

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF COMMUNITY UTILITIES OF)
INDIANA, INC. FOR: AUTHORITY TO INCREASE)
ITS RATES AND CHARGES FOR WATER AND)
WASTEWATER UTILITY SERVICE; APPROVAL)
OF NEW SCHEDULES OF RATES AND CHARGES)
APPLICABLE THERETO; AUTHORITY TO)
RECOVER CERTAIN COSTS INCURRED IN) CAUSE NO. 45651
CONNECTION WITH CAUSE NOS. 44724, 45342)
AND 45389; AUTHORITY TO RECOVER COSTS)
INCURRED AND DEFERRED IN CONNECTION)
WITH THE COVID-19 PANDEMIC; APPROVAL OF)
A NEW RESIDENTIAL LOW-INCOME RATE FOR)
WATER AND WASTEWATER SERVICE; AND)
OTHER APPROPRIATE RELIEF)

PUBLIC'S EXHIBIT NO. 3

TESTIMONY OF CARL N. SEALS

ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

April 28, 2022

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR



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TESTIMONY OF OUCC WITNESS CARL N. SEALS
CAUSE NO. 45651
COMMUNITY UTILITIES OF INDIANA, INC.

I. INTRODUCTION

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

2 A: My name is Carl N. Seals, and my business address is 115 West Washington Street, Suite
3 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 the
6 Assistant Director in the Water/Wastewater Division. My qualifications and experience are
7 set forth in Appendix A.

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

9 A: My testimony will address Community Utilities of Indiana’s (“Community Utilities” or
10 “Petitioner”) proposed improvements to its water system. While I do not oppose projects
11 addressing wells, the water treatment plant, or main and service line replacements, I do
12 criticize the prior lack of long-term planning regarding Petitioner’s water meters. I
13 therefore recommend that in the future Community Utilities more carefully collect, analyze
14 and report data regarding the need for meter replacements and meter reading activities in
15 general.

16 **Q: Please describe the review and analysis you conducted to prepare your testimony.**

17 A: I reviewed Community Utilities’ Petition and testimony of its witnesses in the current
18 cause. I prepared data requests and reviewed Community Utilities’ responses. I reviewed
19 the Commission’s final orders in Cause Nos. 45389 and 45342 and reviewed pertinent
20 portions of testimony presented in those cases. Finally, I reviewed reports Community

1 Utilities filed with the Indiana Department of Environmental Management (“IDEM”),
2 which I accessed via IDEM’s Virtual File Cabinet.¹

3 **Q: Does your testimony include attachments?**

4 A: Yes. My testimony includes the following attachments:

- 5 ○ OUCC Attachment CNS-1 – Response to OUCC Data Request 3-01;
- 6 ○ OUCC Attachment CNS-2 – Article on AMR meter failures, Amherst, New York;
- 7 ○ OUCC Attachment CNS-3 – Response to OUCC Data Request 5-16;
- 8 ○ OUCC Attachment CNS-4 – Response to OUCC Data Request 3-03 & 3-04;
- 9 ○ OUCC Attachment CNS-5 – Response to OUCC Data Request 7-29;
- 10 ○ OUCC Attachment CNS-6 – Response to OUCC Data Request 7-40;
- 11 ○ OUCC Attachment CNS-7 – Response to OUCC Data Request 7-01, and
- 12 ○ OUCC Attachment CNS-8 – Response to OUCC Data Request 7-06 & 7-07.

13 **Q: Please list Petitioner’s proposed water system projects.**

14 A: The proposed water system projects are set out in Table 1 below and total \$6,751,733.

Table 1

| Project Description | Expected Start Date | Expected Completion Date | Estimated Cost |
|--|---------------------|--------------------------|----------------|
| Indiana AMR Replacements - 2021 | 3/1/2021 | 12/31/2021 | 450,233 |
| Indiana AMR Replacements - 2022 | 1/1/2022 | 9/30/2022 | 367,142 |
| Indiana AMR Replacements – 2023 | 1/1/2023 | 9/30/2023 | 427,325 |
| Twin Lakes WTP Iron Filter | 6/1/2019 | 5/31/2022 | 2,355,816 |
| Twin Lakes Wells #12 and #13 | 12/1/2018 | 11/30/2021 | 351,157 |
| 2020/2021 Twin Lakes Watermain and Service Line Replacements | 11/1/2019 | 11/30/2021 | 786,877 |
| 2022 Twin Lakes Watermain and Service Line Replacements | 10/1/2021 | 9/30/2022 | 445,952 |
| 2023 Twin Lakes Watermain and Service Line Replacements | 4/1/2023 | 9/30/2023 | 274,289 |
| 2022 IWSI Watermain Replacement | 10/1/2021 | 9/30/2022 | 800,523 |
| 2023 IWSI Watermain Replacement | 4/1/2023 | 9/30/2023 | 492,419 |
| | | | 6,751,733 |

