

BEFORE THE

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF GERMAN TOWNSHIP WATER)
DISTRICT'S APPLICATION FOR A NEW SCHEDULE) CAUSE NO. 45340-U
OF RATES AND CHARGES)

APPLICANT'S RESPONSE TO OUCC REPORT

German Township Water District, Inc. ("Applicant") provides the following responses to the Office of Utility Consumer Counselor's ("OUCC") Report on Applicant's request for approval of a new schedule of rates and charges pursuant to the Indiana Utility Regulatory Commission ("IURC") rules governing small utility rate change applications.

OUCC's Recommended Rate Increase

On November 2, 2020, the OUCC filed its Report in this Cause in which it recommended a 2.44% across-the-board increase for Applicant. After review of the OUCC Report and the calculations contained therein, Applicant agrees with the calculations and resulting 2.44% increase in rates and charges. Applicant respectfully requests that the IURC issue an Order approving the 2.44% across-the-board rate increase as soon as practicable.

OUCC's Recommended Post-Order Compliance Requirement

The OUCC's Report contains at line 6 of page 7 of 11 of Petitioner's Exhibit No. 1, a recommendation for a post-order compliance requirement related to the two new employees Applicant proposes to hire. As written and filed, this requirement is vague in that the text contains contradictory language as follows... "I propose that within **thirty (90)**

days of the issuance...” (emphasis added). Informal discussions with the OUCC indicate that it is the OUCC’s intent to recommend a ninety (90) day compliance window for this proposed post-order filing requirement.

In general, Applicant does not object to the post-order compliance requirement or the ninety (90) day period within which to fill the proposed positions. This is especially true as it relates to the proposed administrative office employee as Applicant does not expect any difficulty in finding a qualified candidate especially given the current labor market. It may, however, be more difficult to find a qualified candidate for the proposed field position given the specialized skills that Applicant is seeking. In any event, Applicant will make best efforts to fill the proposed positions within the ninety days and will inform the IURC and the OUCC in advance if it appears that it will be unable to do so.

OUCC’s Recommended Use of Restricted Account for Tank Maintenance Funds

The OUCC’s Report contains a recommendation that the IURC require Applicant to segregate funds received and accumulated for future tank maintenance in a restricted account. Applicant believes this is an unnecessary restriction to its normal operating procedures but in the interest of moving the case forward expeditiously will not object at this time to the creation of such an account.

Respectfully submitted,

Scott A. Miller

Scott A. Miller, CPA
Baker Tilly Municipal Advisors, LLC
8365 Keystone Crossing, Suite 300
Indianapolis, Indiana 46240
Telephone: 317-465-1506
Facsimile: 317-465-1550
Email: scott.miller@bakertilly.com

Rate Consultant to Applicant, German
Township Water District, Inc.