVID-19 Utility Update

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Good afternoon - Below is our tenth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated May 20, 2020. Below you will find several actions the Company has taken since our last update:

- **Customer Payment Arrangement Planning** – In preparation for an expected increase in customers who need to setup deferred payment arrangements, the Company has prioritized planning the implementation of payment arrangements in accordance with applicable regulatory orders and directives. Customer Service Representatives are being trained to ensure they are prepared to help our customers setup payment arrangements. As our plans are completed, we will communicate to our customers through various channels to ensure all customers are aware of our plans and willingness to work with them.
- **Phased Re-Opening Planning** – As jurisdictions begin to re-open, the Company continues to monitor the number of confirmed COVID-19 cases in each jurisdiction to determine the impact of loosened movement restrictions. Before deciding to re-open any office location or operations facility, the Company will ensure that there has not been an increase in the COVID-19 transmission rate in the specific jurisdiction. The Company is taking this approach to protect the health and safety of our employees and the communities we serve. The Company's Incident Command Team continues to work with each jurisdiction to develop
- **Regular Customer Communications** – As a Company, we continue to prioritize frequent communication with our customers. We will send our fifth customer communication this week to provide updates on the Company's latest efforts to safely provide water, wastewater and energy services to our customers during this crisis. We will also reiterate the Company's plans to provide deferred payment arrangements for customers experiencing financial hardships. This communication will be sent to customers via email, be posted on our websites, social media platforms and MyUtilityConnect. In addition to this direct customer communication, we continue to provide frequent updates on our websites and social media platforms.
- **Continued Adherence to Updated Policies** – As local jurisdictions begin to re-open, we continue to stress the importance of adhering to the Company's updated operations policies and procedures in order to protect the health and safety of our employees and the communities we serve. Our Incident Command Team continues to monitor the impact re-opening businesses and recreational venues has on the rate of COVID-19 transmission to determine when steps toward normalization of our operations can be safely taken. The Company will continue to prioritize the health and safety of our employees and the communities we serve when making these decisions.

We hope you find these continuing updates by the Company helpful and I invite you to email me call me at 847-897-6510 with any questions or concerns you may have.

Thanks.
Steve

From: Steve M Lubertozi
Sent: Wednesday, May 20, 2020 3:09 PM
To: Gassert, Curt <cgassert@urc.IN.gov>; ryheater@urc.in.gov
Subject: RE: COVID-19 Utility Update

Below is our ninth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated May 7, 2020. Below you will find several actions the Company has taken since our last update:

- ***Phased Re-entry Planning*** – As noted in our previous correspondence, we continue to plan a phased re-entry process for our office locations. The Company's Incident Command team will help develop and implement the re-entry plan for each location with the help of local office staff to ensure the plan meets the needs of each unique office location. All precautions taken as a part of the phased re-entry plan will be focused on protecting the health and safety of our employees while ensuring they are able to complete their jobs effectively. Although this planning process is in place, the Company will continue to be conservative in making decisions regarding opening office locations.
- ***Critical Visitor Protocol Update*** – As guidance from public health organizations and governments have begun to change, the Company has made several updates to its Critical Visitor Policy to ensure precautions are taken to protect the health and safety of our employees. Additional procedures added to the Critical Visitor Protocol include: (i) visitors who are in the office for less than two hours will not be permitted to use a Corix restroom or break facilities, (ii) visitors are now required to self-screen for COVID-19 symptoms and contact the appropriate Corix representative prior to coming onsite, and (iii) visitors may not come to a Corix facility if they have been in contact with someone who has been confirmed or is suspected to have a positive case of COVID-19. We will continue to update all COVID-19 precautionary policies and procedures as necessary.
- ***Self-Screening Policy*** – In order to help protect the health and safety of our employees, the public and the communities we serve, the Company has formalized a self-screening policy for employees who are not working remotely exclusively. This policy provides guidance for employees on how to screen themselves for symptoms of COVID-19 prior to starting the workday. If an employee goes through the screening process and is found to have potential COVID-19 symptoms, the employee is to contact Human Resources and remain at home. This policy has been formalized to ensure we are doing our part to reduce potential exposure to our employees and the public.
- ***Continued Adherence to Updated Policies and Procedures*** – As the COVID-19 crisis continues to evolve, the Company continues following updated policies and procedures enacted to help protect the health and safety of our employees and the communities we serve while meeting our commitment of providing reliable service. Several policies include:
 - o ***Emergency Remote Work Policy*** – Our office-based personnel continue to work remotely to protect employee health.
 - o ***Customer Premise Entry Policy*** – Our operations personnel will not enter a customer's premise until assessments on alternative solutions to essential activities within a customer's premise are necessary under this policy. Entrance with proper Personal Protective Equipment (PPE) is the last resort if essential activities have to be completed and there are no alternative measures that can be taken.

