

FILED  
October 30, 2018  
INDIANA UTILITY  
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF FORT )  
WAYNE, INDIANA FOR AUTHORITY TO )  
ISSUE LONG-TERM DEBT TO FINANCE )  
WATER SYSTEM IMPROVEMENTS AND ) CAUSE NO. 45125  
TO ADJUST ITS RATES AND CHARGES )  
FOR WATER SERVICE )  
)

INTERVENOR CITY OF NEW HAVEN'S EXHIBIT 3  
DIRECT TESTIMONY OF KEITH SCHLEGEL

/s/ R.M. Glennon  
Robert M. Glennon  
Attorney No. 8321-49

Robert Glennon & Assoc. P.C.  
3697 N. Co. Rd. 500E.  
Danville, IN 46122  
(317) 852-2723  
robertglennonlaw@gmail.com

IURC  
INTERVENOR'S - New Haven  
EXHIBIT NO. 3  
1-23-13 DATE REPORTER CR

1   **Q. 1   Please state your name, title, and business address.**

2   A.   Kieth Schelgel, Director of Engineering. My office is located at 815 Lincoln  
3       Highway East, New Haven, Indiana 46774.

4   **Q. 2   By whom are you employed and what is your position?**

5   A.   I am employed as Director of Engineering for the City of New Haven ("New  
6       Haven").

7   **Q. 3   How long have you served as Director of Engineering for New Haven?**

8   A.   I have been employed at the New Haven Engineering Department in total for about  
9       19 years. I have served as Director of Engineering in total for about 16 years. I  
10      have worked in the planning design and supervision of public works projects my  
11      entire career.

12   **Q.    Please describe your career experience.**

13   A.   From 1979 - 1985 I worked for Schnelker Engineering as project draftsman. I  
14      drafted plans for public works projects including municipal water, sewer, storm  
15      sewer, water retention and streets. From 1985-1989 I worked for Turnbell  
16      Engineering as manager of their drafting department. There I worked on project  
17      engineering, subdivision development, sewer, water, street, storm sewer and water  
18      detention projects.

19           In 1989 I was employed by New Haven as a public works construction  
20      inspector. I inspected both ongoing and completed construction projects including  
21      municipal utility projects for water, sewer, storm water, drainage, water retention,  
22      streets and other projects related to public works in New Haven. I was promoted to  
23      Director of Engineering in 1992 and served in that role until 1999. In 1999 I went

1 to work for Schnelker Engineering as a construction inspector. There I provided  
2 project inspection services for several other municipalities and sewer/water  
3 districts. In 2009 I was asked to return to New Haven to again be the Director of  
4 Engineering. I have served in that position since. In my long career I have helped  
5 plan, supervised, inspected many hundreds of municipal construction projects.

6 **Q. Please describe your training.**

7 A. In my youth I had an avid interest in drafting and design. I excelled at mechanical  
8 drawing in school. That lead me into my life's career path that I still enjoy today. I  
9 am not a professional engineer. For approximately 40 years I have worked in the  
10 process of public works design, revising designs, bidding, bid evaluations, bid  
11 selection, project installation supervision, project corrections. In that process I  
12 regularly work with many engineering firms and many Professional Engineers. The  
13 steps needed from start to finish of public works projects, like water utility  
14 infrastructure, requires an informed interactive and coordinated team effort.  
15 Engineers, designers, the Municipality, contract excavators, contract installers all  
16 have to accurately communicate and perform well and efficiently for projects to be  
17 completed correctly, on time and in budget. Members of these teams learn from  
18 each other and teach each other to avoid problems and promote successful project  
19 completion and future operation. As Director of Engineering I am responsible for  
20 overseeing these efforts. In my long career I have regularly worked shoulder to  
21 shoulder with engineers, designers, and contractors in the planning, design,  
22 bidding, and installation of public works projects. I have specialized knowledge  
23 and skill related to municipal public works projects.

1    **Q.    What are your duties as New Haven's Director of Engineering?**

2    A.    As Director of Engineering I am responsible for the successful design, bidding,  
3           construction, oversight and completion of the City of New Haven's construction  
4           projects. I coordinate and supervise the selection of engineering firms, oversee the  
5           design of the projects and review the bid results submitted by the bidders for all  
6           City of New Haven Public Works projects. During the bid review process, it is my  
7           job to ensure that the bids submitted by bidders are within the engineer's estimates.  
8           My duties also include verifying compliance with project specifications during  
9           construction, verifying that the project time of completion is met and that the  
10          project goals of the City of New Haven have been achieved. The New Haven  
11          Engineering Department strives to provide all relative project information to  
12          bidders, so they can accurately bid a Public works project, thereby avoiding  
13          escalated unit costs or excessive bid contingencies. I am in charge of supervision  
14          and inspection of projects under construction.

