FILED January 15, 2021 INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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IN THE MATTER OF THE PETITION OF EASTERN HEIGHTS UTILITIES INC. FOR A NEW SCHEDULE OF RATES AND CHARGES.

CAUSE NO. 45435-U

SUPPLEMENT TO THE OUCC'S REPORT

CONSISTING OF

SUPPLEMENTAL TESTIMONY OF CARLA F. SULLIVAN

ON BEHALF OF THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 1-S

January 15, 2021

Respectfully submitted, INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

David M. Z. Vuy

Daniel M. Le Vay, Atty. No. 22184-49 Deputy Consumer Counselor

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Supplement to the OUCC's Report

Consisting of Public's Exhibit No. 1-S - OUCC's Supplemental Testimony of Carla F. Sullivan

has been provided to the following individuals by electronic service on January 15, 2021.

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SUPPLEMENTAL TESTIMONY OF OUCC WITNESS CARLA F. SULLIVAN CAUSE NO. 45435-U <u>EASTERN HEIGHTS UTILITIES, INC.</u>

I. <u>INTRODUCTION</u>

1	Q:	Please state your name and business address.
2	A:	My name is Carla F. Sullivan, and my business address is 115 West Washington
3		Street, Suite 1500 South, Indianapolis, Indiana 46204.
4	Q:	Did you previously provide testimony in this proceeding?
5	A:	Yes. My case-in-chief testimony was filed as Public's Exhibit No. 1 and includes
6		my qualifications and experience.
7	Q:	What is the purpose of your supplemental testimony?
8	A:	In my case-in-chief testimony, I recommended a post-test year customer growth
9		revenue adjustment. This post-test year growth adjustment increased revenue by
10		\$26,253. But I did not include an estimate of the increased operating expenses the
11		utility would incur to secure those revenues. I refer to these below as increased
12		system delivery expenses. My supplemental testimony identifies and quantifies
13		those expenses resulting in the OUCC increasing its recommended rate increase
14		from 27.90% to 28.11%.
15	Q:	Do you sponsor any schedules?
16	A:	Yes. The schedules below were updated and revised to incorporate the increased
17		operating expenses associated with residential customer growth that the OUCC
18		identified:
19 20 21		Schedule 1 – Comparison of Overall Revenue Requirement (page 1) Reconciliation of Net Operating Income Statement Adjustments (page 2)

1 2	Schedule 2 – Comparative Balance Sheet as of December 31, 2017, 2018, and 2019
3 4	Schedule 3 – Comparative Income Statement for the twelve months ended December 31, 2017, 2018, and 2019
5	Schedule 4 – Pro Forma Net Operating Income Statement
6	Schedule 5 – OUCC Revenue Adjustments
7	Schedule 6 – OUCC Expense Adjustments
8	Schedule 7 – Extensions and Replacements
9	Schedule 8 – Current and Proposed Rates and Charges

II. <u>SYSTEM DELIVERY EXPENSE</u>

10 Q: What do you mean by "system delivery" expense?

- 11 A: System delivery expenses are expenses that are directly affected by increases or
- 12 decreases in water consumption and the number of bills issued. These include
- 13 purchased power expense, chemical expense, and postage expense.

Q: To calculate its post-test year customer growth expense adjustment, did you use the same costs and methodology Eastern Heights used to calculate its test year customer growth expense adjustment?

- 17 A: Yes. Eastern Heights calculated total system delivery expense of \$3.39 on a per bill
- 18 basis, dividing test year delivery expense by the number of test year bills:

		ırchased Power	C	hemical	Р	ostage
	(4	Adj. 6-4)	(A	dj. 6-5)	(Ae	dj. 6-11)
Test Year Expense	\$	179,282	\$	55,772	\$	45,565
Test Year Billings		82,845		82,845		82,845
Cost Per Bill	\$	2.1641	\$	0.6732	\$	0.55
Total System Deliver	v Co	st Per Bill			\$	3.39