- *Physical Distancing Scheduling* - Our operations personnel continue to operate under physical distancing schedules that limit employee contact with one another while performing plant and systems operations and maintenance tasks; our office-based personnel continue to work remotely under the Company's Remote Work Policy.
- *Multiple Employee Tasks* – The Company has developed instructions for operations staff on how to complete routine tasks that require two employees to perform them while maintaining proper physical distancing and appropriate use of PPE.
- *Updated PPE Guidance* – The Company is working to ensure its staff has access to use needed PPE to limit possible transmission of COVID-19. PPE guidance includes gloves, hand sanitizer, cloth masks, surgical masks, KN95 masks and disinfecting wipes.
- *Vehicle Maintenance Guidance* – Guidance has been issued to operations personnel regarding how to handle any maintenance that needs to be done to vehicles while preventing close contact with service providers. Maintaining proper care of fleet vehicles ensures our vehicles continue to remain safe for our employees' use.
- *Critical Contractor/Visitor Policy* – The Company has communicated guidance to its critical visitors and contractors regarding expectations around physical distancing with Company employees while performing services for the Company and self-screening prior to entering a Corix owned facility.
- *Self-Screening Policy* – A formal policy has been instituted providing Corix employees guidance on self-screening for COVID-19 symptoms prior to entering any Corix facility. If symptoms are present, an employee is to contact Corix Human Resources and remain at home.

We will continue to take all necessary precautions to protect the health and safety of our employees and the communities we serve throughout the remainder of the COVID-19 crisis. Adherence to the policies and procedures listed above reflects the Company's "Safety First" culture. If you have any questions, please let me know.

Steve

From: Steve M Lubertozi

Sent: Thursday, May 7, 2020 5:22 PM

To: Gassert, Curt <cgassert@urc.IN.gov>; ryheater@urc.in.gov

Subject: RE: COVID-19 Utility Update

Curt/Ryan,

Below is the eighth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 23, 2020. Below you will find several actions the Company has taken since our last update:

- ***Return to Work Planning*** – The health and safety of our employees will continue to be our first priority in deciding when to reopen offices to our employees and returning operations staff to normal scheduling. The Company's legal team continues to track orders that restrict, or allow, movement and provide guidance for reopening essential and non-essential businesses to understand how each jurisdiction is handling the next steps of the COVID-19 situation. As guidance is provided in each jurisdiction, the Company will make decisions by using an evidence-based approach aimed at protecting the health and safety of our employees and the communities

we serve. Decisions on when to return will be made by the jurisdiction's local business leaders, the Company's Incident Command team and the Company's executive management team. The Company will continue to provide updates as decisions are made.

- **Regular Customer Communication** – Throughout the duration of the COVID-19 crisis, our Company has prioritized regular customer communication. The Company will send our fourth direct communication to customers this week providing an update on actions taken to ensure we meet our commitment to provide safe and reliable service. The notice will also be posted on our website, our customer application, MyUtilityConnect, and all social media channels. In addition to our direct customer communications, we continue to provide real time updates to customers via social media and our websites. As we move forward, we will continue providing customers with proactive communication to share important information and updates.
- **Phased Re-entry Planning** – As we begin to emerge from the COVID-19 crisis and states begin reopening, developing a phased plan for re-entry into offices and returning our operations staff to normal schedule is of the utmost importance. The Company's Incident Command team is currently developing a phased re-entry plan to ensure our employees are able effectively do their jobs while keeping proper physical distance from other employees and contractors. The Company is evaluating each unique office environment to determine when and how to reopen. We are looking at (i) employee work spacing to ensure appropriate physical distancing, (ii) foot traffic flows to minimize contact, (iii) PPE to protect employees, (iv) new behavioral norms that eliminate interpersonal contact, (v) enhanced cleaning requirements, and (vi) the internal communications efforts needed to safely phase-in re-entry plans. The development of this plan will ensure that we are prepared once we decide when to reopen offices to our employees.
- **Flushing Guidance for Customers** – As a result of the COVID-19 pandemic, many of our customers may have temporarily closed businesses, churches, school buildings, or a vacation/rental homes. Water that is held in unused pipes while the buildings are closed can become stagnant, and since stagnant water is a potential health risk and can impact water quality, it is necessary to systematically flush plumbing. The Company has begun providing flushing instructions for potentially impacted customers to ensure water is safe prior to use. Instructions have been shared on our website and social media platforms over the past several weeks.