¹ <https://vfc.idem.in.gov/DocumentSearch.aspx>

1 **Q: Please discuss your concerns regarding Petitioner's proposed meter replacement**
2 **program.**

3 A: I am concerned that Petitioner's proposed meter replacement program appears in part to be
4 a response to poor planning and execution of prior meter replacements. Prior to 2013
5 Petitioner appears to have been installing Badger manual read meters throughout its
6 system. At some point after that, Petitioner made a switch to Master Meter² Automatic
7 Meter Read ("AMR") meters and is now planning to transition to Neptune AMR meters.³

8 **Q: What happened to the Master Meter AMR meters?**

9 A: Petitioner's witness Mr. Grosvenor testified that "[p]rior to 2021, all meters in CUII's water
10 systems were Master Meter AMR meters. These meters began to fail on a widespread scale
11 in 2020 and have continued to fail through 2021." Grosvenor Direct, p. 17. In response to
12 OUCC Data Request 3-01⁴ Petitioner stated:

13 Petitioner did not replace a significant number of meters in 2020 due to the
14 coronavirus 2019 ("COVID-19") pandemic. Petitioner stopped activities
15 that required direct interactions with customers from March to December of
16 2020. The 106 meters replaced during 2020 were installed across an
17 approximate ten month period in 2013. Accordingly, they were
18 approximately seven years old.

19 **Q: Is seven years a normal replacement cycle for a water meter?**

20 A: No, according to 170 Ind. Admin. Code 6-1-10, "Periodic inspections and tests," 5/8-inch
21 meters are to be tested or replaced every ten years or 100,000 cubic feet (748,000 gallons)
22 registered.⁵ Anecdotally, especially in the earlier transition period from manual read meters
23 to AMR there were some issues with reduced battery lives.⁶

² <https://www.mastermeter.com/products/>

³ AMR meters allow for drive-by reading of meters, eliminating the opening of meter pits and reading of manual meters, or using touchpads located on the meter pit.

⁴ OUCC Attachment CNS-1.

⁵ If a utility were to track meter volumes from date of installation, using the 748,000 gallons and an average of 5,000 gallons per month residential usage, meter life could be extended from ten years to approximately 12.5 years. (748,000 / 5,000 / 12 = 12.5)

⁶ See OUCC Attachment CNS-2 for example of article discussing recent (2021) problems in Amherst, New York.

1 **Q: How old are the meters that Community Utilities is replacing?**

2 A: In response to OUCC Data Request 5-16,⁷ Petitioner provided the following table.

Table 2

| <u>year</u> | <u>count of installs</u> | <u># of installs that were replacements</u> | <u>Average age of replaced meters (years)</u> |
|-------------|--------------------------|---|---|
| 2016 | 75 | 73 | 4.3 |
| 2017 | 78 | 65 | 4.9 |
| 2018 | 115 | 111 | 5.2 |
| 2019 | 178 | 170 | 5.7 |
| 2020 | 114 | 95 | 6.7 |
| 2021 | 1372 | 1340 | 8.0 |

3 From this table we can see that the average age of meters being replaced has varied from a
4 low of 4.3 years in the early years to 8.0 years by 2021.

5 **Q: Why is replacing these meters early a problem?**

6 A: Replacing these meters early causes the utility to incur additional costs that are then passed
7 along to its customers through rates.

8 **Q: What do you believe should have been done as the meters began to fail?**

9 A: If the meters were failing prematurely, then I believe the utility should have sought
10 compensation, replacement or technical assistance from the manufacturer. Petitioner has
11 presented no evidence that it has done so.

12 **Q: How did the utility determine that “meters began to fail on a widespread scale in
13 2020?”**

14 A: In response to OUCC Data Request 3-03 and 3-04,⁸ Petitioner stated that it does not
15 actually track meter failures, only that it estimated 1,151 bills in 2020 and another 2,684 in
16 2021. The utility further notes in response to OUCC Data Request 7-29⁹ that “there could
17 be other reasons for estimated meter reads, but the primary reason is failure.” Without the

⁷ OUCC Attachment CNS-3.