1 2	Q:	Do you accept the methodology Eastern Heights used to determine system delivery costs?
3	A:	Yes. The OUCC typically calculates system delivery costs on a per gallon basis
4		rather than a per bill basis. In this case, the effect of the difference in the two
5		methods is immaterial. Therefore, I accept the methodology used and costs
6		calculated by Eastern Heights.
7 8	Q:	What system delivery expense adjustment do you recommend to capture the costs associated with post-test year residential customer growth?
9	A:	I recommend an additional \$4,190 be included in pro forma operating expenses to
10		reflect additional system delivery costs associated with post-test year residential
11		customer growth. I determined Eastern Heights experienced an increase of 103
12		residential customers during the post-test year adjustment period. This results in
13		1,236 additional billings per year (103 x 12). Based on a cost of \$3.39 per billing,
14		providing water to these additional 103 customers would create an additional
15		\$4,190 in annual operating expenses (\$3.38 x 1,236). See OUCC Schedule 6,
16		Adjustment 6. Based on this additional operating expense, I recommend the
17		Commission approve an overall rate increase of 28.11% to generate an additional
18		\$560,742 of revenues.
19	Q:	Does this conclude your testimony?

20 A: Yes.

Comparison Applicant's and OUCC's Revenue Requirements

	Per Applicant	Per OUCC	Sch Ref	OUCC More (Less)
Operating Expenses Extensions and Replacements Debt Service	\$ 1,896,293 481,025 326,301	\$ 1,889,345 424,751 326,301	4 7 APP	\$ (6,948) (56,274)
Total Revenue Requirements Less: Revenue Requirement Offsets: Interest Income Non Utility Income	2,703,619 (14,660)	2,640,397 (14,660) (7,900)	33	(63,222) (7,900)
Rental Income Net Revenue Requirements Less: Revenues at current rates subject to increase Other revenues at current rates	- 2,688,959 (1,974,585) (71,824)	(19,756) 2,598,081 (1,997,511) (39,828)	3 4 4	(19,756) (90,878) (22,926) 31,996
Net Revenue Increase Required Add: Additional IURC Fee	642,550 834	560,742 714		(81,808) (120)
Recommended Increase	\$ 643,384	\$ 561,456		\$ (81,928)
Recommended Percentage Increase	32.58%	28.11%		-4.47%
	Prop	osed		OUCC
Current Rate for 5,000 Gallons	Petitioner	OUCC		<u>More (Less)</u>
Current Rate = \$21.59	\$ 28.62	\$ 27.66	8	\$ (0.96)

Reconciliation of Net Operating Income Statement Adjustments *Pro-forma* Present Rates

	Per Applicant	Per OUCC	OUCC More (Less)
Operating Revenue Adjustments			
Test Year Normalization	\$ 3,946	\$ 3,946	\$ -
Post-Test Year Customer Growth	-	26,253	26,253
Meter Calibration Adjustment	-	(3,327)	(3,327)
Elimination of Surcharge Revenues	-	(31,996)	\$ (31,996)
Total Operating Revenues	3,946		(9,070)
O&M Expense Adjustments			
Salaries and Wages - Employee	17,496	17,496	-
Capitalized Labor	-	(7,708)	(7,708)
Salaries and Wages - Officers	10,847	10,847	-
Employee Benefits	8,026	8,026	-
Emp. Benefits - PERF/Pension	1,312	1,312	-
Purchased Power	396	396	-
Chemical Expense	123	123	-
System Delivery Expense	-	4,190	4,190
Material and Supplies	(8,434) (10,279)	(1,845)
Contractual Services - Engineering	-	(2,516)	(2,516)
Periodic Maintenance Expense	36,676	38,276	1,600
Insurance	3,762	3,762	-
Rate Case Expense	3,000	3,000	-
Miscellaneous Expense	100	100	-
IURC Fee	118	118	-
Revenue Off Set (APP Adjustment 16)	7,669	-	(7,669)
Reclassification of E&R	-	7,000	7,000
Taxes Other Than Income	1,969	1,969	
Total Operating Expenses	83,060	76,112	(6,948)
Net Operating Income	\$ 79,114	\$ 81,236	\$ (2,122)