Thanks. If you have any questions please let me know.

Steve

From: Steve M Lubertozzi [<mailto:Steve.Lubertozzi@uiwater.com>]

Sent: Thursday, April 23, 2020 2:34 PM

To: Gassert, Curt <cgassert@urc.IN.gov>

Cc: Heater, Ryan J <RyHeater@urc.IN.gov>

Subject: RE: COVID-19 Utility Update

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Curt/Ryan,

Here is our seventh update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 16, 2020. Below you will find several actions the Company has taken since our last update:

- ***Tracking Federal and State Restriction Status*** – Following President Trump’s announcement of the three-phase plan to “re-open” the economy, several states have begun to loosen movement restriction status and businesses have begun reopening. We continue to track movement restriction status in each jurisdiction to help guide our plans for returning our employees to their respective offices for work and allowing operations staff to return to normal scheduling. We intend to take the same evidence-based and expert-guided approach to our own decision making about how to normalize operations as we have from the beginning. Just as we were extremely conservative in our policies and decisions at the outset of this crisis, we intend to make similarly fact driven and cautious moves forward as the United States emerge from this public health crisis.
- ***Payment Plan Options*** – As we begin to move out of the COVID-19 crisis, we have placed an emphasis on planning implementation of payment plans for our customers in accordance with applicable regulatory orders and directives. As our plans are completed, we will communicate to our customers through various channels to ensure all customers are aware of our plan and willingness to work with them.
- ***Personal Protective Equipment (PPE) Supplier Notification*** – As mentioned in our previous update, sourcing PPE continues to be a challenge. In response, we have supplied our procurement team with a letter that refers to the US Department of Homeland Security’s guidance that recognizes critical infrastructure workers as essential. Because water, wastewater and energy utility services are critical infrastructure, we are sharing this guidance with suppliers as orders are placed to ensure our orders are given priority and we can continue to source proper PPE for our employees.

Thanks
Steve

From: Steve M Lubertozi
Sent: Thursday, April 16, 2020 9:46 AM
To: Gassert, Curt <cgassert@urc.IN.gov>
Cc: ryheater@urc.in.gov
Subject: RE: COVID-19 Utility Update

Curt/Ryan,

Here is our sixth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 9, 2020. Below you will find several actions the Company has taken since our last update:

- ***Next Step Planning*** – As the day-to-day has become more stable with the COVID-19 crisis, we have begun to plan the necessary communications to customers, employees and other external stakeholders that will need to occur when we start the return to normal business operations. In preparation for the potential increase in customers carrying unpaid balances as a result of economic hardship caused by COVID-19, the Company is preparing communications to customers regarding payment plan options in accordance with applicable regulatory directives. The Company is also working on internal communications for our Operations staff to facilitate a smooth transition back to normal work schedules and staffing plans when Physical Distancing requirements are lifted. We will continue to provide updates as we complete our plans and begin communicating with our customers, employees and other external stakeholders.

