FILED
March 4, 2025
INDIANA UTILITY
REGULATORY COMMISSION

#### STATE OF INDIANA

### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF	)
STUCKER FORK CONSERVANCY	)
DISTRICT FOR APPROVAL OF A NEW	) <b>CAUSE NO. 46167</b>
SCHEDULE OF RATES AND CHARGES FOR	)
WATER SERVICE	)

#### **PUBLIC'S EXHIBIT NO. 3**

### TESTIMONY OF KRISTEN WILLOUGHBY

#### ON BEHALF OF

### THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

March 4, 2025

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

Thomas R. Harper, Attorney No. 16735-53

Deputy Consumer Counselor

Victor Peters, Attorney No. 38310-53

**Deputy Consumer Counselor** 

OFFICE OF UTILITY CONSUMER COUNSELOR

115 W. Washington St., Suite 1500 South

Indianapolis, IN 46204

Email: <a href="mailto:thharper@oucc.in.gov">thharper@oucc.in.gov</a> vipeters@oucc.in.gov

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the *Public's Exhibit No. 3 - Testimony of Kristen Willoughby on behalf of the OUCC* has been served upon the following captioned proceeding by electronic service on March 4, 2025:

J. Christopher Janak Jacob Antrim BOSE MCKINNEY & EVANS LLP

111 Monument Circle, Suite 2700

Indianapolis, IN 46204

Email: <u>JJanak@boselaw.com</u> jantrim@boselaw.com Attorneys for Morgan Foods, Inc.

Steven W. Krohne Jennifer L. Schuster Jack M. Petr

ICE MILLER LLP

One American Square, Suite 2900 Indianapolis, Indiana 46282-0200

Email: <a href="mailto:steven.krohne@icemiller.com">steven.krohne@icemiller.com</a> jennifer.schuster@icemiller.com

jack.petr@icemiller.com

Thomas R. Harper

Deputy Consumer Counselor

### INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

115 West Washington Street Suite 1500 South Indianapolis, IN 46204 infomgt@oucc.in.gov 317/232-2494 – Phone 317/232-5923 – Facsimile

# TESTIMONY OF OUCC WITNESS KRISTEN WILLOUGHBY CAUSE NO. 46167 STUCKER FORK CONSERVANCY DISTRICT

### I. <u>INTRODUCTION</u>

1	Q:	Please state your name and business address.
2	A:	My name is Kristen Willoughby, and my business address is 115 West Washington
3		Street, Suite 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
6		a Utility Analyst in the Water/Wastewater Division. I described my qualifications
7		and experience in Appendix A.
8	Q:	What is the purpose of your testimony?
9	A:	I make recommendations on Stucker Fork Conservancy District's ("Stucker Fork"
10		or "Petitioner") periodic maintenance revenue requirement, periodic maintenance
11		reporting requirement, projects to be funded though depreciation, and the proposed
12		Marble Hill Expansion.
13	Q:	What did you do to prepare your testimony?
14	A:	I reviewed Stucker Fork's petition and the testimonies of its witnesses Douglass
15		Baldessari and Richard A. Burch. I reviewed the Indiana Utility Regulatory
16		Commission's ("Commission" or "IURC") Final Order in Cause No. 44987 issued
17		September 26, 2017, which established Stucker Fork's current rates and charges. I
18		reviewed Stucker Fork's annual reports to the IURC for years 2017 through 2023.
19		I wrote data requests and reviewed Stucker Fork's responses. On January 14, 2025,
20		I met with Stucker Fork representatives (including personnel and consulting

1		personnel), Mr. Derick Wiggins, Mr. Alan Burch, and Mr. Randy Needler, Stucker
2		Fork's Superintendent. I viewed several of Petitioner's above-ground water utility
3		facilities, including the Austin and Marble Hill water treatment locations, one
4		booster station, eleven water storage tanks, and Petitioner's office. I took pictures
5		of those facilities, which I present in Attachment KW-01 to this testimony.
6 7	Q:	If you do not discuss a specific topic or adjustment, does that mean you agree with the Petitioner?
8	A:	No. My silence on any issue should not be construed as an endorsement. Also, my
9		silence in response to any actions or adjustments stated or implied by Petitioner
10		should not be construed as an endorsement.
11	Q:	Does your testimony include attachments?
12	A:	Yes. My testimony includes the following attachments:
13		• OUCC Attachment KW-01: Photos of Stucker Fork's System.
14		• OUCC Attachment KW-02: Petitioner's response to OUCC DR 5-4.
15		• OUCC Attachment KW-03: Petitioner's response to OUCC DR 1-11.
16 17		<ul> <li>OUCC Attachment KW-04: Utility Dashboard, showing operational statistics based upon Stucker Fork's IURC Annual Reports from 2017-2023.</li> </ul>
18		• OUCC Attachment KW-05: Petitioner's response to OUCC DR 2.
19		• OUCC Attachment KW-06: Photos of 24 X 36 bid tabs.
20 21		• OUCC Attachment KW-07: U.V. system maintenance/bulb replacement invoice.
22		• OUCC Attachment KW-08: Petitioner's response to OUCC DR 12-3.
23 24		<ul> <li>OUCC Attachment KW-09: Table of all discovery requests, due dates, and dates received.</li> </ul>
25		• OUCC Attachment KW-10: Petitioner's response to OUCC DR 7.

- OUCC Attachment KW-11: AWWA M42 Manual Steel Water Storage Tanks
   Revised Edition p. 108.
- OUCC Attachment KW-12: Periodic Maintenance Adjustments.
- OUCC Attachment KW-13: Direct Testimony of OUCC Witness Scott Bell,
   Cause No. 44687, pp. 9-11.
- OUCC Attachment KW-14: Petitioner's response to OUCC DR 12-5.

### II. PETITIONER'S CHARACTERISTICS

### 7 Q: Please describe Petitioner's characteristics.

8 A: Petitioner is a conservancy district water utility providing water service to 8,022 9 customers in portions of Scott, Jefferson, Jackson, Jennings, Washington, and Clark Counties. Petitioner's current source of supply consists of five wells and one 10 11 surface water intake. Petitioner has one 4.0 MGD ground water treatment plant and 12 one 8.6 MGD surface water treatment plant. Petitioner's storage and distribution 13 system consists of thirteen storage tanks, three booster stations, and an estimated 1,087 miles of water main.<sup>2</sup> Stucker Fork provides fire protection for customers in 14 the City of Austin.<sup>3</sup> 15

### 16 Q: Does Petitioner have adequate storage capacity?

17 A: Yes. Stucker Fork currently has a total storage capacity of 3,910,000<sup>4</sup> gallons. With total average sales in 2023 of 3,682,189<sup>5</sup> gallons per day, Stucker Fork meets the

<sup>&</sup>lt;sup>1</sup> 2023 Annual Report, page W-1, Year End Customer Numbers; Customers.

<sup>&</sup>lt;sup>2</sup> 2023 Annual Report, page W-7, W-8, W-9.

<sup>&</sup>lt;sup>3</sup> Petitioner's Response to OUCC DR Q-5-4, OUCC Attachment KW-02.

<sup>&</sup>lt;sup>4</sup> Petitioner's Response to OUCC DR O-1-11, OUCC Attachment KW-03: 6,610,000 – (1,000,000 + 500,000

<sup>+1,200,000</sup>) = 3,910,000. Note: The clear well storage was subtracted from the total.

<sup>&</sup>lt;sup>5</sup> 2023 Annual Report page W-6. 1,347,681,000 / 366 = 3,910,000 gallons per day.

Ten States Standards recommendation that total water storage be able to meet average day demands.<sup>6</sup>

### III. WATER LOSS

### Q: What is "water loss" as it pertains to a utility's operations?

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As used in IURC annual reports, "water loss" means the difference between the total volume of water pumped and purchased by the water utility and the total volume of water sold to customers or used for backwash, flushing mains, street cleaning/sewer flushing, or other authorized consumption. Water loss may generally be attributed to leaks or inaccurate measurement of consumption.

### How does water loss affect a utility's costs and operations?

Whether finished water is metered, used for operations or lost through leaks, the cost to produce the water is included in the utility's test year expenses. The cost to produce water that is lost through leaks is a cost paid by all customers through higher rates. Water loss caused by inaccurate or slow meters presents a different dynamic. Water "lost" through under-recording is nonetheless consumed, and therefore, the actual cost to produce that unrecorded water is not avoided by more accurate meters. However, removing inaccurate meters avoids subsidization among customers and allows the utility to both recognize that water is being lost through leaks and measure its success in mitigating that problem.

<sup>&</sup>lt;sup>6</sup> The Great Lakes – Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers Recommended Standards for Water Works ("Ten States Standards"), Section 7.0.1 Sizing of Finished Water Storage.

- 1 Q: What is Stucker Fork's current water loss?
- 2 A: According to its most recent IURC annual report (2023), Stucker Fork's current
- water loss is 17.1%, which is the lowest it's been since 2017.<sup>7</sup>

### IV. PERIODIC MAINTENANCE

4 What are Stucker Fork's proposed adjustments to its Periodic Maintenance Q: 5 expense? 6 During the test year, Petitioner spent \$436,160 on periodic maintenance. As a pro A: 7 forma revenue requirement, Stucker Fork proposes to increase these expenditures 8 to \$485,120, which is an increase of \$48,960 over test year expense. However, in 9 determining its Periodic Maintenance expense, Stucker Form did not calculate 10 fixed, known, and measurable adjustments to test year expenses. As discussed in 11 testimony below, Stucker Fork used other methodologies to derive its requested 12 Periodic Maintenance expense of \$485,120. 13 Q: Is it reasonable for Petitioner to incur expenses to perform all periodic 14 maintenance items? 15 A: Yes. Water utilities need to perform periodic maintenance on their capital assets. 16 Periodic maintenance will allow Stucker Fork to continue to operate its facilities 17 and prevent early termination of assets. 18 How did Petitioner calculate the proposed periodic maintenance expense? O: 19 A: For most periodic maintenance expenses Petitioner took the amount authorized in 20 the last rate case for a periodic maintenance expense item and multiplied it by an inflation factor of 1.27, derived from the Consumer Price Index ("CPI"). 8 For filter 21 22 media replacement at the Austin Plant and storage tank painting, miscellaneous

<sup>&</sup>lt;sup>7</sup> See "Percent Water Loss" chart in Attachment KW-04.

<sup>&</sup>lt;sup>8</sup> Petitioner's Response to OUCC Q-2-3, OUCC Attachment KW-05 and Petitioner's Exhibit 1, p. 8-9.

invoices were used and then an inflation factor from the CPI was applied as necessary. Finally, the cost of the U.V. system maintenance/bulb replacement is based on an invoice and rounded down. 10

### Do you accept Petitioner's methodology for calculating the proposed periodic maintenance expense?

No. Petitioner's starting point was its estimated forecast in the last rate case, which was subject to criticism for its inaccuracy, but authorized in settlement as part of the give and take of compromise. <sup>11</sup> A methodology that uses a questionable forecast, not adequately shown to be representative of historical actual costs, and simply inflates the amount using the CPI, ignores the purpose and spirit of using a historical test year of actual costs and applying fixed, known, and measurable adjustments.

Understandably, variable periodic maintenance, over an extended period of years, cannot be fully, accurately captured in test year expense. However, using actual expenses over time, as a basis for periodic maintenance can provide an accurate, empirical starting point. Failing to anchor periodic maintenance to actual costs cannot be expected to produce an accurate estimate.

Petitioner's estimated Periodic Maintenance expenses are based on a forecast from 2017, not an amount based on Stucker Fork's actual costs for its actual utility operations. <sup>12</sup> Petitioner then used the CPI to adjust this forecasted

Q:

<sup>&</sup>lt;sup>9</sup> Petitioner's Response to OUCC Q-2-3, OUCC Attachment KW-05 and KW-06.

<sup>&</sup>lt;sup>10</sup> Included as Attachment KW-07.

<sup>&</sup>lt;sup>11</sup> As discussed further below, the terms of settlement also included that all periodic maintenance be tracked and reported, and all periodic maintenance be administered through a restricted account. See, also, *Stucker Fork Cons. Dist.*, Cause No. 44987, Final Order (Ind. Util. Reg. Comm'n, July 25, 2018). <sup>12</sup> Final Order, Cause No. 44987, p. 13.

amount for almost seven years. Even more importantly, Stucker Fork has historically spent less on annual periodic maintenance expenses than the amount authorized, or which Stucker Fork has requested in prior rate cases.

Stucker Fork's actual expenses in the 2023 test year and in 2024, did exceed the amount embedded in rates for periodic maintenance. However, this is only two years out of twelve years of data. In addition, periodic maintenance expense is expected to vary from year to year; for instance, one year may include multiple tank painting projects, compared to those years with none, so a given year may include above-average costs.

Stucker Fork is a conservancy district, and it is important to ensure it has enough funds to properly maintain its assets. It is equally important to ensure customers are not paying for periodic maintenance that is not being performed, or is significantly delayed.

As addressed by OUCC witness, Jason T. Compton, Stucker Fork reported a balance of \$665,321 as of December 31, 2023 for the periodic maintenance restricted funds. Stucker Fork's rates include an embedded amount of \$340,332 in its rates for 2024, and Petitioner's responses to OUCC data requests show that Stucker Fork spent \$772,420 for 2024. This increased maintenance expense for 2024 is due to completing multiple maintenance projects which occur infrequently

<sup>&</sup>lt;sup>13</sup> Note: as detailed below Petitioner spent \$772,420 in 2024.

<sup>&</sup>lt;sup>14</sup> Note this includes the test year from the last five rate cases (Cause Nos. 44987, 44687, 44164, 43780, and 42752) plus the seven years lead up to and including 2024.

<sup>&</sup>lt;sup>15</sup> 2023 Annual Report, page W-11(a).

<sup>&</sup>lt;sup>16</sup> Petitioner's response to OUCC DR 12-3, the sum of column M82-M118 excluding M109 which is a capital expense, Attachment KW-08.

and at higher cost, including repainting two legged water storage tanks (Tanks 2 and 4), replacement of all filter media for the four Marble Hill WTP filters, and completion of the inspection and maintenance of the Austin WTP clearwell.

Therefore, Stucker Fork will be anticipated to report an excess balance in the restricted account of approximately \$233,233 ((\$665,321 + \$340,332 = \$1,005,653) - \$772,420 = \$233,233), and it will continue to receive the embedded annual amount of \$340,332 until its rate increase is implemented. While it remains important that Stucker Fork have enough funds to properly complete periodic maintenance, its current excess balance will supplement the amount to be authorized to be embedded in rates for periodic maintenance, further alleviating the risk that it would not have sufficient funds for all periodic maintenance items.

# Q: Are you concerned that ratepayers are paying through rates for periodic maintenance that is not being performed?

Yes. The discrepancies between Petitioner's actual spending on periodic maintenance and its requests for periodic maintenance amounts embedded in rates can be seen going back to Cause No. 42752, where Petitioner requested over \$200,000 annually in periodic maintenance despite only spending about \$34,000 in the test year ending in March 2004.<sup>17</sup>

In this Cause, Petitioner's test year periodic maintenance spend did exceed the amount embedded in rates, as shown in Table 1, below. However, as shown in Table 1, below, Stucker Fork significantly underspent in most years since the Order in Cause No. 44987. In fact, over the past five years (2019-2023), Stucker Fork

<sup>&</sup>lt;sup>17</sup> Cause No. 42752, Petitioner's Exhibit JMS-2, p. 12-13.

- 1 received a total of \$1,701,640 from ratepayers to perform periodic maintenance,
- but it only spent \$1,187,582, a difference of \$514,058. (See Table 1 below)

Table 1: Annual Periodic Maintenance Authorized v. Actual Spend

Year <sup>18</sup>	2019	2020	2021	2022	2023
44987 Settlement	\$340,328	\$340,328	\$340,328	\$340,328	\$340,328
Amount					
Amount Spent	\$266,957	\$45,217	\$115,277	\$313,009	\$447,122
Difference	(\$73,371)	(\$295,111)	(\$225,051)	(\$27,319)	\$106,794

Did the combination of Petitioner's methodology, the historical insufficiency of the amounts spent on periodic maintenance, and the resulting risk that ratepayers could pay excessive rates for periodic maintenance not being performed cause you greater concern?

Yes. Those concerns, in addition to what I would characterize as insufficient evidentiary support in Petitioner's case in chief, caused me to feel compelled to conduct a more thorough review of Petitioner's actual costs and invoices. And given the long periods over which periodic maintenance is completed, I believed it necessary to review some actual cost information preceding the last rate case order.

### Q: Did you, then, request additional information, actual costs, and invoices regarding each of these proposed projects?

Yes. I sought additional information on the maintenance expenses through data requests. My initial questions were included in OUCC DR set No. 2. served on December 13, 2024 with responses served on January 13, 2025 (hours before the scheduled engineering site visit) and with a supplemental response January 14<sup>th</sup> for two data requests which included an additional bid tab and some additional description regarding Marble Hill. As can be seen in OUCC Attachment KW-05 (the responses to OUCC DR set 2), Stucker Fork did respond but did not answer,

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A:

Q:

<sup>&</sup>lt;sup>18</sup> All Periodic Maintenance spending amounts come from Petitioner's IURC Annual Reports.

or fully answer, many of the questions. This impacted the effectiveness of the site visit the next day. Also, many of the bid tabs initially included regarding periodic maintenance items were largely illegible due to the reproductions size. Stucker Fork did later provide legible 24" x 36" original size bid tabs for review. In addition to OUCC DR set 2, I sought additional information and invoices in several other OUCC DR sets and follow up requests. The process for discovery was beset by delays and frustration. Primarily, and especially, facilitating review of actual costs for periodic maintenance items proved challenging; attached as OUCC Attachment KW-09, is a table reflecting the course of discovery. Stucker Fork also expressed its frustration over the data requests. Even with the parties working to resolve discovery issues, the discovery process was onerous.

A:

In discovery, Stucker Fork provided its Periodic Maintenance tracking documentation. The Periodic Maintenance tracking was invaluable to my review, but it was limited to the time period beginning with 2018 for the specifically listed maintenance categories and all maintenance beginning in 2021. Therefore, the Periodic Maintenance tracking will become more important as it is continued and captures additional years of data.

Q: Would continued tracking of Periodic Maintenance expenses and the establishment of an audit file facilitate review and alleviate some of the challenges experienced with discovery?

Yes. The Periodic Maintenance tracking reports have been an invaluable source of information for this cause, especially given the difficulty experienced with respect to discover requesting actual costs and invoices. These reports have shown where Stucker Fork does and does not spend money on periodic maintenance. This

information has prompted the OUCC to propose an additional maintenance category. Continuing the tracking and reporting requirements is important due to the length of the periodic maintenance program, which can span 15 to 20 years in total. It will provide a more complete data set in future years.

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I also recommend Petitioner develop and maintain a periodic maintenance schedule. A periodic maintenance schedule would ensure sound planning practices and help alleviate great deviations in periodic maintenance expense from year to year. Review of information in this case shows that Stucker Fork still frequently spends less on periodic maintenance than they are approved to perform, and maintenance is not occurring as often as recommended by AWWA or even by Stucker Fork. Establishment of a periodic maintenance schedule would let the OUCC, other parties, and the Commission know how often Stucker Fork is actually executing different types of maintenance going forward. For example, the OUCC requested amortization schedules as a proxy for how frequently periodic maintenance items were being performed and accounted for. However, Petitioner had not provided this information in response to OUCC data requests, and instead provided the figure it claims represents its annual average expense. 19 To make certain the schedule is developed in 2025, and Stucker Fork begins following it by 2026, I recommend the first periodic maintenance schedule be submitted as part of Petitioner's 2025 IURC annual report.

<sup>19</sup> Petitioner's response to OUCC DR 7, OUCC Attachment KW-10.

1		Additionally, Stucker Fork appeared to have difficulty locating supporting
2		invoices the OUCC requested to review for this rate case. <sup>20</sup> To avoid this problem
3		in future rate cases, I recommend the Commission order Stucker Fork to create and
4		maintain an audit file with copies of all major periodic maintenance invoices for
5		the next rate case as discussed in greater detail in Mr. Compton's testimony.
6 7	Q:	Based on your review, did you develop a recommendation for an appropriate amount of Periodic Maintenance expense?
8	A:	Yes, I did.
9 10	Q:	Please explain how you determined an appropriate amount of Periodic Maintenance expense.
11	A:	To balance the interests of Stucker Fork and its customers, I propose periodic
12		maintenance expense be determined as follows:
13	•	Maintenance for which Petitioner has not provided a maintenance timetable be
14		based on the average spent from 2019 through 2024. <sup>21</sup>
15	•	Maintenance that is performed periodically is based on the most recent comparable
16		invoice or bid tab provided, adjusted for inflation if appropriate, and amortized over
17		the expected recommended time between maintenance.
18	•	For those maintenance categories where no expenses have been incurred since the
19		last rate case <sup>22</sup> and no comparable invoice was provided or found, I added an Other
20		Periodic Maintenance Expense category (item VIII in Table 2, below) and assumed

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expenses for these categories would be recovered through that category.

<sup>&</sup>lt;sup>20</sup> Petitioner's response to OUCC DR 7, OUCC Attachment KW-10.

Petitioner is response to OCCC DR 7, OCCC Attachment RW 12.

21 Petitioner has provided a list of 2024 periodic maintenance expenses as part of its Periodic Maintenance Report included as Petitioner's response to OUCC DR 12-3, OUCC Attachment KW-08.

22 Pursuant to Petitioner's IURC annual reports and Petitioner's Periodic Maintenance Tracker.

The Other Periodic Maintenance Expense category includes miscellaneous periodic maintenance expenses listed in Petitioner's Periodic Maintenance Tracker such as chemical feed maintenance and clear well cleaning/maintenance, which did not fit into the existing categories. In its next rate case, if Stucker Fork provides supporting documentation for those periodic maintenance projects which would be included in the Other Periodic Maintenance category as being completed, then those expenses can be moved back to separate line items.

A:

When and to the extent Stucker Fork prepares its periodic maintenance schedule, Petitioner may more clearly define the maintenance categories. This tracking methodology will provide a more accurate accounting of what Stucker Fork actually spends on periodic maintenance and should ensure Stucker Fork has sufficient funds to perform periodic maintenance while also ensuring customers are not charged for maintenance that is not being performed.

# **Q:** Is it reasonable for Petitioner to incur expenses for tank inspections as part of its periodic maintenance program?

16 A: Yes. The American Water Works Association ("AWWA") M-42 Manual for Steel
17 Water-Storage Tanks states that tanks "should be inspected at least once every 3-5
18 years."<sup>23</sup>

## Q: Has Stucker Fork completed all tank inspections within its periodic maintenance program consistent with the AWWA guidance?

No. According to Petitioner's response to OUCC DR 1-11, Stucker Fork has not inspected all of their storage tanks within the last five years.<sup>24</sup> Stucker Fork is requesting funds to inspect three storage tanks per year in this cause, which would

<sup>&</sup>lt;sup>23</sup> Page 108 from AWWA M-42 included as OUCC Attachment KW-11.

<sup>&</sup>lt;sup>24</sup> Response to OUCC DR 2-4 is included as OUCC Attachment KW-05.

ensure each of Petitioner's water storage tanks and aeration tanks is inspected once every 5 years. To ensure funds are available to conduct inspections of three tanks per year and painting / maintenance on at least one tank per year, I recommend funds continue to be placed into a restricted account each year for tank inspection, cleaning, and maintenance. Stucker Fork has painted more than one tank at a time and received lower bid prices. I recommend Petitioner continue this practice even if it means painting two tanks every other year.

### What do you recommend for overall periodic maintenance expense?

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Q:

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I recommend reducing the total annual allowance for periodic maintenance expense requested from \$485,120 to \$403,500 to better align with what Petitioner actually spends on periodic maintenance. <sup>25</sup> This is broken down by general category in the summary table below and included in the more detailed table contained in OUCC Attachment KW-12. <sup>26</sup> This amount better aligns with 1) the historic averages over the life of the periodic maintenance program, and 2) allows a sufficient increase to address existing and potential increases in materials and labor.

<sup>&</sup>lt;sup>25</sup> This would be a reduction of test year Periodic Maintenance expense of \$32,660.

<sup>&</sup>lt;sup>26</sup> OUCC Attachment KW-12 compares Petitioner's Periodic Maintenance expense and OUCC's Periodic Maintenance expense and contains a more detailed table which includes information and explanation documenting how the OUCC derived each proposed Periodic Maintenance expense.

**TABLE 2: Annual Periodic Maintenance Amounts Compared** 

	General Category	Petitioner	OUCC	Difference
I. Intake Structure Cleaning		\$10,000	\$9,600	(\$400)
	and Pump Maintenance			
II.	Well Maintenance <sup>27</sup>	\$22,000	\$4,000	(\$18,000)
III.	Austin WTP Maintenance	\$106,820	\$54,900	(\$51,920)
IV.	Marble Hill WTP	\$19,700	\$21,300	\$1,600
	Maintenance			
V.	Tank Maintenance	\$302,500	\$282,500	(\$20,000)
VI.	Booster Station	\$7,600	\$3,900	(\$3,700)
	Maintenance and Pump			
	Replacement			
VII	Meter/Control Valve Pit	\$16,500	\$3,500	(\$13,000)
	Maintenance			
VIII. Other Periodic		-	\$23,800	\$23,800
	Maintenance Expense			
Total		\$485,120	\$403,500	(\$81,620)

The total periodic maintenance budget would be increased from \$340,328 approved in Cause No. 44987 to \$403,500. This is a difference of \$63,172 and is incorporated in the schedules and testimony of OUCC witness Mr. Compton.

### Q: Do you have any other recommendations regarding the tracking and reporting of periodic maintenance expenses?

Yes. Petitioner has not developed a periodic maintenance schedule to ensure maintenance tasks occur in an orderly manner. Since the last rate case, Petitioner has continued to not perform periodic maintenance tasks pursuant to a set periodic maintenance schedule, and it has not performed all periodic maintenance contemplated for which it receives an amount embedded in rates. I recommend the Commission order Petitioner to continue placing all periodic maintenance revenues

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<sup>&</sup>lt;sup>27</sup> Note: Well Chemical Cleaning is one category where Petitioner did not provide any invoices since the last rate case, nor did they identify any specific expenses in Exhibit 12-3.

1		it collects annually into the restricted account and continue tracking and reporting
2		periodic maintenance expenses.
3 4	Q:	Please summarize your recommendations which address effective review of Periodic Maintenance.
5	A:	For effective review and to alleviate discovery issues for both the OUCC and
6		Stucker Fork, I recommend the Commission require:
7		The Periodic Maintenance account continue to be restricted;
8		Continued Periodic Maintenance tracking and reporting;
9		Petitioner implement and maintain a Periodic Maintenance schedule; and
10		Petitioner create and maintain a Periodic Maintenance audit file.
		V. <u>CAPITAL IMPROVEMENT PROGRAM</u>
11	Q:	Has Petitioner identified a need to make capital improvements to its system?
12	A:	Yes. Stuck Fork has included a one-page Capital Improvement Plan which includes
13		the expansion of the Marble Hill water treatment plant ("WTP"). 28
14	Q:	How does Stucker Fork plan to fund the Capital Improvement Plan?
15	A:	Petitioner proposes to fund projects through depreciation and long-term debt as
16		summarized in the table below: <sup>29</sup>

<sup>&</sup>lt;sup>28</sup> Petitioner's Exhibit 4, p. 16. <sup>29</sup> Petitioner's Exhibit 4, p. 16-17.

**TABLE 3: CAPITAL IMPROVEMENT PLAN ITEMS** 

Capital Improvement	Brief Description	Amount	Funding Method
Work Trucks	6 @ \$45,000 each	\$270,000	Depreciation
Marble Hill WTP	One switch gear and one	\$460,000	Depreciation
Electrical	portable generator		1
Improvements			
Booster Station	Add 1 Switch Gear to	\$380,000	Depreciation
Switch Gears	each (3) booster station		
	for portable generator		
Austin WTP Raw	Install a mechanical	\$570,000	Depreciation
Water Intake	screen		
Structure			
Improvements			
16" Main	Double or Nothing Road	\$4,875,000	Depreciation
Replacement	and Slab Road (33,820		
	L.F.)		
Total			\$6,555,000
Marble Hill WTP	Double building size and	\$5,250,000	Long-term
Expansion	add 4 filters		debt
Marble Hill Wells	2 @ \$500,000 each	\$1,000,000	Long-term
			debt
	Total <sup>30</sup>		\$7,325,000

### A. Depreciation Funded Projects

### 1 Q: Did you review Petitioner's proposed capital projects?

Yes, I reviewed Petitioner's proposed projects list, the limited information provided in Petitioner's Case-in-Chief, and asked questions through discovery. During my site visit on January 14, 2025, I spoke with Mr. Needler about each of the proposed capital projects. Each of the capital projects proposed to be funded through depreciation appears to be a prudent need. The costs for all but the 16" Main Replacement, however, were estimated based on the cost estimate from the last rate case adjusted for inflation using the CPI.<sup>31</sup> These costs which were included in the

<sup>&</sup>lt;sup>30</sup> This total includes non-construction cost estimates from Petitioner's Exhibit 4, p. 17.

<sup>&</sup>lt;sup>31</sup> Petitioner's response to OUCC DR 2-9 and 2-10, OUCC Attachment KW-05.

last rate case were also, originally presented in Cause No. 44687 in which cost support was provided as discussed in Mr. Scott Bell's testimony pages 9-11.<sup>32</sup> As discussed earlier in my testimony, the methodology of using a prior, stale (and potentially not well developed) estimate from the last rate case and using the CPI to inflate the costs is not a reasonable or accurate methodology. Additionally, as noted in Cause No. 44687 Petitioner's Exhibit No. 5, page 3, the cost estimates included a 20% estimate for non-construction costs. Using the CPI to inflate costs where a significant portion of those costs were added based on a percentage of construction costs is more questionable.