⁸ OUCC Attachment CNS-4.

⁹ OUCC Attachment CNS-5.

1 ability to track meter failure reasons, I would suggest that it is impossible for the utility to
2 simply conclude that meter estimates automatically equal meter failures. The problem
3 could be as simple as the meter reading vehicle failing to drive down a particular street,
4 thereby not picking up any reads for that street. Without other evidence, equating the
5 number of estimated reads to failed meters is potentially inaccurate and speculative.

6 **Q: Did the utility provide data showing the number of estimates for 2016 through 2021?**

7 **A:** Yes, in response to OUCC Data Request 7-40¹⁰ the utility provided data in Excel format
8 showing the number of estimates for 2016 through 2021. This data was particularly
9 interesting in that in 2021 there were 31 accounts in Twin Lakes that received as many as
10 sequential estimates throughout the year. This suggests that it took the utility as long as
11 nine months to recognize and respond to a previous period estimated read. There were 243
12 accounts in Twin Lakes that received six or more sequential estimates just in the 2021
13 calendar year (i.e. not counting rollovers into 2022).

14 **Q: Why is this delay in responding to an estimated read important?**

15 **A:** A water meter is the utility's cash register. Delays of as much as nine months in assessing
16 and correcting a problem that is causing estimated reads can cause customer leaks to
17 continue undiscovered. In addition, such delays can cause a failure to recognize and timely
18 report and compensate the utility for legitimate high customer usage, such as the filling of
19 a pool, or heavy lawn irrigation. Unexplained high bills due to failures to accurately read
20 meters create problems for customers as well, as they may be suddenly billed for large
21 amounts of usage of which they were not previously aware, until receiving the "catch-up"
22 bill when the meter is finally read.

¹⁰ OUCC Attachment CNS-6.

1 **Q: Do billing systems commonly flag high or zero customer usages for the utility to follow**
2 **up on?**

3 A: Yes, it is common for reports to be generated showing high and/or zero water usages once
4 the meter routes have been uploaded into the billing system. This is an important function
5 of the system, identifying and reporting unusual usage patterns for subsequent verification
6 and/or correction by utility staff.

7 **Q: When did the utility begin transitioning to the Master Meters it now seeks to replace**
8 **with Neptune meters?**

9 A: The changeover to Master Meters appears to have begun during or after 2013. Prior to that
10 time the utility used manually read Badger meters. In response to OUCC Data Request 7-
11 1,¹¹ Petitioner indicated that “[d]uring the last ten years, CUII believes it has used both
12 Badger, model 25 (manual read meters) and Master Meter BL05 (AMR), as well as the
13 currently deployed Neptune meters T10 (AMR).” In addition to the costs of these meter
14 transitions and replacements being passed on to customers, this is potentially inefficient
15 operationally, as separate pieces of equipment must be used to read different
16 manufacturers’ meters.¹²

17 **Q: Has Community Utilities’ parent company recently decided to switch to Neptune**
18 **meters?**

19 A: Yes, in 2021 parent company Corix began a transition to Neptune meters, which may allow
20 for a 10%-15% discount on market value and annual pricing certainty.¹³ Neptune is a well-
21 established, widely-used meter manufacturer.

¹¹ OUCC Attachment CNS-7.

¹² As confirmed in response to OUCC DR 7-6 and 7-7, appearing as OUCC Attachment CNS-8.

¹³ OUCC Data Request 7-17.

1 **Q: What do you believe Petitioner should do regarding its high number of estimated**
2 **meter reads?**

3 A: First I believe Petitioner should be more proactive in responding to estimated meter reads.
4 Petitioner should respond more quickly when estimated reads are flagged by the system,
5 assess the reason for the estimated read and make necessary repairs, or seek to obtain a
6 physical read. Community Utilities should also not automatically assume that an estimated
7 read means the entire meter has failed and should investigate other alternatives such as
8 warranty replacement of meter heads.¹⁴ Finally, Petitioner should seek to establish more
9 consistency in its choice of meter manufacturers, and more aggressively pursue options
10 other than wholesale replacement (at utility and thereby ratepayer cost) if and when
11 problems arise.