15                 The New Haven Engineering Department often looks at the results of prior  
16          projects noting what contributed to their installation, operational and economic  
17          success. The bids, practices and results of those previous projects are then used to  
18          help evaluate the reasonableness of new project bids. The New Haven Engineering  
19          Department maintains a GIS log of all water line breaks.

20          I work closely with other municipal entities, and with associated professionals in  
21          applying for funding opportunities

22    **Q. 4   On whose behalf are you testifying in this proceeding?**

23    A.    I am testifying on behalf of New Haven.

1    **Q. 5 What is the purpose of your testimony?**

2    A.    To provide information helpful to the IURC in evaluating the Fort Wayne  
3           wholesale or “sale for resale” rates that should be approved in this Cause  
4           and charged to New Haven and ensuring New Haven does not pay  
5           unwarranted Fort Wayne costs. I will address:

6                 The unique character of New Haven’s sale for resale municipal  
7           utility status;

8                 The very limited portion of Fort Wayne water assets, particularly  
9           transmission mains that actually provide sale for resale water to the New  
10          Haven municipal water utility.

11                The vast amount of Fort Wayne’s water plant that in no way serves  
12          the needs of New Haven’s municipal water utility.

13                I share my observations regarding some of Fort Wayne’s Capital  
14          Improvement Plan (“CIP”) proposed projects and costs.

15                Lastly, I describe why New Haven should not be charged a fire  
16          protection charge by Fort Wayne.

17   **Q. 6 Do you render an opinion as to the details of how rates would be**  
18       **adjusted based on your observations and opinions expressed in this**  
19       **testimony?**

20   A.    No, I do not. Having Fort Wayne’s sale for resale rates more accurately  
21          reflect what would be fair to New Haven and the dollar amounts of those  
22          adjustments is addressed by our rate experts Mr. Guerrettaz and Mr. Seelye.

23

1           **I. The City of New Haven as a Sale For Resale Entity**

2   **Q. 7   Please describe the City of New Haven's municipal water utility.**

3   A.   New Haven is a small city incorporated in 1963 with a current population of  
4       approximately 15,700. We are located mostly within the I-469 loop contiguous to  
5       and just east / southeast of Fort Wayne. New Haven has operated its municipal  
6       water utility since for over 120 years. The earliest documentation goes back to  
7       1896. New Haven's municipal water utility has transmission mains ranging in  
8       size from 12 to 20 inches and approximately half a million gallons of water  
9       storage. Our municipal water utility has approximately 5,200 customers the bulk  
10      of which are residential customers. New Haven is largely older blue-collar  
11      neighborhoods. Residents seem to like the close nit small town feel of New  
12      Haven.

13           Our municipal utility's water transmission lines connection points to Fort  
14      Wayne's water transmission lines are near Fort Wayne's Three Rivers Water  
15      Filtration Plant. Our water is supplied by Fort Wayne at four connection points  
16      feed by Fort Wayne transmission mains of 12 to 54-inch diameter. Mr. Seelye's  
17      Exhibit WSS-3 provides more details.

18   **Q. 8   How is New Haven billed by Fort Wayne for its wholesale sale for resale**  
19   **water supply service?**

20   A.   Currently each month Fort Wayne charges a volumetric charge, a \$3,027.53  
21      Monthly Demand Charge for each of the four connection points i.e. \$12,110.12  
22      per month, a public fire protection fee of \$232.87 per connection point per month

(monthly total of \$931.48) and a monthly service charge per connection point of \$837.06 (monthly total of \$3,348.24).

**Q. 9 Is New Haven different from other Fort Wayne water customers?**

**A.** Yes. New Haven is Fort Wayne's only sale for resale water customer. Our municipal water utility is dedicated to providing public service and meeting the public's needs for potable water. We buy a large bulk quantity of finished water each year, last year at a total cost of \$979,074.03. I believe we are Fort Wayne's largest volume water customer. New Haven is dedicated to public service. We want to provide our constituents with quality water service at reasonable cost. New Haven has no other available current source of water supply. We must accept Fort Wayne's water, add our municipal utility capital and O&M costs and supply our constituent's water. The price we pay Fort Wayne for our bulk large volume water purchasers is critical to the operation of our water utility and our water service to the citizens of New Haven.