- **Lone Worker Safety** – As you recall in our previous updates, our Operations employees have implemented Physical Distance Schedules to reduce contact among one another. As a result, most employees are working alone throughout the duration of their shifts. To ensure the safety of our lone workers, we have implemented technology that allows lone workers to set regular check-in times with their managers through an app on their I-pads to enable managers to be alerted when a worker misses a scheduled check-in during the course of their workday. This technology helps the Company protect the welfare of its Operations personnel as they work alone. Ensuring the safety of our workers is critical, as they are essential to protecting the public health of our communities during this crisis.
- **PPE Purchasing Support** – As the COVID-19 crisis progresses, proper Personal Protective Equipment (PPE) for our operations staff, including surgical-style masks and gloves, continues to be difficult to find and procure. Our procurement team has worked to diversify suppliers, including contracting with non-traditional vendors of PPE to support the safety of our workforce. The addition of these new vendors has allowed us to increase our PPE inventory. We will continue to be creative in our sourcing activities to ensure our staff has a 30-day supply of PPE on hand throughout the remainder of the COVID-19 emergency.

Thanks
Steve

From: Steve M Lubertozzi
Sent: Thursday, April 9, 2020 6:46 PM
To: Gassert, Curt <cgassert@urc.IN.gov>
Cc: ryheater@urc.in.gov
Subject: RE: COVID-19 Utility Update

Curt/Ryan,

The Corix Group of Companies, which includes Communities Utilities of Indiana, Inc. (the “Company”), is providing this fifth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 1, 2020. Below you will find several actions the Company has taken since our last update:

- **Essential Personal Protective Equipment** – From the beginning of the COVID-19 crisis, the Company has taken actions to ensure our operations teams have an adequate supply of essential personal protective equipment (PPE). Our operations teams are on the front line of public health during this situation, and it is critical that we provide them with the proper PPE to do their jobs effectively. The Company is currently tracking its supplies of hand sanitizer, gloves, disinfecting wipes, masks, eye protection and Tyvek suits to ensure we have a 30-day supply on hand.
- **Tabletop Exercises** – In preparation for potential mass absenteeism in local operations, the Company is performing tabletop exercises to work through theoretical planning scenarios involving widespread infection among operations teams and assessing current states of readiness. These exercises have helped the Company to understand strengths and weaknesses in its Essential Business Continuity Plans and take appropriate corrective measures. We will continue to perform these exercises to ensure we are prepared for possible operational disruptions related to COVID-19 arise.
- **Regular Customer Communications** – As a Company, we continue to prioritize frequent communication with our customers. Our third direct customer communication was sent via email

on April 8, 2020 providing our customers with an update on actions taken by the Company to ensure uninterrupted delivery of safe and reliable service while protecting the health and safety of our employees. In addition to email distribution, this communication is being posted on our websites and MyUtilityConnect. Starting April 7, 2020, we have also included a short message on customer bills reminding them of the suspension of disconnections, as well as the importance of keeping proper physical distance from our operations staff. We also continue to update our websites and social media platforms to provide regular updates to our customers.

We hope you find these continuing updates by the Company helpful. Thanks
Steve

From: Steve M Lubertozi
Sent: Wednesday, April 1, 2020 6:59 PM
To: 'Gassert, Curt' <cgassert@urc.IN.gov>
Cc: 'ryheater@urc.in.gov' <ryheater@urc.in.gov>
Subject: RE: COVID-19 Utility Update

Curt/Ryan,

The Corix Group of Companies, which includes Communities Utilities of Indiana, Inc. (the "Company"), is providing this fourth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 25, 2020. As the COVID-19 situation continues to evolve, we continue to adapt our operations to ensure we continue to provide safe and reliable service to customers, while keeping our employees safe. Below you will find several actions the Company has taken since our last update:

- ***Customer Payment Plan Implementation and Communication*** – In preparation for the potential increase in customers carrying unpaid balances as a result of economic hardship caused by COVID-19, the Company is preparing communications to customers regarding payment plan options. The Company is monitoring recommendations and directives from regulators to ensure we are in compliance and providing the best options for our customers. The Company will use a multiple communications channel approach that includes bill inserts, customer emails, MyUtilityConnect notifications and posts on our websites and social media platforms. We will communicate this information clearly and use different channels to help ensure customers understand their options in setting up payment plans.
- ***Health and Safety Guidance Policies for Operations Staff*** – Throughout the COVID-19 public health crisis, the Company has instituted policies and modified normal operations activities to protect the health of our employees and customers while continuing to meet our commitment of providing reliable service. Several policies include:
 - o *Social Distancing Scheduling* – Our operations personnel are now operating under physical distancing schedules that limit employee contact with one another while performing plant and systems operations and maintenance tasks; our office-based personnel continue to work remotely under the Company's Remote Work Policy.
 - o *Updated PPE Guidance* – The Company is working to ensure its staff has access to use needed PPE to limit possible transmission of COVID-19. Updated PPE guidance now includes gloves, hand sanitizer and disinfecting wipes.
 - o *Vehicle Maintenance Guidance* – New guidance has been issued to Operations personnel regarding how to handle any maintenance that needs to be done to vehicles while

preventing close contact with service providers. Maintaining proper care of fleet vehicles ensures our vehicles continue to remain safe for our employees' uses.

