

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**PETITION OF JACKSON COUNTY WATER
AUTHORITY FOR AUTHORITY TO ISSUE
LONG-TERM DEBT AND ADJUST ITS
RATES AND CHARGES**

CAUSE NO. 46156

VERIFIED PETITION

TO THE INDIANA UTILITY REGULATORY COMMISSION:

Jackson County Water Authority (“Petitioner” or “Jackson County Water”), by counsel, respectfully requests authority to issue long-term debt and adjust its rates and charges. In support of its Verified Petition, Jackson County Water states:

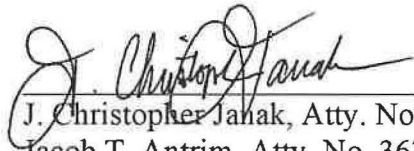
1. Jackson County Water is a water authority constituted under Ind. Code § 13-18-16-16, organized and existing under and through the laws of the State of Indiana. Jackson County Water’s office is located at 1119 Spring Street, Brownstown, IN 47220.
2. Under Ind. Code § 13-18-16-16(h), Jackson County Water’s rates and charges are subject to the jurisdiction of the Indiana Utility Regulatory Commission (“Commission”) as set forth in Ind. Code § 8-1.5-3-8.
3. Under Ind. Code § 8-1-2-78 through 8-1-2-80, the Commission has jurisdiction over Jackson County Water’s issuance of bonds, notes, or other evidences of indebtedness.
4. Jackson County Water believes the following statutes may also be applicable to this case: Ind. Code §§ 8-1-2-42, 8-1-2-61, 8-1-2-83, and other applicable statutes located in Ind. Code ch. 8-1-2.
5. Jackson County Water owns, operates, and maintains wells, treatment facilities, transmission facilities, distribution facilities, land, land rights, equipment, materials, supplies, working capital, and other property which are used and useful for the rendering of water service to its customers. Jackson County Water provides water to primarily residential, commercial, and agricultural customers in Jackson, Jennings, Bartholomew, Brown, and Lawrence Counties, Indiana.

6. Jackson County Water has recently discovered that it has perfluoroalkyl or polyfluoroalkyl substances (“PFAS”) in its water supply. Pursuant to mandates from the Indiana Department of Environmental Management and Environmental Protection Agency, Jackson County Water must make improvements to its waterworks system, most importantly, the construction of new water wells. Jackson County Water proposes to obtain the necessary funds for these improvements from the issuance of new debt through the Drinking Water State Revolving Fund Loan Program (“DWSRF”).
7. In order to have sufficient funds to close on the DWSRF loan, make the requisite debt service payments on the prospective DWSRF debt, and pay its other lawful expenses to own and operate the utility, Jackson County Water must adjust its rates and charges. Without such an adjustment, Jackson County Water’s current rates and charges will be unjust, unreasonable, insufficient, and confiscatory of Jackson County Water’s property.
8. Jackson County Water’s current base rates and charges for water utility service were approved in the Commission’s April 5, 2023 Order in Cause No. 45640. As required by Ind. Code § 8-1-2-42, more than 15 months have passed since the filing date of Petitioner’s last request for a general increase in its basic rates and charges.
9. Jackson County Water proposes a historic test year comprising the 12-month period ending December 31, 2023, with adjustments for changes that are fixed, known, and measurable and in effect within 12 months after the test year.
10. Jackson County Water will propose in this case new water rates and charges which will be sufficient to pay its expenses as set forth in Ind. Code § 8-1.5-3-8, resulting in an estimated \$1,017,465 increase in its revenue requirement, which is approximately a 23.71% across-the-board increase.
11. Jackson County Water proposes in this Cause to incur long-term debt in an amount not to exceed \$7 million through the DWSRF. The proceeds from the debt will be used to pay for new water production facilities and other improvements to its waterworks system.
12. Included with this *Verified Petition*, Jackson County Water is submitting its case-in-chief, which includes the pre-filed testimony and exhibits of Lori A. Young, P.E., Earl J. Ridlen, C.P.A., and Larry W. McIntosh, including supporting attachments, schedules, and workpapers.
13. The attorneys representing Jackson County Water in this proceeding who are authorized to accept service of papers on behalf of Jackson County Water are:

J. Christopher Janak, Atty. No. 18499-49
Jacob T. Antrim, Atty. No. 36762-49
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, IN 46204
(317) 684-5249 Direct Dial
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JJanak@boselaw.com

WHEREFORE, the Petitioner, Jackson County Water Authority, respectfully requests that the Commission: (a) promptly establish a procedural schedule in this Cause; (b) conduct such hearings as the Commission believes necessary and appropriate; (c) authorize Jackson County Water to incur long-term debt as supported by the evidence; (d) authorize Jackson County Water to increase its rates and charges for water utility service; (e) approve Jackson County Water's new schedule of rates and charges; and (f) for all other appropriate relief.

Respectfully Submitted,



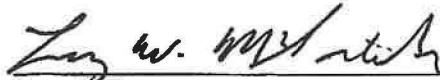
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Counsel for Jackson County Water Authority

VERIFICATION

I have read the foregoing Petition and the allegations contained therein are true and correct to the best of my knowledge and belief.

JACKSON COUNTY WATER AUTHORITY

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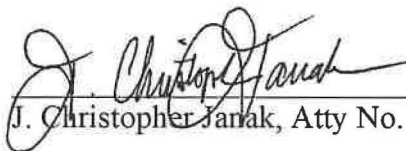
Larry W. McIntosh, General Manager

CERTIFICATE OF SERVICE

I certify that on November 1, 2024, the foregoing was filed electronically with the Indiana Utility Regulatory Commission using the Commission's electronic filing system and was served electronically on the parties below:

Indiana Office of Utility Consumer Counselor

infomgt@oucc.in.gov

A handwritten signature in black ink, appearing to read "J. Christopher Janak", is written over a horizontal line.

J. Christopher Janak, Atty No. 18499-49

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