To the extent the rates we pay for purchased water are too high, that uses money that otherwise would be available for our municipal utility repairs and capital improvement projects. Unlike a large industrial customer entity that seeks to maximize profits to pay higher dividends and increase stockholders share value, everything we do and all the money we generate is for the people of New Haven. It is a closed loop so to speak. Our water utility uses its funds to maintain and operate the utility. What New Haven generates New Haven uses to provide domestic water and fire protection water to New Haven water customers For at least 120 years New Haven has

1 provided one of the most critical public services, the essence of life, to its  
2 constituents, potable water and fire protection. We take that responsibility  
3 very seriously. Thousands of Hoosiers depend on New Haven for quality  
4 potable water service. The approximate one million dollars we pay each  
5 year for purchased water is substantial to our municipal utility budget. We  
6 have an obligation to our thousands of customers to work to ensure the price  
7 we pay for wholesale water supply is fair and reasonable. New Haven in  
8 this case has worked to show the IURC why the price Fort Wayne wants us  
9 to pay is too high.

10 I think a critical element for the IURC to remember in reviewing the  
11 facts and setting the sale for resale rate is that New Haven and its municipal  
12 water utility are dedicated solely to public service. The costs we save help  
13 the 15,700 people that live in New Haven. The cost of our bulk water service  
14 should be kept as low as reasonably possible, so the resulting savings can  
15 be used to best operate and maintain our municipal water utility service.  
16 We are located contiguous to Fort Wayne and close to its water treatment  
17 plant. Making New Haven pay for more Fort Wayne plant and water  
18 transmission main improvements than is used to serve New Haven requires  
19 New Haven to pay a costly subsidy to Fort Wayne. We believe the cost is  
20 too high. Mr. Seelye and Mr. Guerrettaz will address that in more detail.  
21

**II. The Limited Portions of Fort Wayne's Water Plant used to Meet  
New Haven's Sale For Resale Needs.**

**Q. 10 Please describe the limited amount of Fort Wayne water utility plant that is  
actually used to deliver the bulk volumes of sale for resale water to New  
Haven' water utility.**

**A.** Mr. Seelye sponsors an Exhibit WSS-3 which is a map that highlights the limited  
amount of Fort Wayne transmission mains that provide sale for resale service to  
New Haven. New Haven's master meters are served from Fort Wayne transmission  
mains that are fed directly from Fort Wayne's Three Rivers Water Filtration plant,  
which is located a short distance away. New Haven's four metering points from  
South to North are located at Moeller Road, State Road 930, Nelson Road, and  
Camdenwood Lane. We receive 100 percent of our water from these four metering  
points. The Camdenwood Lane connection point accounts for only about 1.5% of  
New Haven's water received. The transmission mains that feed our metering points  
also provide water to Fort Wayne's retail City customers in the East South East and  
Northeast area.

New Haven also receives service from a small portion of Fort Wayne's  
water supply and water treatment plant and limited amount from Fort Wayne storage  
facilities. New Haven's water consumption accounts for about 3% of the finished  
water from Fort Wayne's Three Rivers Water Filtration plant. Mr. Seelye will  
address the rate making impact of that.

1   **III. Fort Wayne Improvement Costs Unrelated to Wholesale Service to New Haven.**

2  
3   **Q. 11 In addition to your concern that New Haven is asked to pay for Fort Wayne**  
4       **plant that is not used to provide wholesale water service to New Haven, does**  
5       **Fort Wayne propose new improvements and have water service expansion**  
6       **areas unrelated to New Haven's sale for resale service?**

7   A. Yes. Fort Wayne seeks to include in New Haven's sale for resale rates both the cost  
8       of acquiring other water utilities and distant proposed new water plant, both of which  
9       are completely unrelated to providing us bulk wholesale water. During the many  
10      years I have been with New Haven, we have been supplied water directly from the  
11      Fort Wayne water treatment plant since 1960. While Fort Wayne has expanded its  
12      distribution system significantly over the years, the manner in which New Haven  
13      has been served by Fort Wayne has remained essentially unchanged. Fort Wayne  
14      has added tens of thousands of customers during the last decade and recently  
15      purchased a private water utility (Aqua Source North and South and Southwest  
16      acquisitions) and materially expanded their customer base. New Haven should not  
17      have to help pay for the acquisition of those water utilities. I am concerned that  
18      New Haven is being asked to pay for the expansion of Fort Wayne's distribution  
19      system necessary to serve new customers, most of which are being added on the  
20      Western outskirts of Fort Wayne's system. I am also concerned that Fort Wayne  
21      would charge New Haven for plant replacements and additions that have no  
22      relationship to serving New Haven.