- *Multiple Employee Tasks* – The Company has developed instructions for Operations staff on how to complete routine tasks that require two employees to perform them while maintaining proper physical distancing and appropriate use of PPE.
- *Critical Contractor/Visitor Guidance* – The Company has communicated guidance to its critical visitors and contractors regarding expectations around physical distancing with Company employees while performing services for the Company.
- **Remote Work Policy Extension** – On March 27th, the Company extended its Remote Work Policy for employees who have been working remotely until further notice. In addition, offices will remain closed to the public until further notice. Since the Remote Work Policy was instituted, the Company has continued to operate without interruption. We will continue to evaluate the status of our Remote Work Policy as public health guidance evolves over the next month.
- **Regular Customer Communications** – Regular communication with our customers remains a key focus for the Company during this uncertain time. To this end, the Company is issuing another COVID-19 update to customers early the week of April 6, 2020. The customer letter will be posted on our website, MyUtilityConnect and on all social media platforms. In addition to providing periodic COVID-19 response updates, we are including regular messaging on our website and social media platforms emphasizing the need for customers to maintain proper social distance with Company Operations staff when they are performing regular tasks in the customer's area and reminding customers not to flush disinfecting wipes to prevent issues in our sewer collection and treatment systems. We will continue to communicate with our customers regularly as circumstances continue to develop over the next several weeks.

If you have any questions please let me know.

Steven M. Lubertozi | President

Community Utilities of Indiana, Inc. | 10996 Four Seasons Pl., Suite 100G, Crown Point, IN 46307

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From: Steve M Lubertozi

Sent: Wednesday, March 25, 2020 7:11 PM

To: 'Gassert, Curt' <cgassert@urc.IN.gov>

Cc: 'ryheater@urc.in.gov' <ryheater@urc.in.gov>

Subject: RE: COVID-19 Utility Update

Curt/Ryan,

The Corix Group of Companies, which includes Communities Utilities of Indiana, Inc. (the “Company”), is providing this third update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 17, 2020. As the COVID-19 situation continues to evolve, we continue to adapt our operations to ensure we continue to provide safe and reliable service to customers, while keeping our employees safe. Below you will find several actions the Company has taken since our last update:

- ***Social Distancing Scheduling*** – The Company has created a new scheduling policy for its operations staff in accordance with the social distancing guidance provided by the Centers for Disease Control (CDC). Social distancing schedules minimize contact between employees while operating utility facilities. Social distancing schedules enable the Company to continue providing safe and reliable service to our customers, while protecting the health and safety of our employees. All Corix companies currently have implemented social distancing operating schedules.
- ***Essential Operations Continuity Plans*** – In preparation for potential large-scale absenteeism in the workplace, all Corix companies are updating their Essential Operations Continuity Plans. Essential Operations Continuity Plans include (i) securing mutual-aid arrangements, (ii) ensuring sufficient chemical supplies and critical spare parts inventories are on hand, and (iii) identifying appropriately licensed personnel or contractors who are available to mobilize quickly to augment the Company’s workforce. All updated continuity plans will be completed by March 30, 2020.
- ***Emergency Security Clearances for Access to Plants and Facilities*** – Since the Company’s last update, many cities, counties and states have instituted “stay-at-home” or “shelter in place” orders. To ensure our operations personnel have access to plants and facilities in locations where movement is restricted, all operations staff will carry an Essential Personnel Card that identifies them to local emergency management and law enforcement officials as critical infrastructure workers who provide essential life sustaining services to customers. The Company is also working with state and local emergency planning officials to ensure our essential services will continue.
- ***Regular Customer Communications*** – During this time of uncertainty, we also continue to provide regular communications to our customers. A direct customer letter was sent to customers via email on March 19, 2020 and again on March 25, 2020 with updates on actions the Company has taken to ensure safe, reliable service to them. This letter can also be found on our website, our customer application, MyUtilityConnect, and social media. In addition to direct customer letters, we are providing real-time updates on our websites and social media. As the COVID-19 public health crisis continues to evolve, we will communicate regularly with our customers.

