KENTUCKY-AMERICAN WATER COMPANY CASE NO. 2015-00418 COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Witness: Linda C. Bridwell

- 9. Refer to the Direct Testimony of Linda C. Bridwell ("Bridwell Testimony"), pages 41-42. For each state that has been identified as adopting tariff riders similar to KAWC's proposed QIP:
 - a. Identify the statute, administrative regulation, or administrative order authorizing each state's infrastructure-replacement tariff rider and provide a copy of such statute, administrative regulation, or order;
 - b. Provide the order from the state's utility regulatory commission authorizing that state's initial infrastructure-replacement tariff rider;
 - c. Provide the most recent order from the state's utility regulatory commission authorizing that states infrastructure-replacement tariff rider;
 - d. State whether that state's utility regulatory commission permits the use of a forecasted test year in a general rate adjustment case, and whether the use of a infrastructure replacement tariff rider limits the use of a forecasted test year;
 - e. State whether the state's infrastructure-replacement tariff rider uses a forecasted or historical period; and
 - f. Provide a comparative analysis listing the similarities and differences between KAWC's proposed QIP to the infrastructure-replacement tariff riders in the listed states. Include detailed discussions for each similarity and difference noted in KAWC's comparative analysis.

Response:

a. In the states where American Water operates:

State	Approved Via Rate Order	Approved Via Promulgated Regulation	Approved Via Statute / Law
CA	2007-2011		
IL			1999
IN			2000
MO			2003
NJ		2012	
NY	2004		
PA	Pre 1996 but		1996 W; 2014 WW

	overturned by Supreme Court	
TN		2013

A Distribution System Improvement Charge "DSIC" was first implemented in Pennsylvania and allows for rate increases, outside of a general rate proceeding, for non-revenue producing investments to replace aging infrastructure. Most recently, it was expanded to include wastewater and gas infrastructure investment. Pennsylvania now allows water and wastewater utilities, natural gas distribution companies, city natural gas distribution operations, and electric distribution companies to petition the Commission for approval to implement a DSIC (Act 11 of 2012 and Docket No. M-2012-2293611).

In addition to Pennsylvania, American Water has regulated utility operations in states with Infrastructure surcharge mechanisms that include California, Illinois, Indiana, Missouri, New Jersey, New York (i.e. System Improvement Charge), and Tennessee.

Illinois: State Statute- Qualifying Infrastructure Plant Surcharge or "QIPS" (Administrative Code Title 83 Chapter 1 Section 656).

Indiana: State Statute- DSIC (Indiana Administrative Code 170 IAC 6-1.1-1).

Missouri: Docket No. WR-2011-0337

New Jersey: Docket No. WR-15010035

New York: DSIC, Case No. 04-W-0577, amended in Case No. 07-W-0508; System Improvement Charge, Case 11-W-0200, allows recovery of specific projects in rate year 2 and 3 including treatment facilities, source of supply, storage facilities and Business Transformation program.

Tennessee: Authorized by the Tennessee Legislature in Tenn. Code Ann. § 65-5-103 and first approved by the Tennessee Regulatory Agency in Docket No. 13-00130.

Other states, that have infrastructure surcharge mechanisms where American Water does not have regulated utility operations:

Arizona: Arizona Water Company- DSIC (Decision 73938 (April 8 and 11, 2013).

Connecticut: Connecticut Water Company- Water Infrastructure and Conservation Adjustment (WICA) (Section 16-262v and w of CGS).

Delaware: UW Delaware- DSIC (statute and regulation).

Maine: State Statute- Infrastructure Surcharge and Capital Reserve Accounts for Water Utilities

(Legislation enacted during the 2012 session (PL 2011, Chapter 602).

New Hampshire: Aquarion Water Company of New Hampshire - Water Infrastructure and Conservation

Adjustment Charge Pilot Program (Order No. 25,019).

Ohio: State Statute: DSIC (Ohio Rev. Code § 4909.15(A)(1).)

Finally, the Public Service Commission of West Virginia recently included the following language in its Order in the West Virginia American Water Company (WVAWC) Case No. 15-0675-W-42T / Case No. 15-0675-S-42T: "...the Commission will direct WVAWC to seek authorization for an IRP (Infrastructure Replacement Program) Surcharge mechanism, if it chooses to do so, in a separate proceeding outside a general rate case filing." (February 24, 2016, p. 27).

- b. The Orders authorizing the initial programs for Illinois, Indiana, New York, Missouri, Tennessee and Pennsylvania are attached.
- c. The most recent Orders for Illinois American Water, Missouri American Water, New Jersey American Water, Indiana American Water, Tennessee American Water, and Pennsylvania American Water are attached.
- d-f. Please refer to the attached comparison. This is the last four pages of the attachment. This information is current to the best of our knowledge.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois-American Water Company :

:

Application for Approval of its Proposed : 04-0336

Qualifying Infrastructure Plant Surcharge Rider pursuant to 83 III. Adm. Code 656.

ORDER

By the Commission:

I. Introduction

On April 14, 2004, Illinois-American Water Company ("IAWC" or the "Company") filed with the Illinois Commerce Commission ("Commission") an Application for Approval of a Proposed Qualifying Infrastructure Plant Surcharge Rider. Pursuant to notice given in accordance with the law and the rules and regulations of the Commission, hearings were held by a duly authorized Administrative Law Judge at the Commission offices in Chicago, Illinois, on May 12, July 15, and September 20, 2004. Appearances were entered by counsel for the Company and the Staff of the Illinois Commerce Commission ("Staff"). At the conclusion of the hearing on September 20, 2004, the record was marked "Heard and Taken." No contested issues remained on that date.

The Company's Application is governed by Section 9-220.2 of the Public Utilities Act (the "Act"), which states:

- a. The Commission may authorize a water or sewer utility to file a surcharge which adjusts rates and charges to provide for recovery of (i) the cost of purchased water, (ii) the cost of purchased sewage treatment service, (iii) other costs which fluctuate for reasons beyond the utility's control or are difficult to predict, or (iv) costs associated with an investment in qualifying infrastructure plant, independent of any other matters related to the utility's revenue requirement. A surcharge approved under this Section can operate on an historical or a prospective basis.
- b. For purposes of this Section, "costs associated with an investment in qualifying infrastructure plant" include a return on the investment in and depreciation expense related to plant items or facilities (including, but not limited to, replacement mains, meters, services, and hydrants) which (i) are not reflected in the rate base used to establish the utility's base rates and (ii) are non-revenue producing. For purposes of this Section, a "non-

revenue producing facility" is one that is not constructed or installed for the purpose of serving a new customer.

c. On a periodic basis, the Commission shall initiate hearings to reconcile amounts collected under each surcharge authorized pursuant to this Section with the actual prudently incurred costs recoverable for each annual period during which the surcharge was in effect.

220 ILCS 5/9-220.2. The Commission adopted 83 III. Adm. Code 656, "Qualifying Infrastructure Plant Surcharge" ("Part 656") to implement Section 9-220.2 of the Act.