However, Stucker Fork has previously stated the projects would be competitively bid. The competitive bidding process will ensure Stucker Fork secures the best price for these projects, allowing unspent depreciation funds to be spent on other needs such as main replacements. OUCC witness Mr. Compton testifies separately regarding the depreciation revenue requirement.

### Q: Are there any proposed capital projects to be funded through depreciation that were not included in Cause No. 44687?

Yes. The 16' main replacement. I spoke with Mr. Needler about this project and found it reasonable and necessary. The cost for the 16' main replacement comes to roughly \$144 per linear foot which is reasonable and prudent, based upon my background, knowledge, experience, and review in this Cause.

<sup>&</sup>lt;sup>32</sup> Included as OUCC Attachment KW-13.

### **B.** Marble Hill Expansion

A:

Q: Please describe Stucker Fork's revenue requirement for the construction of the Marble Hill Expansion.

Stucker Fork plans to borrow funds to double the size of the building that houses its Marble Hill WTP, install four new horizontal filters and associated piping, and add two new wells. As discussed in greater detail by OUCC witness Mr. Compton, proposed projects or items proposed to be funded by debt, themselves, must be necessary and incident to the operations of the water facilities. A reasonable and just charge for services is a charge that produces sufficient revenue to pay all the necessary expenses incident to the operation of the water facilities, which would necessarily include those projects, costs, and expenses funded by debt, and which include debt service and debt service reserve imbedded in rates as part of the revenue requirement. This is true regardless of whether, or not, debt, itself, would be subject to Commission authority and approval.

In other words, Stucker Fork may issue debt for any other of its authorized conservancy district services included in its District Plan, pursuant to Title 14 Article 33, however, before recovering debt in rates, that debt must be necessary and incident to the operation of the water facilities (the debt must fund projects, costs, or expenses necessary and incident to Stucker Fork's operations for water service). While the Commission would not have jurisdiction over Stucker Fork

<sup>&</sup>lt;sup>33</sup> Ind. Code § 14-33-20-13(a). "A district coming under this chapter shall furnish reasonably adequate services and facilities. The charge made by the district for a service provided or to be provided, either directly or indirectly, must be nondiscriminatory, reasonable, and just. Every discriminatory, unjust, or unreasonable charge for service is unlawful."

<sup>&</sup>lt;sup>34</sup> *Id*.

1 purchasing a jet for its other services through a debt issuance, the Commission 2 certainly has authority to find embedding such debt in the revenue requirement paid 3 by water service customers to be unjust and unreasonable. With respect to rates, the 4 Commission has the same jurisdiction as it has over regulated municipal water utilities.<sup>35</sup> 5 6 Q: What reason did Petitioner state for why it needed to expand the Marble Hill 7 WTP? Petitioner stated it needs the expansion for added capacity due to anticipated new 8 A: 9 customers due to inquiries it has received regarding water service near Marble Hill 10 and within Stucker Fork's territory and because Stucker Fork wants to reduce the 11 number of hours the Marble Hill Plant operates per day. Petitioner does not 12 maintain records of water service inquiries or ask how much water per day the 13 development would need. Therefore, Stucker Fork could only provide general recollections of conversations.<sup>36</sup> 14 What support did Stucker Fork provide for the costs of its proposed Marble 15 Q: Hill Expansion? 16 Petitioner provided scant support for the Marble Hill Expansion in its case-in-17 A: chief.<sup>37</sup> The estimate for the Marble Hill Expansion is based on a 1997 bid that is 18 scaled to 2024 dollars using the CPI alone.<sup>38</sup> Despite multiple requests by the 19 20 OUCC, Stucker Fork has not provided any documentation to show if or by how much it is reasonable to increase the capacity of the Marble Hill Plant.<sup>39</sup> Stucker 21

<sup>&</sup>lt;sup>35</sup> See OUCC witness Mr. Jason Compton's testimony for a more detailed explanation.

<sup>&</sup>lt;sup>36</sup> Petitioner's response to OUCC DR 12-5, OUCC Attachment KW-14.

<sup>&</sup>lt;sup>37</sup> Petitioner's Exhibit 1, p. 11-12.

<sup>&</sup>lt;sup>38</sup> Petitioner's response to OUCC DR 2-5, OUCC Attachment KW-05

<sup>&</sup>lt;sup>39</sup> Petitioner's response to OUCC DR 2 and DR 12-5, OUCC Attachments KW-05 and KW-14.

Fork has not even completed the preliminary engineering report for the proposed expansion let alone design drawings, reasonable project cost estimates, the anticipated project schedule, or the justification for the need and extent of the plant expansion. Petitioner did not provide the support necessary to verify the reasonableness and prudence of the Marble Hill Expansion.

Q:

A:

Q:

A:

### Do you accept Petitioner's cost estimates for the Marble Hill Expansion?

No. Stucker Fork's estimate for the Marble Hill Expansion is based on a 1997 bid that is scaled to 2024 dollars using the CPI alone. Using a 27-year-old bid and attempting to make it comparable to today by using an inflation factor is problematic. It is highly unlikely that a bid from the 90's scaled for inflation would be representative of today's costs. Additionally, the bid was a single number, so there is no way to know what was included in the 1997 estimate.

### Should Petitioner be authorized to include debt service or debt service reserve from the Marble Hill Expansion in this cause?

No. Stucker Fork filed this rate case before work to justify the Marble Hill Expansion's need or estimated cost had been done. With no preliminary engineering report to review, the OUCC, Morgan Foods, Inc., and the Commission will be denied the opportunity to evaluate the prudence and reasonableness of the project. I recommend the Commission deny authorization to include debt service or debt service reserve for the Marble Hill Expansion unless, as discussed by OUCC witness Mr. Compton, a subdocket is established to provide all interested parties with the opportunity to review the evidence to determine the reasonableness and prudence of the Marble Hill Expansion.

### 1 Q: What information should be provided in the subdocket? 2 A: Stucker Fork should provide the following information to the Commission and the 3 OUCC as part of a subdocket so that the reasonableness and prudency of the Marble 4 Hill Expansion may be determined:<sup>40</sup> 5 1. Set of updated, internally consistent Design Drawings site plan showing all 6 improvements, floor plans, elevation drawings, foundation plans, roof plans, 7 etc., with consistent and accurate footprints and specifications depicting the 8 difference between the actual proposed expansion and additional equipment which could be added in future projects.<sup>41</sup> 9 10 2. Project Cost Estimate 11 a. Architects/Engineers Final Opinion of Probable Construction Cost broken 12 down by line item. 13 b. Contingency and basis - percent and total dollar amount. 14 c. Escalation, if any, for inflation and basis - percent and total dollar amount. d. Final estimated non-construction costs: legal, financial, architect design 15 16 fees, engineering fees, surveying fees, geotechnical fees, permitting, 17 construction administration fees and inspection fees, etc. 18 e. Total estimated project cost. 3. Preliminary Engineering Report. 19 20 4. Anticipated Project schedule: advertisement for bids, bid date, construction 21 start date, substantial completion date, final completion date.

<sup>&</sup>lt;sup>40</sup> Mr. Compton's Testimony also addresses the need for, and the OUCC's request for, the subdocket.

<sup>&</sup>lt;sup>41</sup>The recent Design Drawings received in response to OUCC DR 2-7 (Attachment KW-05, p. 24-25) show different interior and exterior footprint as well as different number of future filters.

1		5. <u>Specific justification</u> in support of the need for, and extent of, the increased
2		capacity at the Marble Hill WTP.
3	Q:	What is a system development charge?
4	A:	According to the AWWA Manual of Water Supply Practices, "A system
5		development charge (SDC) is a one-time charge paid by a new water system
6		customer for system capacity."42
7	Q:	What is the general purpose of a system development charge?
8	A:	As explained in further detail in the testimony of Mr. Compton, system
9		development charges are used to finance growth or capacity related capital water
10		projects.
11 12	Q:	Has Petitioner considered a system development charge, and what do you recommend Petitioner do?
13	A:	Despite Stucker Fork's position that a primary driver for the Marble Hill Expansion
14		is anticipated growth, Stucker Fork's Board chose not to propose a system
15		development charge at this time. 43 I recommend Stucker Fork develop and
16		implement a system development charge so new customers can contribute to the
17		costs for the additional capacity needed to serve them.
		VI. OUCC RECOMMENDATIONS
18	Q:	Please summarize your recommendations in this Cause.
19	A:	I recommend the following:
20		1. I recommend the Commission approve \$403,500 per year in Periodic

Maintenance expense.

21

 $<sup>^{42}</sup>$  AWWA, Manual of Water Supply Practices, Principles of Water Rates, Fees, and Charges, p. 321  $^{43}$  Petitioner's response to OUCC DR 2-11, OUCC Attachment KW-05.

1		2.	I recommend the Commission order \$403,500 per year be placed into a
2			restricted account for Periodic Maintenance expense.
3		3.	I recommend the Commission require Stucker Fork to continue reporting
4			its annual periodic maintenance expenditures in its IURC annual report as
5			outlined in the Final Order for Cause No. 44987.
6		4.	I recommend the Commission order Petitioner develop a periodic
7			maintenance schedule to be submitted as part of Petitioner's IURC annual
8			report.
9		5.	I recommend the Commission order Stucker Fork to create and maintain a
10			file with copies of all major maintenance invoices.
11		6.	I recommend Stucker Fork develop and implement a system development
12			charge.
13		7.	I recommend the Commission deny authorization to include debt service or
14			debt service reserve for the Marble Hill Expansion unless, as discussed by
15			OUCC witness Mr. Compton, a subdocket is established to provide all
16			interested parties with the opportunity to review the evidence to determine
17			the reasonableness and prudence of the Marble Hill Expansion.
18			Documentation submitted for the subdocket should contain at a minimum
19			the additional information discussed above.
20	Q:	Does	this conclude your testimony?
71	۸.	Vec	

### **APPENDIX A**

1 Q: Please describe your educational background and experience.

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A:

I graduated from Indiana University with a Bachelor of Science degree in Biology and a Master of Public Affairs ("MPA") concentrating in Environmental Management. My graduate coursework included studying how water pollution affects aquatic ecosystems, environmental rules and regulations, toxicology, risk analysis, epidemiology, finance and budgeting, economics, statistics, public management, and other courses on how pollution affects human health and the environment. After graduating with my MPA, I was hired as an Environmental Manager (EM2) by the Indiana Department of Environmental Management, Office of Air Quality, Permits Branch in 2006 where I analyzed projects for a variety of industries, calculated the air emissions associated with those projects, determined applicable state and federal rules, and drafted federally enforceable air permits. I was promoted to a Senior Environmental Manager (SEM1) about one year later. I held this position for more than ten years. As an SEM1, I worked on complex permit projects, trained and mentored staff, reviewed staff's work, and developed templates, guidance, and training materials. Since joining the OUCC in 2018, I have attended numerous utility related seminars and workshops including the National Association of Regulatory Utility Commissioners ("NARUC") Western Utility Rate School.

### **AFFIRMATION**

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

By: Kristen Willoughby, Utility Analyst

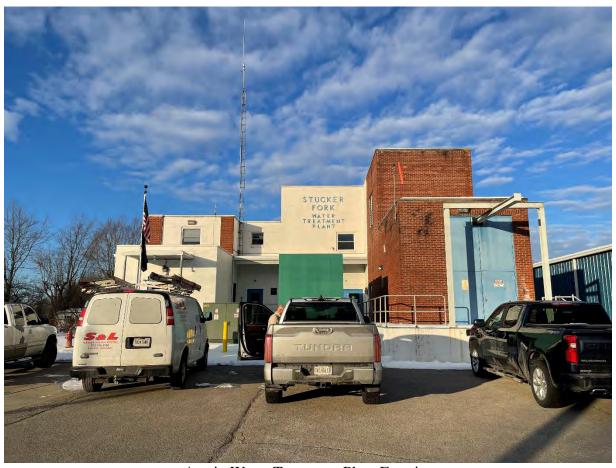
Cause No. 46167

Office of Utility Consumer Counselor (OUCC)

Date: March 4, 2025



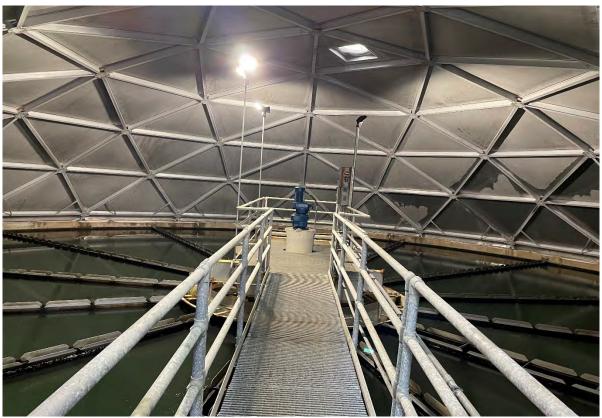
Stucker Fork Office Exterior



Austin Water Treatment Plant Exterior



Austin Water Treatment Plant Aerator



Austin Water Treatment Plant Upflow Clarifier



Austin Water Treatment Plant High Service Pumps



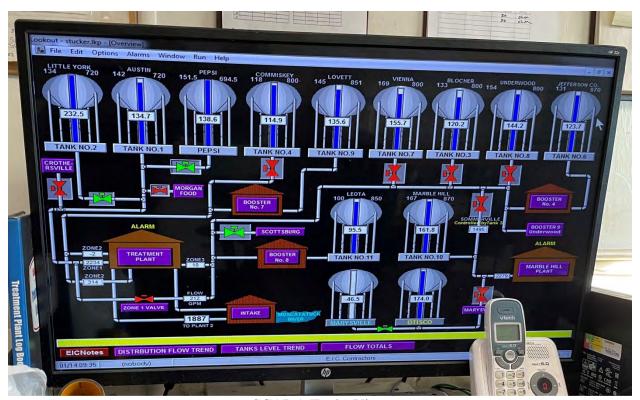
Austin Water Treatment Plant Filtration Tanks



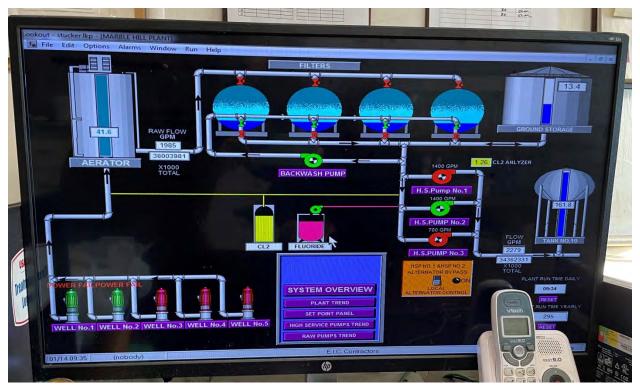
Austin Water Treatment Plant UV System



Austin Water Treatment UV System Control Panel



SCADA Tanks View



SCADA Marble Hill View



Storage Tanks 1 & 12



Storage Tank 2



Storage Tank 3





Storage Tank 6





Storage Tank 8





Storage Tank 10



Storage Tank 11



Booster Station 4 Interior



Marble Hill Water Treatment Plant Exterior



Marble Hill Water Treatment Plant Interior



Marble Hill Water Treatment Plant Horizontal Filters & Piping



Marble Hill Water Treatment Plant Flow Monitor



Marble Hill Water Treatment Plant Concrete and Steel Ground Storage Tanks



Marble Hill Water Treatment Plant Backwash Lagoon

- c. Stucker Fork decided that it would not collect the subsidy from the commercial customers as this customer class was already scheduled to receive a relatively high increase.
- **Q-5-2:** Please provide a copy of the Cost of Service Analysis in Excel format with all formulas intact.
- Response: Stucker Fork has previously provided the cost of service analysis in Excel format with all formulas intact.
- **Q-5-3:** Reference page 24 of the Cost of Service Analysis:
  - a. Please provide a revised schedule which also specifically identifies Morgan Foods; and
  - b. Please explain why the number of bills for certain meter sizes is not divisible by 12, indicating that some customers are not billed on a monthly basis.
- Response:
- a. Please see Exhibit 5-3.
- b. The number of bills for certain meter sizes is not divisible by 12 because some of the customers joined midyear or left midyear. The fact that the number of bills is not divisible by 12 is not due to the fact that some customers are not billed on a monthly basis.
- **Q-5-4:** Reference pages 26, 39, and 42 of the Cost of Service Analysis. Please identify to which customers the public fire charge is assessed and how the charge is assessed to those customers.
- Response: As has been noted in prior rate cases, Stucker Fork only provides fire protection service to customers located within the municipal limits of the City of Austin, Indiana.
- Q-5-5: Reference page 30 of the Cost of Service Analysis. Please explain why it is reasonable to allocate approximately 90% of Transmission & Distribution Structures and Improvements to the Maximum Hour function.
- Response: The allocation of transmission and distribution structures to the max hour function has remained unchanged for the last several cost of service studies. Stucker Fork would further note that the specific allocation is consistent with the example on page 53 of the AWWA M-1 Manual ("M1 Manual").
- Q-5-6: Reference page 29 of the Cost of Service Analysis. Please explain how Average Day, Maximum Day, Maximum Hour, and Customer costs have been assigned to Public and Private Fire Protection Service.

AMPRICA STA

- e. Tank maintenance;
- f. Booster Station maintenance and pump replacement; and
- g. Meter/Control Valve Pit maintenance.

Response: See <u>Exhibit 1-10</u> for the individual periodic maintenance expenses incurred. This information is also summarized by the above periodic maintenance categories and included in each annual report as tab "11b" submitted to the IURC.

**Q-1-11:** Please state when each of Petitioner's water storage tanks was last inspected as well as the cost of the inspection.

**Response:** Please see Exhibit 1-11.

**Q-1-12:** Please state when each of Petitioner's water storage tanks was last painted as well as the cost of the tank painting.

**Response:** Please see Exhibit 1-11.

**Q-1-13:** On pages 26-27 of Mr. Baldessari's testimony, he states "The need for these employees are to cover vacant positions that were terminated prior to the test year." Please explain why Petitioner needs to fill positions that have been vacant for approximately two years.

**Response:** 

The maintenance positions have not been vacant for approximately two years. The employees that held these positions in the test year were terminated during calendar year 2024 and the positions filled with new employes within a few months of becoming vacant. There was a miscommunication regarding the estimated payroll calculation and the maintenance employees terminated during 2024 were inadvertently included in the original estimated payroll calculation. See <a href="Exhibit 1-13">Exhibit 1-13</a> for the original and updated estimated payroll calculations.

TANK#	LOCATION	SIZE / GALLONS	TYPE	YEAR Built	Last Painted	Inspection
1	AUSTIN	500,000	ELEVATED STEEL	1969	2017 \$188,800.00	2017
2	LITTLE YORK	100,000	ELEVATED STEEL	1969	2024 \$262,000.00	2024
3	WOOSTER	150,000	ELEVATED STEEL	1969	unknown	2021 \$2,289.33
4	COMMISKEY	100,000	ELEVATED STEEL	1970	2024 \$258,050.00	2024
5	Decommissioned					
6	EAST POLK RD.	100,000	ELEVATED STEEL	1972	1990	2021 \$2289.33
7	DOUBLE OR NOTHING RD.	500,000	ELEVATED STEEL	1980	2019 \$214,013.00	2020 \$1,000.00
8	Radio Tower RD.	500,000	ELEVATED STEEL	2005	2006	2024 \$2289.33
9	LOVETT	100,000	ELEVATED STEEL	1994	1995	2021 \$2289.33
10	PAYNESVILLE RD.	500,000	ELEVATED STEEL	1998	2023 \$466,000.00	2023
11	FAIRVIEW RD.	360,000	ELEVATED STEEL	2001	2001	2015
12	AUSTIN	1,000,000	ELEVATED STEEL	2017 \$1,445,830	2017	2018 \$1,000
Clear Well 1	AUSTIN	1,200,000	GROUND CONCRETE	1970	n/a	2011
Clear Well 2	MARBLE HILL	500,000	GROUND STEEL	1998	2022 \$215,500.00	2022
Clear Well 3	MARBLE HILL	1,000,000	GROUND CONCRETE	2020	n/a	2021
TOTAL		6,610,000				

## Utility Dashboard Stucker Fork Conservancy District Cause No. 46167

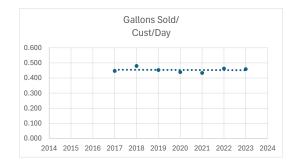
	W-1	W-6	W-6		W-6					W-6
Year	Customers Year-End	Total Pumped & Purchased	Total Sold	Non- Revenue (C - D)	System Usage	Water Loss (E - F)	Percent Loss (G / C)	Average MGD	Gallons Sold/ Cust/Day	Main Breaks
2017	7,632	1,678,952	1,243,305	435,647	30,928	404,719	24.1%	3.406	0.446	40
2018	7,660	1,697,525	1,341,067	356,458	25,383	331,075	19.5%	3.674	0.480	35
2019	7,711	1,614,306	1,273,606	340,700	25,800	314,900	19.5%	3.489	0.453	32
2020	7,820	1,586,081	1,256,704	329,377	17,753	311,624	19.6%	3.434	0.439	14
2021	7,866	1,625,495	1,245,211	380,284	16,878	363,406	22.4%	3.412	0.434	
2022	7,931	1,711,189	1,339,474	371,715	17,978	353,737	20.7%	3.670	0.463	
2023	8,022	1,646,310	1,347,681	298,629	17,524	281,105	17.1%	3.682	0.459	

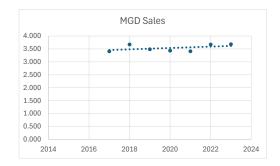
average mgd 2023 avg gals/cust/mo 2023 average cust growth average mgd 7 yrs 3.682 mgd 14,000 gals 55.71428571 /yr 3.538 mgd

All reported in thousand gallons

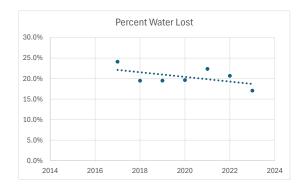
System usage includes water used for firefighting, backwashing, main flushing, etc.

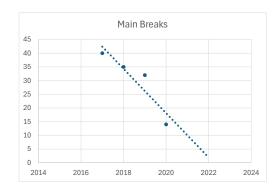
Source: IURC Annual Reports











Dashed lines shows results of linear regression (trend) over period shown

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF STUCKER FORK CONSERVANCY DISTRICT FOR APPROVAL OF A NEW SCHEDULE OF RATES AND CHARGES FOR WATER SERVICE

**CAUSE NO. 46167** 

### STUCKER FORK CONSERVANCY DISTRICT'S RESPONSE TO OUCC DATA REQUEST SET NO. 2

Stucker Fork Conservancy District ("Stucker Fork"), by counsel, hereby provides its response to OUCC Data Request Set No. 2 as follows:

#### II. Data Request

- Q-2-1: Please state whether Stucker Fork Conservancy District ("Stucker Fork" or "Petitioner") tested for Per- and polyfluoroalkyl substances ("PFAS") and/or Perfluorooctane sulfonic acid ("PFOS") and perfluorooctanoic acid ("PFOA").
  - a. If so, please provide all results of any such testing.
  - b. If not, please state whether Stucker Fork intends to conduct, or have conducted, such testing. If Stucker Fork has not completed, and does not intend to complete, such testing, please explain why not.

### Response: Please see the attached **Exhibit 2-1**.

**Q-2-2:** Please provide the most recent copy of Petitioner's Capital Improvement Plan / Master Plan.

## Response: Please see <u>Petitioner's Exhibit 4</u> attached to the prefiled direct testimony and exhibits of Doug Baldessari, page 16.

- **Q-2-3:** For each estimated periodic maintenance expense item on pages 10-13 of the Petitioner's Exhibit 4, please provide:
  - a. Beginning periodic maintenance expense value upon which adjustment is based and the source of this value.
  - b. All actual costs, bid tabs, or other supporting documentation used to develop estimate, and all supporting workpapers in native excel format with formulas intact.

- c. Explanations for any adjustments made including, but not limited to, inflation factor(s).
- d. All calculations with formulas intact.

#### **Response:**

To the extent that Stucker Fork or its consulting engineer, Midwestern Engineers, Inc., had recent bids for similar types of facilities, these bids were used to estimate the costs. (See Exhibit 2-3) Otherwise, Stucker Fork's professional engineer used the periodic maintenance expense items and costs that were approved in Cause No. 44987. Stucker Fork's engineer, Mr. Burch, used the periodic maintenance expense estimates approved in Cause No. 44987 and then applied an inflation factor that is published by the U. S. Bureau of Labor Statistics. An inflation factor of 1.27 was applied for the term from September of 2017 to June of 2024.

- Q-2-4: Please reference Petitioner's Exhibit 3 pages 9-10, questions 15 and 16; and Petitioner's Exhibit No. 3, pages 9-10. Question 18 ("The Petitioner has an expansive waterworks system . . . that all require substantial periodic maintenance. The allowances for periodic maintenance expense have been updated by the Petitioner's consulting engineers from those approved in Petitioner's prior rate case, Cause No. 44987"). Please confirm or deny annual periodic maintenance expense items on pages 10-13 of the Petitioner's Exhibit 4 were based on the allowances or expense amounts approved in Petitioner's last rate case for the periodic maintenance expense items, and were not based on the respective expense amounts during Petitioner's test year (adjusted for inflation and increased costs to complete).
  - a. If confirmed, for annual periodic maintenance expense items on pages 10-13 of the Petitioner's Exhibit 4, please explain in detail why instead of starting from the test year and adjusting for inflation and increased costs, Petitioner chose to adjust "the periodic maintenance expense items from Stucker Fork's last case and then included an appropriate amount for inflation." (Petitioners Exhibit 1, p. 8-9.)
  - b. If denied, please state whether Petitioner intends to file revised testimony to that effect.

#### Response:

Stucker Fork objects to this request on grounds that it is ambiguous, misleading, and seems to reflect a misunderstanding of Stucker Fork's periodic maintenance expense. Water utilities such as Stucker Fork perform similar types of periodic maintenance across the State. Such maintenance is indeed periodic in that it does not happen every year. By way of example, tank painting or filter media replacement occur very infrequently, but Stucker Fork, like most utilities, still needs to account for the funds necessary to perform this maintenance. With this in mind, tank painting, filter media replacement, and other periodic maintenance expense may not have occurred during the test

year, but will nonetheless need to be completed at some date in the future.

In Cause No. 44987, Stucker Fork detailed its periodic maintenance expense items and the Commission agreed with the same. Since that time, the periodic maintenance needs for Stucker Fork have not changed, but the cost of such maintenance has. In its prefiled testimony and exhibits Stucker Fork has tried to quantify and update the most recent costs for performing this maintenance. This estimate was prepared by Midwestern Engineers, the long-time engineering firm for Stucker Fork. Midwestern's engineer, Richard Burch, believes that these are accurate estimates of the periodic maintenance costs that Stucker Fork will incur over time. Accordingly, Stucker Fork has no intention of revising its testimony.

Q-2-5: Please reference page 17 of Petitioner's Exhibit 4 ("Estimated Construction and Engineering Costs"). Please provide detailed explanations and detailed cost breakdowns and itemizations for the Marble Hill expansion project including, without limitation, the new supply wells which comprise the subtotals and estimated total costs, excluding contingency of \$6,250,000.

**Response:** 

As has been previously noted in prior settlement agreements with the OUCC and in corresponding Commission orders, the Commission does not have jurisdiction over the issuance of debt by Stucker Fork. Consequently, the information sought in this Request is not relevant and will not lead to the discovery of admissible evidence. For this reason, Stucker Fork objects to this request. Notwithstanding the objection, please see the attached Exhibit 2-5 which are the bid tabs that were used to estimate the cost of the Marble Hill expansion project. In addition to the amounts set forth in the bid tabs, Midwestern's professional engineer, Mr. Richard Burch, used an inflation adjustment factor published by the U.S. Bureau of Labor Statistics to update the estimate cost of these projects.

Q-2-6: Please reference page 17 of Petitioner's Exhibit 4 ("Estimated Construction and Engineering Costs"). For the Marble Hill expansion project, including without limitation, the new supply wells, please provide all actual costs, bid tabs, requests for proposals ("RFPs"), or other supporting documentation used to develop the estimates, and all calculations and supporting workpapers in native excel format with formulas intact.

Response:

As has been previously noted in prior settlement agreements with the OUCC and in corresponding Commission orders, the Commission does not have jurisdiction over the issuance of debt by Stucker Fork. Consequently, the information sought in this Request is not relevant

and will not lead to the discovery of admissible evidence. For this reason, Stucker Fork objects to this request. Notwithstanding the objection, please see the attached Exhibit 2-5 which are the bid tabs that were used to estimate the cost of the Marble Hill expansion project. In addition to the amounts set forth in the bid tabs, Midwestern's professional engineer, Mr. Richard Burch, used an inflation adjustment factor published by the U.S. Bureau of Labor Statistics to update the estimated cost of these projects.

Q-2-7: Please describe the planned expansion of the Marble Hill treatment plant and building in detail, and please provide all design and engineering diagrams and any related photographs and site surveys.