COMPARATIVE BALANCE SHEET As of December 31,

ASSETS	2019	2018	2017
Utility Plant in Service:			
Utility Plant in Service	\$ 26,255,767	\$ 26,066,499	\$ 26,043,806
Less: Accumulated Depreciation	9,552,685	9,105,881	8,644,107
Accumulated Amortization	12,024	12,024	12,024
Add: Utility Plant Acquisition Adjustment	48,256	64,341	80,427
Net Utility Plant in Service	16,739,314	17,012,935	17,468,102
Other Property an Investments:			
Nonutility Property	216,569	283,410	283,410
Less: Accumulated Depreciation	35,661	35,936	32,868
Add: Special Funds	341,796	341,796	341,796
Total Other Property and Investments	522,704	589,270	592,338
Current Assets:			
Cash and Cash Equivalents	400	400	400
Other Special Deposits	600,000	-	-
Working Funds	258,617	479,358	437,468
Temporary Cash Investments	-	580,215	680,061
Accounts Receivable	88,977	81,804	97,663
Materials and Supplies	91,111	97,742	82,230
Prepaids	77,000	75,000	65,550
Total Current Assets	1,116,105	1,314,519	1,363,372
Total Assets	\$ 18,378,123	\$ 18,916,724	\$ 19,423,812
LIABILITIES	2019	2018	2017
Equity			
Retained Earnings	\$ 289,448	\$ 823,249	\$ 1,202,593
Paid in Capital	-	-	-
Total Equity	289,448	823,249	1,202,593
Contributions in Aid of Construction	13,683,453	13,532,289	13,502,849
Long-term Debt			
Rural Development Loans	3,498,212	3,679,663	3,846,329
Total Long-term Debt	3,498,212	3,679,663	3,846,329
Current Liabilities			
Accounts Payable	43,062	47,021	58,198
Notes Payable	181,777	179,544	176,892
Customer Deposits	655,704	635,858	617,511
Accrued Taxes	17,959	10,188	10,144
Accrued Interest	8,508	8,912	9,296
Other Current Liabilities	907,010	881,523	872,041
Total Liabilities	\$ 18,378,123	\$ 18,916,724	\$ 19,423,812

COMPARATIVE INCOME STATEMENT Twelve Months Ended December 31,

	2019	2018	2017
Operating Revenues	¢ 2 .010	¢ 0.004	¢ 2.200
Unmetered Water Sales	\$ 2,010	\$ 2,824	\$ 2,380
Residential Metered Water Sales	1,728,711	1,742,074	1,727,925
Commercial Metered Water Sales	69,002	76,432	80,297
Industrial Meters Water Sales	12,830	9,463	9,668
Public Authorities	50,700	48,544	50,977
Multi Family	14,093	14,758	16,819
Public Fire Protection	61,030	59,662	60,267
Private Fire Protection	7,123	6,808	6,560
Sales for Resales	11,025	12,890	11,433
Late Fees	14,115	15,985	16,146
Miscellaneous Service Revenue	39,828	43,363	39,157
Other Operating Revenues	31,996	31,452	30,855
Total Operating Revenues	2,042,463	2,064,255	2,052,484
Operating Expenses			
Salaries and Wages - Employee	609,123	596,195	547,951
Salaries and Wages - Officers and Directors	22,500	25,230	24,860
Employee Pension and Benefits	349,650	359,857	329,732
Purchased Power	179,282	192,330	172,480
Chemicals	55,772	46,639	43,241
Materials and Supplies	350,040	329,915	192,521
Contractual Services	220,010	02,,,,10	1,2,021
Engineering	13,533	5,630	4,044
Accounting	32,345	28,740	31,925
Legal	29,749	20,442	21,606
Other/Testing	713	845	932
Other	1,518	7,008	4,368
	49,831	56,738	
Transportation Expense Insurance	49,031	50,758	40,796
Vehicle	0 0 2 0	7 510	<u> </u>
	9,838	7,512	8,304
General Liability	24,222	28,257	28,541
Workman's Compensation	13,199	8,601	6,545
Other	10,270	10,232	10,294
Bad Debt Expense	5,790	4,010	4,276
Miscellaneous Expense	2,090	2,061	751
Total O&M Expense	1,759,465	1,730,242	1,473,167
Depreciation Expense	499,750	491,408	490,582
Amortization Expense	16,086	16,086	16,086
Payroll Taxes	53,768	46,151	43,087
Total Operating Expenses	2,329,069	2,283,887	2,022,922
Net Operating Income	(286,606)	(219,632)	29,562
Other Income (Expense)			
Leases	19,756	15,050	9,300
Gain (Loss) on Sale of Assets	(87,734)	(15,137)	(129,674)
Interest Income	14,660	9,757	5,242
Nonutility Income	7,900	26,702	42,556
Miscellaneous Nonutility Expenses	(18,393)	(4,294)	(4,803)
Interest Expense	(183,384)	(191,790)	
Total Other Income (Expense)	(183,384) (247,195)	(191,790) (159,712)	$\frac{(199,718)}{(277,097)}$
Net Income	\$ (533,801)	\$ (379,344)	\$ (247,535)
	+ (000,001)	÷ (079,011)	÷ (= (7,555)