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

13 A: Yes.

¹⁴ A utility that I recently made a site visit to experienced problems with manually read meters and was able to replace the meter heads at no cost, other than that of the labor to replace the heads.

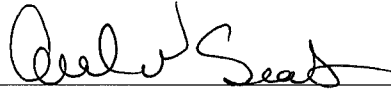
APPENDIX A

QUALIFICATIONS

1 **Q: Please describe your educational background and experience.**
2 A: In 1981 I graduated from Purdue University, where I received a Bachelor of Science degree
3 in Industrial Management with a minor in Engineering. I was recruited by the Union Pacific
4 Railroad, where I served as mechanical and maintenance supervisor and industrial engineer
5 in both local and corporate settings in St. Louis, Chicago, Little Rock and Beaumont,
6 Texas. I then served as Industrial Engineer for a molded-rubber parts manufacturer before
7 joining the Indiana Utility Regulatory Commission (“IURC”) as Engineer, Supervisor and
8 Analyst for more than ten years. It was during my tenure at the IURC that I received my
9 Master of Health Administration degree from Indiana University and began volunteer and
10 part-time work as Firefighter and Emergency Medical Technician in Marion County. After
11 the IURC, I worked at Indiana-American Water Company, initially in their rates
12 department, then managing their Shelbyville operations for eight years, and later served as
13 Director of Regulatory Compliance and Contract Management for Veolia Water
14 Indianapolis. I joined Citizens Energy Group as Rate & Regulatory Analyst following the
15 October 2011 transfer of the Indianapolis water utility and joined the Office of Utility
16 Consumer Counselor in April of 2016. In March 2020 I was promoted to my current
17 position of Assistant Director of the Water and Wastewater Division. In summary, in
18 addition to working in manufacturing and transportation, I have been working in or with
19 utilities since 1988, more than 34 years.

AFFIRMATION

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



By: Carl N. Seals
Cause No. 45651
Office of Utility Consumer Counselor (OUCC)

Date: Apr 27, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 03.01**

| | |
|----------------------|---------------------------------|
| Witness Responsible: | <u>Loren Grosvenor</u> |
| Title: | <u>State Operations Manager</u> |
| Date Received: | <u>January 26, 2022</u> |
| Docket No.: | <u>45651</u> |

OUCC 03.01

How old were the MasterMeters AMR meters that CUII began replacing in 2020 due to failure? Please explain.

OBJECTION:

Petitioner objects to the foregoing Data Request on the grounds that it is vague and ambiguous and potentially overly broad and unduly burdensome, in that it does not reference Petitioner's prefiled testimony or refer to any particular meters. Subject to and without waiving the foregoing objection, Petitioner submits the response set forth below.

RESPONSE:

Petitioner did not replace a significant number of meters in 2020 due to the coronavirus 2019 ("COVID-19") pandemic. Petitioner stopped activities that required direct interactions with customers from March to December of 2020. The 106 meters replaced during 2020 were installed across an approximate ten month period in 2013. Accordingly, they were approximately seven years old.

Attachment:

N/A

Date Response Provided: February 7, 2022

Glitch causes Amherst water meter battery failures

[chroniclet.com/news/270647/glitch-causes-amherst-water-meter-battery-failures](https://www.chroniclet.com/news/270647/glitch-causes-amherst-water-meter-battery-failures)

Glitch causes Amherst water meter battery failures

Jason Hawk

The Chronicle-Telegram

Aug 07, 2021 5:00 AM

AMHERST — A large number of water meter batteries are dying across the city, which means the devices aren't transmitting readings used to calculate monthly bills.

The meters themselves are properly recording water usage, according to Amherst Mayor Mark Costilow.

"The failure has been determined to be in the node that sends the signal over the air to the utility office," he said in a news release Friday.

The city had virtually all water meters replaced in 2018, though a handful of residents chose to opt out. The radio-read meters allow workers to collect data without visiting each home in person.

The batteries that are failing right now were among the first installed that year, Costilow said in an interview.

They should have lasted 10 years. But a glitch in the metering software caused them to never power down, so they burned through the power supply in just three years.

Residents cannot replace these specialized batteries on their own. The original installers, the Eaton Project Team, is now working with the Utilities Department to fix the problem.

The company will replace nearly all water meter batteries citywide at no charge, Costilow said. So far, 300 new batteries have been delivered, and another 3,000 will ship later this month.