The Company is a corporation organized under the laws of the State of Illinois with its principal office in the City of Belleville, Illinois, and is engaged in the business of furnishing water and waste water service to the public in several communities affected by the Company's proposal herein, including: City of Alton; Village of Brighton; Village of Elsah; Village of Godfrey; City of Cairo; City of Belleville; City of Columbia; City of East St. Louis; City of Fairview Heights; City of Granite City; City of Madison; City of O'Fallon; City of Venice; City of Waterloo; Village of Alorton; Village of Brooklyn; Village of Cahokia; Village of Caseyville; Village of Centreville; Village of Fairmont City; Village of Millstadt; Village of Mitchell; Village of Pontoon Beach; Village of Sauget; Village of Shiloh; Village of Swansea; Village of Washington Park; City of Peoria; City of West Peoria; Village of Bartonville; Village of Bellevue; Village of Dunlap; Village of Hanna City; City of Streator; Village of Kangley; and City of Pontiac, Illinois. The Company is a public utility within the meaning of Section 3-105 of the Act. The Company provided notice of the filing of its Application herein in accordance with 83 Ill. Adm. Code 255.20(a), (f)(i) and 656.30 (c)(2)(3).

The Rider proposed by the Company is intended to recover only costs related to qualifying infrastructure plant ("QIP"), as described in Section 9-220.2 of the Act and 83 III. Adm. Code 656.40. All calculations under the Rider are in accordance with 83 III. Adm. Code 656.50 and 656.60. As a part of its Application, the Company filed the following proposed Tariff Sheets as IAWC Exhibits 1.1 and 1.2: III. C.C. No. 22, 2nd Revised Sheet No. 22, canceling First Revised Sheet No. 22; III. C.C. 22, Original Sheet Nos. 22.1 through 22.5; III. C.C. No. 5, Original Sheet Nos. 24.1 through 24.5.

Pursuant to the above Riders, the Company is proposing to implement a QIP Surcharge Rider for its Single Tariff Pricing Rate Zone ("STP" or "STP Rate Zone"), which includes its Alton, Cairo, Interurban, Peoria, Streator, and Pontiac Districts. The Company states that its most recent rate case reflected a combination of those Districts for the calculation of the revenue requirement, and continued movement to uniform pricing for each of those Districts. (See Order (Aug. 12, 2003), 02-0690, at 3, 119.) The Company states that it may file a QIP Surcharge Rider for its other service territories at a future time.

II. Discussion

The QIP Surcharge Riders proposed by the Company would provide for implementation of a charge to cover a return on the capital costs related to replacement or rehabilitation of qualified non-revenue producing plant infrastructure. Such investment would include replacement mains, meters, meter installations, services and hydrants. The QIP Surcharge would apply only to qualified non-revenue producing investment, which has not yet been included in rate base in a rate case. The Surcharge is capped at 5% of base rates billed to customers, consistent with Code Section 656.30(a), and shall be subject to an annual reconciliation pursuant to Section 656.80 to ensure that revenues collected under the QIP Surcharge are equal to the actual costs prudently incurred. The Company asserts that its proposed QIP Surcharge Riders are consistent with the rules codified in Part 656.

The Company provided notice of this proceeding in compliance with 83 III. Adm. Code 656.30, and is maintaining copies of the QIP Surcharge Rider for public inspection and posting public notices in each utility office within the STP Rate Zone. The Company also provided notice by newspaper publication and by mailing a notice of the filing to each customer in the STP Rate Zone.

Company witness Stafford explained that a portion of the Company's infrastructure is nearing the end of its life expectancy and must be replaced. Since the Company must provide adequate, safe, reliable, and low cost service, it seeks to meet this requirement through use of the QIP Surcharge Riders. The Company asserts that implementation of the Riders will reduce the level of rate case costs that otherwise would be associated with infrastructure replacement. IAWC also anticipates that QIP projects will constitute an increasing part of its construction requirements over the next several years, and the related capital and depreciation costs would require a significant level of rate relief in the absence of the Surcharge.

Mr. Stafford further testified that water utilities are not able to postpone the construction of QIP projects so as to reduce the frequency of necessary rate relief. Customer needs require that replacement mains, meters, meter installations, services, hydrants and other non-revenue producing items be installed continuously, with the result that the in-service date of the constructed plant cannot be delayed to reduce rate case frequency. He also explained that such facilities must be placed in service when they are needed by customers or required by law or regulation, irrespective of rate timing. In addition, Mr. Stafford averred that the placement in service of new plant additions is one of the major factors driving the need for water utilities to seek increases in revenues. With the approval of the QIP Surcharge, he concludes, IAWC would be in a better position to absorb increases in non-QIP costs for a bnger period. Customers therefore would benefit from the reduction in rate case frequency and expense. In addition, the QIP Surcharge would provide for more gradual rate increases.

Mr. Stafford opined that the QIP Surcharge will result in fair, just, and reasonable rates, and will operate only to provide a return on the investment in QIP not included in the Company's rate base. He also noted that none of the projects identified as QIP

were reflected in the test year of the Company's last rate case. In the Company's last rate case, Docket 02-0690, the Company used a future test year of calendar year 2003. None of the QIP projects were placed in service until after 2003 and, therefore, none were included in test year cost of service.

The cost of capital under the QIP Surcharge would be the approved overall rate of return in the prior rate order. The QIP Surcharge calls for use of the depreciation rates last approved by the Commission for the respective plant accounts in which the specific items of QIP are recorded. The Company acknowledges that, upon approval of a future rate increase, the QIP Surcharge will be reset as of the effective date of new base rates. The new rates will include in rate base the plant for which costs were formerly recovered through the QIP Surcharge. Only new qualifying plant additions—those not included in the rate base figure—would be eligible to be reflected in the QIP Surcharge subsequent to the effective date of new rates.

The QIP Surcharge will be expressed as a percentage applied to the total amount billed to each customer under the otherwise applicable rates and charges for customer charges, metered usage charges, and private and public fire charges. The QIP Surcharge revenue component would be reflected as a line item on the bill of each customer. The Company prepared an estimate of the percentage based upon a projection of QIP investment for the 2005 – 2009 period, which it filed as Exhibit 1.3 to its Application.

Mr. Stafford explained that the amount of QIP Surcharge revenue collected could vary from the actual amount of revenue needed to cover a return on the Company's investment in QIP plus taxes. As required by 83 III. Adm. Code 656.80, the QIP Surcharge will be subject to an annual reconciliation. Any difference between such revenues will be recouped from, or refunded to, customers. Mr. Stafford testified that the QIP Surcharge also includes a safeguard in the event that earnings in a given period exceed the authorized rate of return. For any calendar year in which the QIP Surcharge has been in effect and the realized rate of return exceeds the authorized rate of return, QIP Surcharge revenues collected during the year would be reflected as a credit in the QIP Surcharge adjustment factor effective on the first day of April of the following year, to the extent that such revenue contributed to realization of a rate of return above the authorized level during the prior calendar year.

Company witness Simpson provided the history of the Company's qualifying plant in the areas of Water Main Replacements & Relocations, Hydrant Replacements, Service Replacements, Meter Replacements and Meter Setting Replacements for the five-year period 1999-2003 for the STP Rate Zone. According to Ms. Simpson, the average number of breaks per mile for the STP Rate Zone has declined from an average of 0.67 breaks per mile in 1999 to 0.59 breaks per mile in 2003.

The Company proposed QIP replacements for the period 2005-2009. For 2005, the Company plans to replace 50,000 feet of water mains of various sizes within the STP Rate Zone. This represents a 4,327 feet per year, or 9.5%, increase above the

current 5-year average of 45,673 feet per year. IAWC also plans to replace 120 hydrants, which is an increase of 11 hydrants per year, or 10%, over the five-year average of 109 hydrants per year. The Company asserts that the increase is directly related to the increase in its small diameter water main replacement program. It additionally plans to replace 500 services, which is approximately double the average rate of replacement of services over the last five years. The increase is related to both the increase in water main replacement and the need to accelerate high priority service replacements. Furthermore, the majority of meters are on a 12-year replacement schedule. Based on this program, the Company will replace 13,243 meters in 2005, as well as 275 meter settings. In subsequent years, 2006-2009, the Company intends to maintain these rates of replacement, but projects that costs will increase 3% for inflation.

