IURC
PETITIONER'S 9
EXHIBIT NO.

DATE REPORTER

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)	
NORTH DEARBORN WATER AUTHORITY)	
FOR EXPEDITED APPROVAL TO ISSUE)	CAUSE NO. 45618
LONG-TERM DEBT AND ADJUST ITS)	
RATES AND CHARGES.)	

<u>PETITIONER'S RESPONSE TO PRESIDING OFFICERS'</u> JANUARY 19, 2022 DOCKET ENTRY QUESTIONS

Petitioner, North Dearborn Water Authority ("North Dearborn"), by counsel, respectfully submits its response to the Presiding Officers' January 19, 2022 Docket Entry Questions as follows:

Q.1: Please identify the remaining estimated useful lives of the current 600 gallon per minute well pumps.

Response:

Well Pump #1 was re-built in 2017. The pump will likely need to be replaced in 2025. Well Pump #2 was rebuilt in 2021, and will likely need to be replaced in 2028. North Dearborn's raw water quality is very good, which allows for these longer cycles between re-build and replacement. The pumps can typically be rebuilt one time, and then need to be replaced on the next cycle.

Q.2: Please identify and explain any discussions Petitioner has had with Hoosier Hills Regional Water District ("Hoosier Hills") concerning Hoosier Hills' interest or willingness to renew/renegotiate the purchased water contract with Petitioner, which is currently set to expire in 2028.

Response: There h regarding

There have not yet been discussions between Petitioner and Hoosier Hills regarding the current contract that is set to expire in 2028. As evidenced by Attachment DE-2, Petitioner's cost to self-supply its own water is approximately \$0.81 per 1,000 gallons compared with \$4.11 per 1,000 gallons to purchase water from Hoosier Hills. Petitioner already pays Hoosier Hills' lowest rate, and does not reasonably expect that Hoosier Hills will renew or renegotiate the contract at a price that is competitive with Petitioner's cost to self-supply water. Accordingly, Petitioner believes it is in its long-term best economic and operational interest to be self-reliant for water supply.



Q.3: Please indicate whether Petitioner has conducted any study or analysis that would demonstrate a need for improved efficiency in Petitioner producing its own water over continuing to purchase water. If so, please provide the study or analysis.

Response: Please see <u>Attachment DE-2</u>. While there has not been a specific study to identify the need for improved engineering efficiencies resulting from self-production of water, the Petitioner's Board, staff and engineers recognize that Petitioner's two connections to Hoosier Hills are near the outer edges of Petitioner's distribution system. One connection is to a 3" water main, and the other connection is to a 4" water main. Petitioner's wells and water treatment plant feed through the center of the distribution system with larger diameter water transmission mains, enabling them to better distribute water through the system than the small Hoosier Hills connections on the fringe of the system. Providing the water from Petitioner's treatment plant provides more efficient transmission to the system.

Q.4: Please explain whether there are high service pumps associated with the proposed water treatment plant project to be equipped with variable frequency drives. If so, please identify the lowest flow limit at which those pumps can be operated.

Response: Yes, the proposed high service pumps are proposed to be equipped with variable frequency drives. The design pumping range for the pumps is 600 – 1,000 gpm with the VFD control.

Q.5: Please indicate whether the high service pumps associated with the proposed water treatment plant project will need to be respecified if the well pumps are not upgraded as proposed by Petitioner.

Response: The project design has progressed and the design team has developed a final design to provide for operational flexibility with a pumping range of 600 – 1,000 GPM.

Q.6: Please provide an updated Project Schedule as listed in Section 6.6 of the 2020 Preliminary Engineering Report ("PER") (Petitioner's Exhibit 3, p. 52).

Response:

Project Component	Date
Submit PER to SRF	June 15, 2020
Public Hearing for PER	May 10, 2021
IURC Rate Case Filing	September, 2021
Plan & Specification Submittal to IDEM	January – February 2022
PER Approval	November 15, 2021
Construction Permit Approval from IDEM	February - March 2022
Advertise for Bids	March, 2022
Receive Bids for Project	April, 2022
Receive IURC Rate Case Approval*	TBD (March-April, 2022)
Close on SRF Loan	May, 2022
Contract Award	May, 2022
Begin Construction	June, 2022
Completion of Construction	June, 2023

Q.7: Please explain why Petitioner applied a 15% contingency in its PER when the Financial Information Form in the PER, at p. 133, notes that the contingency should not exceed 10% of the construction cost.