Pro-forma Net Operating Income Statement

	YearPro formaEndedSchPresent12/31/2019AdjustmentsRefRatesAdjustment		Ended		Ended 12/31/2019		Ended Sci		Ended		ljustments	Sch Ref	Pro forma Proposed Rates
Operating Revenues													
Water Sales	\$ 1	,877,346	\$	3,844	APP	\$ 1,904,218	\$	535,233	1	\$ 2,439,451			
Commercial Sales				102	APP								
Green County Jail Refund				(3,327)	5-2								
Post-test Year Growth				26,253	5-3								
Fire Protection		68,153				68,153		19,156	1	87,309			
Sales for Resale		11,025				11,025		3,099	1	14,124			
Late Payment Charges		14,115				14,115		3,967	1	18,082			
Other Revenue and Surcharge		71,824		(31,996)	5-1	 39,828				 39,828			
Total Operating Revenues	2	,042,463		(5,124)		 2,037,339		561,456		 2,598,794			
						1,997,511							
O&M Expense													
Salaries and Wages - Employee		609,123		17,496	APP	618,911				618,911			
Capitalized Labor				(7,708)	6-1								
Salaries and Wages - Officers		22,500		10,847	APP	33,347				33,347			
Employee Benefits		303,576		8,026	APP	311,602				311,602			
Emp. Benefits - PERF/Pension		46,074		1,312	APP	47,386				47,386			
Purchased Power		179,282		396	APP	179,678				179,678			
Chemical Expense		55,772		123	APP	55,895				55,895			
System Delivery Expense		-		4,190	6-6	4,190				4,190			
Material and Supplies		181,865		(10,279)	6-2	171,586				171,586			
Contractual Services - Engineering		13,533		(2,516)	6-3	11,017				11,017			
Contractual Services - Accounting		32,345				32,345				32,345			
Contractual Services - Legal		29,749				29,749				29,749			
Contractual Services - Testing		713				713				713			
Contractual Services - Other		1,518				1,518				1,518			
Transportation Expense		49,831				49,831				49,831			
Periodic Maintenance Expense		168,175		38,276	6-4	206,451				206,451			
Insurance		57,529		3,762	APP	61,291				61,291			
Rate Case Expense		e , ,e _,		3,000	APP	3,000				3,000			
Bad Debt		5,790		- ,		5,790				5,790			
Property Taxes		2,090				2,090				2,090			
Miscellaneous Expense		_,		100	APP	100				100			
IURC Fee				118	APP	118				118			
Revenue Off Set (APP Adjustment 16)				-		-				-			
Reclassification of E&R				7,000	6-5	7,000				7,000			
Reclassification of Earc				7,000	0.5	7,000				7,000			
Depreciation Expense		499,750				499,750				499,750			
Amortization Expense		16,086				16,086				16,086			
Taxes Other Than Income		,				-0,000				- 0,000			
Payroll Taxes		53,768		1,969	APP	55,737		714	1	56,451			
Total Operating Expenses	2	,329,069		76,112		 2,405,181		714		 2,405,895			
Net Operating Income	\$	(286,606)	\$	(81,236)		\$ (367,842)	\$	560,742		\$ 192,899			