1   **Q. 12   Generally, where has the expansion been on Ft. Wayne's system?**

2   A.     After reviewing the City of Fort Wayne 2017 Master Plan (Updated) – 10-year  
3           Capital Plan (Exhibit 7.2) it appears that the majority of the planned Capital  
4           improvement Projects are located to the North, West and South of the City of Fort  
5           Wayne. There are a few Capital Improvement Projects located to the East of the  
6           City of Fort Wayne. None specifically are for the sole benefit of water flows to  
7           New Haven. Two (2) of these projects (Fort Wayne CIP project numbers 23 and  
8           28) will benefit Fort Wayne water customers located within the City Limits of  
9           New Haven and the City of New Haven Master meter connections.

10   **Q. 13   Can you provide examples of facilities that have been installed by Ft. Wayne**  
11       **to expand its system that provide no value to New Haven?**

12   A.     Yes. Fort Wayne has expanded its system significantly on the north end of its  
13           service territory. In order to provide for its expansion, Fort Wayne has installed  
14           elevated storage facilities and transmission mains to serve customers in that area.  
15           There are a significant number of Capital Improvement Projects planned that will  
16           benefit only City of Fort Wayne water customers located in the West Pressure  
17           Zone such as Fort Wayne CIP project numbers 13, 14, 15, 18, 42, 43, 44 and a few  
18           projects located Northwest of the intersection of Smith Road and Engle Road that  
19           are not identified with project numbers. In addition, there are two (2) CIP projects  
20           (21 and 39) that will only benefit Fort Wayne water customers located in the  
21           Southwest Pressure Zone. New Haven is being asked to pay in sale for resale  
22           rates a portion of the cost of these facilities even though we receive no benefit  
23           from them. Similarly, Fort Wayne has acquired Aqua Source's water utility in its

1 northern service area that will not benefit New Haven water customers in any way.  
2 To keep our water utility costs fair and our customer rates down New Haven needs  
3 to pay for what it uses, not distant unrelated facilities that do not serve our  
4 municipal public service sale for resale needs.

5 **Q. 14 Has Fort Wayne's system grown while you have worked for New Haven?**

6 **A.** Yes. Fort Wayne's has expanded its distribution system considerably while I have  
7 worked for New Haven. Most of the growth has been in areas further away from  
8 Fort Wayne's water treatment plant than New Haven. It is obvious to me that New  
9 Haven's bulk sale for resale water purchases are subsidizing acquisitions and capital  
10 improvements that are unrelated to New Haven's Municipal water needs. New  
11 Haven needs to keep its water rates reasonable. Paying for unrelated capital  
12 expansions, utility acquisitions and capital improvements are contrary to that public  
13 service goal.

14 **IV. Comments and Concerns regarding Fort Wayne's CIP**

15 **Q. 15 Did you review Fort Wayne's 2017 CIP**

16 **A.** Yes.

17 **Q. 16 Do you have any concerns regarding the CIP projects**

18 **A.** Yes. Many of the proposed projects have no relationship to providing service to  
19 New Haven. Those include: Fort Wayne CIP project numbers 32, 33,22,34,20, 41,  
20 26, 37, 9, 8, 19, 3, 6, 4, 7 B, 10,5, 11, 12, 16, 17, 18, 15, 29, 42, 43, 25, 14, 44, 39,  
21 21 and the portion of project 35 south of Tillman Road  
22

1           Additionally some of the projects seem to me to have costs higher than I  
2           would anticipate and higher than I would be comfortable with if I were budgeting  
3           the projects. Those projects and my concerns for each are as follows:

- 4       1.) Fort Wayne Facility CIP project number 21 seems to have an inflated unit cost for  
5           16" pressure pipe when comparing prices of a similar grade pressure pipe bid by  
6           the City of New Haven in 2015. According to the Fort Wayne CIP project  
7           estimate sheet, the cost per lineal foot of 16" Force main is estimated to be  
8           \$200.00/Ft. New Haven bid 16" pressure class 350 D.I. pipe used for water main  
9           in 2015 and received bids from contractors ranging between \$89.00 - \$122.50 per  
10          L.F.
- 11       2.) Fort Wayne Facility CIP project number 32 does not have a specified depth of  
12           asphalt given on the Fort Wayne CIP project estimate sheet. That makes bid  
13           evaluation and bidding itself difficult.
- 14       3.) Fort Wayne Facility CIP project number 38 seems to have an inflated unit cost for  
15           6" pressure class 350 pipe when comparing prices of the same grade pressure pipe  
16           bid by the City of New Haven in 2016. According to the Fort Wayne CIP project  
17           estimate sheet, the cost per lineal foot of 6" Pressure class 350 D.I. pipe is  
18           estimated to be \$168.00/Ft. New Haven bid 6" pressure class 350 D.I. pipe used  
19           for water main in 2016 and received bids from contractors ranging between  
20           \$42.00 - \$95. per L.F. Granted the installation may be more difficult on the  
21           treatment plant site due to the many infrastructure crossing however, \$168.00/L.F.  
22           seems extremely high.

- 1       4.) Fort Wayne Facility CIP project number 58 (Northwest Pump Station  
2       Replacement and Motor Control Center Replacement) will only benefit Fort  
3       Wayne water customers located in the Northwest Pressure Zone.
- 4       5.) Fort Wayne Facility CIP project number 60 (Summit Pump Station) will only  
5       benefit Fort Wayne water customers located in the Northwest Pressure Zone.
- 6       6.) Fort Wayne Facility CIP project number 61 (Bass Road Water Pumping Station)  
7       will only benefit Fort Wayne water customers located in the West Pressure Zone.
- 8       7.) Fort Wayne Facility CIP project number 62 (West side Tank Painting) will only  
9       benefit Fort Wayne water customers located in the West Pressure Zone.
- 10      8.) Fort Wayne Facility CIP project number 63 (Southwest Elevated Tank Painting)  
11      will only benefit Fort Wayne water customers located in the Southwest Pressure  
12      Zone.
- 13      9.) Fort Wayne Facility CIP project number 64 (Dupont Tank Painting) will only  
14      benefit Fort Wayne water customers located in the Southwest Pressure Zone.
- 15      10.) Fort Wayne Facility CIP project number 65 (Southwest Elevated Tank Painting)  
16      will only benefit Fort Wayne water customers located in the Southwest Pressure  
17      Zone.
- 18      11.) Fort Wayne Facility CIP project number 66 (Northwest Reservoir Painting) will  
19      only benefit Fort Wayne water customers located in the Northwest Pressure Zone.
- 20      12.) Fort Wayne Facility CIP project number 67 (Covington Tank Painting) will only  
21      benefit Fort Wayne water customers located in the West Pressure Zone.
- 22      13.) Fort Wayne Facility CIP project number 68 (Lafayette Tank Painting) will only  
23      benefit Fort Wayne water customers located in the Southwest Pressure Zone.

- 1       14.) Fort Wayne Facility CIP project number 69 (Northeast Tank Painting) will benefit  
2           Fort Wayne water customers located in the Northeast quadrant of the City of Fort  
3           Wayne.
- 4       15.) Fort Wayne Facility CIP project number 70 (Aboite Meadows Tank Painting) will  
5           only benefit Fort Wayne water customers located in the West Pressure Zone.
- 6       16.) Fort Wayne Facility CIP project number 71 (Coldwater Tank Painting) will only  
7           benefit Fort Wayne water customers located in the Northwest Pressure Zone.
- 8       17.) Fort Wayne Facility CIP project number 72 (Brooklyn Kinsmoor Elevated Tank  
9           Painting) will only benefit Fort Wayne water customers located in the West  
10          Pressure Zone.
- 11      18.) Fort Wayne Facility CIP project number 73 (New Summit Elevated Tank) will  
12          only benefit Fort Wayne water customers located in the Northwest Pressure Zone.
- 13      19.) Fort Wayne Facility CIP project number 76 (Tank Turnover and Mixing Projects)  
14          are water quality improvement projects that benefit Fort Wayne water Customers  
15          located in the Northwest Pressure Zone, West Pressure Zone, Southwest Pressure  
16          Zone according to the Fort Wayne CIP project estimate sheet.
- 17      20.) Many of the "Facility Projects" have a line item labeled "Planning Contingency".  
18          The Planning Contingency percentages range between 10% to 40%. If that is  
19          construction contingency I would be concerned with contingencies above 15%.
- 20  
21