#### **Response:**

As has been previously noted in prior settlement agreements with the OUCC and in corresponding Commission orders, the Commission does not have jurisdiction over the issuance of debt by Stucker Fork. Consequently, the information sought in this Request is not relevant and will not lead to the discovery of admissible evidence. For this reason, Stucker Fork objects to this request. Notwithstanding the objection, Stucker Fork would note that its existing Marble Hill treatment plant is currently operated more than 20 hours per day. By expanding the production capacity of its existing facilities, Stucker Fork will be able to operate its Marble Hill plant approximately 12-16 hours per day which is more in line with proper operating practices for water treatment facilities. In addition, the availability of additional capacity will allow Stucker Fork to take certain facilities off-line for maintenance when needed. In either case, the expansion should allow Stucker Fork to provide more effective, reliable service while prolonging the operating life of such facilities. Drawings for the proposed expansion are attached as Exhibit 2-7.

Q-2-8: Please reference page 16 of Petitioner's Exhibit 4. Please provide a detailed breakdown of the costs and any supporting documentation for the Marble Hill WTP Electrical Improvements (Switch Gear and Generator).

### **Response:**

Stucker Fork would note that its revenue requirement is not based on the capital improvements identified on page 16 of <u>Petitioner's Exhibit 4</u>. Rather, Stucker Fork has established its revenue requirement based on depreciation (i.e. not extensions and replacements). When estimating the cost of the improvements on page 16, Stucker Fork's professional engineer, Mr. Richard Burch, used the cost of the estimated capital improvements set forth in Cause No. 44987 and updated such costs based upon the inflationary index published by the U.S. Bureau of Labor Statistics.

Q-2-9: Please reference page 16 of Petitioner's Exhibit 4. Please provide a detailed breakdown of the costs and any supporting documentation for the Booster Station (3) Switch Gear Including One Portable Generator.

Response: Stucker Fork would note that its revenue requirement is not based on the capital improvements identified on page 16 of <u>Petitioner's Exhibit 4</u>. Rather, Stucker Fork has established its revenue requirement based on depreciation. When estimating the cost of the improvements on page 16, Stucker Fork's professional engineer, Mr. Richard Burch, used the cost of the estimated capital improvements set forth in Cause No. 44987 and updated such costs based upon the inflationary index published by the U.S. Bureau of Labor Statistics.

Q-2-10: Please reference page 16 of Petitioner's Exhibit 4. Please provide a detailed breakdown of the costs and any supporting documentation for the Austin WTP Raw Water Intake Structure Improvements (Mechanical Screen Installation).

Response: Stucker Fork would note that its revenue requirement is not based on the capital improvements identified on page 16 of Petitioner's Exhibit 4. Rather, Stucker Fork has established its revenue requirement based on depreciation. When estimating the cost of the improvements on page 16, Stucker Fork's professional engineer, Mr. Richard Burch, used the cost of the estimated capital improvements set forth in Cause No. 44987 and updated such costs based upon the inflationary index published by the U.S. Bureau of Labor Statistics.

Q-2-11: Petitioner has stated the planned Marble Hill expansion will allow development of "the remaining property at the PSI Marble Hill site" and that Stucker Fork has received inquiries from entities interested in developing this site. (Petitioner's Exhibit 1, p. 11-12) Please explain why Petitioner has not included a system development charge in this application so future growth can help fund the infrastructure needed to serve it?

Response: The Board did not seek to establish system development charges at this time; however, the Board may elect to implement new system development charges at a later date.

# Exhibit 2-1



#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb

Brian C. Rockensuess

Commissioner

9/12/2023

Mr. Randy Needler Stucker Fork Water Utility P.O. Box 274 Scottsburg, IN 47170

Re:

PFAS Sampling Initiative Results

PWSID # IN5272002

Dear Randy Needler,

The Indiana Department of Environmental Management (IDEM) Drinking Water Branch, in collaboration with Pace Analytical, has received Per- and polyfluoroalkyl substances (PFAS) results for Stucker Fork Water Utility. The samples were collected by the system operator/staff to assist in completing the PFAS Sampling Initiative. Attached are the PFAS results for Stucker Fork Water Utility.

Entry points to the distribution system and/or source water locations were sampled on 8/1/2023 to assess the potential impact from PFAS. The samples were analyzed for 18 common PFAS compounds, which are listed in the attached analytical report. In June 2022, the U.S. EPA published an updated list with interim Lifetime Health Advisory Levels (HALs) for PFOA and PFOS, and established HALs for GenX and PFBS. The new HALs from the EPA are listed below, along with IDEM action levels for PFHxS and PFNA.

Chemical	Lifetime Health Advisory Level/Value (parts per trillion or ppt)	*Minimum Reporting Level (ppt)
PFOA	0.004 (Interim)	2
PFOS	0.02 (Interim)	2
GenX Chemicals	10 (Final)	2
PFBS	2,000 (Final)	2

<sup>\*</sup>The Minimum Reporting Level is the smallest measured concentration of a substance that can be reliably measured by using a given laboratory analytical method.

Chemical	IDEM Action Level (parts per trillion or ppt)
PFHxS	>140
PFNA	>21

For the samples collected on 8/1/2023, the drinking water samples that represented the finished treated water supplied to customers and residents reported detections of PFAS compounds at concentrations that are above the U.S. EPA's Health Advisory Level or IDEM Action Level. Resampling is needed to verify the results before action is needed. IDEM will contact you in the upcoming months to arrange resampling. Please see below for the specific detections.



Location	Analyte	Acronym	Results (ppt)	Exceeds HAL or Action Level?
EP002	Perfluorooctanoic acid	PFOA	2.3	Yes
GW003	Perfluorooctanoic acid	PFOA	2.7	Yes
GW004	Perfluorooctanoic acid	PFOA	2.9	Yes

Please see the laboratory report that was included with this letter as a PDF for additional details. For more information regarding PFAS and results reporting, please refer to <a href="https://www.in.gov/idem/pfas">https://www.in.gov/idem/pfas</a>.

The Indiana State Revolving Fund (SRF) provides low-interest loans to Indiana communities for projects that improve drinking water infrastructure. Communities impacted by PFAS contaminated drinking water may qualify for grant funding through the Bipartisan Infrastructure Law (BIL) designed specifically for PFAS mitigation efforts. To find out how to access SRF funds, please visit <u>in.gov/ifa/srf</u>.

Thank you for your attention to this matter. If you have any questions regarding the PFAS Sampling Initiative, please contact Trisha Williams (twilliam@idem.in.gov).

Sincerely,

Matt Prater, Branch Chief Drinking Water Branch

Office of Water Quality

ecc: Christian Walker, IDEM



### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 N. Senate Avenue . Indianapolis, IN 46204

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Eric J. Holcomb

Brian C. Rockensuess

Commissioner

2/20/2024

Mr. Randy Needler Stucker Fork Water Utility P.O. Box 274 Scottsburg, IN 47170

Re:

PFAS Sampling Initiative Results

PWSID # IN5272002

Dear Randy Needler,

The Indiana Department of Environmental Management (IDEM) Drinking Water Branch, in collaboration with Pace Analytical, has received Per- and polyfluoroalkyl substances (PFAS) results for Stucker Fork Water Utility. The samples were collected to assist in completing the PFAS Sampling Initiative. Attached are the PFAS results for Stucker Fork Water Utility.

Entry points to the distribution system and/or source water locations were sampled on 12/19/2023 to assess the potential impact from PFAS. The samples were analyzed for 18 common PFAS compounds, which are listed in the attached analytical report. In June 2022, the U.S. EPA published an updated list with interim Lifetime Health Advisory Levels (HALs) for PFOA and PFOS, and established HALs for GenX and PFBS. The new HALs from the EPA are listed below, along with IDEM action levels for PFHxS and PFNA.

Chemical	Lifetime Health Advisory Level/Value (parts per trillion or ppt)	*Minimum Reporting Level (ppt)
PFOA	0.004 (Interim)	2
PFOS	0.02 (Interim)	2
GenX Chemicals	10 (Final)	2
PFBS	2,000 (Final)	2

<sup>\*</sup>The Minimum Reporting Level is the smallest measured concentration of a substance that can be reliably measured by using a given laboratory analytical method.

Chemical	IDEM Action Level (parts per trillion or ppt)
PFHxS	>140
PFNA	>21

For the samples collected on 12/19/2023 the drinking water samples that represented the finished treated water supplied to customers and residents reported detections of PFAS compounds at concentrations that do not exceed the U.S. EPA's Health Advisory Level or IDEM Action Level. Please see below for the specific detections.



Location	Analyte	Acronym	Results (ppt)	Exceeds HAL or Action Level?
EP002	Perfluorooctanoic acid	PFOA	1.9	Yes
GW003	Perfluorobutanesulfonic acid	PFBS	1.9	No
EP002	Perfluorobutanesulfonic acid	PFBS	2.0	No
GW004	Perfluorobutanesulfonic acid	PFBS	2.5	No
GW003	Perfluorooctanoic acid	PFOA	2.6	Yes

Please see the laboratory report that was included with this letter as a PDF for additional details. For more information regarding PFAS and results reporting, please refer to <a href="https://www.in.gov/idem/pfas">https://www.in.gov/idem/pfas</a>.

The Indiana State Revolving Fund (SRF) provides low-interest loans to Indiana communities for projects that improve drinking water infrastructure. Communities impacted by PFAS contaminated drinking water may qualify for grant funding through the Bipartisan Infrastructure Law (BIL) designed specifically for PFAS mitigation efforts. To find out how to access SRF funds, please visit <u>in.gov/ifa/srf</u>.

Thank you for your attention to this matter. If you have any questions regarding the PFAS Sampling Initiative, please contact Trisha Williams (twilliam@idem.in.gov).

Sincerely,

Matt Prater, Branch Chief Drinking Water Branch Office of Water Quality

ecc: Christian Walker, cwalker1@idem.in.gov

# Exhibit 2-3

DIVISION D - REMARLITATION OF A 196/000 GALLON RI-SYATED WATER STORAGE TANK FOR THE TOWN OF RAINSBUDGE, PUTNAM COUNTY, INDIANA	L STORAGE TANK		Marke.		هم المالية المالية												
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MASE ALU DESCRIPTION	GTIMATED QUANTITY	UNIT	TOTAL	UNGT	TOTAL	CNIT	TOTAL. PRICE	UNIT	TOTAL	UNIT	TOTAL	UNIT	TOTAL	UNIT	TOTAL C:	DNUT TO THE PREKEE	TOTAL
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BID TABOLATION FOR WATER SYSTEM INPROVEMENTS
DIVISION II - REHABILITATION OF THE EXISTING

DIVISION II - REHABILITATION OF THE EXISTING
254,000 GALLON WATER STORAGE TANK
TOWN OF DALLS, SPENCER COUNTY, INDIANA
MET PROTECT AN 2010ST OF

BEDDATE: JULY 21, 2013 @ 600 P.M. CENTRAL (LOCAL TIME) 2-55 - 1, 32 x 4 2 23, 000 = \$374,000

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		ENGINGERS	KER'S LATE	745 CAME RUN 5T. P.O. BOX 652 HARRODSBURG, KY 40330	JUN ST. K 692 G, KY 40330	SOS COURTINEY HODGES BLVD. PERRY, GA 31009		n 7670 state eighway 15 Menomone, Wi 54751	BGBWAY 25 5, WI 54751
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STORAGE TANK  12. COMPLETELY SANDBLAST & PAINT EXTERIOR OF WATER	21	\$20,000.00	000000055	\$65,000.00	\$65,000.00	\$25,000.00	\$55,000,00	\$6,590.00	00.022,550
STORAGE TANK  13. COMPLETELY SANDBLAST AND PAINT EXPOSED PORTION	1 LS.	\$141,000.00	\$141,000,00	\$107,000.00	\$107,000.00	\$115,000.00	\$115,000,00	\$163,350.00	\$163,350,00
OF THE CONCRETE FOUNDATION 14. ONE (1) YEAR ANNIVERSARY INSPECTION	1 L.S.	0070200125	\$2,000.00	\$5,000,00 \$1,000,00	\$2,000,00 \$1,000,00	\$3,000.00 \$1,000.00	\$3,000.00	\$1,800.00	00.002.53
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<ol> <li>REPLACE THE SCREEN ON THE OVERFLOW PIPE AIR VACUTAM BREAK WITH A STAINLESS STEEL #5 MESH SCREEN</li> </ol>	1 1.8	00.0052	00,000	arrones	8380.00	00'0053	00003	\$1,250.00	\$1,250.00
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DATE: MARCH & 2019 SE ESS P.M. CENTRAI, (LOCAL TIME)																			
Page 2		MOHON BLANTING AND COATINGS, LLC IN HARPER CIRCLE INFECHNONT, KY 42333	SHING SALEC HIGHE OY ADED	CURRENS CONSTRUCTION SERVICES, LLC P.O. BOX 472: 1025 DANYTLE RD HARRONING KY 40340	PRICTION LLC ANVILLE RD KY 4030	CENTRAL PAINTING & SANDRASTING INC 8943 RUPERIAND APE, SW NAVARRE, DH. 4460	NTING & NG. INC. D AVE. SW H 44663	GEORGE KOUNTUPES PAINTENG CO. 641 SCHITTENELD ROAD LINCHAN PARK, MI 48146	CANTONIPES WG CO. IELD ROAD CC.NE 45146	HORIZAN BRITA PABITING CORP. 1863 KPADRA LANE ROWELL NG SEALS	A LANE A LANE	CTILITY SERVET CO., INC. 535 COURTNEY HORGES HEVE. PERREY, CA. 1869	II CO., INC. INCES HEVIL.	L&TPARTING, INC. 5050 BUNDES CREEK TRI. SIEL BY TWP MILEUT	EC, INC. PLEIK TRI. MI ACUT	THE COATINGS INC. 32st TEAMINAL DRIVE ST. PAIT. MA MEET	ACS INC.	SOCTHERS ROAD & BRIDGE LLC TABBON STORMER IN LARGE	MATTER TACK
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NOTES METROS ELASTERGANO COATRIGS, LLC METROS ELASTERGANO COATRIGS, LLC METROS ELASTERGANO COMPANIO ELASTERIA DE LA PROPERTIONIO DE LA PROPERTIONIO			56	SR, PROJECT ENGINEER	SIECULA SIECULA														

1.24 × 136,000= \$ (69,000 " Use \$170,000

	BID TABULATION FOR	REHABILITATION AND REPAINTING OF THE	500,000 GALLON SOUTH ELEVATED WATER STORAGE TANK	CITY OF JASPER, DUBOIS COUNTY, INDIANA	MEI PROJECT NO.: 2019058
Š	BID	Æ	200	Ē	ME

BID DATE: AUGUST 29, 2019 @ 8:00 A.M. (EASTERN) LOCAL TIME

		TANK PRO INC	JAC	ON SOME ACCUMAND STATEMENT TO	CM SCHEET CO	The second second second	
BASE BID - DOMESTIC STEEL REQUIRED PER 6.25 OF THE GENERAL CONDITIONS		5500 WATERMELON ROAD NORTHPORT, AL 35473	LON ROAD AL 35473	N7670 STATE HIGHWAY 25 MENOMONIE, WI 54751	E COALINES, INC. IGHWAY 25 , WI 54751	UTILITY SERVICE CO, INC. 535 COURTNEY HODGES BLVD. PERRY, GA 31069	CE CO, INC. ODGES BLVD. 131069
ITEM NO. DESCRIPTION	ESTIMATED QUANTITY	BID UNIT PRICE	BID TOTAL PRICE	BID UNIT PRICE	BID TOTAL PRICE	BID UNIT PRICE	BID TOTAL
1. MOBILIZATION/DEMOBILIZATION, SAFETY HEALTH AND ENVIRONMENTAL							
COMPLIANCE	1 L.S.	\$5,000.00	\$5,000.00	\$28,800.00	828,800.00	\$17.000.00	\$17,000,00
<ol> <li>MINCELLANGUUS IMP. &amp; KEPAIKS AS LISTED IN GENERAL SPECIFICATIONS</li> <li>TOT IN TEST</li> </ol>	I L.S.	82,000.00	\$5,000.00	\$15,200.00	\$15,200.00	\$22,500.00	\$22,500.00
5. ICLA [ES] A COMPUTIND BY ACT 8. DADED DESIGNATION OF SECTEMENT SECONDS CONTINUES.	4 EA	\$225.00	8900.00	\$200.00	\$800.00	\$125.00	\$500.00
4. COMPLETE BLAST & FALM IN EXION OF WAISH STURAGE TANK	i S	281,000.00	\$81,000.00	\$128,600.00	\$128,600.00	\$114,500.00	\$114,500.00
2. COMPLETE BLAST & PAINT EXTERIOR OF WATER STURAGE TANK	1 L.S.	\$127,145.00	\$127,145.00	\$225,400.00	\$225,400.00	\$217,800.00	\$217,800.00
6. FREFARE AND FAINT EXPOSED PORTION OF THE CONCRETE FOUNDATION	1 L.S.	\$2,000.00	\$2,000.00	\$3,600.00	83,600.00	\$2,800,00	\$2,800.00
FINALAL & MALY LALL CONTAINMENT STRIKM	1 L.S.	\$75,000.00	\$75,000.00	\$69,450.00	\$69,450.00	\$122,000.00	\$122,000.00
O ONE (1) VEAD AND TENER DE STECHTONS	L.S.	\$62,000.00	\$62,000.00	\$63,900.00	\$63,900.00	\$105,200.00	\$105,200.00
CONE (1) LEAR ANNIVERSARY INSECTION	1 L.S.	\$1,000.00	\$1,000.00	\$1,200.00	\$1,200.00	\$1,000.00	\$1,000.00
	TOTAL BASE BID	-	\$359,045.00	Ur 4900	\$536,950.00	Alaese et al.	\$603,390.00
MANDATORY ALTERNATE BID ITEMS							
10. USE OF PRETOX OR BLASTOX WITH PROPER REMOVAL AND DISPOSAL OF ALL REMOVED PAINT ARRASIVES AND DISPOSA BY	-						
(ITEM WILL BE ADDED BY CHANGE ORDER IF REQUIRED)	I L.S.	825,330.00	\$25,330.00	\$42,150.00	\$42,150.00	\$29,400.00	\$29,400.00
<ol> <li>COST (DEDUCT) IF NON-DOMESTIC STEEL IS UTILIZED FOR THIS PROJECT</li> </ol>	1 L.S.	\$7,000.00	\$7,000.00	\$550.00	\$550.00	\$18,600.00	\$18,600.00

NOTE. (1) CONTRACTOR IS REQUIRED TO HAVE A LINE ITEM BID OF \$1,000.00 OR MORE FOR THE ONE (1) YEAR ANNIVERSARY INSPECTION. LINE ITEM BIDS FOR THE ONE (1) YEAR ANNIVERSARY INSPECTION LESS THAN \$1,000.00 MAY BE CONSIDERED NON-RESPONSIVE.

(2) THE BASIS OF AWARD MAY CONSIDER THE BASE BID WITH OR WITHOUT THE ALTERNATE(S) IN DETERMINING THE LOWEST RESPONSIVE AND RESPONSIBLE BIDDER.

REMARKS:
The following documents were submitted with all bids:
1. Signed Bid
2. Bid Security
3. Form 96 with signed non-collusion affidavit & financial statement

NOTES: CLASSIC PROTECTIVE COATINGS, INC. DID NOT ACKNOWLEDGE ADDENDUMS NO. 1 & NO. 2



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\$460,173.00 BED FACILITY FOR EXZANTENC OF THE SERVING CONTROL OF THE STOPACE TANK NO. 3 MAYER WATER CONTRACT INC. CLASE COURT, INDIANA, INDIA

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	CORPORATION IDCL ROAD	FC, PA 15361 TOTAL PRICE	0.000.53 0.000.53 0.000.53 0.000.53 0.000.53 0.000.53	00'000'115
	D & M PAINTING CORPORATION 1500 AMITY REDGE ROAD	WASHINGTON, PA 15901 UNIT PRECE TOTAL P	32,000,00 \$25,000,00 \$21,040,00 \$3,000,00 \$3,000,00	\$17,000.00
	IAL PARTING , SUITE 639	TOTAL PRICE	\$5,000.00 \$132,000.00 \$240.00 \$178,200.00 \$1,500.00 \$1,500.00	00.000,623
	VIKENG PIDUSTRÍAL PARTING S799 F STREKT, SUITE 639 OMARA NE ACUA	UNIT PRICE	25,000.20 \$132,000.00 \$132,00.00 \$176,200.00 \$1,500.00	02,000,502
	CR CO., IPC. ODGES BLVD. 131069	TOTAL PRICE	\$16,000 \$143,700 \$1,200 \$1,500 \$1,69,500 \$2,500	530,900 523,100
	UTILATY SERVICE CO., INC. S35 COURTINEY HODGES BLVD. PERRY, GA 31069	DATT PRICE	\$16,000 \$143,700 \$224,000 \$2,000 \$2,000	906,062 200,052
,	100N, DNC, 11466 5, SD 97301	TOTAL PRICE	25,000 5100,000 5200 51,000 51,500 5451,700	000 003
	MAGUINE IRON, INC. P.O. BOX 1446 SOUIX PALLS, SD 57101	UNIT PRICE	\$125.00	11
985	XERVICES, 1 LC X 492 G, KY 44330	TOTAL PRICE	57,000,00 576,000,00 5168,800,00 5131,900,00 513,900,00 5286,798,80	00.000,153
CURRENS	CONSTRUCTION SERVICES, LLC P.O. BOX 472 HARRODSBURG, KY 44330	UNIT PRICE	\$27,777,0.0 \$76,000,00 \$102,800,00 \$131,200,80 \$1,500.00	\$49,200.00 \$21,000.00
384,700° 22	ESTIMATED	QUANTITY	11.8 11.5 4 BA. 11.8 11.8 11.5 VOTAL BASE RUD	1 L.S.
BID DATE: MARCH 3, 1921 @ 12:00 P.M. EASTERN (LOCAL TIME) C.P.C. 2. 1.19 X 354,,700 2.		1. MOBILIZATION, DEMOBILIZATION BANDRA SAFETY AND PAVIR CAMPETY.	2 CONFLIANCE 2 CONTAINMENT SYSTEM 3 TOLF PERS. 4 COMPLETE SLAFT & PAINT PATENCE OF WATER STURAGE TANK 5 COMPLETE SLAFT & PAINT PATENCE OF WATER STURAGE TANK 6 ONE (1) YEAR ANNIVERSARY INGRECTION MANDATORY ALTHRUATE SID ITEMS	7. FCZZ HYDROSTYSTBA BATBLOR PART ADDER (COST INCREASE ONLY) 2. SENES YO HYDROFLON EXTERIOR PAINT ADDER (COST INCREASE ONLY)
BLD DAT	ON NATE	- E	MANG MANG	7. m 33.

\$56,000 \$104,000 \$1,000 \$244,000 \$1,500 \$674,888

\$66,000 \$100,000 \$250 \$251,500 \$1,500

TOTAL PRICE

UNIT PRICE

TMI COATING, INC. E291 TERMINAL DRIVE ST. PAUL, MN 55121

\$15,000

\$15,000

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(2) THE BASSONEY RESPONSIVE AND RESPONSIBLE BIDDS.

REMARKS.
The Etherit documents were submitted with all below.
I Signed Bid.
2. Bid Society.
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R Derick Wigging P.E. S. Project Engineer MIDWESTERN ENGINEERS, INC.

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BENTONE EXPERIENCES, X '8, SINE BENTOM AND MEAL WE WIND HER AL.	1.5.	\$4,360.00 \$450.00	Mines Residen	\$300.00	140.00	\$1,100.50	\$1,107.50	\$1,000.00	\$1,04020	\$1,500.00	\$1,100.00 \$2,600.00	\$3,400.00	\$3,60 m	\$3.007.01	51,000 00	\$1.150.20	51,
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GENERAL STATES AND	1 AA   1 A	S. 11.200 S. 12.200 S. 12.	190   110   190	\$1,000.00  \$1,000.00	\$500.00 \$1,000.0	Section 6: 12 (1997)   12 (199	\$4,000 to \$2,000	\$1,000 to \$1,000	\$1,000.00 \$1,000	\$ 11000 \$1,0000 (\$ 11	\$1,000 to \$1,000	\$2,000.00 C \$1,200.00 C \$1,200	CONTROL CONTRO	2,000 mg 31,000 mg 31,000 mg 32,000	Signer   S	1326 1326 1326 1326 1326 1326 1326 1326	Section 1997 1997 1997 1997 1997 1997 1997 199
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# Exhibit 2-5

BID DATE: DECEMBER 13, 2021 @ 6:30 P.M. (LOCAL TIME) CITY OF PETERSBURG, PIKE COUNTY, INDIANA WATER SYSTEM IMPROVEMENTS DIVISION II - NEW SUPPLY WELLS NO. 5 AND 6 MEI PROJECT NO. 2015067-01 BID TABULATION FOR

BASE BID		LAYNE CHRISTENSEN COMPANY 1301 E. MAIN STREET 1 OUISVII J.E. KY 40206	SEN COMPANY N STREET KY 40206	NATIONAL WATER SERVICES, LLC P.O. BOX 230 PAOLL IN 47454	( SERVICES, LLC X 230 8 47454
ITEM NO.	ESTIMATED QUANTITY	UNIT PRICE	AS BID TOTAL PRICE	UNIT PRICE	AS BID TOTAL PRICE
1. NEW WATER SUPPLY WELL#5	1 L.S.	\$536,886,00	\$536,886.00	\$570,570.00	\$570,570.00
	TOTAL BASE BID	11	\$536,886.00	11	\$\$70,\$70.00
MANDATORY ALTERNATE BID					
1. NEW WATER SUPPLY WELL #6	I L.S.	\$402,224.00	\$402,224.00	\$441,441.00	\$441,441.00
TOTAL MANDATORY ALTERNATE BID	'ALTERNATE BID	"	\$402,224.00	H	\$441,441.00
VOLUNTARY DEDUCTIVE ALTERNATE BID SHOULD A CONTRACTOR BE AWARDED MORE THAN ONE CONTRACT	ONTRACTOR BE	ı	N/A	1	N/A

NO. PE1300241



DETERMINING THE LOWEST RESPONSIVE AND RESPONSIBLE BIDDER FOR THIS DIVISION AND/OR MULTIPLE DIVISIONS/CONTRACTS.

3. Form 96 with signed non-collusion affidavit & financial statement

4. Acknowledge Addendum's No. 1, 2, 3, 4, & 5

NOTES:

The following documents were submitted with all bids:

REMARKS:

Signed Bid
 Bid Security

NOTE: THE BASIS OF AWARD MAY CONSIDER THE BASE BID OR THE BASI BID WITH THE VOLUNTARY DEDUCTIVE ALTERNATE BID IN CLINT W. ROOS, P.E. SR. PROJECT ENGINEER

12/14/2021

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	ESTEMATE	TOTAL PRICE	\$1,975,000.00	\$25,000,00	00'000'000'25
	ENGINER'S ESTIMATE	UNCET PROCE	\$1,975,000.00	\$25,000,00	
	Cuterpreses T S.R. 54 N 47167	ESTIMATED GATERICS TOTALPRICE TOTALPRICE TOTALPRICE UNIT PRICE UNIT PRICE TOTALPRICE UNIT PRICE UNIT PRICE TOTALPRICE UNIT PRICE TOTALPRICE UNIT PRICE UNI	\$2,650,000.00	238,500.00	\$2,688,500,00
	COTTONGER INTERPRESES 5010 EAST S.R. 56 SALEM, IN 47167	UNIT PRICE	00:000:059,53	\$38,500.00	
	JOHN WILL CONST. CO, INC. P.O. BOX 1857 LOUISVILLE, KY 49201	TOTAL PRICE	52,626,360.00	\$24,300.00	\$2,651,000.00
	ALLIN WILE CO 20. B. LOUSVILLI	UNIT PRICE	\$2,626,900.00	\$24,500.00	
	TETON CORPORATION 2217 NORTH S.R. 7 MADESON, IN 47250	TOTAL PRICE	\$2,502,000,00	8,000 08	\$2,542,000.00
		UNIT PRUCE	\$2,502,000.00	\$40,000.00	
	NGAM! VALLEY CONTRACTORS P.O. BOX 668 VANDALLA, OR 45377	TOTAL PRICE	\$2.418,000.00	\$25,000.00	\$2,443,000,00
	NEAM! VALLEY P.O. B VANDALIA	DKIT PRICE	52,418,000.00	\$25,000.00	
	BOWEN ENGENERANG P.O. BOX 40729 NDIANAPOLES, IN 46248	TOTAL PRICE			\$2,394,000,00
	BOWEN EN P.O. BC INDEANAPON	UNIT PRICE			
	SMITH CONTRACTORS, INC. P.O. BOX 480 LAWRENCIBURG, KY 44342	TOTAL PRICE	\$2,338,650.00	\$37,700,00	\$2,376,350,00
	SMITH CONT P.O. B LAWRENCES	UNIT PRICE	\$2,338,650.00	Q0.007,75X	
	REPYOLDS, INC. 4520 NORTH S.B. 37 GRLEANS, IN 47452	TOTAL PRICE	22,300,000.00	\$26,100.00	22,726,100.00
	EEYYOI 4520 NOR GRLEANS	UNIT PRICE	00'000'005'28	\$26,100,00	
	MTCHKLL & STARK CONST. P.O. BOX 219 MGDORA, JR 4726	TOTAL PRICE	00'000'00£'Z\$ 00'000'0£Z\$ 00'000'05	\$25,248.00	\$2,061,248,00
	MITCHELL 4: P.O. B. MEDORA	UNIT PRICE	52,036,000,00	\$25,248,00	
		ESTIMATED		1 1.5	
BID DATE: DIK, ENDRER ZZ, 1997 2500 P.M.		DESCRIPTION	1. CONSTRUCTION OF WATER TREATMENT FACILITY EXPANSION AND APPURTENANCES	2. 2630 LF, OF CHAIN LINK FENCE INCLUDING SIX IO WIDE GATES	DIVISION II TOTAL BASE RID

2 PE FROM DEL, 1941? To JULK, 2024: 1.95

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\$2034,000 x 1.95 = \$3,970,000 - 250,000 - 250,000 - 364,209,000 -Han - Const (25%) 1,050,000. Torse Pass. Pass. Cost \$ 5,250,000

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REMARKS

DIVISION II - ALTERNATE NO. 1

DIVERON II BASE BID - BOWEN ENCINKRRING CORP. Armal Bid was not on Revised Bid Form. Bidder animomicajes Revised Addendam Bid Porm.

