STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

COMPLAINT OF SUGAR CREEK PACKING CO. FOR REVIEW OF WESTERN WAYNE REGIONAL SEWAGE DISTRICT'S OPERATIONS PURSUANT TO IC § 8-1-30(3)(b).	)	**CAUSE NO. 44948**
RESPONDENT: WESTERN WAYNE REGIONAL SEWAGE DISTRICT	)	

SUBMISSION OF ADDITIONAL CORRECTIONS TO TESTIMONY

Complainant, Sugar Creek Packing Co. ("Sugar Creek"), by counsel, hereby submits additional corrections to testimony Complainant filed in this Cause as follows:

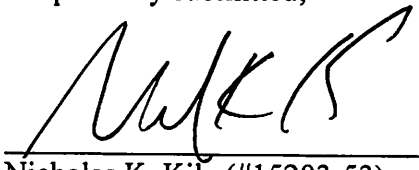
1. Additional corrections to Rebuttal Testimony of Scott Gregory:

   (a) Page 3, line 23, delete the word "peak".

   (b) Page 4, line 1, insert "On many days, he shows a total flow attributable to Sugar Creek in excess of our water purchases. Indeed, his total Sugar Creek Daily Flow of 18,917,292 (the sum of Sugar Creek Total Flows on pages 2-3 of the exhibit) exceeds our total water purchased during the same period of 18,622,630 gallons, which is impossible." and delete "For example, July 16, 2017 is a Sunday, a day on which Sugar Creek did not operate its production facility and did not discharge wastewater from its pretreatment plant between 11 a.m. and 9 p.m. However, on that day, WWRSD's flow meter indicates Sugar Creek had a peak flow of 622.5 gpm at 5:45 p.m. This is impossible, because, as I stated, Sugar Creek was not discharging at that time on July 16, 2017."

Redline and clean copies of the revised pages are attached.

Respectfully submitted,



Nicholas K. Kile (#15203-53)
Lauren M. Box (#32521-49)
BARNES & THORNBURG LLP

11 South Meridian Street
Indianapolis, Indiana 46204
Mr. Kile: (317) 231-7768
Ms. Box: (317) 231-7289
Nicholas.Kile@btlaw.com
Lauren.Box@btlaw.com
Facsimile: (317) 231-7433

Attorneys for Complainant
Sugar Creek Packing Co.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 14th day of September, 2017, by electronic transmission to the following:

Lorraine Hitz-Bradley
Indiana Office of Utility Consumer Counselor
PNC Center
115 West Washington Street, Suite 1500 South
Indianapolis, Indiana 46204
lhitzbradley@oucc.in.gov
infomgt@oucc.in.gov

Keith L. Beall
Beall & Beall
13238 Snow Owl Drive, Suite A
Carmel, Indiana 46033
kbeall@indy.rr.com

Anne H. Poindexter
Altman, Poindexter & Wyatt LLC
90 Executive Drive, Suite G
Carmel, Indiana 46032
apoindexter@apwlawyer.com

Robert L. Bever
Boston Bever Klinge Cross & Chidester
27 North 8th Street
Richmond, Indiana 47374
bbever@bbkcc.com

Steven W. Krohne
Mark R. Alson
Ice Miller LLP
One Indiana Square, Suite 2900
Indianapolis, Indiana 46282-0200
Steven.krohne@icemiller.com
Mark.alson@icemiller.com

Ronald L. Cross
Boston Bever Klinge Cross & Chidester
27 North 8th Street
Richmond, Indiana 47374
rcross@bbkcc.com

Nicholas K. Kile

DMS 10903789v1

Xylem field service technician did very little to assess the pumps during his visit. He simply pulled them up a little, jiggled them, and set them back down.

Q. Beginning on page 21 of Mr. Wessler's testimony, Mr. Wessler discusses the flow monitoring data WWRSD has collected after installing its own Gripp, Inc. meters at the Industrial Park on June 5, 2017. With respect to the data WWRSD has observed, on page 22, line 20, and page 23, lines 1-4, Mr. Wessler testifies "the data is very alarming and of great concern to [WWRSD because]…the daily flows from Sugar Creek are approximately 70,000 gpd greater than the capacity Sugar Creek requested…[and Sugar Creek's] flow rate has averaged almost 400 gpm…and their peak flow rate has regularly exceeded the lift station pump rated capacity of 280 gpm on every day except for two days." Are the flow figures Mr. Wessler cites in his testimony correct?

A. No, absolutely not. As I will explain further in my testimony, the flow data WWRSD collected, and on which Mr. Wessler bases his calculations, is incorrect and could not have occurred.

Q. Mr. Wessler indicated that WWRSD began monitoring flows at the lift station using meters installed and calibrated by Gripp, Inc., and on page 22, lines 12 through 17 and MW-10, Mr. Wessler provided a summary of that flow data. Please respond to Mr. Wessler's summary.

A. I have reviewed the flow data provided in Mr. Wessler's testimony and Exhibit MW-10, and it is clear from the data that the flow meters were improperly installed and/or calibrated, because, as I will explain, the ~~peak~~ flows attributed to Sugar Creek in the flow

data are impossible. On many days, he shows a total flow attributable to Sugar Creek in excess of our water purchases. Indeed, his total Sugar Creek Daily Flow of 18,917,292 (the sum of Sugar Creek Total Flows on pages 2-3 of the exhibit) exceeds our total water purchased during the same period of 18,622,630 gallons, which is impossible. ~~For example, July 16, 2017 is a Sunday, a day on which Sugar Creek did not operate its production facility and did not discharge wastewater from its pretreatment plant between 11 a.m and 9 p.m. However, on that day, WWRSD's flow meter indicates Sugar Creek had a peak flow of 622.5 gpm at 5:45 p.m. This is impossible, because, as I stated, Sugar Creek was not discharging at that time on July 16, 2017.~~ Further, Sugar Creek monitors its hourly flow rates out of its final DAF in its pretreatment system, which has a maximum pump rating of 230 gpm. It is also important to note that even though the DAF pumps are rated at 230 gpm, the rate at which they pump does not equal the amount that flows out of the DAF to WWRSD's system. There is a continual purge of valves on the bottom of the DAF unit which recirculates water through a sand filter system and back through the treatment chain. This recirculated water averages 10-15 gpm, so the average flow to WWRSD's system is actually closer to 215-220 gpm; however, we have not operated in excess of 185 gpm since the May Event.

Q. Do you have any other concerns with the Gripp, Inc. flow data Mr. Wessler presents on page 22 and Exhibit MW-10 of his testimony?

Yes. Again, the data is completely wrong. Attachment SG-R3 is a spreadsheet comparing the peak flows recorded by WWRSD's Gripp metering and the flows recorded by Sugar Creek. As shown on Attachment SG-R3, in many cases the flows recorded by WWRSD's Gripp meters vary drastically from the flows recorded by Sugar Creek. I know Sugar

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