Because of global supply chain issues caused by the COVID-19 pandemic, another 3,950 batteries aren't expected to arrive until November.

Only the batteries themselves will be replaced, Costilow said. The actual meters are still in working condition and will be reprogrammed to remove the glitch that caused the issue.

Eaton may bring in a third-party partner to get battery testing and replacement done faster, according to the city's release. That work will also be done at no cost to local taxpayers.

In the meantime, the Amherst Utilities Department is using prior bills to estimate usage for those customers whose meter batteries have already been depleted, since the actual readings aren't being sent out.

Bills for affected customers will show they are calculated by estimate. Customers can choose instead to call in their own readings to (440) 988-4224; the city said the best time to do so is the middle of the month.

Contact Jason Hawk at (440) 329-7122 or news@lcnewspapers.com.

COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 05.16

Witness Responsible: Andrew Dickson
Title: FP&A Manager
Date Received: February 25, 2022
Docket No.: 45651

OUCC 05.16:

For each of the following years, please state how many meters were replaced and how old the meters were: 2016, 2017, 2018, 2019, 2021, and 2022.

RESPONSE:

| <u>year</u> | <u>count of installs</u> | <u># of installs that were replacements</u> | <u>Average age of replaced meters (years)</u> |
|-------------|--------------------------|---|---|
| 2016 | 75 | 73 | 4.3 |
| 2017 | 78 | 65 | 4.9 |
| 2018 | 115 | 111 | 5.2 |
| 2019 | 178 | 170 | 5.7 |
| 2020 | 114 | 95 | 6.7 |
| 2021 | 1372 | 1340 | 8.0 |

Attachment:

N/A

Date Response Provided: March 7, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 03.03**

| | |
|----------------------|---------------------------------|
| Witness Responsible: | <u>Loren Grosvenor</u> |
| Title: | <u>State Operations Manager</u> |
| Date Received: | <u>January 26, 2022</u> |
| Docket No.: | <u>45651</u> |

OUCC 03.03

How many meters failed in 2020?

OBJECTION:

Petitioner objects to the foregoing Data Request on the grounds that it is vague and ambiguous and potentially overly broad and unduly burdensome, in that it does not reference Petitioner's prefiled testimony or refer to any particular meters – nor does it reference any particular area or system or define the term "failed." Petitioner further objects to the foregoing Data Request to the extent it is requesting that Petitioner prepare information that does not exist. Subject to and without waiving the foregoing objection, Petitioner submits the response set forth below.

RESPONSE:

Petitioner does not track meter failures and meters were not replaced during most of 2020 due to the COVID-19 pandemic. However, Petitioner estimated bills for 1,151 meters in 2020, which does not necessarily indicate that each of those meters failed. However, it does indicate that at some point during the year, Petitioner was unable to read those meters.

Attachment:

N/A

Date Response Provided: February 7, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 03.04**

| | |
|----------------------|---------------------------------|
| Witness Responsible: | <u>Loren Grosvenor</u> |
| Title: | <u>State Operations Manager</u> |
| Date Received: | <u>January 26, 2022</u> |
| Docket No.: | <u>45651</u> |

OUCC 03.04

How many meters failed in 2021?

OBJECTION:

Petitioner objects to the foregoing Data Request on the grounds that it is vague and ambiguous and potentially overly broad and unduly burdensome, in that it does not reference Petitioner's prefiled testimony or refer to any particular meters – nor does it reference any particular area or system or define the term "failed." Petitioner further objects to the foregoing Data Request to the extent it is requesting that Petitioner prepare information that does not exist. Subject to and without waiving the foregoing objection, Petitioner submits the response set forth below.

RESPONSE:

Petitioner does not track meter failures. However, Petitioner estimated bills for 2,684 meters in 2021, which does not necessarily indicate that each of those meters failed. However, it does indicate that at some point during the year, Petitioner was unable to read those meters.

Attachment:

N/A

Date Response Provided: February 7, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 07.29**

Witness Responsible: Loren Grosvenor
Title: State Operations Manager
Date Received: March 11, 2022
Docket No.: 45651

OUCC 07.29

Reference Petitioner's response to DR 3-4 asking how many meters failed in 2021 which read in part:

Petitioner does not track meter failures. However, Petitioner estimated bills for 2,684 meters in 2021, which does not necessarily indicate that each of those meters failed. However, it does indicate that at some point during the year, Petitioner was unable to read those meters.