REPART OF OUR ALL AND SPECIAL COLUMN SECTION OF THE SPECIAL COLUMN SEC														Man a service of the		4 SONS CONSTRUCT		TOWN & TOWNS BECAN.		DAVE OPENEA CONTRACTOR INC.	TOR THE.
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16" RPE RETULENENT From CRISO South DJ

SLAS ROAD & DAINE DELA

OLT. 2014 LPI To JUNE 2024

81515, west x 132 a \$2,005,5782

That Konder: 18,310'

2024 Confront: \$2,005,5782, 18,310' = \$110" / Ft.

PROBABLE Cost

Construction: 33,820' x \$110" / Ft. \$3,720,200"

How Construction: 33,820' x \$110" / Ft. \$3,720,200"

How Construction: 33,820' x \$110" / Ft. \$3,720,200"

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Construction: 33,820' x \$110" / Ft. \$3,720,200"

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# Exhibit 2-7

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF STUCKER FORK CONSERVANCY DISTRICT FOR APPROVAL OF A NEW SCHEDULE OF RATES AND CHARGES FOR WATER SERVICE

**CAUSE NO. 46167** 

## STUCKER FORK CONSERVANCY DISTRICT'S SUPPLEMENTAL RESPONSE TO OUCC DATA REQUEST SET NO. 2

Stucker Fork Conservancy District ("Stucker Fork"), by counsel, hereby provides its supplemental response to OUCC Data Request Set No. 2 as follows:

#### II. Data Request

- **Q-2-3:** For each estimated periodic maintenance expense item on pages 10-13 of the Petitioner's Exhibit 4, please provide:
  - a. Beginning periodic maintenance expense value upon which adjustment is based and the source of this value.
  - b. All actual costs, bid tabs, or other supporting documentation used to develop estimate, and all supporting workpapers in native excel format with formulas intact.
  - c. Explanations for any adjustments made including, but not limited to, inflation factor(s).
  - d. All calculations with formulas intact.
- Supplemental Response: In addition to the initial response to Request 2-3, Stucker Fork is including the attached as part of Exhibit 2-3. The additional document included as part of Exhibit 2-3 is a bid tab for the filter media replacement for the municipal water utility owned and operated in the City of Washington, Indiana. As you will see, the recent cost for filter media replacement in the City of Washington was more than the cost that was estimated for Stucker Fork in this Cause.
- Q-2-7: Please describe the planned expansion of the Marble Hill treatment plant and building in detail, and please provide all design and engineering diagrams and any related photographs and site surveys.
- Supplemental Response: In addition to the original response to Request 2-7, Stucker Fork would note that the Marble Hill water treatment plant

expansion includes a 3,600 square foot building that will accommodate four (4) separate 1 mgd filters and associated piping that will interconnect the new filters with the existing water treatment and transmission facilities. The building will also accommodate four (4) additional 1 mgd filters for future expansion. These facilities are outlined and further explained in the Exhibit 2-7 that was attached to the original response.

# Exhibit 2-3

NATIONAL WATER SERVICES, LLC P.O. BOX 230 PAOLI, IN 47454 UNIT PRICE TOTAL PRICE	\$99,173.25 \$396,693.00	00,000,000
LAYNE CHRISTENSEN COMPANY 301 E. MAIN STREET LOUISVILLE, KY 40206 UNIT PRICE		M.0+0,1/55
S S S S S S S S S S S S S S S S S S S	000	\$305,000.00
DEBRA-KUEMPEL, INC. 1325 E. VIRGINIA STREET EVANSVILLE, IN 47711 INT PRICE	\$92,415.00	
NBH INDUSTRIAL SERVICES, LLC D/BA/A BIOVAC INDUSTRIAL SERVICES P.O. BOX 4392 21564 CEDAR BRANCH TRL. AUSTINTOWN, OH 4149 INIT PRICE TOTAL PRICE	.21	5268,944,85
NBH INDUSTF DIBAN BIOVACI PO 21564 CED ESTIMATED AUSTINY DIIANTTY INT PRICE		IOTAL BASE BID
BID TABULATION FOR WATER TREATMENT PLANT FILTER MEDIA REPLACEMENT FILTER MEDIA REPLACEMENT CITY OF WASHINGTON, DAVIESS COUNTY, INDÍANA BID DATE: MARCH 28, 2024 @ 10:00 A.M. EASTERN (LOCAL TIME) MEI PROJECT NO. 2024042-03 BASE BID ITEM NO	I. REPLACE MEDIA AND REMOVE AND REPLACE NOZZLES IN FILTERS 5, 6, 7 AND 8	

NOTE: FOR EACH INDIVIDUAL FILTER CELL, THE FILTER NOZZLES MUST BE REPLACED WITH NEW NOZZLES (EXISTING NOZZLES TO BE DELIVERED TO OWNER), THE MEDIA MUST BE REPLACED, THE CELL DISINFECTED AND RETURNED TO SERVICE BEFORE PAYMENT WILL BE RECOMMENDED BY ENGINEER AND APPROVED BY OWNER.

REMARKS:
The following documents were submitted with all bids:
1. Singeod Bid
2. Sideoded Bid
3. Form 96 with signed non-collusion affidavit & financial statement
4. Acknowlodgement of Addendum's No. 1 & No. 2

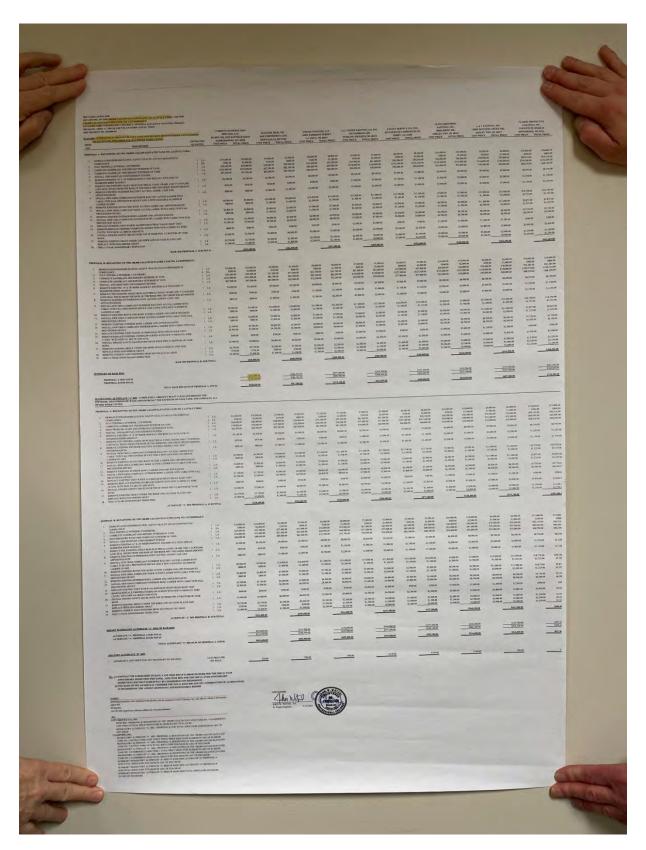
NOTES:
NBH INDUSTRIAL SERVICES, LLC D/B/A/ BIOVAC INDUSTRIAL SERVICES
I. BASE BID, LINE ITEM NO. 1 SHOULD BE \$268.944 \$H IN LIEU OF \$268.944 \$5.
2. TOTAL BASE BID SHOULD BE \$268.944 \$H IN LIEU OF \$268.944 \$5.



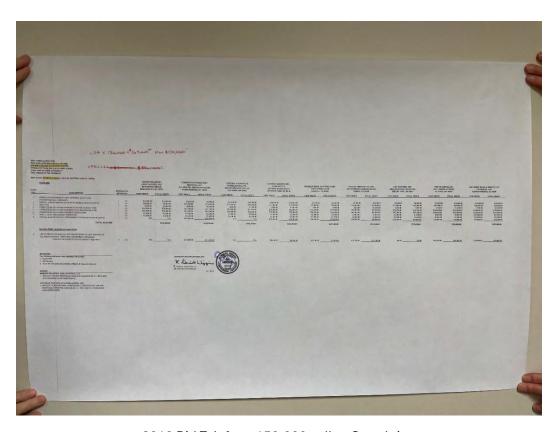
FLJC. B. RICHARD A BURCH SR. PROJECT ENGINEER

MIDWESTERN ENGINEERS, INC.

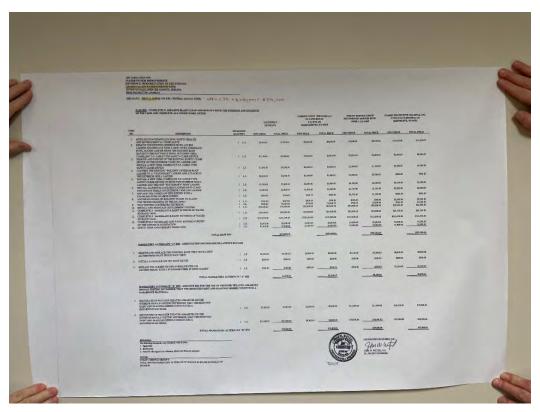
3/29/2024



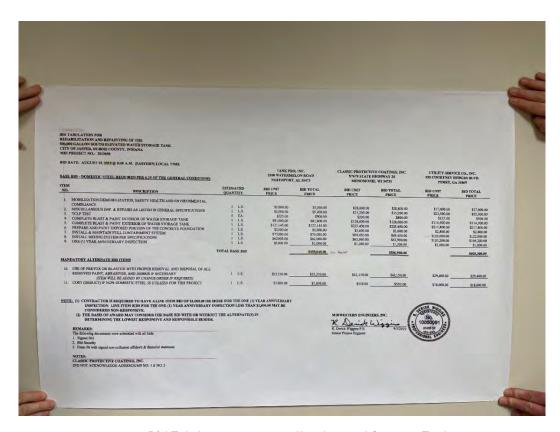
2024 Bid Tab for two 100,000 gallon Legged Storage Tanks



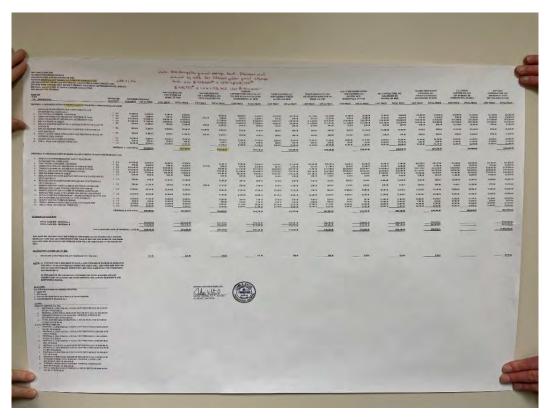
2019 Bid Tab for a 150,000 gallon Standpipe



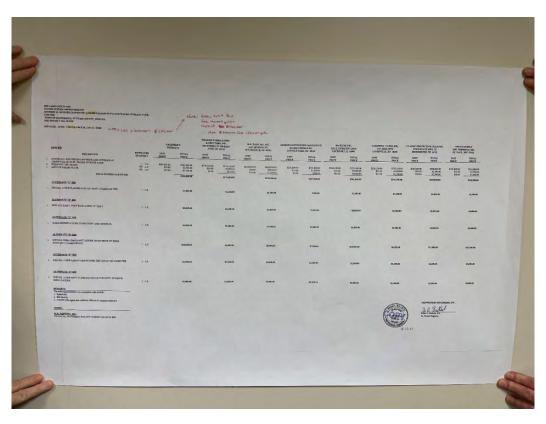
2015 Bid Tab for a 250,000 gallon Legged Storage Tank



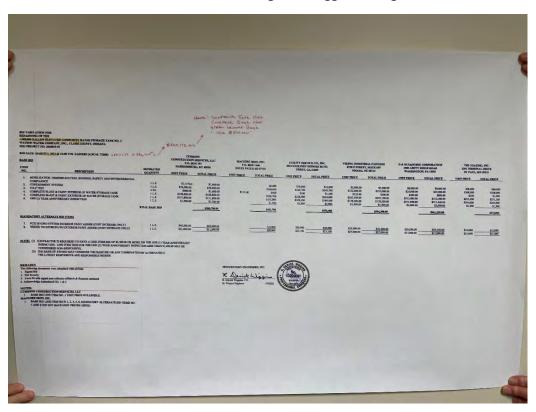
2019 Bid Tab for a 500,000 gallon Legged Storage Tank



2022 Bid Tab for a 500,000 gallon Ground Storage Tank & a 500,000 Elevated Storage Tank



2011 Bid Tab for a 150,000 gallon Legged Storage Tank



2021 Bid Tab for a 1,000,000 gallon Composite Storage Tank

OUCC Attachment KW-07 Cause No. 46167 Page 1 of 6 Form 301 (Rev. 1995)

# WATER ACCOUNTS PAYABLE VOUCHER

PAGE: 1

· ·	WATER ACCOUNTS.		•	10:01	0 /
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Stucker Fork Water Ut	IIILy	ned, dates service rendered, by whom, ra	tes per day, number	of hours,	"
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MUNICIPAL WATER		Water Treatment			
Stucker Fork Water	Utility	Transmission and Dist.			
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		Utility Plant In Service	<u> </u>	10912	
		Constr. Work in Progress			
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	10 910 15				
Total Amount of Warrant	103 103 112			1000	12
Month of	17 2025	Tot	tal	10962	(L)
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ordered and received except	O . 2 . 2	// 00  -	h 1/		
	4-18-23		ww		
	Mo. Day Yr.	Signature	0	fficer/Title	
eby certify that the attached invoice(s), or	bill(s), is (are) true and correct and	I have audited same in accordance with	/C 5-11-10-1.8.		
	O + b = 0	Kandy Tleedle	<i>/</i>		
	4.18.23	SUPERINTENDENT			
	Mo. Day Yr.	Signature	0	fficer/Title	
-		<u>.</u>			
	Board/Co	uncil Members			

**OUCC Attachment KW-07** Cause No. 46167 Page 2 of 6



TROJAN TECHNOLOGIES 3020 GORE ROAD LONDON, ON N5V 4T7 CANADA www.trojantechnologies.com

INVOICE 200 / 5060 Reprint

Sold to

STUCKER FORK WATER UTILITY

PO Box 274

Scottsburg IN 47170-0274

**UNITED STATES** 

Ship to

STUCKER FORK WATER UTILITY

5783 Water Tower Rd Austin IN 47102-8647 **UNITED STATES** 

Cust, Service Contact

: tuvcustomerservice@trojantechnologies.com

Invoice Contact

: accountsreceivable@trojanuv.co

Sales Order

: 010002507

Our VAT/TAX No

: 98-1343341

Order Date

: 11-18-2022

Payment Terms

: 0% / 00 / 30 net

Invoice Date

: 11-23-2022

**Delivery Terms** 

: DELIVERED DUTY PAID

Final Destination Country

: US

Carrier/LSP

: 100004902

Resale #

Customer No. Customer PO

: Verbal by Brad Peacock

Packing Slip

: OS0011557

Shipment Date

: 11-21-2022

Sold To VAT/TAX No

: 35-1176220

Ship To VAT/TAX No

: 35-1176220

#### Brad Peacock 812-820-0583

Line Project Item Description	Ordered Quantity Delivered Quantity	Price Discount	Unit Net Price Net Amount	Tax Rate Tax Amount	Amount
1	12.00		615.00	0.00%	
820856 LAMP P, PKG KIT 30CM UV	12.00 SWIFT12	615.00/ EA 0.00%	7,380.00	0.00	7,380.00
2	4.00		788.00	0.00%	
820821-558 SLEEVE, SYNTH QTZ 34x39	4.00 9x558	788.00/ EA 0.00%	3,152.00	0.00	3,152.00
3	1.00		430.65	0.00%	
FREIGHT & HANDLING	1.00	430.65/ EA 0.00%	430.65	0.00%	430.65
Goods	10,532.00	Discount	0.00	Tax Amount	Total USD
Costs	430.65	Subtotal	10,962.65	0.00	10,962.65

Scotlabank - CAD Cheques

Trojan Technologies Group ULC

C/O T10539

PO BOX 4388, STN A

GST# 743287328 RT0001

QST# 1212591056

BC PST# 1099-3713

ABN/GST# 89 315 683 549 MB PST# 743287328MT001

SK PST# 5862367

Toronto, ON M5W 3S1

FOR USD ACH, WIRES AND EFT PAYMENTS

Scotiabank

ACCOUNT NO: 00042-002-000420286516

SWIFT CODE: NOSCCATT ABA ROUTING: CC000247696 FOR CAD ACH, WIRES AND EFT PAYMENTS

Scotlabank

ACCOUNT NO: 00042-002-000420321419

SWIFT CODE: NOSCGATT ABA ROUTING: CC000247696

Chicago, IL 60689-5337

Fifth Third - US Checks - Lockbox # 233730

VIA COURIER - 910 Pasquinelli Drive

VIA USPS - 3730 Momentum Place

**OUCC Attachment KW-07** Cause No. 46167 Page 3 of 6



TROJAN TECHNOLOGIES 3020 GORE ROAD LONDON, ON N5V 4T7 **CANADA** 

www.trojantechnologies.com

INVOICE 200 / 5060 Reprint

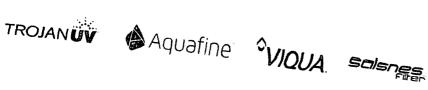
#### Terms and Conditions

All purchases of Trojan products and/or services are expressly and without limitation subject to Trojan's Terms and Conditions of Sale ("Trojan" or "SELLER"), incorporated herein by reference and published on Trojan's website https: www.trojantechnologies.com/sales-terms-conditions/

Trojan TCS are incorporated by reference into each of Trojan's offers or quotations, order acknowledgments, and invoice and shipping documents. The first of the following acts shall constitute an acceptance of Trojan's offer and not a counteroffer and shall create a contract of sale ("Contract") in accordance with the Trojan TCS, subject to Trojan's final credit approval: (i) Buyer's issuance of a purchase order document against Trojan's offer or quotation; (ii) Trojan's acknowledgement of Buyer's order; or (iii) commencement of any performance by Trojan in response to Buyer's order. Provisions contained in Buyer's purchase documents that materially alter, add to or subtract from the provisions of the Trojan's TCS shall be null and void and not considered part of the Contract.

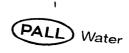
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OUCC Attachment KW-07 Cause No. 46167 Page 4 of 6

fi to e.

**APV Number Fund** 22641

**Invoice Number** 200 / 5060

TROJAN TECHNOLOGIES

09/18/2023

\$10962.65

**Amount** 

G-2795

018175

Total

\$10962.65 <

> 11/23/2022

OUCC Attachment KW-07 Cause No. 46167 Page 6 of 6

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF STUCKER FORK CONSERVANCY DISTRICT FOR APPROVAL OF A NEW SCHEDULE OF RATES AND CHARGES FOR WATER SERVICE

**CAUSE NO. 46167** 

## STUCKER FORK CONSERVANCY DISTRICT'S RESPONSE TO OUCC DATA REQUEST SET NO. 12

Stucker Fork Conservancy District ("Stucker Fork"), by counsel, hereby provides its response to OUCC Data Request Set No. 12 as follows:

#### II. Data Request

- **Q-12-1.** Please refer to Petitioner's response to OUCC DR 7-10.
  - a. Please provide a copy of all contracts or contractual documents governing Cummins' provision of periodic maintenance for the Austin WTP generator.
  - b. Please provide invoices for Austin WTP generator periodic maintenance for 2020, 2021, 2022, 2023, and 2024.

#### Response: a. Please see Exhibit 12-1.

- b. Please see Response to OUCC Data Request No. 7, Exhibit 7-28.
- **Q-12-2.** Please provide the name of each vendor providing, or contracted to provide, tank painting since 2020 (e.g. O&J Coatings, Currens Construction). Please also state whether the use of such vendor for tank painting has been discontinued.
  - Response: The only two (2) vendors providing tank painting since 2020 have been O&J Coatings and Currens Construction. Stucker Fork has used these contractors in the past and may, indeed, use them again in the future.
- **Q-12-3.** Please refer to Petitioner's response to OUCC DR 7-28. Please provide the Periodic Maintenance Tracker in Excel format, with formulas intact, and which includes, without limitation, all updated data to date.

#### Response: Please see attached <u>Exhibit 12-3</u>.

- **Q-12-4.** Has Petitioner considered establishing a system development charge? Please explain why or why not.
  - Response: Stucker Fork's professionals have discussed a system development charge with Stucker Fork management; however, no formal action has been taken on promulgating a system development charge at this time.
- **Q-12-5.** Please refer to Petitioner's Exhibit 1, the Direct Testimony of Richard Burch, pp. 11 12.
  - a. Please provide the number of business or other non-residential class customers that have made inquiries for water service in the past five years; and please provide the number of in each of calendar years 2021, 2022, 2023, and 2024.
  - b. Has Petitioner estimated the capacity requirements for such potential customers? And, if so, how much additional capacity has Petitioner estimated would be needed to serve such potential customers?
  - c. Please provide the number of residential developments or residential communities that have made inquiries for water service in the past five years; and please provide the number of in each of calendar years 2021, 2022, 2023, and 2024.
  - d. Has Petitioner estimated the capacity requirements for such potential residential customers? And, if so, how much additional capacity has Petitioner estimated would be needed to serve such potential residential customers?
  - Response: a. Stucker Fork does not maintain a list of individuals, businesses, or entities that inquire about the possibility of receiving water service for a new development. Notwithstanding the forgoing, Stucker Fork has had a customer within the last twelve (12) months inquire about water to a new development near its Marble Hill Water Treatment Plant. This developer was seeking up to one million (1,000,000) per day of water for the development.
    - b. For the industrial facility near its Marble Hill plant, the estimated usage was one million mgd.

### STUCKER FORK CONSERVANCY DISTRICT Water Utility

#### Periodic Maintenance Tracker

Quarter	Date	Account	Account Name	Vendor	Description	Amount	Cumulative Balance
2020	0.000				2020 balance carried forward	(\$318,944.00)	(\$318,944.00)
2021 Q1	02/01/21	620.16	Trans & Dist Materials and Supplies	B H Electric	Austin WTP: High service pump maintenance	(5,565.00)	(324,509.00)
2021 Q1	03/01/21	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Austin WTP: High service pump maintenance	(3,202.50)	(327,711.50)
2021 Q1	03/15/21	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP: Generator maintenance	(411.49)	(328,122.99)
2021 Q1	02/15/21	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Austin WTP: Filter maintenance	(875.00)	(328,997.99)
2021 Q1	01/18/21	620.13	Water Treatment - Materials and Supplies	Living Waters Company, Inc.	Austin WTP: Chemical feed pump maintenance	(1,991.81)	(330,989.80)
2021 Q1	02/01/21	620.13	Water Treatment - Materials and Supplies	Cole Parmer	Austin WTP: Chemical feed pump maintenance	(5,392.33)	(336,382.13)
2021 Q1	03/15/21	620.13	Water Treatment - Materials and Supplies	Cole Parmer	Austin WTP: Chemical feed pump maintenance	(5,778.88)	(342,161.01)
2021 Q1	01/04/21	635.13	Water Treatment - Contractual Services	Brehob, Inc.	Austin & Marble Hill WTP: Hoist maintenance	(1,474.14)	(343,635.15)
2021 Q1	01/18/21	620.13	Water Treatment - Materials and Supplies	EIC Contractors, Inc.	Marble Hill WTP: Pump control valve maintenance	(4,570.00)	(348,205.15)
2021 Q2	06/07/21	635.16	Trans & Dist Contractual Services	EIC Contractors, Inc.	Austin WTP: High service pump maintenance	(1,690.00)	(349,895.15)
2021 Q2	04/19/21	304.13	Property & Plant - Water	Bastin Logan, Inc.	Austin WTP: Filter maintenance	(31,912.75)	(381,807.90)
2021 Q2	04/05/21	620.13	Water Treatment - Materials and Supplies	Cole Parmer	Austin WTP: Chemical feed pump maintenance	(1,597.27)	(383,405.17)
2021 Q2	05/17/21	635.16	Trans & Dist Contractual Services	Midco Diving & Marine	Tank Cleaning and inspection	(6,898.00)	(390,303.17)
2021 Q2	04/05/21	620.16	Trans & Dist Materials and Supplies	USA Bluebook	Booster Station maintenance	(1,053.79)	(391,356.96)
2021 Q2	06/21/21	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Well 5 Maintenance	(6,577.00)	(397,933.96)
2021 Q3	08/16/21	635.16	Trans & Dist Contractual Services	EIC Contractors, Inc.	Marble Hill WTP: Maintenance	(3,218.00)	(401,151.96)
2021 Q3	07/06/21	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Marble Hill WTP: Filter media maintenance	(18,797.50)	(419,949.46)
2021 Q3	08/16/21	620.16	Trans & Dist Materials and Supplies	B H Electric	Booster Station maintenance (Booster 7)	(2,577.94)	(422,527.40)
2021 Q3	08/16/21	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP: Generator maintenance	(3,510.24)	(426,037.64)
2021 Q4	10/04/21	620.13	Water Treatment - Materials and Supplies	Living Waters Company, Inc.	Austin WTP: Chemical feed maintenance	(2,254.89)	(428,292.53)
2021 Q4	10/04/21	620.13	Water Treatment - Materials and Supplies	Living Waters Company, Inc.	Austin WTP: Chemical feed maintenance	(1,749.12)	(430,041.65)
2021 Q4	10/04/21	620.16	Trans & Dist Materials and Supplies	BL Anderson	Marble Hill WTP: High service pump maintenance	(4,179.00)	(434,220.65)
2022 Q1	01/04/22	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Intake pump maintenance	(14,402.00)	(448,622.65)
2022 Q1					Intake pump maintenance	(6,390.00)	(455,012.65)
2022 Q1	01/17/22	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Austin WTP Maintenance	(1,028.00)	(456,040.65)
2022 Q1	02/07/22	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Austin WTP Maintenance	(5,260.00)	(461,300.65)
2022 Q1	02/21/22	635.13	Water Treatment - Contractual Services	B H Electric	Austin WTP Maintenance	(2,372.46)	(463,673.11)
2022 Q1	01/04/22	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Austin WTP Maintenance: High service pump maintenance	(6,801.50)	(470,474.61)
2022 Q1	02/07/22	635.13	Water Treatment - Contractual Services	Johnson Controls Fire	Austin WTP Maintenance: Fire extinguisher maintenance	(1,809.00)	(472,283.61)
2022 Q1	02/07/22	635.18	Adm & Gen - Contractual Services	Johnson Controls Fire	Austin WTP Maintenance: Fire extinguisher maintenance	(142.00)	(472,425.61)
2022 Q1	02/21/22	635.16	Trans & Dist Contractual Services	Johnson Controls Fire	Marble Hill WTP: Fire extinguisher maintenance	(310.00)	(472,735.61)
2022 Q2					Austin WTP Maintenance	(3,261.07)	(475,996.68)
2022 Q2	06/20/22	620.13	Water Treatment - Materials and Supplies	EIC Contractors, Inc.	Austin WTP Maintenance	(1,202.00)	(477,198.68)
2022 Q2	6/6/2022	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Austin WTP Maintenance: UV System Maintenance / Bulb Repalcement	(3,899.00)	(481,097.68)
2022 Q2	6/6/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Austin WTP Maintenance: UV System Maintenance / Bulb Repalcement	(1,728.00)	(482,825.68)
2022 Q2	6/20/2022	635.16	Trans & Dist Contractual Services	B H Electric	Booster Station Maintenance: #7	(1,230.00)	(484,055.68)
2022 Q2	5/2/2022	635.16	Trans & Dist Contractual Services	B H Electric	Booster Station Maintenance: #9	(1,500.00)	(485,555.68)
2022 Q2	4/4/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Control Valve/Metering Pit Maintenance: Well 4	(898.00)	(486,453.68)
2022 Q2	5/16/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Control Valve/Metering Pit Maintenance: Well 4	(5,808.00)	(492,261.68)
2022 Q3	7/18/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Austin WTP Maintenance	(1,140.00)	(493,401.68)
2022 Q3	9/6/2022	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Generator Maintenance	(3,921.73)	(497,323.41)
2022 Q3	9/19/2022	620.13	Water Treatment - Materials and Supplies	Living Waters Company, Inc	Chemical Feed Maintenance	(3,082.47)	(500,405.88)
2022 Q3	7/5/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Marble Hill WTP Maintenance	(5,489.00)	(505,894.88)
2022 Q3	9/19/2022	635.16	Trans & Dist Contractual Services	EIC Contractors, Inc.	Marble Hill WTP Maintenance	(645.00)	(506,539.88)
2022 Q3	9/19/2022	620.13	Water Treatment - Materials and Supplies	Living Waters Company, Inc	Filter Media Maintenance	(2,617.96)	(509,157.84)
2022 Q4	10/3/2022	620.16	Trans & Dist Materials and Supplies	BL ANDERSON	Pump control valve maintenance	(799.20)	(509,957.04)
2022 Q4	11/7/2022	635.16	Trans & Dist Contractual Services	B&H Electric	Booster station maintenance #7	(1,153.43)	(511,110.47)
2022 Q4	11/7/2022	631.16	Adm & Gen - Contractual Services	Midwestern Engineers, Inc.	Water tank repainting and inspection	(16,020.38)	(527,130.85)
2022 Q4	12/19/2022	635.16	Trans & Dist Contractual Services	Bastin Logan, Inc.	Well 1, 2, 3	(975.00)	(528,105.85)
2022 Q4	12/19/2022	635.13	Water Treatment - Contractual Services	EIC Contractors, Inc.	Well 3	(3,266.00)	(531,371.85)
2022 Q4	12/8/2022	102.11	TANK 10 & GROUND STORAGE	O&J Coatings Inc	Tank painting	(200,925.00)	(732,296.85)
2022 Q4	12/19/2022	102.11	TANK 10 & GROUND STORAGE	Midwestern Engineers, Inc.	Tank painting/inspection	(14,933.04)	(747,229.89)