Finally, Ms. Simpson noted that Investment Projects (IPs) are those individual water main replacement or relocation projects that have a cost of \$100,000 or greater, or are longer than 1,500 feet in length, or have a diameter greater than 12 inches. Relocation projects are the result of other infrastructure replacement activities by local, state and federal entities. The Company states that it does not have accurate information for these outside infrastructure eplacement activities beyond a two-year time frame. For 2005, however, IP water main and water main relocation projects total \$454,000. The Company states that the amount of replacement and relocation is less than recent years due to the elimination of the Illinois First program in 2003, and the large amount of investment by the Company in the Interstate-74 Relocation project in Peoria in 2001-2003.

Staff witness Smith does not oppose adoption of the QIP Surcharge Rider. Mr. Smith stated that a QIP Surcharge Rider provides rate relief and funding for the replacement of old and deteriorating distribution systems and reduces regulatory lag. In Staff's view, the Company has adequate resources to plan and construct infrastructure and to maintain proper financial records of QIP projects. Staff, however, was concerned that the Company's proposed riders would provide the Company too much discretion by allowing an option to use either an annual prospective operation or a quarterly historical operation for its QIP Surcharge. The Company replied that conversion to or from prospective or historical operation is contemplated by Code Section 656.60, but limits the selection of prospective operation only to circumstances where utilities use the future test year in their most recent rate case. Mr. Stafford recommended that language be added to the Company's proposed tariffs to clarify that prospective operation only will be used if the Company's preceding rate case utilized the future test year, and historic operation only will be used if the Company's preceding rate case utilized an historical test year. Staff concurred with this recommendation.

The projects supporting the cost identified on IWAC Exhibit 2.1 generally are of the type allowable for surcharge recovery under Section 656.40 of 83 III. Adm. Code. Mr. Smith also identified certain projects that did not qualify, including hydrants replaced due to vehicular collisions, and services replaced as a result of customer requests. Staff also asserts, and the Company agreed that, while touch pad and wiring costs

connected to the meter are includable in QIP, the equipment used to read the meter is not allowable as QIP. Therefore, the Neptune ProRead remote touch pad, while properly includable in rate base, is not QIP.

IAWC identified eight large customers who receive service under competitive contracts. The QIP Surcharge generally applies to customer charges for meter, volume and fire protection. Competitive customers are not exempt from the regulations found in Section 656 of 83 III. Adm. Code or any tariffs that are developed from this rule. The QIP Surcharge Rider does not impact competitive customers in the same way that it impacts a customer served under traditional cost-of-service regulated rates, however. Competitive contracts are based on market considerations rather than the cost to the Company to serve the competitive customer. Nevertheless, the meter, private fire, and public fire charges paid by the competitive contract customers are the same as those provided for cost-based customers. It therefore is reasonable to view these charges to reflect utility costs, including that of current infrastructure. Competitive service customers should pay the portion of the QIP Surcharge related to meter and fire protection charges, since they benefit from the infrastructure paid for by the Surcharge. Conversely, the volume charges of competitive contract customers are based on negotiation, rather than the cost of operating the system, so it is reasonable that these customers not pay QIP charges on the volume rates.

Mr. Smith also recommended that clarifying language be added to the tariff sheets to address that matter. In particular, Mr. Smith recommended that the following paragraph be added after III. C.C. No. 22, Second Revised Sheet No. 22, paragraph (B) and also after III. C.C. No. 5, Original Sheet No. 24, paragraph (B):

(C) The QIP surcharge percentage shall not be applied to volume charges of competitive contract customers when those charges are established by contract, or to municipal or fire district charges where those charges are established by agreement.

Finally, Mr. Smith recommended that the Company's proposed QIP Surcharge Rider meet the requirements of Section 9-220.2 of the Act and that the revised tariffs conform to Section 656 of 83 Ill. Adm. Code. To that end, the Company, within 30 working days of the date of the Order in this proceeding and no later than the 20th day of the month preceding the effective date, should file a QIP tariff, as a compliance filing, with an effective date no earlier than the first day of the month following the issuance of the Order in this Docket. The Company also should file its QIP percentage on an Information Sheet with supporting data no later than the 20th day of the month preceding the effective date of the QIP Surcharge percentage. The Company concurred with this recommendation.

III. Commission Conclusion

The Company seeks approval of proposed QIP Surcharge Riders for its STP Rate Zone. The Riders would allow for the recovery of certain costs related to

qualifying infrastructure plant, and are proposed pursuant to Section 9-220.2 of the Public Utilities Act and 83 III. Adm. Code 656.

Section 9-220.2 of the Act provides in part that the Commission "may authorize a water or sewer utility to file a surcharge which adjusts rates and charges to provide for recovery of ...(iv) costs associated with an investment in qualifying infrastructure plant, independent of any other matters related to the utility's revenue requirement." Section 9-220.2 of the Act also requires proceedings to reconcile the amounts collected with the actual costs prudently incurred for each year the surcharge is in effect.

The Riders should be revised, consistent with the agreement between the Company and Staff, to clarify that prospective operation of the Surcharge will only be used if the Company's immediately preceding rate case utilized a future test year and historical operation will only be used if an historical test year was used in the immediately preceding rate case. Also, the tariffs should clearly indicate the applicable portions of the QIP Surcharge with respect to contract, municipal, and fire district customers. Staff and the Company concur that, with those modifications, the proposed Riders meet the requirements of Section 9-220.2 of the Act and conform to proposed Part 656. The Commission therefore finds that the proposal of the Company to implement QIP Surcharge Riders for its STP Rate Zone, as revised, meets the requirements of Section 9220.2 of the Act and Part 656 of the Commission's rules applicable to the implementation of QIP surcharge tariffs.

Within 30 business days from the date of this Order, and no later than the 20th day of the month preceding the effective date, the Company should file the Rider tariffs as a compliance filing, with an effective date of the first day of the following month. The Company should file the QIP Surcharge percentage on an Information Sheet no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage.

IV. Findings and Ordering Paragraphs

The Commission, having considered the entire record and being fully advised in the premises, is of the opinion and finds that:

- (1) Illinois-American Water Company provides water service to the public in certain areas in the State of Illinois, and is a public utility within the meaning of the Act;
- (2) the Commission has jurisdiction over the Company and the subject matter of this proceeding;
- (3) the facts recited and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) the proposed tariffs should be modified to clarify that prospective operation will only be used if the Company used a future test year in its

immediately preceding rate case, and historic operation will only be used if the Company used a historic test year in its immediately preceding rate case:

- (5) the proposed tariffs should also be modified to clarify the language regarding certain charges to contract, municipal, and fire district customers, as discussed herein;
- (6) the proposal of the Company to implement QIP Surcharge Riders for its STP Rate Zone, submitted as IAWC Exhibits 1.1 and 1.2 and revised in accordance with the conditions and determinations set forth herein, should be approved;
- (7) within 30 business days from the date of this Order, and no later than the 20th day of the month preceding the effective date, the Company should file, as a compliance filing, tariffs substantially in the form of the QIP Surcharge Riders marked as IAWC Exhibits 1.1 and 1.2, as modified pursuant to Findings 4 and 5 above; such tariffs should be marked with an effective date of January 1, 2005, or the first day of any subsequent month;
- (8) the Company should file the QIP Surcharge Percentage on an Information Sheet with supporting data no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage; and
- (9) the relief granted in this Order creates no presumptions with respect to whether the specific projects or types of projects described in the Company's filing in this proceeding meet the criteria for qualifying infrastructure plant set forth in Section 9-202.2 of the Act and Part 656 of the Commission's rules.