OUCC Revenue Adjustments

(1) Surcharge Revenue

To reflect the elimination of surcharge revenue.

Pro forma Surcharge Revenue

\$ -(31,996)

Adjustment Increase (Decrease)

\$ (31,996)

(2) Applicant's Calibration Overcharge Adjustment

To reflect overcharge to Green County Jail from September to December 2019. (Applicant included this adjustment as Expense Adjustment #16)

	(4,884)	
	1,557	
	1,557	
	4	
	389.28	
	43.70	
	23.80	
\$	321.78	
-	\$	23.80 43.70 389.28

OUCC Revenue Adjustments

(3) <u>Post Test Year Residential Normalization Adjustment</u>

To adjust for residential customer growth subsequent to the test year.

Number of Residential Customer at 12/31/20	6,909		
Less: Number of Residential Customer at 12/31/19	 (6,806)	-	
Number of Additional Monthly Customers	103		
Times 12 to Annualize	 12	-	
Number of Additional Annual Customers	1,236		
Times Average Test Year Billing	\$ 21.24	-	
Adjustment Increase (Decrease)		\$	26,253

	Residential		
	Billings	Total Residential Billings as of September 2020	61,670
Jan	6,815	October 2020 Residential Billings	6,935
Feb	6,806	November 2020 Residential Billings	6,944
Mar	6,801	Total Residential Billings as of November 2020	75,549
Apr	6,813	Less: Total Residential Billings as of December 202(82,458
May	6,821	Residential Customers as of 12/31/2020	6,909
Jun	6,867		
Jul	6,896		
Aug	6,924		
Sep	6,927		
Total	61,670		

OUCC Expense Adjustments

(1) <u>Capitalize Labor</u>

To capitalize labor associated with test year connections.

Labor Authorized in TD2190 Number of Single Meter Taps	\$ 111.38 66
	7,351.08
Labor Authorized in TD2190	\$ 111.38
Additional Labor Authorized in TD2190	7.43
Total Dual Meter Installation Labor	118.81
Number of Dual Meter Taps	3
	356.43

Adjustment Increase (Decrease)

\$ (7,708)

(2) Non-Recurring Material and Supplies

To remove non-recurring expense incurred due a lightening strike.

Vendor	Description	Account	Amount
Bastin Logan	Well Motor 75 HP - Loaner	6205	\$ (8,434)
B L Anderson	Work on Computer Boards	6205	 (1,845)

Adjustment Increase (Decrease)

\$ (10,279)

(3) Wellhead Protection Costs

To amortize test year wellhead protection costs over five years.

Wessler Invoice 33566	\$ 1,542.15
Wessler Invoice 34121	1,602.94
Total Test Year Wellhead Protection Cost	3,145.09
Divide by Five Years	5
Annual Wellhead Protection Cost	\$ 629
Total Test Year Wellhead Protection Cost	(3,145)
Less: Annual Wellhead Protection Cost	629

Adjustment Increase (Decrease)

\$ (2,516)

OUCC Expense Adjustments

(4)

Periodic Maintenance Expense

To adjust for periodic maintenance expense.

Tank Painting/Cleaning Amortize over 15 years	\$ 2,966,264 15	
Well Cleaning and Well Pump Maintenance	 35,502 5	197,751
Booster Pump Maintenance	\$ 8,000.0 5	7,100
Total Periodic Maintenance Expense Less: Test Year Expense		1,600 206,451 (168,175)
Adjustment Increase (Decrease)		\$ 38,276

(5)

Reclassification of E&R as Operating Expense

To reclassify E&R items as Operating Expense.