Response:

The 15% contingency applied in Petitioner's PER represents a 15% contingency in the amount of Petitioner's requested borrowing authority from this Commission, and not a 15% contingency in the final project cost that will be submitted to the Indiana Finance Authority ("IFA") and reflected in the loan. The professional engineering firm for North Dearborn, Curry and Associates, includes higher contingencies in the PER because the estimated costs at that stage of the process are typically written prior to design of the project. At this point, North Dearborn and its professional engineer do not have all the detailed information needed to prepare an accurate cost estimate based on the final design and possible cost escalations that all utilities are currently experiencing in the construction marketplace. Once North Dearborn receives the final bids, North Dearborn will know its construction costs with a greater degree of certainty; North Dearborn can size the amount of the bonds based on the actual bid amounts; North Dearborn will reduce the contingency to 5% of the actual bid amount in accordance with the IFA's requirements; and no waiver will be needed (from the Indiana Finance Authority). Considering the current bidding environment (and until bids are received), North Dearborn and its professional engineer believe it is appropriate to include a 15% contingency so that North Dearborn will not

need to return to the Commission for additional borrowing authority if final costs are higher than originally anticipated. To be clear, once the final bids are received, North Dearborn will only borrow an amount that includes no more than a 5% contingency on the project costs reflected in the final bids as required by the IFA.

Q.8:

Mr. Baldessari, at p. 5 of his rebuttal testimony, indicates his agreement with the Indiana Office of Utility Consumer Counselor's ("OUCC") proposed calculation of the debt service requirement for Phase 1. However, Petitioner's revised schedules (Exhibit 8, p. 2) reflect an annual debt payment for Phase 1 of \$138,600, which differs from the OUCC's annual debt payment of \$110,136 (OUCC's Exhibit 3, Attachment SD-4, p.1). Please explain the discrepancy.

Response:

On page 5 of Mr. Baldessari's rebuttal testimony it does state that Mr. Baldessari agrees with the OUCC's proposed calculation of the debt service requirement for phase I. However, the intention of this response was that Mr. Baldessari agreed with the methodology of how the debt service requirement was calculated using the monthly payments at an interest rate of 2.65% for Series A and 2.75% for Series B. The difference in the debt service requirement between the OUCC's proposed calculation and the Petitioner's Rebuttal calculation is due to the fact that Petitioner did not agree with the total amount of the project costs as proposed by the OUCC, as stated on page 2 of Mr. Baldessari's rebuttal testimony. Petitioner's proposed par amounts are \$1,645,000 for Series A and \$1,960,000 for Series B which are amortized to calculate the debt service requirement. The total par amount of bonds proposed by the Petitioner is \$3,605,000 which is \$359,930 more than proposed by the OUCC.

Respectfully Submitted.

Missi Shoult J. Christopher Janak, No. 18499-49

Nikki G. Shoultz, No. 16509-41

Kristina K. Wheeler, No. 20957-49A

Bose McKinney & Evans LLP

111 Monument Circle, Suite 2700

Indianapolis, IN 46204

(317) 684-5000 | (317) 684-5173 Fax

Counsel for Petitioner, North Dearborn Water Authority

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon the following by electronic mail this 24^{th} day of January, 2022:

Scott Franson
Indiana Office of Utility Consumer Counselor

infomgt@ouce in gov SFranson@ouce IN gov

Vikki G. Shoultz, No. 6509-41

Bose McKinney & Evans LLP 111 Monument Circle, Suite 2700 Indianapolis, IN 46204 (317) 684-5000 Telephone (317) 684-5173 Facsimile

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North Dearborn Water Authority 7484 Christina Drive Suite 103 West Harrison IN 47060 812-576-2177

Production Cost of Water 2019 and 2020 Compared to purchase water from Hoosier Hills Regional Water District

2019 Cost taken from the Annual Audit see attached document

Electricity	\$56,014.00
Well Field Lease	\$9,973.00
Supplies (chemicals)	\$17,340.00
Total	\$83,104.00