IT IS THEREFORE ORDERED that, subject to the conditions and determinations set forth herein, the proposal of the Company to implement QIP Surcharge Riders for its STP Rate Zone, substantially in the form of IAWC Exhibits 1.1 and 1.2, as modified by Findings 4 and 5 above, is hereby approved; accordingly, the Company is hereby authorized to file such tariffs:

IT IS FURTHER ORDERED that, within 30 business days from the date of this Order and no later than the 20th day of the month preceding the effective date, the Company should file, as a compliance filing, tariffs substantially in the form of the QIP Surcharge Riders marked as IAWC Exhibits 1.1 and 1.2, as modified by Findings 4 and 5 above; such tariffs to be marked with an effective date of January 1, 2005, or the first day of any subsequent month.

IT IS FURTHER ORDERED that, the Company should file the QIP Surcharge Percentage on an Information Sheet with supporting data no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage.

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IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 III. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 15th day of December, 2004.

(SIGNED) EDWARD C. HURLEY

Chairman

ORIGINAL

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STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA-AMERICAN)
WATER COMPANY, INC. FOR)
APPROVAL OF (A) A DISTRIBUTION)
SYSTEM IMPROVEMENT CHARGE)
("DSIC") PURSUANT TO IND. CODE)
CHAP. 8-1-31; (B) A NEW RATE)
SCHEDULE REFLECTING THE DSIC;)
AND (C) INCLUSION OF THE COST)
OF ELIGIBLE DISTRIBUTION)
SYSTEM IMPROVEMENTS IN ITS)
DSIC

CAUSE NO. 42351 DSIC-1

APPROVED: FEB 2 7 2003

BY THE COMMISSION:

Judith G. Ripley, Commissioner William G. Divine, Administrative Law Judge

On December 19, 2002, pursuant to Indiana Code 8-1-31, Indiana-American Water Company, Inc. ("Petitioner" or "Indiana-American") filed its Petition seeking approval of a Distribution System Improvement Charge ("DSIC") for various improvement projects that were placed in service between August 1, 2001 and November 30, 2002. Given the statutory deadline requiring the Commission to issue an Order not later than sixty (60) days after a petition is filed under Indiana Code 8-1-31, the Presiding Officers, in lieu of convening a Prehearing Conference, issued a Docket Entry on December 27, 2002 establishing a procedural schedule for this Cause and scheduling an Evidentiary Hearing date of January 29, 2003. Petitioner prefiled its direct case-in-chief on December 19, 2002. The Indiana Office of Utility Consumer Counselor ("Public") prefiled its case-in-chief on January 21, 2003. The Petitioner prefiled rebuttal testimony on January 24, 2003.

Accompanying its Petition, on December 19, 2002, Petitioner filed a Verified Motion for Establishment of Procedures to Protect Against Disclosure of Confidential Information ("Motion to Protect Confidential Information"). The Motion to Protect Confidential Information sought confidential treatment of evidence to be introduced at the Evidentiary Hearing concerning Petitioner's security improvements made in response to the terrorist attacks of September 11, 2001. In addition to the claim of trade secrets, Petitioner claimed that detailed disclosure of its security improvements could jeopardize the effectiveness of its security system. In a December 30, 2002 Docket Entry, the Presiding Officers established a procedure that, following the public portion of the evidentiary hearing, an in camera session would be conducted for the purpose of eliciting detailed information about Petitioner's security improvements for which it was requesting approval of a DSIC. Attendance at the in camera session was limited to the Presiding

Officers, other Commissioners, and authorized Commission and Public employees. Based on a preliminary finding that the security improvements constituted trade secrets, the disclosure of which might also jeopardize a security system that is within the state's and national interest to protect, this Docket Entry provided that the record comprising the *in camera* session of the Evidentiary Hearing would be handled and maintained as confidential information, in accordance with Indiana Code 5-14-3.

Thereafter, and pursuant to notice published as required by law, an Evidentiary Hearing was convened on January 29, 2003 at 10:30 a.m. EST, in Room E-306 of the Indiana Government Center South, Indianapolis, Indiana. Petitioner and the Public attended and participated in the Evidentiary Hearing by presenting evidence into the record of this Cause. On January 29, 2003, at the conclusion of both the public and *in camera* sessions of the Evidentiary Hearing, this Cause was adjourned. On January 31, 2003, each party filed a Proposed Order that aligned with its testimonial position taken at the January 29, 2003 Evidentiary Hearing.

On January 30, 2003, Petitioner and the Public advised the Presiding Officers via telephone that they had reached a settlement agreement. The Presiding Officers agreed to consider a late-filed settlement agreement. On February 3, 2003, the parties filed their Stipulation and Settlement Agreement and a joint Proposed Order. Also filed on February 3, 2003, was Petitioner's Notice with Respect to 60-Day Deadline, which stated Petitioner recognized that the Commission's receipt and consideration of a settlement agreement at this point in the proceedings would require time beyond that allowed by Indiana Code 8-1-31-9(c) for the Commission to issue its Order and Petitioner would have no objection to an Order being issued beyond the 60-day deadline so long as an Order was issued by March 5, 2003. In order to receive the Stipulation and Settlement Agreement into the record of this proceeding, this Cause was public noticed according to law for an Evidentiary Hearing to be conducted on February 14, 2003. With Petitioner and the Public in attendance, this Cause was reopened on February 14, 2003, at 1:30 p.m. EST, in Room E306 of the Indiana Government Center South, Indianapolis, Indiana. The Stipulation and Settlement Agreement was admitted into the record at the Evidentiary Hearing and, with no members of the general public appearing or having expressed a desire to be heard, this Cause was adjourned.

- 1. <u>Notice and Jurisdiction</u>. The Commission published notice of the public Evidentiary Hearings held in this Cause as required by law. Petitioner is a "public utility" within the meaning of Indiana Code 8-1-2-1 and is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana. This Commission has jurisdiction over Petitioner and the subject matter of this proceeding.
- 2. <u>Petitioner's Characteristics</u>. Petitioner is an Indiana corporation engaged in the business of providing water utility service to approximately 268,000 customers in twenty-one (21) counties in the State of Indiana. Petitioner's corporate office is located in the City of Greenwood, Indiana. Petitioner provides water utility service by means of water utility plant, property, equipment and related facilities owned,

leased, operated, managed and controlled by it, which are used and useful for the convenience of the public in the production, treatment, transmission, distribution and sale of water for residential, commercial, industrial, sale for resale, public authority and public and private fire protection purposes. In addition, Petitioner provides sewer utility service in the City of Somerset, Wabash County, Indiana and in or near the City of Muncie, Delaware County, Indiana.

- 3. <u>Indiana Code 8-1-31</u>. Effective July 1, 2000, the Indiana Legislature enacted Indiana Code 8-1-31 which provides for the Commission to approve distribution system improvement charges in order to allow water utilities to automatically adjust their basic rates and charges to recover a pre-tax return and depreciation expense on Eligible Distribution System Improvements. Eligible Distribution System Improvements are defined as new, used and useful water utility plant projects that:
 - (a) do not increase revenues by connecting the distribution system to new customers;
 - (b) are in service; and
 - (c) were not included in the public utility's rate base in its most recent general rate case. Indiana Code 8-1-31-5.