### STUCKER FORK CONSERVANCY DISTRICT Water Utility

#### Periodic Maintenance Tracker

Quarter	Date	Account	Account Name	Vendor	Description	Amount	Cumulative Balance
2023 Q1					Intake Pump Maintenance	(582.00)	(747,811.89)
2023 Q1	1/16/2023	620.16	Trans & Dist - Materials and Supplies	B&H Electric	Austin WTP - Low Service Pump Maintenance	(2,620.00)	(750,431.89)
2023 Q1	2/6/2023	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP - Generator Maintenance	(411.49)	(750,843.38)
2023 Q1	3/6/2023	635.13	Water Treatment - Contractual Services	Brehob, Inc.	Austin WTP - Chlorine Crane Hoist Maintenance	(450.00)	(751,293.38)
2023 Q1	3/6/2023	635.13	Water Treatment - Contractual Services	Brehob, Inc.	Marble Hill WTP - Chlorine Crane Hoist Maintenance	(450.00)	(751,743.38)
2023 Q1					Control Valve/Metering Pit Maintenance - Pepsi?	(720.00)	(752,463.38)
2023 Q2	5/1/2023	635.16	Trans & Dist - Contractual	Coomes Excavating	Intake Structure Cleaning	(5,200.00)	(757,663.38)
2023 Q2	6/5/2023	635.16	Trans & Dist - Contractual	Bastin Logan, Inc.	Intake Pump Maintenance	(13,048.50)	(770,711.88)
2023 Q2	6/5/2023	635.16	Trans & Dist - Contractual	Eic Contractors, Inc.	Austin WTP Maintenance	(2,345.00)	(773,056.88)
2023 Q2	5/15/2023	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP - Generator Maintenance	(4,574.53)	(777,631.41)
2023 Q2	4/3/2023	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc.	Control Valve/Metering Pit Maintenance - Tank 7	(2,364.00)	(779,995.41)
2023 Q3	7/3/2023	102.11	Tank 10 & Ground Storage	O&J Coatings Inc.	Tank Painting	(344,850.00)	(1,124,845.41)
2023 Q3	7/3/2023	102.11	Tank 10 & Ground Storage	Midwestern Engineers, Inc.	Tank Painting	(21,478.91)	(1,146,324.32)
2023 Q3	8/7/2023	620.16	Trans & Dist - Materials and Supplies	B&H Electric	U.V. System Maintenance/Bulb Replacement	(372.00)	(1,146,696.32)
2023 Q3	9/5/2023	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Generator Maintenance	(411.49)	(1,147,107.81)
2023 Q3	9/5/2023	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc.	Well 5 Maintenance	(3,820.00)	(1,150,927.81)
2023 Q3	9/18/2023	304.13	Property & Plant - Meter & Meter	Trojan Technologies	U.V. System Maintenance/Bulb Replacement	(10,962.65)	(1,161,890.46)
2023 Q3	9/18/2023	635.16	Trans & Dist - Contractual	B&H Electric	Marble Hill - Tank Cleaning and Inspection	(6,213.54)	(1,168,104.00)
2023 Q3	9/18/2023	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc.	Well 5 Maintenance	(6,108.00)	(1,174,212.00)
2023 Q4	10/2/2023	635.13	Water Treatment - Contractual Services	Bastin Logan, Inc.	Intake Pump Maintenance	(16,731.75)	(1,190,943.75)
2023 Q4	12/18/2023	635.16	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP Maintenance: Generator Maintenance	(3,408.38)	(1,194,352.13)
2024 Q1	3/18/2024	304.13	Property & Plant - Water	ET Masonry	Chain Link Fence Repair	(5,200.00)	(1,199,552.13)
2024 Q1	2/19/2024	304.13	Property & Plant - Water	Mitchell & Starke	Clearwell & Clarifier	(66,093.72)	(1,265,645.85)
2024 Q1					Marble Hill WTP Pump control valve maintenance	(8,370.00)	(1,274,015.85)
2024 Q2	4/15/2024	635.13	Water Treatment - Contractual Services	Brehob, INC	Austin WTB Maintenance: Chlorine Hoist	(1,820.21)	(1,275,836.06)
2024 Q2	6/17/2024	635.13	Water Treatment - Contractual Services	Living Waters Company, INC	Austin WTP Maintenance: Chlorination Equipment	(4,356.36)	(1,280,192.42)
2024 Q2	5/20/2024	304.13	Property & Plant - Water	Eic Contractors, Inc.	Austin WTP- High service pump maintenance	(6,500.00)	(1,286,692.42)
2024 Q2	6/17/2024	304.13	Property & Plant - Water	Eic Contractors, Inc.	Austin WTP- High service pump maintenance	(6,500.00)	(1,293,192.42)
2024 Q2	6/17/2024	635.16	Trans & Dist - Contractual	B&H Electric	Booster station maintenance	(400.00)	(1,293,592.42)
2024 Q2	4/1/2024	635.16	Trans & Dist - Contractual	Eic Contractors, Inc.	Control Valve/Metering Pit Maintenance - Tank 6	(768.00)	(1,294,360.42)
2024 Q3	7/1/2024	635.16	Trans & Dist - Contractual	B&H Electric	Intake pump maintenance	(400.00)	(1,294,760.42)
2024 Q3	8/19/2024	635.16	Trans & Dist - Contractual	Thomas Plastic Machinery INC	Austin WTP Maintenance - backflow testing	(710.00)	(1,295,470.42)
2024 Q3	8/19/2024	635.13	Water Treatment - Contractual Services	Cummins Sales & Service	Austin WTP Maintenance - Generator maintenance	(3,861.26)	(1,299,331.68)
2024 Q3	8/5/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Marble Hill WTP Maintenance - voltage indicator 3, 4 and 5	(875.00)	(1,300,206.68)
2024 Q3	9/16/2024	635.13	Water Treatment - Contractual Services	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(2,831.94)	(1,303,038.62)
2024 Q3	9/16/2024	635.13	Water Treatment - Contractual Services	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(2,894.90)	(1,305,933.52)
2024 Q3	8/6/2024	102.12	Tanks 2 & 4 - Painting project	Currens Construction	Tanks 2&4 painting	(162,405.00)	(1,468,338.52)
2024 Q3	9/4/2024	102.12	Tanks 2 & 4 - Painting project	Currens Construction	Tanks 2&4 painting	(205,650.00)	(1,673,988.52)
2024 Q3	9/3/2024	635.16	Trans & Dist - Contractual	B&H Electric	Booster station maintenance - Henryville	(4,226.56)	(1,678,215.08)
2024 Q3	7/15/2024	620.16	Trans & Dist Materials and Supplies	B&H Electric	Booster station maintenance - pump	(3,322.00)	(1,681,537.08)
2024 Q3	7/15/2024	620.16	Trans & Dist Materials and Supplies	B&H Electric	Booster station maintenance - pump	(1,100.00)	(1,682,637.08)
2024 Q3	7/15/2024	635.16	Trans & Dist - Contractual	B&H Electric	Booster station maintenance - pump	(2,002.46)	(1,684,639.54)
2024 Q4	10/7/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Wells and pumps maintenance	(2,070.99)	(1,686,710.53)
2024 Q4	12/2/2024	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc	Austin WTP maintenance - scada system	(3,079.00)	(1,689,789.53)
2024 Q4	10/21/2024	635.16	Trans & Dist - Contractual	B&H Electric	Austin WTP maintenance - flow meter	(986.51)	(1,690,776.04)
2024 Q4	10/21/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Austin WTP Maintenance - high service pump maintenance	(1,977.30)	(1,692,753.34)
2024 Q4	11/18/2024	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc	Austin WTP Maintenance - high service pump maintenance (pump 2)	(955.00)	(1,693,708.34)
2024 Q4	10/7/2024	635.16	Trans & Dist - Contractual	B&H Electric	Austin WTP Maintenance - lagoon cleaning/maintenance	(2,466.24)	(1,696,174.58)
2024 Q4	10/21/2024	104.1	Marble Hill/Railroad Corridor	Mitchell & Starke Construction	Marble Hill WTP Maintenance - flow meter installation	(16,054.00)	(1,712,228.58)
2024 Q4	11/4/2024	620.13	Water Treatment - Materials and Supplies	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(900.00)	(1,713,128.58)
2024 Q4	11/4/2024	635.13	Water Treatment - Contractual Services	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(3,898.00)	(1,717,026.58)
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1,2,3&4	(28,528.00)	(1,745,554.58)
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1,2,3&4	(28,528.00)	(1,774,082.58)

### STUCKER FORK CONSERVANCY DISTRICT Water Utility

#### Periodic Maintenance Tracker

Quarter	Date	Account	Account Name	Vendor	Description	Amount	Cumulative Balance
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1,2,3&4	(28,528.00)	(1,802,610.58)
2024 Q4	12/2/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1,2,3&4	(28,528.00)	(1,831,138.58)
2024 Q4	10/7/2024	102.12	Tanks 2 & 4 - Painting project	Currens Construction	Tanks 2&4 painting	(98,730.00)	(1,929,868.58)
2024 Q4	12/17/2024	102.12	Tanks 2 & 4 - Painting project	Currens Construction	Tanks 2&4 painting	(51,865.00)	(1,981,733.58)
2024 Q4	12/16/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Booster Station maintenance (Booster 7)	(1,192.96)	(1,982,926.54)

	Discover	y Response Due Date v. Received D	ate	_
Discovery Request No.	Date Response Due	Extended Date Response Due	Date Response Received	Days After Service
DR 01	Monday, December 16, 2024		Tuesday, December 17, 2024	11
DR 02	Monday, December 23, 2024	Monday, January 6, 2025	Monday, January 13, 2025	31
DR 03	Thursday, January 2, 2025		Monday, January 13, 2025	21
DR 04	Monday, January 13, 2025		Thursday, January 16, 2025	14
DR 05	Tuesday, January 21, 2025		Wednesday, January 29, 2025	19
DR 06	Monday, February 3, 2025		Thursday, January 30, 2025	7
DR 07	Monday, February 3, 2025		Wednesday, February 5, 2025	12
DR 08	Monday, February 10, 2025		Tuesday, February 11, 2025	11
DR 09	Friday, February 14, 2025		Friday, February 21, 2025	17
DR 10	Monday, February 17, 2025		Tuesday, February 11, 2025	6
DR 11	Monday, February 17, 2025		Friday, February 21, 2025	14
DR 12	Friday, February 21, 2025		Friday, February 21, 2025	10

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF STUCKER FORK CONSERVANCY DISTRICT FOR APPROVAL OF A NEW SCHEDULE OF RATES AND CHARGES FOR WATER SERVICE

**CAUSE NO. 46167** 

## STUCKER FORK CONSERVANCY DISTRICT'S RESPONSE TO OUCC DATA REQUEST SET NO. 7

Stucker Fork Conservancy District ("Stucker Fork"), by counsel, hereby provides its response to OUCC Data Request Set No. 7 as follows:

#### II. Data Request

Q-7-1: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For each intake pump, please state (a) the total estimated cost for each pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for this periodic maintenance expense item is \$2,000 per year for each intake pump.
- (b) The \$2,000 cost represents the average annual cost for this periodic maintenance expense item is the average cost to maintain each intake pump on an annual basis.
- (c) The periodic maintenance required for each intake pump, includes, among other things: changing the oil; inspecting, maintaining, and/or replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, and electrical components in the pump.
- Q-7-2: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For each well and pump chemical cleaning, please state (a) the total estimated cost for each chemical well cleaning and (b) the time period over which these costs are being amortized.

#### Response:

- (a) The total estimated cost for this periodic maintenance is \$1,900 per year for each well.
- (b) The \$1,900 represents the average annual cost for this periodic maintenance expense item.

Q-7-3: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For each well pump maintenance, please state (a) the total estimated cost for each well pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for this periodic maintenance expense item is \$2,500 per year for each well pump.
- (b) The \$2,500 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each well pump includes, among other things: changing the oil; inspecting, maintaining and/or replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, electrical components in the pumps, and the soft start for each pump.
- Q-7-4: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP high service pumps, please state (a) the total estimated cost for each high service pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for this periodic maintenance expense item is \$1,500 per year for each high service pump.
- (b) The \$1,500 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each water treatment plant high service pump includes, but is not necessarily limited to: changing the oil; inspecting, maintaining, and/or replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, electrical components, and the soft start for each pump.
- Q-7-5: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP low service pumps, please state (a) the total estimated cost for each low service pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for periodic maintenance for each low service pump is \$600 per year.
- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for the Austin WTP low service pump includes, but is not necessarily

limited to: changing the oil; inspecting, maintaining, and replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, electrical components in the pumps, and the variable frequency drive.

Q-7-6: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP backwash pumps, please state (a) the total estimated cost for each backwash pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for this periodic maintenance item is \$1,000 per year for each back wash pump.
- (b) The \$1,000 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense for each back wash pump includes, but is not necessarily limited to: changing the oil, inspecting, maintaining, and/or replacing the packing glands, and inspecting, maintaining, and repairing the shafts, motors, and electrical components in the back wash pumps.
- Q-7-7: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP pump control valves, please state (a) the total estimated cost for each pump control valve, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total estimated cost for this periodic maintenance expense item is \$600 per year for each valve.
- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each Austin WTP pump control valve includes, but is not necessarily limited to: inspecting and maintaining the solenoid operating valves and pilot lines; and inspecting, maintaining, and repairing or completing an overall of the diaphragms.
- Q-7-8: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP plant production meters, please state (a) the total estimated cost for calibrating each plant production meter, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

(a) The total cost for this periodic maintenance expense item is \$600 per year for each meter.

- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance required for each Austin WTP plant production meter includes, but is not necessarily limited to, testing, inspecting, maintaining, and replacing the individual components contained within each of the individual meters.
- Q-7-9: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP turbidity meters, please state (a) the total estimated cost for each turbidity meter, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total cost for this periodic maintenance expense item is \$600 per year for each meter.
- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance required for each Austin WTP turbidity meter includes, among other things: the use and application of the required calibration solution; filter inspection, repair, and replacement; and the inspection, maintenance, and repair of the individual cartridges within each meter.
- Q-7-10: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP generator, please state (a) the total estimated cost for each generator, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total cost for this periodic maintenance expense item is \$1,900 per year.
- (b) The \$1,900 represents the average annual cost for this periodic maintenance expense item.
- (c) Stucker Fork retains an outside contractor (i.e. Cummins) to inspect and make any necessary maintenance to the Austin WTP generator each year. Cummins is responsible for all periodic maintenance, including, but not limited to, changing the oil, filters, and conducting a load test.
- Q-7-11: Please confirm that the fire extinguisher maintenance included in Petitioner's Exhibit 4, "Adjustment 3 Periodic Maintenance" for the Austin and Marble hill water treatment plants is performed on a recurring annual basis at a cost of \$400 per plant each year. If not confirmed, please state (a) the total estimated cost for

each fire extinguisher maintenance, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total cost for this periodic maintenance expense item is \$400.
- (b) The \$400 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense for the cost to inspect all the fire extinguishers on an annual basis, including, but not limited to, inspecting the fire extinguishers to insure they are properly charged and have up to date tags and labeling.
- Q-7-12: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Austin WTP filters, please state (a) the total estimated cost for each filter, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

Response: Please see Response to OUCC Data Request No. 6-4.

Q-7-13: Please confirm that the Austin WTP U.V. system maintenance (bulb replacement) maintenance included in Petitioner's Exhibit 4, "Adjustment 3 – Periodic Maintenance" assumes each bulb is replaced on an annual basis If not confirmed, please explain.

Response:

The most recent cost of the bulbs is approximately \$615 per bulb. The bulbs must be replaced once every 500 hours of operation which equates to a bit more than one time each year.

Q-7-14: Please reference "Adjustment 3 — Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Marble Hill WTP high service pumps, please state (a) the total estimated cost for each high service pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total cost for this periodic maintenance expense item is \$1,500 per year for each high service pump.
- (b) The \$1,500 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each water treatment plant high service pump includes, but is not necessarily limited to: changing the oil; inspecting, maintaining, and/or replacing the packing glands; and

## inspecting, maintaining, and repairing the shafts, motors, electrical components, and the soft start for each pump.

Q-7-15: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Marble Hill WTP backwash pumps, please state (a) the total estimated cost for each backwash pump, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### Response:

- (a) The total estimated cost for this periodic maintenance expense item is \$1,000 per year.
- (b) The \$1,000 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance required for each backwash pump, includes, among other things: changing the oil; inspecting, maintaining, and/or replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, and electrical components in the pump.
- Q-7-16: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Marble Hill WTP pump control valves, please state (a) the total estimated cost for each pump control valve, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total estimated cost for this periodic maintenance expense item is \$600 per year for each valve.
- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each Austin WTP pump control valve includes, but is not necessarily limited to: inspecting and maintaining the solenoid operating valves and pilot lines; and inspecting, maintaining, and repairing or completing an overall of the diaphragms.
- Q-7-17: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Marble Hill WTP plant production meters, please state (a) the total estimated cost for calibrating each plant production meter (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

(a) The total cost for this periodic maintenance expense item is \$600 per year for each meter. Stucker Fork would note, however, that it only has three (3) plant production meters at

the Marble Hill plant. Accordingly, the amount of periodic maintenance expense for this item should be reduced from \$2,400 per year to \$1,800 per year.

- (b) The \$600 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance required for each Austin WTP plant production meter includes, but is not necessarily limited to: testing, inspecting, maintaining, and replacing the individual components contained within each of the individual meters.
- Q-7-18: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the Marble Hill WTP filters, please state (a) the total estimated cost for each filter media maintenance (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total cost for this periodic maintenance expense item is \$14,250 per year for filter media maintenance. Stucker Fork would note that after receiving this data request, it realized that it had recently replaced the filter media at the Marble Hill WTP and the cost of such replacement was \$28,500 per filter for a total cost of \$114,000 for all four (4) filters. (See Exhibit 7-18).
- (b) Stucker Fork previously performed the filter media maintenance in 2016. Consequently, Stucker Fork believes that the total cost for filter media maintenance should be amortized over eight years for a per year cost of \$14,250. This is an increase of \$4,650 per year (as set forth on page 11 of Petitioner's Exhibit 4). The \$14,250 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance required for the filter media maintenance is the testing, inspection, maintaining, and replacing the filter media in each of the four filters.
- Q-7-19: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For booster station maintenance and pump replacement, please state
  - a. Total estimated cost for each booster station maintenance.
  - b. Time period over which each booster station maintenance costs are being amortized.
  - c. Total estimated cost for each booster station pump replacement; and
  - d. Time period over which each booster station pump replacement is being amortized.
  - e. A brief description of the maintenance performed for each booster station.

#### **Response:**

- (a) The total estimated cost for booster station maintenance is \$3,800 per year for Booster Station No. 4 and \$1,900 per year for Booster Station Nos. 7 and 8.
- (b) The amount of the periodic maintenance expense listed on page 13 of <u>Petitioner's Exhibit 4</u> represents the average annual cost for this periodic maintenance expense item.
- (c) Stucker Fork objects to this request on grounds that Stucker Fork is not seeking to recover the cost of a booster station replacement or the entire replacement of the pump therein. (See Response to OUCC Request No. 6-2).
- (d) Not applicable.
- (e) The periodic maintenance required for the booster stations includes, but is not necessarily limited to: changing the oil; inspecting, maintaining, and/or replacing the packing glands; and inspecting, maintaining, and repairing the shafts, motors, electrical components, and the pumps, valves, fittings, and seals.
- Q-7-20: Please reference "Adjustment 3 Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. For the meter/control valve pits, please state (a) the total estimated cost for each meter/control valve pit maintenance, (b) the time period over which these costs are being amortized, and (c) a brief description of the maintenance performed.

#### **Response:**

- (a) The total cost for this periodic maintenance expense item is \$1,500 for each valve.
- (b) The \$1,500 represents the average annual cost for this periodic maintenance expense item.
- (c) The periodic maintenance expense required for each valve/metering pit includes, but is not necessarily limited to, inspecting, maintaining, and replacing, the valves, electrical components, diaphragm, solenoid valves, and prolines.
- Q-7-21: During the OUCC's engineering site visit on January 14, 2025, Petitioner indicated only 2 filters are planned to be installed at this time as part of the Marble Hill expansion. However, the bids from December 22, 1997 were for doubling all of the plant (Response to OUCC DR 2-5). Admit or deny installing less equipment will lower the cost of Petitioner's proposed Marble Hill expansion project.

#### **Response:**

No, the preliminary plans for the Marble Hill that were approved by Stucker Fork's Board and will be described in the Preliminary Engineering Report ("PER") show the installation of four (4) filters, not two (2) filters.

Q-7-22: Please provide the PER for the Marble Hill expansion. If not yet available, please indicate when this PER will be available.

Response: Stucker Fork and its professional engineer, Midwestern Engineers, Inc., are currently working on completing PER.

The PER will be completed and submitted to the SRF Program on or before March 31, 2025.

Q-7-23: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. Please explain whether the estimated tank painting costs reflect the cost of painting both the interior and exterior of each tank or whether these costs only reflect the cost of painting the exterior of each tank.

Response: The estimated tank painting costs reflect the cost of painting both the interior and exterior of each tank.

Q-7-24: Please reference "Adjustment 3 – Periodic Maintenance" on pages 10-13 of Petitioner's Exhibit 4. Please explain whether the estimated tank cleaning and inspection costs reflect the cost of cleaning and inspecting both the interior and exterior of each tank or whether these costs only reflect the cost of cleaning and inspecting the exterior of each tank.

Response: The estimated tank cleaning and inspection costs reflect the cost of cleaning and inspecting the interior of each tank.

Q-7-25: Please state how often Petitioner paints and/or cleans the interior of each water storage tank in its system.

Response: Please see page 12 of <u>Petitioner's Exhibit 4</u> which specifically states how often Stucker Fork paints its tanks. In terms of cleaning, Stucker Fork completes this periodic maintenance tank every five (5) years.

Q-7-26: Please identify each account included in the \$436,160 of test year maintenance expense as reflected on page 13 of Petitioner's Exhibit 4, including the associated amount of maintenance costs for each account.

Response: The information responsive to this request has previously been provided to the OUCC on page 167 of the estimated operation and maintenance expense work papers.

Q-7-27: If any of the accounts provided in response to the previous question do not entirely consist of maintenance expense transactions, please provide, in Excel format, a list

of the maintenance expense transactions in each such account for test year maintenance expense.

Response: This information was provided as **Exhibit 1-10** in response to

OUCC Data Request No. 1-10 and is also included in Exhibit 7-

28 attached hereto.

Q-7-28: In response to OUCC Data Request No. 1-10, Petitioner provided test year maintenance expense by category. Please provide the same information in Excel format for calendar year 2024 (accounting adjustment period).

Response: Please see Exhibit 7-28 that is attached hereto.

Q-7-29: Please state (a) the date each storage tank was painted prior to the most recent tank painting provided in response to OUCC Data request No. 1-12 and (b) the cost of each of these paintings.

Response: Information responsive to this request was provided to the OUCC in Cause No. 44987.

In terms of the cost of such paintings, Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the Consumer Price Index ("CPI") to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance

expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Q-7-30: Please provide a copy of the invoice for each of the most recent tank paining costs as provided in response to OUCC Data Request No. 1-12.

#### Response:

Stucker Fork objects to this request on the grounds that it is unduly burdensome. Capital and periodic maintenance expense projects, such as tank painting, require months to complete and there are numerous invoices issued for such projects. To locate each of the individual invoices for tank painting would require significant time and expense to research and find. Stucker Fork would further note that its requested amount for tank paining is significantly less per tank than similarly situated utilities such as Edwardsville Water Authority. In Edwardsville Water Authority's most recent rate case, Cause No. 45997, Edwardsville requested and received approval for approximately \$203,000 in tank maintenance expense, yet Edwardsville owns, operates, and maintains less than one-half the number of tanks that Stucker Fork does. If the OUCC needs to review each of the individual invoices for the tank paining projects over the last 10-15 years, Stucker Fork can make such records available at its office.

Stucker Fork also objects to this request on grounds that it is not relevant and it will not lead to the discovery of admissible evidence. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance

items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objections above, attached please find Exhibit 7-30. This Exhibit details the final invoices for the most recent tank paintings. Stucker Fork would particularly note that tank No. 10, the Paynesville Road tank, cost \$575,500 to complete. On page 12 of Petitioner's Exhibit 4, Stucker Fork estimated a cost to paint this tank of \$400,000. Unfortunately, Stucker Fork's estimate was understated for this particular periodic maintenance expense item.

Q-7-31: Please identify the date and cost for each of the last two chemical well cleanings for each of Petitioner's five (5) wells and provide a copy of the invoice for the most recent chemical well cleaning for each of Petitioner's wells.

#### Response:

Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance

items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

Q-7-32: Please identify the date and cost for each of the last two well and pump maintenance events for each of Petitioner's five (5) wells and provide a copy of each invoice for the most recent well and pump maintenance costs incurred for each of Petitioner's wells.

#### Response:

Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance

items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

- Q-7-33: Please identify (a) the date and (b) cost for each of the last two maintenance events performed for each of the following items at the Austin water treatment plant. Please also provide a copy of the invoice for the most recent maintenance event for each item in each of these categories:
  - a. High service pump maintenance (8 pumps);
  - b. Low service pump maintenance (3 pumps);
  - c. Backwash pump maintenance (2 pumps);
  - d. Pump control valve maintenance (4 valves);
  - e. Plant production meter calibration (7 meters);
  - f. Turbidity meter maintenance (9 meters);
  - g. Generator maintenance (1 generator);
  - h. Filter maintenance (8 filters); and
  - i. Lagoon cleaning (1 lagoon).

#### Response:

Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than

1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see <u>Exhibit 7-28</u> which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in <u>Exhibit 7-28</u> tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

- Q-7-34: Please identify the (a) date and (b) cost for each of the last two maintenances performed for each of the following items at the Marble Hill water treatment plant. Please also provide the invoice for the most recent maintenance event for each item in each of these categories:
  - a. High service pump maintenance (3 pumps);
  - b. Backwash pump maintenance (1 pump);
  - c. Pump control valve maintenance (3 valves);
  - d. Plant production meter calibration (4 meters); and
  - e. Filter media maintenance (4 filters).

Response: Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible

evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

Q-7-35: Please identify the (a) date and (b) cost for each of the last two booster station maintenance events for each of Petitioner's three (3) booster stations and provide a copy of each invoice for the most recent booster station maintenance costs incurred for each of Petitioner's booster stations.

Response: Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented

that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

Q-7-36: Please identify the (a) date and (b) cost for each of the last two booster station pump replacements for each of Petitioner's three (3) booster stations and provide a copy of each invoice for the most recent booster station maintenance costs incurred for each booster station.

**Response:** 

Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital

projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

Q-7-37: Please state the number of pumps at each of Petitioner's booster stations and state the size of each pump.

Response:

Stucker Fork has two pumps at each of its booster stations. For booster station number 4, the motor sizes are 30hp; for booster station number 7, the motor sizes are 15hp; and for booster station number 8, the motor sizes are 20hp.

Q-7-38: Please identify the (a) date and (b) cost for each of the last two meter/control valve pit maintenance events for each of Petitioner's eleven (11) meter/control valve pits

and provide a copy of each invoice for the most recent meter/control valve pit maintenance costs incurred for each.

### **Response:**

Stucker Fork objects to this request on grounds that it is not relevant, it will not lead to the discovery of admissible evidence, and it is unduly burdensome. It is well documented that costs for performing periodic maintenance and capital projects over the last several years have significantly increased. Due to the volatility in pricing, any invoices that are more than 1-2 years old are simply too dated and cannot be relied upon as an accurate estimate of the prospective costs for performing periodic maintenance. In recognition of this inflationary environment, Stucker Fork used the previously approved periodic maintenance expense items and amounts from Cause No. 44987 and applied an inflation factor based upon the CPI to arrive at an estimate of periodic maintenance expense. To the extent Stucker Fork has performed periodic maintenance items within the last year, it has used these estimates as the basis for prospective periodic maintenance.

Stucker Fork chose to use the previously-approved tasks and amounts for periodic maintenance from Cause No. 44987 and an inflation factor that Stucker Fork hoped would capture or reflect the inflationary environment over the last 5-6 years. In certain instances, however, even the inflationary adjustment has been insufficient as the inflation for periodic maintenance expense items has increased at a pace greater than the inflation reflected in the CPI. By way of example, please see the response to OUCC Data Request No. 7-13 (where the actual cost of performing the services is greater than the inflationary estimate). Although Stucker Fork believes that its method of calculating the anticipated cost of periodic maintenance expense is the best approach, recent bids and costs suggest that Stucker Fork's proposed periodic maintenance expense for some tasks may be understated.