Water Produced at Treatment Plant 2019

107,263,000 gallons

see attached document

\$83,104.00 divided by 107,357 =

\$.77 cents per 1000 gallon

2020 Cost taken from the Annual Audit see attached document

Electricity	\$65,091.00
Well Field Lease	\$9,973.00
Supplies (chemicals)	\$12,134.00
Total	\$87,198.00

Water Produced at Treatment Plant 2020

107,357,000 gallons

see attached document

\$87,198.00 divided by 107,357 =

\$.81 cents per 1000 gallons

Hoosier Hill lowest tier is \$4.11 per 1000 galons see attached rate schedule

North Dearborn Water Corporation Notes to Financial Statements December 31, 2020 and 2019

7. Expense Disclosures

Expenses are assigned directly to specific activities as expenditures are made.

		_			
	Program Activities	St	upporting Activities		
			Management		
	Water Distribution	<u> </u>	and General	Tot	al Expenses
Purchased water	\$ 99,603	\$	-	\$	99,603
Electricity	65,091		-		65,091
Meter reading and reporting	13,800		to to		13,800
Locates and disconnect charges	20,260	-	~		20,260
Well field lease	9,973		-		9,973
Laboratory testing	3,070		-		3,070
Contracted maintenance service	176,809		-		176,809
Repairs and maintenance	62,149	and the same of th	=		62,149
Supplies	12,134	ر ک	-		12,134
Depreciation	147,898		-		147,898
Office wages and payroll taxes	-		68,084		68,084
Office supplies and small equipment	-		12,383		12,383
Postage	-		7,846		7,846
Insurance	-		11,403		11,403
Office rent and utilities	-		18,371		18,371
Professional Fees	-		25,655		25,655
Bank charges and fees	-		1,420		1,420
Director fees	-		2,850		2,850
Misc Expense			15,935		15,935
Total Expenses	\$ 610,787	\$	163,947	\$	774,734

North Dearborn Water Corporation Notes to Financial Statements December 31, 2020 and 2019

Note 7, Expense Disclosures, continued.

	20		
	Program Activities	Supporting Activities	
		Management	
	Water Distribution	and General	Total Expenses
Purchased water	\$ 97,539	\$ -	\$ 97,539
Electricity	56,014	-	56,014
Meter reading and reporting	13,801	=	13,801
Locates and disconnect charges	19,640	-	19,640
Well field lease	9,750	-	9,750
Laboratory testing	4,223	-	4,223
Contracted maintenance service	164,809	-	164,809
Repairs and maintenance	68,713	-	68,713
Supplies	17,340	-	17,340
Depreciation	152,057	-	152,057
Office wages and payroll taxes	•	61,113	61,113
Office supplies and small equipment	F	10,817	10,817
Postage	-	7,304	7,304
Insurance	-	9,092	9,092
Office rent and utilities	~	18,012	18,012
Professional Fees	-	9,650	9,650
Bank charges and fees	-	1,630	1,630
Directorfees	-	4,000	4,000
Misc Expense	-	15,473	15,473
Total Expenses	\$ < 603,886	\$ 137,091	\$ 740,977

8. Supplemental Disclosure of Cash Flow Information

	December 31, 2020		December 31, 2019	
Cash paid during the year for:			47.19.29	
Interest	\$	48,271	\$	51,373
Income Taxes		=		-

Reconcilation of cash and cash equivalents and cash held by bond trustee as reported in Statements of Financial Position to the amount reported in the Statement of Cash Flows

	December 31, 2020		Decen	nber 31, 2019
Cash and cash equivalents	\$	407,406	\$	231,796
Cash held by bond trustee		120,774	-	115,071
Cash and cash equivalents and cash				
held by bond trustee at year end	\$	528,180	\$	346,867

See independent auditor's report.