A petition under Indiana Code 8-1-31 may not be filed more than once every twelve (12) months or in the same calendar year in which the public utility has petitioned the Commission for a general increase in its basic rates and charges. Indiana Code 8-1-31-10. The rate of return allowed on Eligible Distribution System Improvements is equal to the public utility's weighted cost of capital. Unless the Commission finds that such determination is no longer representative of current conditions, the cost of common equity to be used in determining the weighted cost of capital shall be the most recent determination by the Commission in a general rate proceeding of the public utility. Indiana Code 8-1-31-12. The Commission may not approve a DSIC to the extent the proposed DSIC would produce total DSIC revenues exceeding 5% of the public utility's base revenue level approved by the Commission in the most recent general rate proceeding. Indiana Code 8-1-31-13. The DSIC is to be calculated based upon a reasonable estimate of sales in the period in which the charge will be in effect. At the end of each 12 month period with the charges in effect, the difference between the revenues produced through the DSIC ("DSIC revenues") and the depreciation expense and pre-tax return associated with the Eligible Distribution System Improvements ("DSIC costs") shall be reconciled and the difference refunded or recovered as the case may be through adjustment of the DSIC. Indiana Code 8-1-31-14. When a petition to establish a DSIC is filed, the Public may, within thirty (30) days of the petition being filed, confirm that the system improvements are eligible and that the charges were properly calculated, and submit a report to the Commission. The Commission is required to hold a hearing and issue its order not later than 60 days after the petition is filed. Indiana Code 8-1-31-9.

4. Relief Requested. Petitioner seeks approval of a DSIC pursuant to Indiana Code 8-1-31, a new rate schedule reflecting the DSIC, and inclusion of the cost

of the Eligible Distribution System Improvements in Petitioner's DSIC. Briefly stated, Petitioner seeks to recover its DSIC costs for Eligible Distribution System Improvements placed in service between August 1, 2001 and November 30, 2002 amounting to \$11,959,762. (The total cost of the projects for which Indiana-American claims the ability to recover through a DSIC is \$13,270,267, with \$11,959,762 representing the investor supplied additions and being the figure used to determine the requested DSIC revenue requirement due to reimbursement from the Indiana Department of Transportation ("INDOT") in the amount \$1,310,504.) The depreciation expense of such improvements is \$297,503 (calculated by using Petitioner's current Commissionapproved depreciation accrual rates), with a return on the improvements using a weighted after-tax cost of capital of 7.83% (10.81% on a pre-tax basis). The rate of return was calculated based on Petitioner's current capital structure and debt cost rate and the cost of common equity determined by the Commission in Petitioner's last rate order. Petitioner's proposed DSIC would produce additional annual revenues of approximately \$1,590,353, which would equate to an increase of approximately 1.29% above the rates currently in effect.

5. <u>Petitioner's Direct Evidence</u>. Petitioner's direct evidence was presented and supported by two (2) of its officers: Assistant Treasurer and Assistant Secretary James L. Cutshaw, who is a Senior Financial Analyst for Petitioner, and Alan J. DeBoy, Vice President of Engineering.

Mr. Cutshaw provided some general background information about DSICs, testifying that the purpose served by a DSIC is to provide an innovative ratemaking mechanism necessary to replace aging infrastructure, which is an issue of national concern. Mr. Cutshaw testified that DSIC revenues to be derived from approval of the Petition would amount to \$1,590,353, which is 1.29% of its current base revenue level of \$123,449,194. Mr. Cutshaw provided evidence concerning the calculation of the proposed DSIC and sponsored, as Petitioner's Exhibit JLC-1, Petitioner's proposed rate schedules reflecting the DSIC. He explained that the rate of return used in the DSIC revenue requirement calculation is Petitioner's weighted average cost of capital derived from Petitioner's capital structure as of November 30, 2002. The long-term debt cost rate used in the calculation is the average embedded long-term debt cost rate as of that date. A common equity cost rate of 10,5% was used because that rate was determined by the Commission in Petitioner's most recent general rate case in Cause No. 42029. The result is a weighted average cost of capital of 7.83% on an after-tax basis. This rate was converted to a pre-tax rate of 10.81% to include revenues for state and federal income taxes.

Depreciation expense was calculated by applying the applicable Commission-approved depreciation accrual rates to the Eligible Distribution System Improvements, net of related retirements. The proposed DSIC volumetric rate was calculated by dividing the DSIC revenue requirement by Petitioner's projected 2003 water sales. Mr. Cutshaw testified that the DSIC revenues that would be produced by the proposed DSIC will be less than 5% of Petitioner's base revenue level as approved in Petitioner's last base rate order.

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Petitioner's witness Alan J. DeBoy sponsored Petitioner's Exhibit AJD-1 that gave a brief description of each improvement project, the cost of each project, the date each project was placed in service, the account number assigned to each project based on accounting standards found in the Uniform System of Accounts, and Petitioner's operation area where each project exists. Mr. DeBoy generally described the projects as being replacement infrastructure, reinforcement infrastructure, or security improvements. Mr. DeBoy defined replacement infrastructure as consisting of mains, valves, hydrants, customer services, a water storage tank, process unit components like filter media, coating systems, and sludge collector drive units. Mr. DeBoy stated that a significant portion of main replacements are associated with right-of-way improvement projects where the location of Petitioner's mains conflicts with municipal improvement projects. Reinforcement projects, according to Mr. DeBoy, are projects that improve service to large areas of the existing distribution system by increasing flow capacity, and consist of new mains, a water storage tank in Hobart, Indiana, and a pump station located in Petitioner's Northwest operation referred to as the Taft Street Pump Station. Mr. DeBoy stated that security improvements provide enhancements that deter, delay and detect unauthorized entry to water utility property.

Mr. DeBoy also provided testimony that each improvement listed on Petitioner's Exhibit AJD-1 was an "Eligible Distribution System Improvement" as defined in Indiana Code 8-1-31-5. As to the eligibility requirement that a project not increase revenues by connecting the distribution system to new customers, Mr. DeBoy testified that he had an understanding and familiarity with all of the projects listed on *Petitioner's Exhibit AJD-1*, and none on them increased revenues by connecting the distribution system to new customers. Regarding the second statutory eligibility requirement that all projects are in service, Mr. DeBoy stated that he has personal knowledge of the projects listed on Petitioner's Exhibit AJD-1. Mr. DeBoy further testified as to his understanding that before an in service date can be designated on Petitioner's accounting system the person responsible for oversight of the project must conduct a physical inspection to confirm that the project is in service. Mr. DeBoy also reiterated Mr. Cutshaw's testimony that none of the improvements were included in Petitioner's rate base in its most recent general rate case. Mr. DeBoy testified that the rate base cutoff date used in Petitioner's last general rate case was July 31, 2001, and that all projects listed on Petitioner's Exhibit AJD-1 reflect in service dates subsequent to July 31, 2001.

6. <u>Public's Case-In-Chief.</u> The Public's case-in-chief was presented through three (3) of its employees: Edward R. Kaufman, Lead Financial Analyst in the Rates/Water/Sewer Division; Judith I. Gemmecke, Utility Analyst; and Scott A. Bell, Assistant Director of the Sewer/Water Division.

Mr. Kaufman asserted that Petitioner should not be allowed to recover through a DSIC proceeding those improvements to components of its utility that comprise source of supply, water treatment plant, general plant or security. After removing improvements to those utility components that should be disallowed, Mr. Kaufman proposed that completed plant amounting to \$7,723,795 could be included in Petitioner's DSIC.