1   **V. Fire Protection Charge**

2   **Q. 17   What are your comments on Fort Wayne's fire protection charge to New**  
3       **Haven?**

4   **A.**    It seems improper to me. New Haven provides its own public fire hydrants and its  
5           own fire use water. Fort Wayne does not pay for or maintain New Haven utility  
6           fire protection items. Three of New Haven's connection points to Fort Wayne's  
7           transmission lines are slightly in New Haven's corporate boundaries. That goes  
8           back many years to resolution of an annexation dispute with Fort Wayne. As a  
9           result Fort Wayne serves and Fort Wayne directly bills a total of about 540 retail  
10          Fort Wayne water customers slightly inside of New Haven's boundaries off of its  
11          transmission lines to three metering stations: Nelson Road; S.R. 930 and Moller  
12          Road. Those customers are all on Fort Wayne's side of the New Haven master  
13          meters. They are directly billed by and directly pay Fort Wayne for their retail  
14          service water. As such their fire protection should be in the retail rates they pay,  
15          not in New Haven's sale for resale rates. Those 540 retail Fort Wayne customers  
16          have nothing to do with forcing our approximate 5,200 New Haven water utility  
17          customers to erroneously pay for Fort Wayne fire protection they do not receive.

18   **Q. 23   In summery what is your position?**

19   **A.**    New Haven's water utility is unique among Fort Wayne water customers as it is  
20          not the end use customer. It needs economically priced bulk water from Fort  
21          Wayne to provide to the Citizens of New Haven. The reasonableness of the price  
22          is important to keep New Haven's water rates reasonable, and support our water  
23          utilities need for capital replacements. Currently and as proposed in this case Fort

1 Wayne's rates to New Haven incorrectly charge New Haven for plant and distant  
2 utility acquisitions not used to serve New Haven. New Haven needs that  
3 overcharge corrected. Fort Wayne's utility acquisitions and many of the City of  
4 Fort Wayne CIP projects will not benefit New Haven Water customers. New  
5 Haven municipal water utility and its water customers should not be required to  
6 pay for Fort Wayne water plant, its utility acquisitions, and its CIP projects that  
7 do not benefit New Haven Water customers. Lastly New Haven should not have  
8 to pay Fort Wayne fire protection charges.

9 **Q. 24 Does this conclude your testimony?**

10 **A.** Yes, at this time.

VERIFICATION

I affirm under the penalties of perjury that the contents of my attached testimony  
to the best of my knowledge are true and accurate.

Keith Schlegel  
Keith Schlegel

10/30/18  
Date

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Testimony was served upon the following by electronic delivery this the 30th day of October 2018, to:

Daniel M. Le Vay  
Indiana Office  
of Utility Consumer Counselor  
PNC Center, Suite 1500 South  
115 West Washington Street  
Indianapolis, Indiana 46204-2208

Brian C. Bosma  
Kroger, Gardis & Regas, LLP  
111 Monument Circle, Suite 900  
Indianapolis, IN 46204  
[bbosma@kgirlaw.com](mailto:bbosma@kgirlaw.com)

J. Christopher Janak  
Jonathan W. Hughes, Esq.  
Bose McKinney & Evans LLP  
111 Monument Circle, Suite 2700  
Indianapolis, IN 46204  
[jjanak@boselaw.com](mailto:jjanak@boselaw.com)  
[jhughes@boselaw.com](mailto:jhughes@boselaw.com)

Brandon J. Almas  
Associate City Attorney – City Utilities  
200 E. Berry St.  
Fort Wayne, IN 46802

/s/ R.M. Glennon

Robert M. Glennon  
Attorney at Law, #8321-49

Counsel for City of New Haven

Robert M. Glennon  
Robert Glennon & Assoc., P.C.  
3697 N. Co. Rd. 500 E.  
Danville, Indiana 46122  
Telephone: (317) 852-2723  
Fax: (317) 852-0115  
[robertglennonlaw@gmail.com](mailto:robertglennonlaw@gmail.com)