Notwithstanding the objection above, please see Exhibit 7-28 which details the periodic maintenance expense costs incurred by Stucker Fork from 2021 to 2024. Stucker Fork would further note that the periodic maintenance expense items identified in Exhibit 7-28 tie to and are reflected in Stucker Fork's Annual Report filed with the IURC.

# **Exhibit 7-18**



INVOICE

REM	нт то:
P.O.	Box 55

Phone (337) 738-4577

Franklin, (M. 46 ) SI.

Fax (317) 738-9295

Stucker Fork Water Utility
P.O. Box 274
Scottshurg IN 47170

DATE:

11/4/2024

INVOICE NO. 19319 - Job #5503-F

YOUR P.O. NO

Filter # 1 Marble Hill

DERMIS: NET TO DAYS.

1-1<mark>72% PER MO</mark>STIT WITE BE ADDED AFTER 30 Desc

A 9 R OF TREE

QUANTITY

DESCRIPTION

AMOUNT:

### Stucker Fork - Filter #1 - Media Replacement

Supply all labor, equipment and materials to remove all filter media, inspect filter interior, clean filter baffles, install support gravel, install filter media and chlorinate.

**Total Invoice Due** 

\$28,528.00

TAX EXEMPT : # \_\_\_\_

TAXABLE.



REMITTO:

P.O. Box 55

Franklin, IN 46131

Phone (317) 738-4577

Fax (317) 738-9295

Stucker Fork Water Utility
P.O. Box 274
Scottsburg, IN 47170

DATE:

11/6/2024

INVOICE NO. 19328 - Job #5503-F

YOUR P.O. No.

Filter # 2 Marble Hill

TERMS: NET TO DAY'S

1 1/2% PER MONTH WILL BE ADDED AT BER 30 for a

A.P.R. of 18%

Stucker Fork - Filter #2 - Media Replacement

Supply all labor, equipment and materials to remove all filter media, inspect filter interior, clean filter baffles, install support gravel, install filter media and chlorinate.

**Total Invoice Due** 

\$28,528.00

	3° A V 10 V 1	EMPT ' : II	en kanga ina minan mpanggari kanganakan kalimenta ya 1919 - P	The second secon
TAXABLE	TAA KAI	(IVO)   R	manus agram mercane e e e e e e e e e e e e e e e e e e	er e maggire skip i



	<i>s</i> '		INVC		Page 23 of 43
	GUM DERVICES AND ANGLES	REIMIT TO: P.O. Box 55	energy and a second particle and a second se		
<i>c</i> a :		Franklin, IN 46131 Phone (317) 738-4577	Fax (317)	738-9295	
S	tucker Fork Water Utility P.O. Box 274 Scottsburg, IN 47170		DATE:	11/11/2024	
			INVOICE NO.	19333 - Job #5	5503-F
· · · ·	Filter #3 - Marble Hill		YOUR P.O. NO.		
			TERMS: NET 10 14/2% PER MONT A.P.R. of 18%	) DAY). 'H WILL BE ADDED AI	FTER 30 DAYS
QUANTITY		DESCRIPTION			TMDOMA
	Supply all labor, equipment and minterior, clean filter baffles, install		lter media, ins		
			Total Inv	oice Due	\$28,528.00

TAX EXEMPT TAXABLE [ ]



REMIT TO: P.O. Box 55

Franklin, IN 46131

Phone (317) 738-4577

Fax (317) 738-9295

Stucker Fork Water Utility P.O. Box 274 Scottsburg, IN 47170

DATE:

11/20/2024

INVOICE NO. 19351 - Job #5503-F

YOUR P.O. NO.

Filter #4 - Marble Hill

TERMSONET 10 DAYS

1 1/2% PER MONTH WILL BE ADDED AFTER 30 DAYS

A.P.3. of 18%

	M.T. 11, 111 LO70	
QUANTITY	DESCRIPTION .	AMOUNT
	Stucker Fork - Filter #4 - Media Replacement	or age where the control of the cont
	Supply all labor, equipment and materials to remove all filter media, inspect filter interior, clean filter baffles, install support gravel, install filter media and chlorinate.	
	Total Invoice Due Filter #4	\$28,528.00
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	4.	
		engin sakan anaka kasa kasa ka sa sa sa sa sa Asa a 17

TAX EXEMPT

TAXABLE

# Exhibit 7-28

# Periodic Maintenance Tracker

Cumulative Balance	(\$318,944.00)	(324,509.00)	(327,711.50)	(328,122.99)	(328,997.99)	(330,989.80)	(336,382.13)	(342,161.01)	(343,635.15)	(348,205.15)	(349,895.15)	(381,807.90)	(383,405.17)	(390,303.17)	(391,356.96)	(397,933.96)	(401,151.96)	(419,949.46)	(422,527.40)	(426,037.64)	(428,292.53)	(430,041.65)	(434,220.65)	(448,622.65)	(455,012.65)	(456,040.65)	(461,300.65)	(463,673.11)	(470,474.61)	(472,283.61)	(472,425.61)	(472,735.61)	(475,996.68)	(477,198.68)	(481,097.68)	(482,825.68)	(484,055.68)	(485,555.68)	(486,453.68)	(492,261.68)	(493,401.68)	(497,323.41)	(500,405.88)	(505,894.88)	(506,539.88)	(509,157.84)	(509,957.04)	(511,110.47)	(527,130.85)	(528,105.85)
	(\$318,944.00)	(5,565.00)	(3,202.50)	(411.49)	(875.00)	(1,991.81)	(5,392.33)	(5,778.88)	(1,474.14)	(4,570.00)	(1,690.00)	(31,912.75)	(1,597.27)	(6,898.00)	(1,053.79)	(6,577.00)	(3,218.00)	(18,797.50)	(2,577.94)	(3,510.24)	(2,254.89)	(1,749.12)	(4,179.00)	(14,402.00)	(6,390.00)	(1,028.00)	(5,260.00)	(2,372.46)	(6,801.50)	(1,809.00)	(142.00)	(310.00)	(3,261.07)	(1,202.00)	(3,899.00)	(1,728.00)	(1,230.00)	(1,500.00)	(888.00)	(5,808.00)	(1,140.00)	(3,921.73)	(3,082.47)	(5,489.00)	(645.00)	(2,617.96)	(799.20)	(1,153.43)	(16,020.38)	(975.00)
Description	2020 balance carried forward	Austin WTP: High service pump maintenance	Austin WTP: High service pump maintenance	Austin WTP: Generator maintenance	Austin WTP: Filter maintenance	Austin WTP: Chemical feed pump maintenance	Austin WTP: Chemical feed pump maintenance	Austin WTP: Chemical feed pump maintenance	Austin & Marble Hill WTP: Hoist maintenance	Marble Hill WTP: Pump control valve maintenance	Austin WTP: High service pump maintenance	Austin WTP: Filter maintenance	Austin WTP: Chemical feed pump maintenance	Tank Cleaning and inspection	Booster Station maintenance	Well 5 Maintenance	Marble Hill WTP: Maintenance	Marble Hill WTP: Filter media maintenance	Booster Station maintenance (Booster 7)	Austin WTP: Generator maintenance	Austin WTP: Chemical feed maintenance	Austin WTP: Chemical feed maintenance	Marble Hill WTP: High service pump maintenance	Intake pump maintenance	Intake pump maintenance	Austin WTP Maintenance	Austin WTP Maintenance	Austin WTP Maintenance	Austin WTP Maintenance: High service pump maintenance	Austin WTP Maintenance: Fire extinguisher maintenance	Austin WTP Maintenance: Fire extinguisher maintenance	Marble Hill WTP: Fire extinguisher maintenance	Austin WTP Maintenance	Austin WTP Maintenance	Austin WTP Maintenance: UV System Maintenance / Bulb Repalcement	Austin WTP Maintenance: UV System Maintenance / Bulb Repalcement	Booster Station Maintenance: #7	Booster Station Maintenance: #9	Control Valve/Metering Pit Maintenance: Well 4	Control Valve/Metering Pit Maintenance: Well 4	Austin WTP Maintenance	Generator Maintenance	Chemical Feed Maintenance	Marble Hill WTP Maintenance	Marble Hill WTP Maintenance	Filter Media Maintenance	Pump control valve maintenance	Booster station maintenance #7	Water tank repainting and inspection	Well 1, 2, 3
Vendor		B H Electric	Bastin Logan, Inc.	Cummins Sales & Service	Bastin Logan, Inc.	Living Waters Company, Inc.	Cole Parmer	Cole Parmer	Brehob, Inc.	EIC Contractors, Inc.	EIC Contractors, Inc.	Bastin Logan, Inc.	Cole Parmer	Midco Diving & Marine	USA Bluebook	Bastin Logan, Inc.	EIC Contractors, Inc.	Bastin Logan, Inc.	B H Electric	Cummins Sales & Service	Living Waters Company, Inc.	Living Waters Company, Inc.	BL Anderson	Bastin Logan, Inc.		EIC Contractors, Inc.	EIC Contractors, Inc.	B H Electric	Bastin Logan, Inc.	Johnson Controls Fire	Johnson Controls Fire	Johnson Controls Fire		EIC Contractors, Inc.	Bastin Logan, Inc.	EIC Contractors, Inc.	B H Electric	B H Electric	EIC Contractors, Inc.	EIC Contractors, Inc.	EIC Contractors, Inc.	Cummins Sales & Service	Living Waters Company, Inc	EIC Contractors, Inc.	EIC Contractors, Inc.	Living Waters Company, Inc	BL ANDERSON	B&H Electric	Midwestern Engineers, Inc.	Bastin Logan, Inc.
Account Name		Trans & Dist Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Materials and Supplies	Water Treatment - Materials and Supplies	Water Treatment - Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Materials and Supplies	Trans & Dist Contractual Services	Property & Plant - Water	Water Treatment - Materials and Supplies	Trans & Dist Contractual Services	Trans & Dist Materials and Supplies	Water Treatment - Contractual Services	Trans & Dist Contractual Services	Water Treatment - Contractual Services	Trans & Dist Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Materials and Supplies	Water Treatment - Materials and Supplies	Trans & Dist Materials and Supplies	Water Treatment - Contractual Services		Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Adm & Gen - Contractual Services	Trans & Dist Contractual Services		Water Treatment - Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Trans & Dist Contractual Services	Trans & Dist Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Materials and Supplies	Water Treatment - Contractual Services	Trans & Dist Contractual Services	Water Treatment - Materials and Supplies	Trans & Dist Materials and Supplies	Trans & Dist Contractual Services	Adm & Gen - Contractual Services	Trans & Dist Contractual Services
Account		620.16	635.13	635.13	635.13	620.13	620.13	620.13	635.13	620.13	635.16	304.13	620.13	635.16	620.16	635.13	635.16	635.13	620.16	635.13	620.13	620.13	620.16	635.13		635.13	635.13	635.13	635.13	635.13	635.18	635.16		620.13	635.13	635.13	635.16	635.16	635.13	635.13	635.13	635.13	620.13	635.13	635.16	620.13	620.16	635.16	631.16	635.16
Date		02/01/21	03/01/21	03/15/21	02/15/21	01/18/21	02/01/21	03/15/21	01/04/21	01/18/21	06/07/21	04/19/21	04/05/21	05/17/21	04/05/21	06/21/21	08/16/21	07/06/21	08/16/21	08/16/21	10/04/21	10/04/21	10/04/21	01/04/22		01/17/22	02/07/22	02/21/22	01/04/22	02/07/22	02/07/22	02/21/22		06/20/22	6/6/2022	6/6/2022	6/20/2022	5/2/2022	4/4/2022	5/16/2022	7/18/2022	9/6/2022	9/19/2022	7/5/2022	9/19/2022	9/19/2022	10/3/2022	11/7/2022	11/7/2022	12/19/2022
Ouzrter	2020	2021 O1	2021 Q1	202: 01	202: 01	202: 01	202: 01	202: 01	202: 01	2021 Q1	2021 Q2	2021 Q2	2021 02	2021 02	2021 02	2021 Q2	2021 Q3	2021 Q3	2021 Q3	2021 Q3	2021 04	2021 Q4	2021 04	2022 01	2022 Q1	2022 Q1	2022 Q1	2022 Q1	2022 Q1	2022 Q1	2022 Q1	2022 Q1	2022 Q2	2022 Q2	2022 Q2	2022 Q2	2022 Q2	2022 Q2	2022 Q2	2022 Q2	2022 Q3	2022 Q3	2022 Q3	2022 Q3	2022 Q3	2022 Q3	2022 Q4	2022 Q4	2022 Q4	2022 Q4

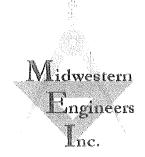
# Periodic Maintenance Tracker

Cumulative Balance	(531,371.85)	(732,296.85)	(747,229.89)	(747,811.89)	(750,431.89)	(750,843.38)	(751,293.38)	(751,743.38)	(752,463.38)	(757,663.38)	(770,711.88)	(773,056.88)	(777,631.41)	(779,995.41)	(1,124,845.41)	(1,146,324.32)	(1,146,696.32)	(1,147,107.81)	(1,150,927.81)	(1,161,890.46)	(1,168,104.00)	(1,174,212.00)	(1,190,943.75)	(1,194,352.13)	(1,260,445.85)	(1,265,645.85)	(1,274,015.85)	(1,303,740.85)	(1,304,508.85)	(1,306,329.06)	(1,312,829.06)	(1,319,329.06)	(1,323,685.42)	(1,324,085.42)	(1,324,485.42)	(1,344,730.36)	(1,348,052.36)	(1,349,152.36)	(1,351,154.82)	(1,352,029.82)	(1,514,434.82)	(1,520,750.57)	(1,521,460.57)	(1,525,321.83)	(1,529,548.39)	(1,735,198.39)	(1,749,873.02)	(1,752,704.96)	(1,755,599.86)	(1,854,329.86)
Amount	(3,266.00)	(200,925.00)	(14,933.04)	(582.00)	(2,620.00)	(411.49)	(450.00)	(450.00)	(720.00)	(5,200.00)	(13,048.50)	(2,345.00)	(4,574.53)	(2,364.00)	(344,850.00)	(21,478.91)	(372.00)	(411.49)	(3,820.00)	(10,962.65)	(6,213.54)	(6,108.00)	(16,731.75)	(3,408.38)	(66,093.72)	(5,200.00)	(8,370.00)	(29,725.00)	(768.00)	(1,820.21)	(6,500.00)	(6,500.00)	(4,356.36)	(400.00)	(400.00)	(20,244.94)	(3,322.00)	(1,100.00)	(2,002.46)	(875.00)	(162,405.00)	(6,315.75)	(710.00)	(3,861.26)	(4,226.56)	(205,650.00)	(14,674.63)	(2,831.94)	(2,894.90)	(98,730.00)
Description	Well 3	Tank painting	Tank painting/inspection	Intake Pump Maintenance	Austin WTP - Low Service Pump Maintenance	Austin WTP - Generator Maintenance	Austin WTP - Chlorine Crane Hoist Maintenance	Marble Hill WTP - Chlorine Crane Hoist Maintenance	Control Valve/Metering Pit Maintenance - Pepsi?	Intake Structure Cleaning	Intake Pump Maintenance	Austin WTP Maintenance	Austin WTP - Generator Maintenance	Control Valve/Metering Pit Maintenance - Tank 7	Tank Painting	Tank Painting	U.V. System Maintenance/Bulb Replacement	Generator Maintenance	Well 5 Maintenance	U.V. System Maintenance/Bulb Replacement	Marble Hill - Tank Cleaning and Inspection	Well 5 Maintenance	Intake Pump Maintenance	Austin WTP Maintenance: Generator Maintenance	Clearwell & Clarifier	Chain Link Fence Repair	Marble Hill WTP Pump control valve maintenance	Tank Painting	Control Valve/Metering Pit Maintenance - Tank 6	Austin WTB Maintenance: Chlorine Hoist	Austin WTP- High service pump maintenance	Austin WTP- High service pump maintenance	Austin WTP Maintenance: Chlorination Equipment	Booster station maintenance	Intake pump maintenance	Tank Painting	Booster station maintenance - pump	Booster station maintenance - pump	Booster station maintenance - pump	Marble Hill WTP Maintenance - voltage indicator 3, 4 and 5	Tanks 2&4 painting	Tanks 2&4 painting	Austin WTP Maintenance - backflow testing	Austin WTP Maintenance - Generator maintenance	Booster station maintenance - Henryville	Tanks 2&4 painting	Tanks 2&4 painting	Marble Hill WTP Maintenance - Chlorination equipment	Marble Hill WTP Maintenance - Chlorination equipment	Tanks 2&4 painting
Vendor	EIC Contractors, Inc.	O&J Coatings Inc	Midwestern Engineers, Inc.		B&H Electric	Cummins Sales & Service	Brehob, Inc.	Brehob, Inc.		Coomes Excavating	Bastin Logan, Inc.	Eic Contractors, Inc.	Cummins Sales & Service	Eic Contractors, Inc.	O&J Coatings Inc.	Midwestern Engineers, Inc.	B&H Electric	Cummins Sales & Service	Eic Contractors, Inc.	Trojan Technologies	B&H Electric	Eic Contractors, Inc.	Bastin Logan, Inc.	Cummins Sales & Service	Mitchell & Starke	ET Masonry		O&J Coatings Inc.	Eic Contractors, Inc.	Brehob, INC	Eic Contractors, Inc.	Eic Contractors, Inc.	Living Waters Company, INC	B&H Electric	B&H Electric	Midwestern Engineers, Inc	B&H Electric	B&H Electric	B&H Electric	B&H Electric	Currens Construction	Midwestern Engineers Inc	Thomas Plastic Machinery INC	Cummins Sales & Service	B&H Electric	Currens Construction	Midwestern Engineers Inc	Living Waters Company, INC	Living Waters Company, INC	Currens Construction
Account Name	Water Treatment - Contractual Services	TANK 10 & GROUND STORAGE	TANK 10 & GROTIND STORAGE		Trans & Dist - Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services		Trans & Dist - Contractual	Trans & Dist - Contractual	Trans & Dist - Contractual	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Tank 10 & Ground Storage	Tank 10 & Ground Storage	Trans & Dist - Materials and Supplies	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Property & Plant - Meter & Meter	Trans & Dist - Contractual	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Property & Plant - Water	Property & Plant - Water	•	Tank 10 & Ground Storage	Trans & Dist - Contractual	Water Treatment - Contractual Services	Property & Plant - Water	Property & Plant - Water	Water Treatment - Contractual Services	Trans & Dist - Contractual	Trans & Dist - Contractual	Contractual Svc - Engineering	Trans & Dist Materials and Supplies	Trans & Dist Materials and Supplies	Trans & Dist - Contractual	Water Treatment - Contractual Services	Tanks 2 & 4 - Painting project	Tanks 2 & 4 - Painting project	Trans & Dist - Contractual	Water Treatment - Contractual Services	Trans & Dist - Contractual	Tanks 2 & 4 - Painting project	Tanks 2 & 4 - Painting project	Water Treatment - Contractual Services	Water Treatment - Contractual Services	Tanks 2 & 4 - Painting project
Account	635.13	102.11	102 11	102:11	620.16	635.13	635.13	635 13		635.16	635.16	635.16	635.13	635.13	102.11	102.11	620.16	635.13	635.13	304.13	635.16	635.13	635.13	635.16	304.13	304.13		102.11	635.16	635.13	304.13	304.13	635.13	635.16	635.16	631.16	620.16	620.16	635.16	635.13	102.12	102.12	635.16	635.13	635.16	102.12	102.12	635.13	635.13	102.12
Date	12/19/2022	12/8/2022	12/19/2022	12/12/12/12	1/16/2023	2/6/2023	3/6/2023	3/6/2023		5/1/2023	6/5/2023	6/5/2023	5/15/2023	4/3/2023	7/3/2023	7/3/2023	8/7/2023	9/5/2023	9/5/2023	9/18/2023	9/18/2023	9/18/2023	10/2/2023	12/18/2023	2/19/2024	3/18/2024		4/1/2024	4/1/2024	4/15/2024	5/20/2024	6/17/2024	6/17/2024	6/17/2024	7/1/2024	7/1/2024	7/15/2024	7/15/2024	7/15/2024	8/5/2024	8/6/2024	8/6/2024	8/19/2024	8/19/2024	9/3/2024	9/4/2024	9/16/2024	9/16/2024	9/16/2024	10/7/2024
Quarter	2022 04	2022 034	3022 04	2023	2023 (21	2023	2023 (21	2023 Q1	2023 Q1	2023 02	2023 02	2023 02	2023 02	2023 02	2023 03	2023 03	2023 03	2023 Q3	2023 Q3	2023 Q3	2023 Q3	2023 03	2023 04	2023 04	2024 Q1	2024 Q1	2024 Q1	2024 Q2	2024 Q2	2024 Q2	2024 Q2	2024 Q2	2024 Q2	2024 Q2	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q3	2024 Q4

# Periodic Maintenance Tracker

Ouarter	Date	Account	Account Name	Vendor	Description	Amount	Cumulative Balance
2024 04	10/7/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Wells and pumps maintenance	(2,070.99)	(1,856,400.85)
2024 04	10/7/2024	635.16	Trans & Dist - Contractual	B&H Electric	Austin WTP Maintenance - lagoon cleaning/maintenance	(2,466.24)	(1,858,867.09)
, <del>2</del>	10/7/2024	102.11	ORAGE TANK	R Midwestern Engineers Inc	Tank Painting	(1,895.93)	(1,860,763.02)
2024 Q4	10/7/2024	102.12	TANKS 2 & 4 - PAINTING PROJECT	Midwestern Engineers Inc	Tanks 2&4 painting	(6,196.69)	(1,866,959.71)
. Q	10/21/2024	104.1	Marble Hill/Railroad Corridor	Mitchell & Starke Construction	Marble Hill WTP Maintenance - flow meter installation	(16,054.00)	(1,883,013.71)
2024 Q4	10/21/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Austin WTP Maintenance - high service pump maintenance	(1,977.30)	(1,884,991.01)
2024 Q4	10/21/2024	635.16	Trans & Dist - Contractual	B&H Electric	Austin WTP maintenance - flow meter	(986.51)	(1,885,977.52)
2024 Q4	11/4/2024	620.13	Water Treatment - Materials and Supplies	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(000:00)	(1,886,877.52)
2024 Q4	11/4/2024	635.13	Water Treatment - Contractual Services	Living Waters Company, INC	Marble Hill WTP Maintenance - Chlorination equipment	(3,898.00)	(1,890,775.52)
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1 2,3 & 4	(28,528.00)	(1,919,303.52)
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 12,3&4	(28,528.00)	(1,947,831.52)
2024 Q4	11/18/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1.2,3&4	(28,528.00)	(1,976,359.52)
2024 Q4	11/18/2024	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc	Austin WTP Maintenance - high service pump maintenance (pump 2)	(955.00)	(1,977,314.52)
2024 Q4	12/2/2024	104.1	Marble Hill/Railroad Corridor	Bastin Logan INC	Marble Hill WTP Maintenance - filter media maintenance, meters 1.2,3&4	(28,528.00)	(2,005,842.52)
2024 Q4	12/2/2024	635.13	Water Treatment - Contractual Services	Eic Contractors, Inc	Austin WTP maintenance - scada system	(3,079.00)	(2,008,921.52)
2024 Q4	12/16/2024	635.13	Water Treatment - Contractual Services	B&H Electric	Booster Station maintenance (Booster 7)	(1,192.96)	(2,010,114.48)
2024 Q4	12/17/2024	102.12	Tanks 2 & 4 - Painting project	Currens Construction	Tanks 2&4 painting	(51,865.00)	(2,061,979.48)

# Exhibit 7-30



Quality Engineering Services Since 1953

Consultants . Mechanical . Electrical . Civil

R. DERICK WIGGINS, P.E. CLINT W. ROOS, P.E. TREY M. KIDWELL, P.E MARK M. SULLIVAN, P.E. ALAN F. BURCH, P.E. NATHAN J. WALKER, P.L.S. BRANDON A. PARKER, P.L.S.

December 7, 2024

Stucker Fork Conservancy District 2260 N. US Highway 31 Austin, IN 47102

ATTN: Board of Directors & Randy Needler, Superintendent

Re:

Repainting of the 100,000 Gallon Elevated Tank No. 2 (Little York) And the 100,000 Gallon Elevated Tank No. 4 (Commiskey)

Current Contractor Pay Request

MEI # 2023009-03

All:

Enclosed please find one (1) copy of Partial Pay Application No. 4 from Currens Construction Services, LLC for the above referenced project in the amount of \$51,865.00. The amount due is as follows:

	Pay App. #4
Work Completed	\$518,650.00
Materials Stored	\$0.00
Sub-Total	\$518,650.00
Less Retainage	(\$0.00)
Less Previous Payments	(\$466,785,00)
Amount Duc	\$51,865.00

This Pay Application No. 4 includes work completed from 9/23/2024 through 12/1/2024. Midwestern has reviewed and approved the pay request and recommends your consideration of approval. If acceptable and approved, please execute where indicated then return a copy to me.

Should you have any questions or need additional information, please advise. Thank you for your continued confidence in Midwestern Engineers, Inc. We greatly appreciate the opportunity to work with you.

Respectfully,

MIDWESTERN ENGINEERS, INC.

Alan F. Burch, P.E., M.B.A. Senior Project Engineer/CFO

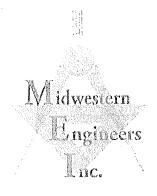
AFB/can

EICOCI	Contractor's	Contractor's Application for Payment No.	Payment No. 4 (Retainge)	
ENGINEERS JOINT CONTRACT DOCUMENTS COMMITTEE	Application Period:		Application Date:	
To (Pener):	From (Contractor):		Va (Engineer):	
Stucker Fork Conservancy District	Currens Construction Services, LLC		Midwestern Engineers, Inc	
Project: Repainting of the Little York (Tank ±2) and Commiskey (Tank #41 Elevated Tanks	Contract: k N/A			
Owner's Contract No.:	Contractor's Project No.:		Engineer's Project No.:	
N/A	NiA		NEI Project No. 2023009-03	
Application For Payment	neat			
Approved Change Orders	nary	1. ORIGINAL CONTRACT PRICE	PRICE 5 5520,656.00	90 <del>0</del>
Whenhor	Dadacione	2 Not observe by Chance Order		
	SIGNATURE OF THE PROPERTY OF T	3. Current Contract Price (Line 1 ± 2)		9.00
		4. TOTAL COMPLETED AND STORED TO DATE	ND STORED TO DATE	
		(Column F total on Progress Estimates)	ss Estimates)	0,00
		S. RETAINAGE:		
		a. 16% X	X S518,650,00 Work Completed S	į
		.si	X Stored Material 5	
		c. Total l	c. Total Retainage (Line S.a + Line S.b) S	
		6. AMOUNT ELIGIBLE TO DATE (Line 4 - Line 5.c)	DATE (Line 4 - Line 5.c) S \$518,650.08	0.08
TOTALS		7. LESS PREVIOUS PAYM	rom prior Application	5.00
NET CHANGE BY		8. AMOUNT DUE THIS APPLICATION	PLICATION. S SSI,865.00	100 Includes all retainage held on Pay Applications #1-3
CHANGE ORDERS		9. BALANCE TO FINISH (Column G total on Progre	BALANCE TO FINISH (Column G total on Progress Estimates + Line S.c. above)	00 metudes \$1.000/tank for anniversary inspections in Pall 2025
Contractor's Certification				
The undersigned Contractor certifies, to the best of its knowledge, the following:	dge, the following:	Payment of: S	のでいるので	
(1) All previous progress payments received from Owner on account of Work done under the Contract	ccount of Work done under the Contract		(Line Sor other - answerensking of the other amount)	
inve treet appared on account to distangle Contractor's region with the Work cowered by prior Applications for Payment, On This to all World accounted and contractor incommend	are obligations incurred in connection		The state of the s	e comment
(2) The to an Avola, materials and epigenment incorporate at side who is one-waye tisce in or convered by this Application for a payment, in gas to Owarer at time of payment free and clear of all Lices, security interests and encumbrances freeces used as are covered by a bond accompanie, to Oware Lices, security interests and encumbrances freeces used as are covered by a bond accompanie, to Oware	sard work, or otherwise lister in or it sime of payment free and clear of all ecovered by a bond acceptable to Owner	is recommended by.	(Engineer) (Date)	- I
indomnifying Owner against any such Liens, security interest, or encumbrances), and (3) All the Work covered by this Application for Payment is in accordance with the Contract Documents	or encumbrances); and accordance with the Contract Documents		00.53.00	
and is not defective.		rayment of:	ر ا	
		is approved by:	7	
Contractor Signature			(Owner) (Date)	
By: Lel Ban	Date: 12/2/2025	Approved by:		
	- 10		runding or rinancing Entry (if applicable) (Date)	

EVCDC® C-420 Contractor's Application for Psymens 4) 2013 National Seciety of Professional Engineers for EICDC. All rights reserved. Page 1 of 1

Progress Estimate - Currens Construction Services, LLC.