(Emphasis added)

Reference Petitioner's response to DR 5-18 regarding estimated meter reads, which read in part:

Petitioner tracks estimated reads due to failed meters. The number of estimated reads reflects a large number of failed meters.

Please reconcile these two contradictory responses. Please also indicate the total number of estimated reads for 2021 by month and the total number of estimated reads for 2021 by month due to meter failures.

RESPONSE:

The large number of estimated reads does reflect a large number of failed meters. Accounts with ongoing estimated meter reads indicate that the meter has failed. As reflected in Data Request 07.11, there could be other reasons for estimated meter reads, but the primary reason is failure.

Attachment:

N/A

Date Response Provided: March 21, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 07.40**

Witness Responsible: Loren Grosvenor
Title: State Operations Manager
Date Received: March 11, 2022
Docket No.: 45651

OUCC 07.40

In response to OUCC Data Request No. 5-18(a), Petitioner stated it “tracks estimated reads due to failed meters.” Please provide the number of estimated meter reads for each month during the period January 2016 through December 2021. If codes are used to track the reason for the estimated meter read, please provide this information by code by month.

OBJECTION:

Petitioner objects to the foregoing Data Request to the extent that it requests that Petitioner conduct a study or prepare an analysis that does not presently exist as opposed to providing documents already in its possession. Petitioner does not have a report showing the requested information by month. Petitioner further objects on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Petitioner states as follows.

RESPONSE:

Petitioner does not have a report showing the requested information by month. Please see attached excel sheet showing an annual breakdown by system and year from 2016-2021.

Attachment:

OUCC 07.40 – Estimated Meter Reads (January 2016 – December 2021).xlsx

Date Response Provided: March 21, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 07.01**

| | |
|----------------------|--------------------------|
| Witness Responsible: | Loren Grosvenor |
| Title: | State Operations Manager |
| Date Received: | March 11, 2022 |
| Docket No.: | 45651 |

OUCC 07.01

For each of the last ten years, please list all meter manufacturers, models and types of reading methodology (e.g. manual, touchpad, AMR) for each type of meter being used.

OBJECTION:

Petitioner objects to the foregoing Data Request on the grounds that the requested time period is overly broad and unduly burdensome. Petitioner further objects on the grounds that the Data Request seeks information that is not relevant to the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Petitioner submits the following response.

RESPONSE:

During the last ten years, CUll believes it has used both Badger, model 25 (manual read meters) and Master Meter BL05 (AMR), as well as the currently deployed Neptune meters T10 (AMR).

Attachment:

N/A

Date Response Provided: March 21, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 07.06**

| | |
|----------------------|---------------------------------|
| Witness Responsible: | <u>Loren Grosvenor</u> |
| Title: | <u>State Operations Manager</u> |
| Date Received: | <u>March 11, 2022</u> |
| Docket No.: | <u>45651</u> |

OUCC 07.06

Please explain how CUll reads meters on its routes, uploads data, and generates bills, especially using multiple meter types and/or manufacturers.

RESPONSE:

CUll reads meters per county for Twin Lakes at separate times during the month, and once per month for WSC and IWSI. CUll uses Customer Care and Billing ("CC&B") software to upload and download meter reads, and for billing purposes. CUll staff will have both meter reading devices running during route to capture both types of meter reads.

Attachment:

N/A

Date Response Provided: March 21, 2022

**COMMUNITY UTILITIES OF INDIANA, INC,
RESPONSE TO THE OUCC
DATA REQUEST OUCC 07.07**

| | |
|----------------------|---------------------------------|
| Witness Responsible: | <u>Loren Grosvenor</u> |
| Title: | <u>State Operations Manager</u> |
| Date Received: | <u>March 11, 2022</u> |
| Docket No.: | <u>45651</u> |

OUCC 07.07

Does reading meters made by multiple meter manufacturers require multiple receiving units? Please explain.

RESPONSE:

Yes, each manufacturer requires its own meter reading device and software.

Attachment:

N/A

Date Response Provided: March 21, 2022

CERTIFICATE OF SERVICE

This is to certify that a copy of the *Public's Exhibit No. 3 – Testimony of Carl N. Seals on behalf of the OUCC* has been served upon the following counsel of record in the captioned proceeding by electronic service on April 28, 2022.

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