NORTH DEARBORN WATER CORP. ANNUAL USAGE AND WATER LOST 2019

	Treatment Plant	Elrod Penntown	Elrod Hwy 48	TTW Mt. Pleas.	TTW Geo.	Greendale	Total Purchased	TOTAL WATER
Jan.	8,093,000	249,000	1,245,000	342,000	542,000	365,000	2,743,000	10,836,000
Feb.	7,817,000		1,121,000		474,000	•	2,333,000	10,150,000
March	8,483,000		1,235,000		646,000		2,792,000	11,275,000
April	7,827,000	· ·	1,180,000		555,000		2,554,000	10,381,000
May	9,551,000		1,289,000		755,000		2,997,000	12,548,000
June	8,701,000	228,000	1,031,000	358,000	608,000	379,000	2,604,000	11,305,000
July	10,155,000	200,000	1,187,000	487,000	650,000	437,000	2,961,000	13,116,000
Aug.	10,573,000	123,000	1,187,000	451,000	681,000	425,000	2,867,000	13,440,000
Sept.	10,131,000	122,000	1,174,000	428,000	684,000	479,000	2,887,000	13,018,000
Oct.	9,204,000	121,000	1,142,000		524,000	428,000	2,593,000	11,797,000
Nov.	8,307,000	134,000	1,113,000	383,000	496,000	380,000	2,506,000	10,813,000
Dec.	8,421,000	144,000	1,148,000	408,000	535,000	386,000	2,621,000	11,042,000
TOTAL	107,263,000	2,169,000	14,052,000	4,551,000	7,150,000	4,536,000	32,458,000	139,721,000
AVERAGE PER MON		180,750	1,171,000	379,250	595,833	378,000	2,704,833	11,643,417
		Total Purchas	sed	32.458,000		Total Produce	·d	107,263,000
Dec./ 8		TOTAL WATE 10,986,000	ΞR	WATER SOL	D	WATER LOS	Γ	PERCENT
Jan. Feb.		10,836,000 10.150,000		19,382,907		2,439,093		11%
March April		11,275,000 10,381,000		19,522,349		1,902,651		9%
May		12,548,000						
June July		11,305,000 13,116,000		20,523,741		2,405,259		10%
Aug. Sept.		13,440,000 13,018,000		22,245,993		2,175,007		9%
Oct.		11,797,000		24,274,164		2,183,836		8%
Nov. Dec.		10,813,000		20,990,562		1,619,438		7%
TOTAL		139,665,000		126,939,716		12,725,284		9%
AVERAGE								
PER MONTH		11,638,750		10,578,310		1,060,440		9%

NORTH DEARBORN WATER CORP. ANNUAL USAGE AND WATER LOST 2020

	Treatment Plant	Elrod Penntown	Elrod Hwy 48	TTW Mt. Pleas.	TTW Geo.	Greendale	Total Purchased	TOTAL WATER
Jan.	8,000,000	125,000	1,136,000	385,000	513,000	386,000	2,545,000	10,545,000
Feb.	8,055,000		1,076,000		481,000	349,000	2,350,000	10,405,000
March	8,099,000		1,161,000	·	532,000	362,000	2,546,000	10,645,000
April	7,999,000		1,123,000		565,000	397,000	2,559,000	10,558,000
May	9,363,000		1,179,000		649,000	482,000	2,894,000	12,257,000
June	10,099,000		1,215,000		612,000	516,000	2,983,000	13,082,000
July	10,874,000	123,000	1,242,000	489,000	650,000	581,000	3,085,000	13,959,000
Aug.	10,267,000	179,000	1,153,000	451,000	608,000	610,000	3,001,000	13,268,000
Sept.	9,692,000	247,000	1,142,000	384,000	608,000	436,000	2,817,000	12,509,000
Oct.	8,775,000	331,000	1,163,000	335,000	576,000	372,000	2,777,000	11,552,000
Nov.	7,726,000	374,000	1,144,000	301,000	556,000	348,000	2,723,000	10,449,000
Dec.	8,408,000	234,000	1,163,000	310,000	655,000	381,000	2,743,000	11,151,000
TOTAL	107,357,000	2,250,000	13,897,000	4,651,000	7,005,000	5,220,000	33,023,000	140,380,000
AVERAGE PER MON		187,500	1,158,083	387,583	583,750	435,000	2,751,917	11,698,333
		Total Purchas	ed	33,023,000		Total Produce	ed	107,357,000
Dec. 19		TOTAL WATE 11,042,000	ΞR	WATER SOL	D	WATER LOS	Т	PERCENT
Jan.		10,545,000						
Feb.		10,405,000		18,502,754		3,084,246		14%
March		10,645,000						
April		10,558,000		19,031,123		2,018,877		10%
May		12,257,000						***
June		13,082,000		20,839,212		1,975,788		9%
July		13,959,000		04.500.000		0 540 440		00/
Aug.		13,268,000		24,500,890		2,540,110		9%
Sept. Oct.		12,509,000 11,552,000		22,063,728		3,713,272		14%
Nov.		10,449,000		22,003,720		3,713,272		1470
Dec.		10,449,000		20,378,720		1,622,280		7%
TOTAL		140,271,000		125,316,427		14,954,573		11%
AVERAGE PER MONTH		11,689,250		10,443,036		1,246.214		11%