Particular   Par	pilication Period:	923/2024 - 12/12624				۲	delication Date:		1100001							
A							The second second									
No. of the control						_	8	S	A			떠		Ŀı		ပ
10. SECALAMAN DEFINITION   1.0. SECALAMAN DEFINITION   1	Bid Item No.		Usk	Bid Quantity	, 5 	alt Proce	Bid Value	Installed Previously	Installed This Period	Total Quantity Increlled	Total Installe Value		ļ	sted and Date	(F/B)	Balance to Finish (B - F)
	hedult A - Little 1	Vork (Tank #2) - \$262,680.00 TOTAL					ÿ									
Statistic State   St	-	Mobilization / Demobilization, Safety Health and Environmental Co	57	7	s	10,mag,no   S	10,000,00	1.00		1,000		00		L	-	- 8
Accordance of Triangle Control	2	TCLP Testing	รา	-1	s	\$ 00,00	2,000,00	C80.7		7.00		90		2,000.00	Т	s.
Statistic Contention of Contention Content	3	Complete Sandblast and Repairt of Interior of Tank	SJ	-	'n	40,400.00	10,400,00	1.50		1.00	S 40,400.	90	*	↓_	T	\$
Activation of Control	7	Complete Sandblast and Repaint of Exercise of Tank	SJ	-	5	105,0111.00 S	115,000,00	1,00		1,00		00		ļ_	1	S
Stient State	5	Install and Maintain Containment System	ડા		8	67,000,00	00,000,00	28.		1,00	ĺ	00		L	Τ	*
Station of south	9	Remove Existing Manway and Replace with 24" Diam. Manway	ST	_	2	\$ 00.00C+	1,300.00	00.1		1.00		8		ļ_	1	s.
Estation Excepting Machine Laber Asset Laber         1.5         1.9         5. MORIDO         1.0         5. MORIDO         1.0         5. MORIDO         5. MORIDO         1.0         5. MORIDO         5. MORIDO         1.0         5. MORIDO         5. MORIDO         1.0         6. MORIDO         1.0         6. MORIDO         1.0         7. MORIDO         1.0         6. MORIDO         1.0         7. MORIDO         8. MORIDO         1.0         9. MORIDO         8. MORIDO         1.0         9. MORIDO         8. MORIDO         9. MORIDO	*	Remove Existing Angle Iron Electrical Panel France	2.1	-	149	-		1.00		1,00		00	S	Ļ.	100,0%	8
Examine Descoy Labeler of Safety Clinch         L.S.         1         S.         1,000,00         1,00         S.         2,000,00         S.         9,000,00         S.         S,000,00         S.         9,000,00         S.         S,000,00         S.         S,000,00         S.         S,000,00         S.         S,000,00         S.         <	×	Remove Existing Exterior Balcony Access Ladder	2.5	-	n	X00.00		1.00		1.00		90	S	ļ.,	+	S
Signature (Seed According Labert)         1.5         1.0000         1.00	9	Install New Exterior Balcony Ladder w/ Safety Clinto	SJ	-	s	9,94KL00 \$		1.03		1.00		co		L	†-	S
Company Port Decided Front Decide Front Decided Front Decided F	10	Remove Existing Revolving Reof Access Ladder	23	-	5	800.00		1.00		1.00		00	٠.	Ļ	-	S
Rigination Enviloation         LS         1         Support         Support         1         Support         Supp	=	Install New Exterior Roof Acaess Ladder w/ Safety Climb	SJ	_	~	2,801.00		1.00		1,00		8		L	1	s.
Registed Control. The Control of State of S	12	Remove Existing laterior Bowl Ladder	SJ	-	\$	800.008		68		00.1		Ŕ	s	Ļ.	T	s.
State   Stat	5	Install New Interior Bowl Ladder w/ Safety Climb	SJ	-	s	3,700.00 \$		1.91		1,30		00		L	H	5
Stationary   Sta	*	15	53		2	\$ 200.00	5,900,00	1,00		1.30		00		_	-	u
1, 10, 10, 10, 10, 10, 10, 10, 10, 10,	15	Remove and Replace Overflow Screen	FT.	_	S	\$ 00.009	600,000	80.		1.00		60	8	L	-	S
Responded Cond Under Resulting Base Plants         15         1         5         2.750.00         1         6         2.750.00         1         6         2.750.00         1         6         2.750.00         1         6         1	16	Install Hinged Safety Grate Over Riser Opening	S	-	۵	3,500.00	3,990,00	90'1		1,00		00				s
State   Stat	17	Remove and Replace Growt Under Riser/Leg Base Plate	33		۳,	2,750,00 \$	2,750,00	1,00		1.00		3		2,750.00	-	
And Description Solitory Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         1 (2000) Controller         2 (2000)	8.	One (1) Year Anniversary Inspection	53	-	\$	1,00000	1,000,00				s		s	_		\$ 1,000,0x
100   100	heiliste B - Comuns	iskey Tank (Tank #4) - S258,050 AB TOTAL														
15   15   15   15   15   15   15   15	1	Mobilization / Demobilization, Safety Health and Environmental Co	57		*	10,000,00		1.00		1.90		00		0.000.00		
Authorite and Repaired Clark  LS 1 1 8 11/10RNOO 1 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 100 15 10 10 10 10 10 10 10 10 10 10 10 10 10	7	TCL.P Testing	1.5	-7	S	\$ 90.008	2,000,00	4,00		4,90		GG)				
And Designation of Exercised Tasky         LS         1 S         5 (1/1000000)         1 (100         S         1 (100)0000         1 (100)         S         1 (100)0000         1 (100)         S         1 (100)0000         S         1 (100)0000         S         5 (1/100000)         S         7 (1/100000)         S         7 (1/10000)         S         7 (1/100000)         S         7 (1/100000)         <	۲	Complete Sandblast and Repaint of Interior of Tank	รา		\$	39,500,00	39,500,00	1.00		1,90		0:0				
19   19   19   19   19   19   19   19	7	Complete Sandblast and Repaint of Exterior of Tank	SI		s	rationares s	101,000,101	1.00		1,90	-	00		1,900,00		
stand Replace vill 3.1 Den. Manney         1.5         1.30 LOG         1.00         1.00         1.00         5         1.30 LOG         1.00 CM         1.00         5         1.30 LOG         1.00 CM         1.00         5         1.30 LOG         1.00         1.00         5         1.30 LOG         1.00         1.00         5         950 LOG         1.00         1.00         5         950 LOG         1.00         1.00         5         950 LOG         5         7.00         1.00         5         950 LOG         1.00         1.00         1.00         1.00         1.00         1.00         1.00         1.00         1.00         1.00         1.00         1.0		Install and Maintain Contamment System	SI	-	3	57, man, 00		1,00		1,00		98		7,000,00	100,0%	s
sing Agele From Electrical Panel Frame         15         95000         100         5         95000         100         5         95000         100         5         95000         100         5         95000         100         100         5         95000         100         100         6         95000         100         100         6         95000         100         100         6         95000         100         100         6         80000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         8         95000         100         100         100         8         95000         100         100         100         8         95000         100         100         100         8         95000         100	9	Remove Existing Manuay and Replace with 24" Dism. Manuay	57		\$	\$ 00'00E't	**	1.09		1.00	7	00	7	1,300,00	7	·
Station of Station State Exercity Ballonery Access Ladder         LS         1         5         WRIGOR         1         6         SWOOD         1         6         SWOOD         1         6         SWOOD         1         6         SWOOD         1         7         5         SWOOD         5         3         7         7         3	7	Remove Existing Angle Iron Electrical Panel Frame	รา		s	950,00   \$	00'056	1.09		1.00		90		_	tun'u.	· ·
Exterior Beleave Ladder w Safety Clamb         LS         1,80,000         1,80,000         1,00         5         9,50,000         1,00°         5         9,50,000         1,00°         5         9,50,000         1,00°         5         9,50,000         1,00°         5         9,50,000         1,00°         5         9,50,000         1,00°         5         9,50,000         1,00°         5         2,50,000         1,00°         5         2,50,000         5         2,50,000         1,00°         5         2,50,000         5         2,50,000         1,00°         5         2,50,000         5         2,50,000         1,00°         5         2,50,000         5         2,50,000         1,00°         6         8         2,50,000         1,00°         6         8         8         1,00°         8         3,50,000         1,00°         8         3,50,000         8         3,50,000         1,00°         8         3,50,000         8         3,50,000         1,00°         8         3,50,000         1,00°         8         3,50,000         1,00°         8         3,50,000         1,00°         8         3,50,000         1,00°         8         3,50,000         1,00°         9         3,50,000         1,00°         1,00° <td>æ</td> <td>Remove Existing Exterior Balcony. Access Ludder</td> <td>1.5</td> <td>-</td> <td>s</td> <td></td> <td></td> <td>1.00</td> <td></td> <td>1.00</td> <td></td> <td>90</td> <td></td> <td>_</td> <td></td> <td>, v</td>	æ	Remove Existing Exterior Balcony. Access Ludder	1.5	-	s			1.00		1.00		90		_		, v
static Revolving, Road Access Ladder         LS         1         5         WRADO         1 km         6         SERDIO         5         STATUGO         1 km         6         SERDIO         5         STATUGO         1 km         6         SERDIO         6         7         STATUGO         1 km         6         STATUGO         1 km         6         STATUGO         1 km         6         STATUGO         1 km         6         STATUGO         1 km         7         STATUGO         1 km         7         STATUGO         1 km         7         STATUGO         1 km         8         1 km         8         1 km <td>a)</td> <td>Install New Exterior Bakeasy Ladder w/ Safety Climb</td> <td>57</td> <td>ī</td> <td>S</td> <td>9.300,00</td> <td></td> <td>1,00</td> <td></td> <td>1.00</td> <td>6</td> <td>90</td> <td></td> <td>_</td> <td>1993.0%</td> <td></td>	a)	Install New Exterior Bakeasy Ladder w/ Safety Climb	57	ī	S	9.300,00		1,00		1.00	6	90		_	1993.0%	
Exterior Roy Aucrost adder wit Staffy Climb  LS 1 S 2,800.00 S 2,800.00 100 S 2,800.00  Staff blook between the control of the	10	Remove Existing Revolving Roof Access Ladder	SI	-	\$	\$ 00'00k		1.00		1.00		90		_	Н	۰.
state planeric Bent Laddar         LS         1         S         RB010         S         100         S         NU10         S	=	install New Exterior Roof Access Ladder w/ Salety Climb	รา	-	s	2,500.00		1.150		당.		96		4	7	\$
Instruct Bond Lack Washington         LS         1         5         3.78 mol o         1 mol o         5         3.78 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         1 mol o         5         3.78 mol o         1 mol o         2         3.78 mol o         3         3	12	Remove Existing Interior Bowl Ladder	27		S	S CO'DON		1.00		1.60		8	İ	_	_	S
strictly Vert vital New Administrar Proof Proof Verd         LS         1, 00 to 10         1, 00 to 10         5, 500 to 10         5, 500 to 0         100 to 75         1, 00 to 1         <	13	Install New Intersor Boyrl Ladder w/ Safety Climb	เ	-	s	3,780,00 \$		1.00		COO.		. do			100001	
Repine Overlation Service         LS         1         5         640100         1         7         640100         1         640100	rı	Replace Existing Vent with New Aluminum Frast Proof Vent	277		v.	5,900,000,8		1.03		1.00		93				s
and Sakey Grates Over Risare Opening.  LS 1 S 3,900,200 S 3,900,200 S 3,900,200 B 1,000 B 1,000 B 3,900,200 B 2 3,	15	Remove and Replace Overflow Server.	2	-	s	5 00,000	06,906	1,00		1.90		8				,
Replace Consult Under Resert Leg         LS         1         5         2.750.00         1,00         5         2.750.00         100 Interest         5         2.750.00         100 Interest         5         2.750.00         100 Interest         5         2.750.00         100 Interest         5         7.750.00         100 Interest	91	Install Hinged Safety Grate Over Riser Opening	ม	-	8	3,930,00	3,900,00	1.00		1.90		90		L		
Indications         LS         1         S         750,00         1,00         S         750,00         S         750,00         S         100,00         S         100,00         S         S         -         -         S         -         -         S         -         -         S         -	17	Remove and Replace Grout Under RisenLeg Buse Plate	S	-	s	2,750,00 \$	2,750,00	29.		5.	\$ 2,750.	013				
Admiversary Inspection 1.5 1 S 1, Januarpo S 1, 600,000 S - S - S S S S S - S	25	Remove Canduit and Fastanars From Southeast Leg Drop	SI		S	250.00 S	750.90	87		1.60		30	s			٠.
EA S	19	One (1) Year Anniversary Inspection	1.5		u,	1,000.00	3,000,00				, u		y.			30,000,1
EA S	beduke C - Urit Ps	rice Bid items														
	1	Pt Welding	æ		2	10.30							-	_	-	



Quality Engineering Services Since 1959

## Consultants . Mechanical . Electrical . Civil

JOHN W. WETZEL, P.E. R. DERICK WIGGINS, P.E. MARK M. SULLIVAN, P.E. ALAN F. BURCH, P.E. CLINT W. ROOS, P.E. NATHAN J. WALKER, P.E.S. BRANDON A. PARKER, P.E.S

March 22, 2024

Stucker Fork Conservancy District 2260 U.S. Highway 31 Austin, 1N 47102

Attn: Board of Directors and Randy Needler, Superintendent

RE:

Water System Improvements

Rehabilitation and Repainting of the

Existing 500,000 Gallon Marble Hill Ground Storage Tank and the Existing 500,000 Gallon Tank No. 10 Elevated Water Storage Tank

March Contractor Pay Request MEI Project #2021009-08

Dear Board of Directors and Mr. Needler:

Please find enclosed copy of Pay Request No. 3 from O&J Coatings, Inc. for the above referenced project in the amount of \$29,725.00. The amount due to O&J Coatings, Inc. is as follows:

	O&J Contings, Inc.
	Pay Request No. 3
Work Complete	\$575,500.00
Materials on Hand	<u>\$0.00</u>
Sub-Total	\$575,500.00
Less Retainage	(\$0.00)
Less Previous Payment	(\$545,775.00)
Amount Duc	\$29,725.00

The O&J Coatings, Inc. (O&J) pay request includes release of retainage on the project and work completed on the anniversary inspection of the 500,000 gallon ground storage tank at the water treatment plant. They have not completed the anniversary inspection for the elevated storage tank (this will happen summer 2024). The amount requested would pay O&J for all work completed to date and would release all retainage held on the project. The only remaining amount to be completed is \$1,000.00 for the elevated tank anniversary inspection.

Midwestern has reviewed and approved the pay request; we recommend your consideration of approval. If approved, please sign the request where indicated and return a copy for our records.

A spreadsheet presenting a summary of the pay requests to date, as well as the amount of drawdowns from local funds, is included for your review and use. Midwestern Engineers, Inc. will not be submitting a pay application this month. Should you have any questions, please advise. Thank you for your confidence in Midwestern, we greatly appreciate the opportunity to work with you.

Respectfully,

MIDWESTERN ENGINEERS, INC.

Eddison K. Peters, E.I. Asst. Project Engineer

EKP/ckp

Enclosures

802 W. BROADWAY ST. • P.O. BOX 295 • LOOGOOTEE, IN 47553 • P: 812-295-2800 6809 CORPORATE DRIVE • INDIANA POLIS, IN 46278 • P: 317-334-0262

meinc@midwesterneng.com • www.midwesterneng.com

ACEC
AMERICAN COUNCIL OF ENGINEERING COMPANIES
of Induses

			Contr	actor's A	plication for	Payment No.	3	
			Application	06/20/2023 TO		Application Date:	2/27/2024	
To STUCKER FORI	K CONSERVAN	CY DISTRICT	From (Contract	or): O&J COATING	s, INC.	Via (Engineer):	MIDWESTERN ENGINE	ERS, INC.
Project AND THE EXIS	TING 500,000 G	AL TANK	Contract:					State of the state
NOIOELEVATI Owner's Contract No.:	ST-22-01-10	.AI\.	Contractor's Pro	oject No.:	2021009-08	Engineer's Project No.:	2021009-08	a papaganga paga nagamana namata Andria and the William
annegia e se descentira de Vidada de la segui de la segui de Segui de Carrella de La companya de La companya d	Applicatio	m For Payment						
	Change C	order Summary						
Approved Change Orders			·				\$	
Number	Addi	tions	Ded	actions			\$	
W. A. C. C. C. C. C. C. C. C. C. C. C. C. C.	Cost (\$)	Calendar Days	Cost (\$)	Calendar Days			5	\$576,500.00
						FED AND STORED TO		
						Progress Estimates)	5	\$575,500.00
					5. RETAINAGE:			
NO CORNER NO CONTROL OF THE PARTY OF THE PAR		ļ			я. 5%	Х	_ Work Completed 5	***************************************
· Apply and the company of the compa		ļ <u></u>			b. 5%		Stored Material	
of special constants of Parish States and St					f	Retainage (Line 5.a +5.1		
							Ane 5) S	74EAMON1241-1-1
					t .		n prior Applientian) 8	
TOTALS		ļ						
NET CHANGE BY					9. BALANCE TO FINI	ISH, PLUS RETAINAG	E	\$1,000.00
CHANGE ORDERS					Í			
								*************************
					1			\$29,725.00
					Payment of:	/1 : 9 11	r - attach explanation of the	
Contractor's Certification The undersigned Contractor (1) All previous progress pay	certifies, to the b	est of its knowled	lge, the following	g: lone under the		Eddison K. Peters		3/22/2024
Contract have been applied connection with the Work co	m account to disc overed by prior A	charge Contractor pplications for Pa	's legitimate obli syment;	igations incurred ir		***************************************	(incer)	(Date)
(2) Fitle to all Work, material covered by this Application all Liens, security interests, t	for Payment, will	nase to Owner at	time of paymen	it free and clear of	Payment of:	\$		\$29,725.00
to Owner indemnifying Own (3) All the Work covered by Documents and is not defect (1) Protect days remaining to	er against any su this Application ive.	ich Liens, security for Payment is in	y interest, or enc accordance with	umbrances); and the Contract	is approved by:	(Line 8 or othe	r - attach explanation of the	other amount)
remaining in accordance with the "content central days" for change order, and reflected s	h the Contract Di r previous time ii	ocuments as of th	e date of signam	re. No adjustments		(O)	wner)	(Date)
,					Approved by:			(15
Contractor Signature			·		-	Funding or Financin	g Entity (if applicable)	(Date)
The formal of			Date:		1			

riogiess estimat	riogics estimate - Om Fine work													
For (Contract);	FXIXTING S01,900 GAL MARBLE HILL GST AND THE EXISTING S01,306 GAL TANK NOIG ELEVATED WATER STOBAGE. FANK	SELE HILL	GST AN	O THE EXISTIN	G SBURGO GAL TA:	NK NOI0 ELE	IVATED WAT	er storage	ETANK			Application Number:	mber	er.
Estimate Period:				146/260/2023	16/2/12/02/2 TO 02/27/2024							Application Date:	10:	
	K				æ	υ	c	513	u.	o	Е		ſ	¥
	ltem		Con	Contract Information			Estimated	Estimated	17.11.7					
Sid hon Ye.	Description	item Quantity	nits.	Unit Price	Total Value af Nem (S)	Previously Billed	Quantity Billed This Period	Quantity Rifted to Date	Silled This Period	Value of Work Billed To Date	Materials Proxontly Stored (not in C)	Total Complet and Stored to Date	ķ	Balance to Finish (B - F)
CST	MOBILIZATION:DEMO SAFETY HEALTH AND ENVIRON-	-	33	\$5,000	00,000,62		59		50,00	\$5,000.00	96.90	\$5,000,00	100.0%	59.60
	TCLP TESTING (2 INTERIOR, 2 EXTERIOR)	v	S	\$500	\$2,940,00	••	•	~	80.00	\$2,000.50	(AC'US	\$2,000,00	100,007	\$0.09
	COMPLETE SANDBLAST/REPAINT INTERIOR OF TANK	-	S	\$100,000	\$100,000,00		0		\$0.00	\$100,900,00	20.00	\$190,000,00	100.0%	\$0.00
	COMPLETE SANDBLAST/REPAINT EXTERIOR OF TANK	-	i,	\$100,000	\$100,000,00	_	3		\$0.00	\$100,000,00	80.00	\$100,000,00	100.0%	50.00
	REPLACE MANWAY GASKET	CI	5.3	5500	\$1,000,00	7	9	e-i	50.00	\$1,000.00	00'0S	51,000,00	100.0%	50,00
	REPLACE EXISTING MANWAY NUTS AND BOLTS	7	S.	\$1,000	52,900.00	- 2	o	r-1	\$0.00	\$2,000.00	00.02	00.000,52	100.0%	S0,02
	REPLACE EXISTING ROOF HATCH NUTS AND BOLTS	L!	S.	\$500	\$1,000,00	-7	0	r-1	06.08	\$1,000.00	80.00	\$1,000,00	100.0%	\$0.00
	INSTRALL NEW CABLE TYPE FALL PREVENTION SYSTEM	-	23	\$3,000	53,900.00	-			00.0%	53,000.00	20.00	53,090.00	100.0%	\$0.00
	MODIFY EXISTING OVERFLOW SCREEN	-	si	\$500	\$500.00	-			50,50	\$500.00	50.02	5500.00	%0.001	\$0.00
	ONE YEAR WARRANTY INSPECTION	-	S.	\$1,040	\$1,000,00	0			51,000,00	00'060'':S	06.02	\$1,000.00	100.0%	50.00
=	MOBILIZATION/DEMO SAFETY HEALTH AND ENVIRON-	-	3	\$5,000	\$5,000.00	-	е		\$0,00	\$5,040.00	\$0.03	55,000,00	100.0%	SOLPH
ELEVATED 2 TCLPT	TCLP TESTING (2 INTERIOR, 2 EXTERIOR)	4	3	S500	52,4881,00	"	0		\$0.00	52,000.00	\$0.00	\$2,090,00	100.0%	20.00
ELEVATED 3 COMPL	COMPLETE SANDBLAST & REPAINT INTERIOR OF TANK		SJ.	\$120,000	\$120,000.00	-	0		00.02	\$120,000.00	20.02	\$120,000,00	100.0%	20:00
	COMPLETE SANDBLAST & REPAINT EXTERIOR OF TANK	-	Z.	51%2000	\$180,000,00	-	0		00'000'0818	\$180,000.00	\$0.00	2180,000,00	100.0%	SC.00
ELEVATED S INSTAL	INSTALL AND MAINTAIN CONTAINMENT SYSTEM	-	15   5	Saturn	00'000'01'S	1	0		\$6.60	\$40,000.00	\$0.00	00'000'C±S	100.0%	Sc.na
ELEVATED & REPLAC	REPLACE RISER MANWAY GASKET	-	2	\$500	\$540,00		•		\$0.00	\$500,00	50,00	\$500,003	100.0%	Sc.0c
ELEVATED 7 REPLAC	REPLACE EXISTING RISER MANWAY NUTS AND BOLTS		S	51,003	00,000,13		۵.		\$1,090.12	\$1,500,00	\$0.00	\$1,000,00	100.0%	50.00
ELEVATED'S REPLAC	REPLACE EXISTING ROOF HATCH NUTS AND BOLTS	16.	Ð	\$500	\$1,500.00	3		0	\$0.00	51,500.00	\$0.00	\$1,500.00	100.0%	\$0.00
ELEVATED 9   REMON	REMOVE AND REPLACE EXTERIOR SAFETY CLIMB SYSTEM		15	\$2,000	\$2,006.00		ď		50,60	\$2,000.00	\$0.00	\$2,000.00	100.0%	Sc.nc
ELEVATED 10 REMOV	ELEVATED 10 REMOVE AND REPLACE INTERIOR SAFETY CLIMB SYSTEM	-	3	83,000	53,000,00	-			\$0.00	\$3,000,00	\$0.00	83,000.00	100.0%	So.nc
SLEVATED 11 REPLA	ELEVATED 11 REPLACE EXISTING INTERIOR BOWL LADDER BOLTS	r	LS.	\$1,000,00	\$1,600,000	-	D		20.00	\$1,000.00	50.00	S1,000,00	109.0%	50,00
ELEVATED 12 MODIF	ELEVATED 12 MODIFY EXISTING OVERFLOW SCREEN	-	S	\$1,000.00	\$1,000.00	_	0		\$0.00	\$1,000.90	00.00	\$1,000.00	100.0%	\$6.00
ELEVATED 13 INSTAL	ELEVATED 13 INSTALL HINGED SAFETY GRATE OVER TOP OF RISER	+-	rs.	\$3,000.00	53,000,00		9		\$0.00	\$3,000,00	\$0.00	\$3,000,00	100.0%	S0,00
ELEVATED 14 ONE Y	ELEVATED 14 ONE YEAR WARRANTY INSPECTION	4-	rs	51,000,00	\$1,000,00	0	6	0	\$0.00	\$0.00	50.00	\$0.00	0.0%	\$1,000.00
	TOTAL CONTRACT		-		\$576.500.00				\$182,600.00	\$575,500.00	\$0.90	5575.509.00	100,0%	51,000.00

STUCKER FORK CONSERVANCY DISTRICT

WATER SYSTEM IMPROVEMENTS

REHABILITATION AND REPAINTING OF THE EXISTING 500,000 MARBLE HILL GROUND STORAGE TANK AND THE EXISTING 500,000 GALLON TANK NO. 10 ELEVATED WATER STORAGE TANK PAY REQUESTS (AS OF 3/22/2024)

MEI# 2021009-08

filename: stuckerforktankrepaintpayrequest

	O&J Coatings, Inc. Work Completed	inc. eted	O&J Coatings, Inc. Materials on Hand	k province of concluding for Con-	O&J Coatings, Inc. Total Project	0 1
Pay Request #1 - September, 2022 Retainage #1 Pay Request #2 - June, 2023 Retainage #2 Pay Request #3 - March, 2024 Retainage #3	\$200,925.00 \$344,850.00 \$29,725.00	\$10,575.00 \$18,150.00 (\$28,725.00)	\$0.00	\$0.00 \$0.00	\$200,925.00 \$344,850.00 \$29,725.00	\$10,575.00 \$18,150.00 (\$28,725.00)
TOTAL TO DATE	\$575,500.00	\$0.00	\$0.00	\$0.00	\$575,500.00	80.00
Original Contract Amount Change Order No. 2 Current Contract Amount % Requested To Date % Paid To Date	\$576,500.00 N/A \$576,500.00 99.8%					
Project Financing Post-Bid Budget Budget Increase (Change Order) SFW Total Budget	\$681,500.00 <u>N/A</u> <b>\$681,500.00</b>					
Payment of Requests	Local Funds	Total Funds				
No. 1 (August, 2022) No. 2 (September, 2022) No. 3 (June, 2023) No. 4 (March, 2024) Total	\$16,020.38 \$215,858.04 \$366,328.91 \$29,725.00 \$627,932.33	\$16,020.38 (M \$215,858.04 (M \$366,328.91 (M \$29,725.00 (O	\$16,020.38 (MEI Invoice No. 1 = \$16,020.38) \$215,858.04 (MEI Invoice No. 2 = \$14,933.04, O&J Pay App. No. 1 = \$200,925.00) \$366,328.91 (MEI Invoice No. 3 = \$21,478.91, O&J Pay App. No. 2 = \$344,850.00) \$29,725.00 (O&J Pay App. No. 3 = \$29,725.00) \$627,932.33	38) 34, O&J Pay 31, O&J Pay 5.00)	App. No. 1 = \$200,925. App. No. 2 = \$344,850.	.00) .00)
Remaining Funds SFW Total Budget Total	<u>\$53,567.67</u> \$53,567.67					

# Coomes Excavating LLC

9675 E. State Rd. 356 Lexington, IN 47138 Ph# (812) 889-3775 Cell# (812) 820-0553

Bill To	
Stucker Fork	
PO box 274	
Scottsburg, IN	
47170-0274	
Attn Randy Needler	

OUCC Attachment KW-10 Cause No. 46167 Page 37 of 43 Invoice

Date	Invoice #
4/26/2023	3315

Project

		Pump house C	Due on receipt	
Quantity	Description		Rate	Amount
8	8 hours of VAC truck time and opperator of	on 4-19-2023	250.00	2,000.00
8	labor for one man for the above on 4-19-20	)23	75.0	600.00
8	8 hours of Vac truck time and opperator or	1 4-20-2023	250.0	2,000.00
8	labor for one man on the above for 4-20-20	023	75.0	0 600.00
	ALL the above work was at the pump hou	se		1
We really ap	preciate your business.		Total	\$5,200.0

P.O. No.

Terms

Midco Diving & Marine Services, Inc. P.O. Box 513 Rapid City, SD 57709-0513 8004791558 lori@midcodiving.com http://www.midcodiving.co m



BILL TO

Stucker Fork Water Utility Attn: Randy Needler PO Box 274 Scottsburg, IN 47170 SHIP TO

Stucker Fork Water Utility Attn: Randy Needler PO Box 274 Scottsburg, IN 47170 **INVOICE 4173** 

DATE 05/04/2021 TERMS Net 10 Days

**DUE DATE 05/14/2021** 

JOB ID P2020144

DATE DESCRIPTION

AMOUNT

05/01/2021 Water Reservoir Cleaning and Inspection x3 + DVD

6,898.00

Thank you for your business!

TOTAL DUE

\$6,898.00

OUCC Attachment KW-10 Cause No. 46167 Page 39 of 43



REMIT TO:

P.O. Box 55

Franklin, IN 46131

Phone (317) 738-4577

Fax (317) 738-9295

Stucker Fork Water Utility P.O. Box 274 Scottsburg, IN 47170

DATE:

2/8/2021

INVOICE NO.

17241 - Job #4808-F

YOUR P.O. NO.

TERMS: NET 10 DAYS

1 1/2% PER MONTH WILL BE ADDED AFTER 30 DAYS

A.P.R. of 18%

QUANTITY	DESCRIPTION	AMOUNT
	Stucker Fork Water Utility	
	Austin WTP - Filter Inspection	
2/1/2021	2 man crew and equipment to travel to job, inspect filters, measure media depths, make recommendations for media addition.	
	Total Invoice Due	\$875.00
	4.	
1	t .	