I hope you find these continuing updates by the Company helpful. If you have any questions please let me know.

Steve

Steven M. Lubertozi | President

Community Utilities of Indiana, Inc. | 10996 Four Seasons Pl., Suite 100G, Crown Point, IN 46307

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steve.lubertozi@uiwater.com | www.uiwater.com

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error, please notify the sender immediately and delete the e-mail and any attachments from your computer and files. Thank you.

From: Steve M Lubertozi
Sent: Tuesday, March 17, 2020 8:43 PM
To: Gassert, Curt <cgassert@urc.IN.gov>
Cc: ryheater@urc.in.gov
Subject: RE: COVID-19 Utility Update

Curt/Ryan,

The Corix Group of Companies, which includes Communities Utilities of Indiana, Inc. (the "Company"), is providing this update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 13, 2020. The COVID-19 situation continues to evolve rapidly; as a result, the Company is working to adapt quickly and make timely decisions that ensure the health and safety of our employees and the communities we serve. Below you will find a list of several steps taken by the Company in the last four days:

- **Remote Work and Office Closures** – Following a successful remote work "dry run" exercise on Friday, March 13th, the Company has asked all employees for whom it is possible to work away from the office to begin working remotely starting, Monday, March 16th for a period of at least two weeks. Remote work has been identified as core to the Company's social distancing practices as directed by the Centers for Disease Control and Prevention ("CDC"). Employees who are not able to work remotely, will continue to perform their essential operational and field activities, while practicing social distancing. Because of our transition to remote work as well as recent guidance provided by the CDC concerning social distancing, all Company offices were closed to the public temporarily, effective at 5:00 pm on March 16th. The Company will revisit the temporary remote working plan before March 31st.
- **Contingency Plans** – Essential job functions have been identified and contingency plans have begun to be developed for both operational field staff and office staff in preparation for potential large-scale absenteeism in the workplace. Contingency plans will be in place and will be implemented as necessary to ensure we meet our commitment to provide safe and reliable water and wastewater service to our customers.
- **Emergency Security Clearances for Access to Plants and Facilities** – Company leaders are currently in the process of securing the proper local emergency security clearances necessary to access utility systems in case of mandatory curfews and movement restrictions. This will ensure we are able to continue to operate our utility facilities as the situation develops.
- **Cyber Security Precautions** – Company Information Technology Services personnel have been working to ensure employees are operating in a secure manner from home WiFi networks through VPN access and written guidance to employees about cyber security protocols and measures to safeguard our systems during this temporary remote work period.

The Corix Group of Companies will continue to take all reasonable and appropriate, science-based, actions required to mitigate the impacts the COVID-19 outbreak on our employees and customers. We are committed to keeping stakeholders, customers and the communities we serve apprised of our decisions and actions. Please do not hesitate to contact me.

Thanks
Steve

From: Steve M Lubertozi
Sent: Saturday, March 14, 2020 7:03 PM
To: Gassert, Curt <cgassert@urc.IN.gov>
Cc: ryheater@urc.in.gov
Subject: COVID-19 Utility Update

Curt,

At the Corix Group of Companies, which includes Community Utilities of Indiana, Inc. (the "Company"), the health and safety of our employees and customers is our first priority. This priority has guided our efforts to mitigate any potential public health or business impacts the Coronavirus (COVID-19) outbreak may cause. Over the course of the past several weeks, Corix has instituted a company-wide Incident Command Task Force that is charged with planning and executing preparedness activities focused on protecting employee and public health and ensuring we continue to provide our customers and communities with safe, reliable water and wastewater services. Since the formation of the Incident Command Task Force, several steps have been taken to mitigate any disruption to our employees and customers. Below you will find a list of several actions taken by the Company:

- ***Suspension of Disconnections and Reconnections*** – On March 10, 2020, the Company announced its decision to suspend water and wastewater service disconnection through at least March 30, 2020 in order to provide critical sanitation and potable water services for all customers during this public health event. In conjunction with this decision, customers who recently have been disconnected for nonpayment will be reconnected at no charge, at their election, and collection of any outstanding balances and late fees will be suspended during this time. Lost revenues and associated costs incurred by the Company are being tracked by the Company for subsequent regulatory recovery consideration by state public utility commissions.
- ***Critical Inventories and Spares Planning*** – Chemicals and critical spare parts inventories are being assessed and preparations made to ensure sufficient supplies are kept on-hand to maintain essential business operations and ensure safe, reliable service to our customers.
- ***Workforce Planning*** – Essential job functions are being identified to prepare for potential large-scale absenteeism in the workplace; a remote work pilot exercise was conducted on Friday, March 13, 2020 to test the necessary administrative and IT systems needed to support implementation of a temporary remote work policy. Remote work has been identified as core to the company's social distancing practices as directed by the Centers for Disease Control and Prevention ("CDC").
- ***Facility Emergency Action Plans*** – Company health and safety professionals are working to complete updated Emergency Action Plans for all office locations to ensure appropriate protective and disinfection actions are taken if COVID-19 infects one or more employees.
- ***Suspension of All Non-essential Business Travel*** – The Company has suspended all international and domestic business travel until further notice. This suspension of business travel does not include regular, essential operational and field activities, which can be performed using recommended social distancing measures.

The Corix Group of Companies is taking all reasonable and appropriate, science-based, actions required to mitigate the impacts the COVID-19 outbreak on our employees and customers. As the situation continues to develop, we will closely monitor guidance provided by the CDC, the World Health Organization and our state and local public health agencies and make decisions accordingly. The Corix Group of Companies takes pride in providing the communities we serve with safe and reliable water and wastewater services. During this uncertain time, we are focused on serving our communities and being strong partners in the global effort to protect public health. Please do not hesitate to contact me.

Steven M. Lubertozi | President

Community Utilities of Indiana, Inc. | 10996 Four Seasons Pl., Suite 100G, Crown Point, IN 46307

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Senator Jean D. Breau
Assistant Minority Leader
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Indianapolis, Indiana 46204
(317) 232-9534
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Committees:
Health & Provider Services, RMM
Insurance and Financial Institutions, RMM
Appropriations
Elections
Ethics
Family & Children Services
Joint Rules
Rules & Legislative Procedure

June 23, 2020

Chairman Jim Huston
Indiana Utility Regulatory Commission
101 West Washington Street
Indianapolis, Indiana 46204

Dear Chairman Huston,

Thank you for your response to my previous letter dated May 26th. I appreciate the IURC's commitment to transparency and public participation in the matter of Cause Number 45380. I am following up to urge the IURC to extend indefinitely the moratorium on utility shutoffs, which expires on June 30th.

As State Senator, the well-being of my constituents is my number one priority. Because of the pandemic, many of my constituents have experienced numerous uncertainties over the last several months. Thankfully, because of the moratorium on utility shutoffs, they have not had to worry about their utilities being disconnected.

While Indiana is on track to reopen all parts of the economy in the next few weeks, the long-term economic effects of this pandemic still persist. The Federal Reserve reported that 40% of Americans with annual income under \$40,000 lost their jobs due to the COVID-19 Pandemic, and a study by Pew Research Center found that minorities were the hardest hit of this group, with 70% of minorities indicating they do not have a three month emergency fund.

I continue to see the need for an extended shutoff moratorium right here in my district. Many of my constituents who reached out to my office for assistance have just recently received the unemployment relief they are entitled to from DWD, while others are still awaiting the benefits they applied for months ago. These constituents deserve access to water and electricity, and should not be punished for circumstances that are outside of their control.

It is clear to me that it is far too soon to allow utility companies to begin disconnecting consumers' utilities. I strongly urge the IURC to extend the shutoff moratorium for as long as necessary for Hoosiers to get back on their feet.

I look forward to your prompt response to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'JB', with a large loop at the start and a horizontal flourish extending to the right.

Jean D. Breaux
Assistant Minority Leader
Indiana Senate District 34