HOOSIER HILLS REGIONAL WATER DISTRICT P.O. BOX 395, MILAN IN 47031 PHONE 812-654-3200 TOLL FREE 866-268-3200 WEBSITE hhrwd.com ****SCHEDULE OF RATES & CHARGES****

METERED RATES PER MONTH	PER 1,000 GALLONS
FIRST 3,000 GALLONS	\$8.94
NEXT 3,000 GALLONS	\$8.00
NEXT 4,000 GALLONS	\$6.39
NEXT 10,000 GALLONS	\$4.75
OVER 20,000 GALLONS	\$4.11

MINIMUM CHARGE PER MONTH

EACH USER SHALL PAY A MINIMUM CHARGE IN ACCORDANCE WITH THE FOLLOWING APPLICABLE SIZE OF METER INSTALLED FOR WHICH THE USER WILL BE ENTITLED TO THE QUANTITY OF WATER SET FORTH BELOW:

METER SIZE	GALLONS	RATE PER MONTH
5/8"	3,000	\$26.82 + tax = \$28.70
3/4"	4,500	\$38.82
1"	7,500	\$60.41
1 1/2"	15,000	\$100.13
2"	24,000	\$140.32
3"	45,000	\$226.63
₹ "	75,000	\$349.93

HYDRANTS

THERE ARE NO FIRE HYDRANTS OR PRIVATE PROTECTION DEVICES ON THE WATER SYSTEM. TWO INCE (2") FLUSH HYDRANTS INSTALLED ON THE SYSTEM ARE AVAILABLE TO FIRE COMPANY'S WITHIN THE AREA FOR GRAVITY USE TO FILL WATER TRUCK TANKS ONLY.

MEMBERSHIP

\$100.00, WHICH IS REFUNDABLE IF SERVICE IS EVER CANCELLED

THE METERS ARE READ THE THIRD FULL WEEK OF EVERY MONTH. THE BILLS GO OUT ON THE 1^{97} OF EVERY MONTH AND ARE DUE ON THE 17^{18} OF EVERY MONTH. IF BILLS ARE NOT PAID IN FULL BY THE 17^{18} OF EACH MONTH, A PENALTY OF 104 OF THE FIRST \$3.00/3% OF BALANCE WILL BE ACCESSED

DISCONNECT NOTICES

NOTICES WILL BE SENT OUT ON THE 18 OF EACH MONTH FOR PAST DUE ACCOUNTS. ONCE A NOTICE IS SENT OUT OUR OFFICE CAN ONLY ACCEPT CASH, MONEY ORDER, CREDIT/DEBIT CARDS

RECONNECT FEE

IF THE NEED ARISES TO DISCONNECT ANY USERS SERVICE, THESE CHARGES WILL BE APPLIED TO RECONNECT THEIR SERVICE:

DURING OFFICE HOURS - \$50.00 AFTER OFFICE HOURS - \$100.00 CUT LOCK CHARGE - \$75.00

\$50.00 RECONNECT FEE WILL BE CHARGED FOR ALL CURRENT MEMBERS WISHING TO HAVE SERVICE RESTORED AT ANOTHER RESIDENCE THAT HAS BEEN DISCONNECTED.

REQUEST TO RE-READ METERS

\$50.00 FEE WILL BE CHARGED FOR ALL CURRENT MEMBERS REQUESTING THEIR METERS RE-READ.