TAXABLE	TAX	EXEMPT
---------	-----	--------

#				
11	_			

# INVOICE



REMIT TO:

P.O. Box 55

Franklin, IN 46131

Phone (317) 738-4577

Fax (317) 738-9295

Stucker Fork Water Utility
P.O. Box 274
Scottsburg, IN 47170

DATE:

4/2/2021

INVOICE NO.

17304 - Job #4808-F

YOUR P.O. NO.

TERMS: NET 10 DAYS

1 1/2% PER MONTH WILL BE ADDED AFTER 30 DAYS

A.P.R. of 18%

QUANTITY	DESCRIPTION	AMOUNT
	Stucker Fork Water Utility	
	Austin WTP - Media Addition	
	Material	
1701 cu. ft.	Anthracite filter media size 1.0 mm - 1.2mm at \$12.75 per cu. ft.	\$21,687.75
	Labor - 2 man crew and equipment	
2/24/2021	3 hrs Shop load media for mobilization and installation	
2/25/2021	9.5 hrs Install media - North Cells #1 and #2	
	9.5 hrs Extra man	
2/26/2021	9.5 hrs Install media - North Cells #3 & #4	
	9.5 hrs Extra man	
2/27/2021	1.5 hrs Unload media at-shop	
3/1/2021	9.5 hrs Install media - South Cells #1 & #3	
4/1/2021	8.5 hrs Install media	
	36.5 hrs 2 man crew with crane and equipment at \$200.00/hr.	\$7,300.00
	19 hrs Extra man @ \$75.00/hr.	\$1,425.00
	5 hrs @ man crew with crane and equipment O.T. @ \$300.00/hr.	\$1,500.00
	Total Invoice Due	\$31,912.75

AXABLE	TAX EXEMPT	#	



B&H Electric and Supply P.O. Box 1005 Seymour, IN 47274 UNITED STATES

INVOICE NUMBER INVOICE DATE PAGE 876828 9/16/2024

SEYMOUR PHONE

SHELBYVILLE PHONE

**BLOOMINGTON PHONE** 

(812) 522-5607

(317) 392-8988

(812) 333-7303

S STU350

STUCKER FORK WATER

D UTILITY

PO BOX 274 SCOTTSBURG, IN 47170

Ó

S STUCKER FORK WATER

H UTILITY

PO BOX 274

SCOTTSBURG, IN 47170

T

0

**NET DUE** 

2,466.24

SALES REP	SHIP DATE	SHIP VIA	TERMS	JOB NO	TRAN	IS ID
100	9/13/2024		30	00156050	00010	0023
CUSTOMER PO:		PO RELEASE:		MISC NUMBER	₹:	
NAMEPLATE DAT No nameplate d		-11				
SPECIAL INSTRUC RE-RUN POWE	CTIONS R FOR PUMP AT POND		ě			
ITEM # / DESCRIP	TION / NOTES	LIN	IKED JOB ID UNITS	QUANTITY	UNIT PRICE	EXTENSION
700 FIELD SERVICE	= ř					-0
Labor Subtotal						1,400.00

Material Subtotal

1,066.24

TAXABLE	NONTAXABLE	FREIGHT	SALES TAX	MISC	TOTAL
0.00	2,466.24	0.00	0.00	0.00	2,466.24
PREPAYMENT	0.00			NET DUE	2,466.24

# Mitchell & Stark Const. Co., Inc.

P.O Box 219

Phone Number

Medora, IN 47260

(812) 966-2151

Sold To:

Stucker Fork Water Utiltiy

PO Box 274

Scottsburg IN 47170

Attn: Randy Needler

Invoice Number:

672

672

Invoice Date:

2/5/2024

Purchase Order #

Your Order #:

Terms:

Net 30

Sales Rep.

Brad R.

For:

Work At Austin WTP

For office use:

Check #

Date Paid

Invoice

Amount

Quantity	ity Unit Description		Unit Price	Amount
7)	LS	Labor, Equipment & Materials for	\$66,093.72	\$ 66,093.7
Y		Divers for Clearwell Inspection		\$ -
		Repair of East Contactor Sample Lines		\$
		Replace bolts. Clean & Paint Pump room Piping		\$
				\$
		100		\$
			1	\$
				\$
				\$
		R	1	\$
				\$
		4.		\$
				\$
				\$
				\$
				\$
			Subtotal	\$ 66,093,7
			OH & P	\$
		/	Tax	
			Freight	
		Please Pay This Amount	Total	\$ 66,093.7

Questions concerning this invoice?

Please call:

Brad Robertson

(812) 966-2151

Make all checks payable to:

Mitchell & Stark Const. Co., Inc.

P.O. Box 219

Medora, IN 47260

THANK YOU FOR YOUR BUSINESS

# Stucker Fork - Austin WTP Misc Invoices

Vendor	An	Amount		
Bulldog Diving - Clearwell Inspection	\$	5,515.00		
Ace Hardware - Salem	\$	39.55		
All-Phase Electric - S/S uni-strut	\$	737.76		
Winnelson Supply - Pipe & Fittings	\$	1,485.29		
Professional Concrete Cutting	\$	600.00		
FACO - Link-seal for sample lines	\$	164.77		
Fastenal - Misc Anchors inv# 219624	\$			
Fastenal - Bolts inv# 219809	\$			
Home Depot - Hydraulic Cement	\$			
Jasper Bolt - Flange Bolts	S	4,286.40		
Sherwin Williams - Oaint inv #9046-8	\$			
Menards - Painting Supplies	\$	194.54		
Sherwin Williams - Paint inv # 9295-1	\$	480,89		
White Cap- Grout inv#9421		1,020.92		
256 Supply inv #42990 & 43294	\$			
256 Supply inv #44021 & 44112	5	107.40		
Sub-total	5	16,553.52		
OH&P on Material	\$	7,483.03		
Total Materials	-> \$	19,036.55		
Labor				
Week of 12/11/2023	- 5	4,761.89		
Week of 12/18/2023	\$	8,185.13		
Week of 1/1/2024		6,426.20		
Week of 1/8/2024		10,787.00		
Week of 1/15/2024	\$	8,399.60		
Week of 1/22/2024	\$	8,497.35		
Total Labor-	> \$	47,057.17		

Total Invoice-> \$ 66,093.72

- at the start of the application of the primer coat
- before the finish coat is applied
- once work is completed, to verify final coating thicknesses, acceptability of application, continuity of interior coatings, and acceptability of the exterior coatings' appearance.

Because it is difficult to know exactly what took place between inspections, the professional performing spot inspections may have to do a considerable amount of research. Full-time inspection of tank coating is recommended because of (1) the technical nature of tank coatings, (2) the need to comply with environmental regulations, and (3) the need to apply coatings intended for potable water contact in such a manner as to maintain the product's certification according to NSF/ANSI 61.

Unit-price work and work being done by change order should be performed in the presence of the purchaser to ensure the work is being done in the owner's best interest.

# PERIODIC REINSPECTION

Once the three phases of tank maintenance have been completed and the first-anniversary inspection has been performed, the tank should be inspected at least once every 3 to 5 years or as required by state regulatory agencies.

Three methods of evaluating tank interiors are currently popular: a drained "dry" evaluation, an underwater evaluation performed by divers, and a robotic inspection.

The dry evaluation is the most thorough evaluation, as the tank can be washed out and the mud and debris removed from the interior surfaces before the inspection. Specially trained technicians can get to the necessary surfaces on the tank by rigging and rappelling the interior as required by the condition of each tank.

When the tank cannot be drained, an underwater evaluation of the tank interior may be performed. The diving evaluation should include a careful study of the tank's interior wet surfaces by a Certified Commercial Diver who is experienced in the inspection of water tanks. When performing an underwater evaluation, the diver should use a full dry suit and full-face diving mask to prevent contamination of the potable water. Prior to entering the tank, the diver and all equipment are thoroughly disinfected in accordance with ANSI/AWWA C652-11. The tank must be isolated from the water system and all connecting valves locked out.

The third type of evaluation is a remotely operated vehicle (ROV) inspection of the tank interior. This type of evaluation utilizes a robotic device, guided and monitored by a specially trained field technician, to videotape the tank interior. The video should then be reviewed by a professional engineer experienced in water tank evaluation to determine the condition of the interior surfaces.

These inspections will turn up minor deficiencies that can be corrected before they become major, expensive, and time-consuming problems. Cathodic protection may be installed to protect the steel from metal loss in case small coating failures develop. Repairs and cathodic protection can significantly extend the life of a coating system. With periodic inspection, cleaning, and touchup work, a steel tank can remain in service for many decades without major renovation.

#### OUCC Attachment KW-12 Cause No. 46167 Page 1 of 3

# STUCKER FORK CONSERVANCY DISTRICT Water Utility

#### ESTIMATED ANNUAL OPERATION AND MAINTENANCE EXPENSES

(Explanation of Adjustments)

#### Adjustment 6 - Periodic Maintenance

Proposed maintenance expenses are based upon the average of maintenance costs since last rate case (2019-2024) unless otherwise noted. Data on periodic maintenance expenditures comes from the Expenses on Periodic Maintenance Report in the Utility's Annual Report or from Petitioner's response to OUCC DR 12-3, OUCC Attachment KW-08.

			Stucker Fork	OUCC	Difference
I.	Intake	Structure Cleaning and Pump Maintenance			
	a.	Cleaning (every 5 yrs)	4,000	1,000	(3,000)
	_	Only cleaning completed since last rate case was in 2023 for \$5,200			
	b.	Intake pump maintenance, 3 pumps	6,000	8,600	2,600
		Total	10,000	9,600	(400)
II.	Well M	<u> Iaintenance</u>	Stucker Fork	OUCC	Difference
	a.	Wells and pumps - Clean each of 5 wells chemically once every 5 yrs  No expenses incurred since last rate case pursuant to IURC reports and Petitioner's  Periodic Maintenance Tracker. Well chemical cleaning allocation is considered part of the other periodic maintenance expense until Petitioner can provide support in next rate	9,500	-	(9,500)
	b.	Wells and pumps - pump maintenance, 5 wells	12,500	4,000	(8,500)
		Total	22,000	4,000	(18,000)
III.	Austin	WTP Maintenance	Stucker Fork	OUCC	Difference
	a.	8 High service pump maintenance	12,000	6,500	(5,500)
	b.	3 Low service pump maintenance	1,800	400	(1,400)
	c.	2 Backwash pump maintenance	2,000	-	(2,000)
		No expenses incurred since last rate case pursuant to IURC reports and Petitioner's Periodic Maintenance Tracker. Backwash pump maintenance allocation will be considered part of the other periodic maintenance expense until Petitioner can provide	·		
	d.	Pump control valve maintenance (4 valves)	2,400	100	(2,300)
	e.	Plant production meter calibration (7 meters)	4,200	200	(4,000)
	f.	Turbidity meter maintenance (9 meters)	5,400	800	(4,600)
	g.	Generator maintenance, 1 unit	1,900	4,300	2,400
	h.	Fire extinguisher maintenance	400	400	-
	i.	Filter maintenance, 8 filters (every 8 yrs) \$28,528 per filter from 2024 invoice for 4 filters at Marble Hill Plant. Petitioner did provide a 2024 bid tab from the City of Washington, however, those bids included removing & replacing nozzles for each filter bed. Petitioner does not have nozzles and used the Mable Hill quotes as comparable in 44987.	68,000	28,500	(39,500)
	j.	Filter maintenance, 8 filters (add filter material/inspect filters)	-	5,900	5,900
	k.	Lagoon cleaning (every 5 yrs)  Only maintenance since last rate case was for new power line to lagoon done in 2024 for \$2,466.24. Lagoon cleaning allocation will be considered part of the other periodic maintenance expense until Petitioner can provide support in next rate case.	1,520	400	(1,120)
	1.	U.V. system maintenance/bulb replacement (3 reactors w/ 4 bulbs each, \$615 annually per bulb)	7,200	7,400	200
		Total	106,820	54,900	(51,920)
IV.	<u>M</u> arble	Hill WTP Maintenance	Stucker Fork	OUCC	Difference
	a.	High service pump maintenance (3 pumps)	4,500	700	(3,800)
	b.	Backwash pump maintenance (1 pump)  No expenses incurred since last rate case pursuant to IURC reports and Petitioner's Periodic Maintenance Tracker. Backwash pump maintenance allocation will be considered part of the other periodic maintenance expense until Petitioner can provide support in next rate case.	1,000	-	(1,000)
	c.	Pump control valve maintenance (3 valves)	1,800	2,600	800
	d.	Plant production meter calibration (4 meters)	2,400	100	(2,300)
	e.	Fire extinguisher maintenance	400	100	(300)
	f.	Filter media maintenance (4 filters)	9,600	14,300	4,700
		(\$28,528 per filter from 2024 invoice, 4 filters)		•	•
	g.	Filter maintenance, 8 filters (add filter material/inspect filters)		3,500	3,500
		Total	19,700	21,300	1,600

(Cont'd)

# ESTIMATED ANNUAL OPERATION AND MAINTENANCE EXPENSES

(Explanation of Adjustments)

## Adjustment 6 - Periodic Maintenance (cont'd)

V.	Tank N	<u> Maintenance</u>	Stucker Fork	OUCC	Difference
	a.	Cleaning and inspection 2024 Tank inspection amount is from Petitioner's response to OUCC DR 1-11. This amount is supported by a 2021 invoice for inspecting 3 tanks included in OUCC Attachment KW-03.	7,600	6,900	(700)
	b.	Tank painting			
		1. Austin tank (500,000 gallons)	26,700	23,900	(2,800)
		(\$357,760 every 15 yrs, based on 2022 bid times 1.04 CPI inflation)			
		2. Little York tank (100,000 gallons)	17,300	17,400	100
		(\$260,325 every fifteen years, based on average of 2024 bids for Tanks 2 & 4))			
		3. Blocher tank (150,000 gallons)	20,000	20,000	-
		(\$300,000 every 15 yrs, only comparable bid found from 2011. Instead took 2024 bid for 100,000 tank and rounded up to \$300,000)			
		4. Commiskey tank (100,000 gallons)	17,300	17,400	100
		(\$260,325 every fifteen years, based on average of 2024 bids for Tanks 2 & 4))			
		5. Polk Road tank (100,000 gallons)	17,300	17,400	100
		(\$260,325 every fifteen years, based on average of 2024 bids for Tanks 2 & 4))			
		6. Double or Nothing Road tank (500,000 gallons)	26,700	23,900	(2,800)
		(\$357,760 every 15 yrs, based on 2022 bid times 1.04 CPI inflation)			
		7. Radiotower Road (500,000 gallons)	26,700	23,900	(2,800)
		(\$357,760 every 15 yrs, based on 2022 bid times 1.04 CPI inflation)			
		8. Lovett tank (100,000 gallons)	17,300	17,400	100
		(\$260,325 every fifteen years, based on average of 2024 bids for Tanks 2 & 4))			
		9. Paynesville Road tank (500,000 gallons)	26,700	23,900	(2,800)
		(\$357,760 every 15 yrs, based on 2022 bid times 1.04 CPI inflation)			
		10. Fairview Road tank (250,000 gallons)	25,300	21,700	(3,600)
		(\$325,406 every 15 yrs, based on 1.25% of Tank #2 Cost )			
		11. Austin tank 2 (1,000,000 gallons)	33,300	33,300	-
		(\$500,000 every fifteen yrs, based on 2021 bid times 1.19 CPI inflation then rounded up to \$500,000 since 2021 bid tab was for a concrete base and this is legged tank)			
		12. Marble Hill ground tank (500,000 gallons)	16,700	13,400	(3,300)
		(\$168,640 every 15 yrs, based on 2022 bid times 1.04 CPI inflation)			
		13. 1 MG Concrete Ground Storage Tank	1,000	0	(1,000)
		(Concrete Ground Storage Tank, painting not applicable)	ŕ		
		14. Marble Hill WTP aeration tank	11,300	11,000	(300)
		(\$164,560 every 15 yrs, based on 2019 bid times 1.21 CPI inflation)			
		15. Marble Hill WTP aeration tank	11,300	11,000	(300)
		(\$164,560 every 15 yrs, based on 2019 bid times 1.21 CPI inflation)			
		Total	302,500	282,500	(20,000)

(Cont'd)

# ESTIMATED ANNUAL OPERATION AND MAINTENANCE EXPENSES

(Explanation of Adjustments)

#### Adjustment 6 - Periodic Maintenance (cont'd)

VI.	Booste	er Station Maintenance and Pump Replacement	Stucker Fork	OUCC	Difference
	a.	Booster station No. 4 maintenance	3,800		
	b.	Booster station No. 7 maintenance	1,900		
	c.	Booster station No. 8 maintenance	1,900		
		Total Booster Station Maintenance	7,600	3,900	(3,700)
VII	. Meter/	Control Valve Pit Maintenance	Stucker Fork	OUCC	Difference
	a.	Tank 2 control valve pit maintenance	1,500		
	b.	Tank 3 control valve/metering pit maintenance	1,500		
	c.	Tank 4 control valve/metering pit maintenance	1,500		
	d.	Tank 7 control valve/metering pit maintenance	1,500		
	e.	Tank 8 control valve/metering pit maintenance	1,500		
	f.	Sommerville control valve/metering pit maintenance	1,500		
	g.	Marysville control valve/metering pit maintenance	1,500		
	h.	Rural membership control valve/metering pit maintenance	1,500		
	i.	Scottsburg control valve/metering pit maintenance	1,500		
	j.	Crothersville control valve/metering pit maintenance	1,500		
	k.	Pepsi control valve/metering pit maintenance	1,500		
		Total control valve/metering pit maintenance	16,500	3,500	(13,000)
VII	l Other l	Periodic Maintenance Expense		23,800	23,800
V 11.	Ouler	Average of other maintenance costs since last rate case (2019-2024) Includes chemical feed system maintenance, clear well cleaning, & other from Petitioner's response to OUCC DR 12-3, OUCC Attachment KW-08.	-	23,800	23,800
		Total	-	23,800	23,800
		Sub-total	485,120	403,500	(81,620)
		Less test year expense	(436,160)	(436,160)	
		Adjustment	\$48,960	(\$32,660)	=

Note: all CPI inflation amounts are based on the month date of the bid or invoice until the end of the test year. from Mitchell & Starke Construction for Marble Hill WTP Maintenance - flow meter installation. I did not include this entry as part of the periodic maintenance since installing new flow meters is a capitol expense.

FILED
January 15, 2016
INDIANA UTILITY
REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF STUCKER	)	
FORK CONSERVANCY DISTRICT FOR APPROVAL	)	<b>CAUSE NO. 44687</b>
OF A NEW SCHEDULE OF RATES AND CHARGES	)	

# OFFICIAL EXHIBITS

**TESTIMONY OF** 

SCOTT A. BELL - PUBLIC'S EXHIBIT NO. 2

ON BEHALF OF THE

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

**JANUARY 15, 2016** 

IURC PUBLIC'S

REPORTER

Respectfully submitted,

Lorraine Hitz-Bradley, Arty. No. 18006-29

Deputy Consumer Counselor

Public's Exhibit No. 2 Cause No. 44687 Page 1 of 17

# TESTIMONY OF SCOTT A. BELL CAUSE NO. 44687 STUCKER FORK CONSERVANCY DISTRICT

# I. <u>INTRODUCTION</u>

1	Q:	Please state your name and business address.
2	A:	My name is Scott A. Bell, 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		Director of the Water/Wastewater Division. My qualifications and experience are set
7		forth in Appendix A.
8	Q:	What is the purpose of your testimony?
9	A:	I discuss Petitioner's proposed debt-funded capital improvement projects, and extensions
10		and replacements revenue requirement. I also discuss Petitioner's request to recover
11		periodic maintenance expenses.
12	Q:	Does your testimony include attachments?
13	A:	Yes. My testimony includes the following attachments:
14		• Attachment SAB-1: OUCC Data Request Set No. 2.
15		II. <u>DEBT FUNDED CAPITAL IMPROVEMENTS</u>
16 17	Q:	Does Petitioner seek to construct capital improvements that will be funded by the issuance of revenue bonds?
18	A:	Yes. Petitioner's Exhibit 5, page 11, Accounting Report on Proposed Rates and Charges,
19		provides a Schedule of Estimated Project Costs and Funding. This schedule provides the
20		estimated construction cost for three capital improvement projects: (1) 1 million gallon
21		("MG") tank for Zone 1; (2) Austin WTP Zone 1 high service pump improvements; and

1 Q: Did you seek additional information for Petitioner's proposed purchase of 10 work 2 trucks? 3 Yes. In Data Request No. 2.10, the OUCC sought supporting documentation relied upon A: 4 to estimate the \$350,000 cost of ten (10) work trucks. In response, Petitioner provided 5 documentation of the purchase of two new Chevrolet Silverado 1500 4WD half-ton pick-6 up trucks at a cost of \$33,600 each. Additionally, Petitioner indicated that the next two 7 trucks it anticipates purchasing are a one-ton truck and a two-ton truck at a cost of 8 \$50,000 to \$60,000 each. Petitioner proposes to purchase the ten (10) work trucks over a 9 five-year period. After reviewing the supporting documentation, I agree that Petitioner 10 should purchase the proposed trucks and that \$350,000 is representative of the estimated 11 cost for the ten (10) work trucks. 12 Did you seek additional information for Petitioner's proposed purchase of a O: backhoe? 13 14 Yes. In Data Request No. 2.11, the OUCC sought supporting documentation relied upon A: 15 to estimate the \$100,000 cost of a backhoe. In response, Petitioner indicated that it had 16 received a quoted price for the backhoe at \$84,560. Petitioner provided a copy of the 17 price quote from Jacobi Sales, Inc. in a supplemental response to OUCC Data Request 18 2.11. Petitioner proposes to purchase the new backhoe in year 2017 or 2018. At that 19 time, Petitioner's only backhoe will be approximately ten (10) years old. After reviewing 20 the response to the OUCC data request, I agree that Petitioner should purchase a backhoe 21 and that \$100,000 is representative of the estimated cost. 22 Q: Why is Petitioner proposing to construct electrical improvements (switch gear and 23 generator) at the Marble Hill WTP? 24 In Data Request No. 3.13, the OUCC asked Petitioner to identify all facilities operated by A: 25 Stucker Fork that have emergency electric power arrangements. Petitioner indicated that

1 there are no facilities that currently have emergency power available, which is why the 2 request for switch gear and generators is being proposed. Petitioner also provided me a 3 copy of an Indiana Department of Environmental Management ("IDEM") Public Water 4 System Sanitary Survey Report, dated September 5, 2013. The IDEM Sanitary Survey 5 Report indicated the need for standby or auxiliary power at the treatment plants and at 6 booster stations to be in compliance with 327 Ind. Admin. Code 8-2-8.2(e)(7)(E)(ii). 7 Did you seek additional cost information for Petitioner's proposed "Marble Hill Q: WTP electrical improvements (switch gear and generator)" project? 8 9 A: Yes. In Data Request No. 2.12, the OUCC sought supporting documentation Petitioner 10 relied upon to estimate the \$360,000 cost of the "Marble Hill WTP electrical 11 improvements (switch gear and generator)" project. In response, Petitioner indicated that 12 it relied on the experience of Mr. Burch, who based the estimated cost of this project on a 13 similar project for Patoka Lake. Mr. Burch provided me with a copy of the cost details of 14 the Patoka Lake project to support the cost estimate for the electric improvements for the 15 Marble Hill WTP project. I also toured the Marble Hill WTP and discussed with Mr. 16 Burch and Mr. Needler the need for the electrical improvements, which are not scheduled 17 to be completed until the 2017-2019 time frame. I agree that Petitioner should complete the proposed project and that \$360,000 is representative of the estimated cost. Petitioner 18 19 added that the Marble Hill WTP electrical improvements project would be competitively 20 bid. 21 Q: Why is Petitioner proposing the "Booster Station (4) switch gear including 1 22 portable generator" project? 23 In Data Request No. 3.13, the OUCC asked Petitioner to identify all facilities operated by A: 24 Stucker Fork that have emergency electric power arrangements. Petitioner indicated that

1 there are no facilities that currently have emergency power available, which is why the 2 request for the "Booster Station (4) switch gear and 1 portable generator" project is being 3 proposed. Petitioner also provided a copy of an IDEM Public Water System Sanitary 4 Survey Report, dated September 5, 2013. The IDEM Sanitary Survey Report indicated 5 the need for standby or auxiliary power at the treatment plants and at booster stations to 6 be in compliance with 327 I.A.C. 8-2-8.2(e)(7)(E)(ii). Did you seek additional cost information for Petitioner's proposed "Booster Station 7 Q: (4) switch gear including 1 portable generator" project? 9 Yes. In Data Request No. 2.12, the OUCC sought supporting documentation relied upon A: to estimate the \$300,000 cost of the "Booster Station (4) switch gear including 1 portable 10 11 generator" project. In response, Petitioner indicated that it relied on the experience of 12 Mr. Burch, who based the estimated cost of this project on a similar project for Floyds 13 Knobs. Mr. Burch provided me with documentation of the costs incurred by Floyds 14 Knobs for the upgrade of an existing booster station, which included adding a generator. 15 I also visited several booster stations and discussed with Mr. Burch and Mr. Needler the 16 need for the booster station switch gear and portable generator, which are not scheduled 17 to be completed until the 2017–2019 time frame. I agree that Petitioner should complete 18 the proposed project and that \$300,000 is representative of the estimated cost. Petitioner 19 added that the Booster Station (4) switch gear including 1 portable generator project 20 would be competitively bid. 21 Did you seek additional cost information for Petitioner's proposed "Marble Hill **Q**: WTP building expansion (3,600 sq. ft.) and 1 new filter" project? 22 23 Yes. In Data Request No. 2.12, the OUCC sought supporting documentation Petitioner A: 24 relied upon to estimate the \$600,000 cost of the "Marble Hill WTP building expansion 1

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Q:

A:

requirement.

(3,600 sq. ft.) and 1 new filter" project. In response, Petitioner indicated that it relied on the experience of Mr. Burch, who had worked on similar types of projects. Petitioner also indicated that Mr. Burch contacted a filter manufacturer to obtain a cost for the filter and associated piping and valves. Based on those conversations, Mr. Burch estimated the cost of materials to be \$150,000. He estimated that the installation cost was another \$150,000, with the remaining \$300,000 dedicated to the construction of a 3,600 sq. ft building and non-construction costs associated with the project. Mr. Burch provided me with documentation of the costs incurred by Floyds Knobs for its water treatment plant expansion and a manufacturer's quote for the material costs of a new filter. Petitioner indicated that it plans to begin the project in 2019-2020 time frame. I toured the Marble Hill WTP and discussed the project with both Mr. Needler and Mr. Burch. I agree that Petitioner should complete the proposed project and that \$600,000 is representative of the estimated cost. Petitioner added that the Marble Hill WTP building expansion (3,600 sq. ft.) and 1 new filter project would be competitively bid. Do you have any recommendations regarding Petitioner's proposed Capital **Improvement Plan?** Yes. I recommend that the Commission approve Petitioner's Capital Improvement Plan. I also recommend that the Capital Improvement Project be funded partially by the E&R revenue requirement and partially by available cash on hand. OUCC Utility Analyst Greg

#### IV. OPERATION AND MAINTENANCE EXPENSES

23 Q: Is it reasonable for Petitioner to incur expenses to perform periodic maintenance?

A: Yes. It is prudent for Petitioner to incur reasonable expenses to perform periodic

Foster discusses the portions to be funded by either cash on hand or by the E&R revenue

## Response: Please see attached Exhibit 12-3.

**Q-12-4.** Has Petitioner considered establishing a system development charge? Please explain why or why not.

Response: Stucker Fork's professionals have discussed a system development charge with Stucker Fork management; however, no formal action has been taken on promulgating a system development charge at this time.

- **Q-12-5.** Please refer to Petitioner's Exhibit 1, the Direct Testimony of Richard Burch, pp. 11 12.
  - a. Please provide the number of business or other non-residential class customers that have made inquiries for water service in the past five years; and please provide the number of in each of calendar years 2021, 2022, 2023, and 2024.
  - b. Has Petitioner estimated the capacity requirements for such potential customers? And, if so, how much additional capacity has Petitioner estimated would be needed to serve such potential customers?
  - c. Please provide the number of residential developments or residential communities that have made inquiries for water service in the past five years; and please provide the number of in each of calendar years 2021, 2022, 2023, and 2024.
  - d. Has Petitioner estimated the capacity requirements for such potential residential customers? And, if so, how much additional capacity has Petitioner estimated would be needed to serve such potential residential customers?
  - Response: a. Stucker Fork does not maintain a list of individuals, businesses, or entities that inquire about the possibility of receiving water service for a new development. Notwithstanding the forgoing, Stucker Fork has had a customer within the last twelve (12) months inquire about water to a new development near its Marble Hill Water Treatment Plant. This developer was seeking up to one million (1,000,000) per day of water for the development.
    - b. For the industrial facility near its Marble Hill plant, the estimated usage was one million mgd.

- c. Stucker Fork has received an inquiry from developers regarding multiple residential subdivisions. See the response to Request No. 12-5(a)-(b).
- d. While the specifics were never discussed, Stucker Fork understood that the residential subdivisions would contain at least fifty (50) lots per subdivision with each lot or residence using three hundred and ten (310) gallons per day based upon the rules of the Indiana Department of Environmental Management.

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been served upon the following by electronic mail this 21st day of February, 2025:

**Indiana Office of Utility Consumer Counselor** 

infomgt@oucc.in.gov thharper@oucc.in.gov vipeters@oucc.in.gov

steven.krohne@icemiller.com
jack.petr@icemiller.com

J. Christopher Janak

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

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