In his testimony, Public's witness Mr. Kaufman discussed the theory behind DSICs. Mr. Kaufman asserted that the DSIC was created as a special tool to provide utilities with additional resources to accelerate the replacement of aged distribution assets. Mr. Kaufman supported his analysis by quoting several sources including a January 18, 2000 memo from Eric W. Thornburg, former Vice President of Indiana-American, to the Members of the Indiana Senate Committee on Commerce and Consumer Affairs. This memo was included as Attachment No. 1 to Public's Exhibit No. 1. In that memo Mr. Thornburg stated as follows:

This new technique will allow for the replacement of aged infrastructure, primarily pipelines, without the necessity of filing for a rate increase with the added cost to customers and delay of such undertakings. It does not include new main extensions that would produce additional revenues for the utility.

Mr. Kaufman then discussed the factors that differentiated distribution mains and other distribution assets from other investments made by utilities between rate cases. In *Public's Exhibit No. 1, pgs. 7 & 8*, Mr. Kaufman asserted as follows:

There are several factors which in combination give weight to the need for a DSIC to specifically promote the replacement of old distribution system assets:

- 1) The scope of replacing these assets is very large.
- 2) The replacement of distribution system assets is ongoing or continuous in nature.
- 3) The replacement of distribution assets is a series of many small projects. Thus, a utility is unable to time a rate case around their replacement as it could for a single large project.

Mr. Kaufman added that if one accepts the supposition that the factors described above are so severe that traditional ratemaking is unlikely to adequately facilitate necessary infrastructure improvements on a large scale, then the same rationale needs to be used to determine what plant should be approved in a DSIC case. Mr. Kaufman contended that the purpose of a DSIC is to accelerate the repair and replacement of aging infrastructure that has not or would not occur under traditional ratemaking. He added that the DSIC was created as a special tool to promote the adequate replacement of old and/or dilapidated distribution assets. The DSIC should not be applied to typical investments made by water utilities on a regular basis and investments that can be handled through traditional ratemaking should be handled in that manner.

Mr. Kaufman also noted that Petitioner's proposed DSIC seeks to earn a return on and return of assets that did not rehabilitate its distribution system and that Petitioner was

using the DSIC as a catch-all for virtually all of its rate base additions (other than those that increase revenues by hooking up new customers to the distribution system). Mr. Kaufman then referred to several of Petitioner's responses to data request questions that highlighted Petitioner's assertion that the DSIC was designed to include treatment plant, general plant and source of supply assets as well as distribution assets. Mr. Kaufman added that Indiana-American's response to data request question 36 indicated that Indiana-American has not accelerated the replacement of its mains as a result of the opportunity to collect DSIC revenues.

Mr. Kaufman also asserted that the limited time frame of a DSIC procedure limited the Public's ability to conduct meaningful fact finding and that a DSIC procedure should not include additions that are controversial and/or require a lengthy review. Additionally, Mr. Kaufman stated that the DSICs used in Pennsylvania and Illinois had significant differences than the DSIC proposed by Petitioner. The key differences were that both Illinois' and Pennsylvania's DSICs limited recovery to very specific account categories, included an earnings test and required consumer notification. Finally, Mr. Kaufman proposed that any future DSIC should include a 10-year projection of plans to repair and rehabilitate its distribution. Mr. Kaufman argued that since the rationale of the DSIC is to promote the replacement of aging infrastructure it seems logical that utilities should have a plan on how and when they intends to replace aging infrastructure. Such a plan will help to address the concerns expressed by the parties that led to creation of the DSIC.

Also testifying on behalf of the Public was accountant, Judith I. Gemmecke. Ms. Gemmecke echoed Mr. Kaufman's beliefs about what should be included in a DSIC and discussed specific calculations of the DSIC given certain parameters shown below. In considering Ms. Gemmecke's testimony it is important to note that Petitioner presented its calculation for the DSIC which included a return of 10.81% (before tax) on additions made which Petitioner asserts are subject to the surcharge, less the amounts contributed by INDOT. To that result, Petitioner added depreciation, which it calculated by subtracting retirements from the total additions of assets. Ms. Gemmecke noted that by making no adjustment for those contributed funds, this calculation allows depreciation on Contributions in Aid of Construction ("CIAC").

Ms. Gemmecke, presented her calculation of the DSIC, which also included the 10.81% before tax return, but only on the additions the Public recommends should be allowed in the DSIC as discussed earlier. Her calculation decreases the allowable additions by the amount of related retirements at original cost. To that result, Ms. Gemmecke also added depreciation expense, which she calculated by subtracting retirements from the total additions of allowable assets. By making no adjustment for funds contributed by INDOT, this calculation also allows for depreciation to be collected on CIAC. Ms. Gemmecke points out in her testimony that Indiana is one of a handful of states that allows water utilities to collect depreciation on CIAC. Allowing depreciation on contributed plant accomplishes many of the same goals the DSIC was intended to accomplish -- namely, providing additional funds to replace aging distribution systems.

On page 6 of Public's Exhibit No. 2, Ms. Gemmecke included the following accounts in her calculation of the DSIC:

331001 – TD (Transmission/Distribution) Mains Not Classified b Size (formerly Mains Conversions)
333000 - Services
334200 – Meter Installations
335000 - Hydrants

The Public encouraged the Commission to use these same accounts in determining eligibility for a DSIC, especially in light of the time limitations for conducting discovery, conducting an evidentiary hearing, and issuing a final order.

The Public's engineering witness, Mr. Scott A. Bell, Assistant Director of the Public's Rates/Water/Sewer Division, testified that Petitioner's investments in Source of Supply, Water Treatment Plant and General Plant should not be included in the calculation of the DSIC. He also stated that there are some items Petitioner listed as Transmission and Distribution Plant that should also not be included in the calculation of Mr. Bell pointed out that Petitioner made investments in "Tank Security Improvements" in a number of its operational areas that total approximately \$1,977,417. He stated that Petitioner has categorized those investments as "Transmission and Distribution Plant" and assigned to Account No. 330000. While having no independent knowledge of the exact nature of the security improvements other than what was represented by Petitioner in its pre-filed testimony, Mr. Bell testified that these "Tank Security Improvements" should not be considered eligible for inclusion in the calculation of the DSIC because these improvements are not repairs or replacements of aging transmission and distribution infrastructure, but rather are investments in the new security systems as a result of the increased security risks after September 11, 2001. He concluded that while it is important that a utility make prudent investments in security, such improvements should not be considered eligible for inclusion in the calculation of the DSIC. Mr. Bell recommended that Petitioner should recover its security related investments in a more appropriate proceeding.

Mr. Bell also testified about Petitioner's inclusion of the 1.5 MG water storage tank in Hobart, Indiana, which represents an investment of approximately \$1,644,841. He testified that the water storage tank and associated facilities should not be eligible for inclusion in the calculation of the DSIC because the investment Petitioner made in the Hobart water storage tank was not only to replace an aging water storage facility, but also to provide additional storage capacity to adequately serve increasing water demands or to meet fire-flow requirements. He stated that, in effect, the Hobart water storage tank would increase Indiana-American's revenue by making it possible to connect the distribution system to new users. He concluded that the investment in the 1.5 MG storage facility should not be considered DSIC eligible.