Water Loss Audit and Risk Assessment	\$	15,000	
Emergency Response Plan		10,000	
Cyber Security Plan		10,000	
	\$	35,000	
		5	
Adjustment Increase (Decre	ease)		\$ 7,000

(6)

System Delivery Adjustment

To increase operating expenses that result from post-test year customer growth.

	Φ 170 2 02						
Test Year Purchased Power Expense	\$ 179,282						
Test Year Chemical Expense	55,772						
	235,054						
Divided by: # of Test Year Bills	82,845						
Cost Per Bill		\$	2.84				
Plus: Postage Cost			0.55				
		\$	3.39				
Times: Number of Additional Post-Test Year Bills			1,236				
Adjustment Increas	se (Decrease)			\$	4,190		

Extensions and Replacements

To reflect the average amount of extensions and replacements required over a five year period.

	Year 1	Year 2	Year 3	Year 4	Year 5	Total
SCADA Improvements (20 Sites)	\$ -	\$ 275,000	\$ -	\$ -	\$ -	\$ 275,000
Bloomfield Wellfield Generator	-	-	-	222,000	-	222,000
Trailer Generator	-	-	100,000	-	-	100,000
Booster Station #2 Replacement	-	-	-	265,360	-	265,360
Water Main Relocation - US231	125,395	-	-	-	-	125,395
Water Main Replacement - Hobbievill	. –	-	-	656,000	-	656,000
Vehicles	61,000	61,000	61,000	61,000	61,000	305,000
Excavator Trades	5,000	5,000	5,000	5,000	5,000	25,000
SR 58 Water Service Tie-Overs	150,000	-	-	-	-	150,000
	\$ 341,395	\$ 341,000	\$ 166,000	\$ 1,209,360	\$ 66,000	2,123,755

Divide by 5 Years

Average Annual Extensions and Replacements

5

424,751 \$

OUCC Supplemental Schedule 9 Page 1 of 1

EASTERN HEIGHTS UTILITIES, INC CAUSE NUMBER 45435-U

Current and Proposed Rates and Charges

		Petitioner	OUCC	OUCC
	Current	Proposed	Proposed	More (Less)
Metered Rate				
First 3,000 Gallons	\$ 4.95	\$ 6.56	\$ 6.34	(0.22)
Next 12,000 Gallons	3.37	4.47	4.32	(0.15)
Next 35,000 Gallons	2.65	3.51	3.39	(0.12)
Next 100,000 Gallons	2.38	3.16	3.05	(0.11)
All Over 150,000 Gallons	2.16	2.86	2.77	(0.09)
Minimum Rate				
5/8" - 3,000 Gallons	14.85	19.69	19.02	(0.67)
3/4" - 4,500 Gallons	19.91	26.4	25.51	(0.89)
1" - 7,500 Gallons	30.02	39.8	38.46	(1.34)
1 1/2" - 17,400 Gallons	61.65	81.74	78.98	(2.76)
2" - 30,000 Gallons	95.04	126.01	121.75	(4.26)
3" - 69,000 Gallons	193.26	256.23	247.58	(8.65)
4" - 123,000 Gallons	321.78	426.63	412.23	(14.40)
6" - 276,000 Gallons	658.20	872.66	843.21	(29.45)
Hydrant Charge per Annual				
Public	364.68	483.50	467.18	(16.32)
Private	364.68	483.50	467.18	(16.32)
2" Service	58.27	77.26	74.65	(2.61)
3" Service	131.12	173.84	167.97	(5.87)
4" Service	233.08	309.03	298.59	(10.44)
6" Service	524.43	695.31	671.84	(23.47)
8" Service	936.48	1,241.62	1,199.70	(41.92)
10" Service	1,456.74	1,931.39	1,866.20	(65.19)
12" Service	2,097.70	2,781.20	2,687.32	(93.88)