7. Petitioner's Rebuttal. Mr. Cutshaw responded to the Public's testimony to exclude improvements that have been recorded as Source of Supply, Water Treatment Plant, General Plant, Distribution Reservoirs and security improvements. Mr. Cutshaw testified that Indiana-American reviewed the language of the statute, as written, to determine what improvements are and are not eligible. Mr. Cutshaw suggests that the Public is attempting to add factors not provided in the statute and is relying on variations of the DSIC implemented in the States of Pennsylvania and Illinois to support its position. Mr. Cutshaw testified that these additional factors are not found in Indiana Code 8-1-31 and stated that Indiana-American's proposed DSIC is calculated pursuant to the definition the Legislature used.

Mr. Cutshaw stated that it is significant that some of the improvements Indiana-American included as "Eligible Distribution System Improvements" could not be included in a similar rate adjustment in either Illinois or Pennsylvania because it reveals the differences in the Indiana legislation as compared to Pennsylvania and Illinois. He explained that the Pennsylvania variety of the DSIC was first employed before there was a statute specifically authorizing it. The Pennsylvania Public Utility Commission established its DSIC in the order that is included with Mr. Kaufman's testimony as Attachment No. 4. The only statutory authority for the request was the generic authority to approve automatic tracker mechanisms. The Pennsylvania Commission approved of the concept of a DSIC, and in the process, established all of the procedures and requirements for a DSIC without any guidance from the legislature. In doing so, the Commission defined what is and is not eligible. After the Pennsylvania DSIC was first approved in this fashion, the Pennsylvania legislature confirmed what the Commission had done, and left all decisions regarding the eligibility and implementation to the Pennsylvania Commission. 66 Pa. Cons. Stat. § 1307(g).

Mr. Cutshaw further testified that the Illinois variety of the DSIC is likewise very general. The Illinois legislature left the decision whether to approve a DSIC entirely up to the Commission, indicating that the Commission "may authorize" the mechanism. 220 Ill. Code § 5/9-220.2. Mr. Cutshaw states these differences are significant for purposes of Indiana's DSIC legislation because this alternative approach was available to the General Assembly when Indiana Code 8-1-31 was enacted. The Legislature could have left to the Commission the decisions whether a DSIC should be approved, what would be eligible and what procedures would govern, as has been done in both Illinois and Pennsylvania. He speculated that the Legislature chose not to do so and instead specifically chose to define what is authorized as a DSIC.

Mr. Cutshaw responds to Mr. Kaufman's concerns that Indiana-American has not increased its investment in the replacement of mains by noting that Indiana-American makes its investment decisions based upon what will be needed, when it will be needed, and whether and to what extent there is capital available. Indiana-American believes the DSIC should help with its ability to access capital by mitigating some of the effects of regulatory lag. The DSIC should therefore help Petitioner in its ability to make all types of rehabilitations, replacements, and improvements throughout its utility systems. Mr. Cutshaw did not consider it appropriate to eliminate the Hobart storage tank from the

DSIC asserting it was not included in rate base in Cause No. 42029, and that it does not increase revenues by connecting new customers. He also stated that, while not a requirement under Indiana Code 8-1-31, the Hobart storage tank is a replacement of existing tanks as explained by Mr. DeBoy.

In defending the inclusion of security costs, Mr. Cutshaw testified that the security improvements are improvements to existing infrastructure. Mr. Cutshaw suggests that if a 100-foot section of a main is replaced, the overall main will have been improved. In the same manner, if an investment is made to secure one of its facilities against a terrorist attack, the facility will have been improved. He does not believe an improvement to existing infrastructure should be treated any differently from the replacement of existing infrastructure. Mr. Cutshaw further testified that he believed adequate access to information had been provided to the Public related to the security improvements and he finds it significant that a Non-Disclosure Agreement was executed with the Utility Consumer Counselor and the Public's Water and Sewer/Rates Director. Mr. Cutshaw also disagreed that Indiana-American has provided no more information on the security-related improvements than it provided on security expense in Cause No. 42029. He stated that at issue in Cause No. 42029 were security-related Operation and Maintenance expenses as opposed to the capital items at issue here. He explained that Indiana-American has provided in this proceeding every security task order number, the total amount for each, and the operation for each in Petitioner's Exhibit AJD-1. Indiana-American also provided information on security capital expenditures through the presentation of its case-in-chief during the in camera portion of the hearing. Finally, Indiana-American's witnesses have been available to respond to any questions about the security program or task orders that are included in Petitioner's Exhibit AJD-1.

As to Mr. Kaufman's concern that the type of review that would be done in a rate case cannot be completed during the abbreviated process for a DSIC, Mr. Cutshaw stated that the DSIC was not intended to be and will not result in a final determination that the DSIC assets are in rate base for purposes of a general rate case. The Public will have the opportunity to conduct a full rate base review in its next general rate case.

Mr. Cutshaw stated that he did not believe limitations on accounts that are eligible for DSIC and an earnings test would be consistent with Indiana Code 8-1-31. However, Mr. Cutshaw believed a requirement for customer notice and a requirement that a utility file a forecast that could be updated in future DSIC proceedings could be consistent with the DSIC statute and could be adopted if the Commission finds appropriate. Mr. Cutshaw stated Indiana-American would be willing to comply with these requirements in future DSIC proceedings if the Commission requests, but suggested a five-year forecast instead of ten years.

Mr. Cutshaw does not agree with the Public's assertion that retirements should be deducted from additions subject to DSIC in determining the net investor supplied DSIC additions to which the pre-tax return is applied. Mr. Cutshaw explained that under mass asset accounting rules, retirements are treated as fully depreciated with the original cost

being deducted from both utility plant and accumulated depreciation. Such a retirement results in no change to the net book value of the Company's assets.

Mr. Cutshaw also disagreed with the depreciation rates used by the Pubic because different depreciation rates apply to Petitioner's Northwest, Mooresville, Warsaw, West Lafayette, and Winchester operations. Mr. Cutshaw provided a table that was later corrected at the hearing which reflects the appropriate depreciation rates. Next, Mr. Cutshaw disagreed with the Public's conversion from MGAL to CCF. Indiana-American determined the conversion to CCF (hundred cubic feet) by dividing the MGAL (thousand gallons) by 0.75. He explained that this is the same relationship that has existed in the Company's tariff sheets for many years.

Finally, Mr. Cutshaw disagreed with the Public's suggestion to separate Water Groups 1,2,3 into Water Group 1, Water Group 2, and Water Group 3. Mr. Cutshaw explained that this is inappropriate because the company's rate design has moved toward Single Tariff Pricing ("STP"). Rate base and operating income findings have been proposed and approved for the combined Groups, not for each separate Group mainly because there are different groupings for General Water Service, Sales for Resale, Private Fire Protection, and Public Fire Protection. The Groups shown on Schedule No. 1 of Public's Exhibit No. 2 are the Sales for Resale groupings. For General Water Service there are only two Groups, with Johnson County and Southern Indiana in Group 2. Mr. Cutshaw stated it is consistent with the movement towards STP to continue to make one finding for Water Groups 1,2,3 as a whole as proposed on Petitioner's Exhibit JLC-2.

During Indiana-American's rebuttal case, Mr. DeBoy testified that he did not agree with Mr. Bell's opinion that the Hobart water storage tank should not be included in this case. He asserted that the Hobart tank satisfied the conditions for eligible distribution system improvements put forth in Mr. Cutshaw's testimony. Mr. DeBoy testified that he believed that Mr. Bell proposed to exclude the tank because it is new as opposed to replacement infrastructure. Mr. DeBoy noted that there is nothing in the statute that states only replacement infrastructure is eligible. He went on to explain that, in fact, the Hobart water storage tank actually replaced three elevated water storage tanks that were beyond economical repair.

8. <u>Commission Findings and Analysis</u>. We note, first, that the Petitioner and Public have filed a *Stipulation and Settlement Agreement*. The Commission has a clear standard for its review and consideration of settlement agreements. Settlements presented to the Commission are not ordinary contracts between private parties. *United States Gypsum, Inc. v. Indiana Gas Co.*, 735 N.E.2d 790, 803 (Ind. 2000). When the Commission approves a settlement, that settlement "loses its status as a strictly private contract and takes on a public interest gloss." *Id.* (quoting *Citizens Action Coalition v. IPL Energy*, 664 N.E.2d 401, 406 (Ind. Ct. App. 1996)). Thus, the Commission "may not accept a settlement merely because the private parties are satisfied; rather [the Commission] must consider whether the public interest will be served by accepting the settlement." *Citizens Action Coalition*, 664 N.E.2d at 406.

As will be explained more fully below, we find that the public interest will not be served by approving the parties' settlement.

A determination of whether the Petition filed herein complies with Indiana Code 8-1-31 hinges on the phrase "distribution system." This phrase is not defined in Indiana Code 8-1-31 or elsewhere in Title 8 of the Indiana Code. In addition, the testimony of the Parties agrees neither on the meaning nor significance of this phrase. Petitioner contends that any improvement to a water utility qualifies for a DSIC so long as the improvement meets the eligibility criteria of (1) not increasing revenues by connecting the distribution system to new customers, (2) being in service, and (3) not being included in the public utility's rate base in the most recent general rate case. Indiana Code 8-1-31-5. Petitioner encourages the Commission to look to the plain language of the statute and find that any improvement to any component of a water utility qualifies for a DSIC, limited only by the above three (3) eligibility criteria. The Public, on the other hand, supports a more limited meaning of "distribution system," relying on legislative intent, DSIC legislation in other states, as well as an interpretation of the language of Indiana's DSIC statute that may tend to argue against the broad view advocated by Petitioner.

A. Meaning of "Distribution System." Use of the phrase "distribution system" as applied to different types of utilities, and of the phrase "water distribution system" as applied specifically to water utilities, is not foreign or uncommon to the Commission or to those whom it regulates. This Commission has used the phrases "distribution system" or "water distribution system" to identify one component of a water utility that is distinguishable from other water utility components. By way of example, on September 18, 2002, in Cause No. 42226, the Commission issued an Order in a proceeding brought by the same Petitioner in this proceeding, Indiana-American Water Company, Inc., seeking approval to acquire the water distribution system properties of the Town of Dune Acres. The Commission's Order in that acquisition proceeding restated Indiana-American's testimony as to the relief it was seeking: "He (Indiana-American witness, Randal D. Edgemon) testified that Indiana-American proposes to acquire only the distribution system assets consisting of the distribution mains, valves, hydrants and other appurtenances necessary to provide water service. This also includes the service lines, meters, and meter installation. Mr. Edgemon testified that Indiana-American is not purchasing the source of supply, storage or booster pumps related to source and treatment from Dune Acres. The remaining facilities not purchased will not be needed to provide service after the system is interconnected to Indiana-American's Northwest Operation." Cause No. 42226, September 18, 2002, pg.3.

Other Commission Orders have also distinguished the distribution system from other functional components of a water utility. See, for example, Cause No. 41684, August 4, 2000, pgs. 3 & 4: "The directors of North Dearborn Water Corporation authorized Robert E. Curry & Associates to perform an engineering study of the utility's source of water supplies, water treatment, water distribution system and elevated water storage for the purpose of determining the adequacy of the existing water works facilities to accommodate present and future water demands to the utility." In Cause No. 41879, July 3, 2001, pg. 2, it states: "Petitioner's facilities consist of a water distribution system serving the customers and a water treatment plant rated at 350,000 gal/day that was built

in 1952. Petitioner's facilities also include 2 wells with a pumping capacity of 350 GPM each and a water tower with a capacity of 150,000 gallons." From these examples, the commonly recognized components of a water utility are its source of supply (underground wells or surface water), treatment (water treatment plants), storage (elevated water storage tanks), and distribution (mains/pipes, valves, hydrants and meters needed to deliver water to customers). In short, this Commission and regulated water utilities commonly differentiate among their various utility components, including the segregation of activity into the "distribution system."

This differentiation was established in this proceeding in a response to a discovery request from the Public asking Petitioner to identify the categories of all relevant capital improvements. The discovery response, submitted by the Public into evidence (Public's Exhibit No. 1, Attachment No. 3, pg. 20), is a table containing information that Petitioner prepared using the same accounting format as other water utilities when submitting their Annual Reports to the Commission. More specifically, this table is an account matrix that corresponds to accounting practices originally promulgated by the National Association of Regulatory Utility Commissioners ("NARUC") and then adopted by most state public utility commissions, including Indiana's Commission. Indiana's adoption, by reference, of NARUC's rules governing the classification of accounts for water utilities is found at 170 IAC 6-2-2. A summary of Petitioner's account matrix, categorizing all of its proposed DSIC eligible projects, is illustrated below. The "Subsidiary Accounts" and their corresponding numbers shown on the vertical axis are further segregated by the matrix into classifications by function as shown on the horizontal axis (EG: "Source of Supply," "Water Treatment," and "Transmission and Distribution").

Subsidiary Account	Description	Amount	Source of Supply/ Pumping Plant Plant (SS)(PU)		Transmission & Distribution Plant (TD)	General
303200	Land SS	143,998.81	143,998.81			
304100	Structures SS	74,673.16	74,673.16			
304200	Structures PU	545,787.04	545,787.04			
304300	Structures WT	111,572.31	•	111,572.31		
304302	Tank Ptg WT	49,498.00		49,498.00		
304800	Structures Misc	51,299.61				51,299.61
307000	Wells & Springs	31,632.50	31,632.50			
311200	Pump Eq Elec	320,973.09	320,973.09			
311300	Pump Eq Diesel	62,477.00	62,477.00			
320100	WT Equip	340,250.55		340,250.55		
320190	Wt Equip Clear	60,529.00		60,529.00		
320191	WT Equip Plant	27,903.00		27,903.00		
330000	Dist Reserv	3,622,258.29			3,622,258.29	
331001	Mains	5,020,306.63			5,020,306.63	
333000	Services	1,279,349.58	•		1,279,349.58	
334200	Mtr Installs	1,074,128.33			1,074,128.33	
335000	Hydrants	350,010.33			350,010.33	
343000	Tools/Shop	4,339.00				4,339.00
346100	Comm Equip	30,085.00				30,085.00
346190	Remote Instrum	10,608.00			•	10,608.00
347000	Misc Equip	58,588.08				58,588.08
Grand Total		13,270,267.31	1,179,541.60	589,752.86	11,346,053.16	154,919.69

The Public's evidence supports, for DSIC purposes, those project amounts identified in Subsidiary Account Nos. 331001 (Mains), 333000 (Services), 334200 (Meter Installations), and 335000 (Hydrants), totaling \$7,723,795, all of which are further categorized functionally on the matrix within "Transmission & Distribution Plant." The only other Subsidiary Account Petitioner lists within "Transmission and Distribution Plant," and for which the Public's evidence supports exclusion from DSIC, is No. 330000 (Distribution Reservoir), amounting to \$3,622,258.29, which the evidence shows accounts for all "Tank Security Improvements," and the installation of a 1.5 million gallon water storage tank in Hobart, Indiana.

This breakdown of a water utility into its various functional components is also used by the American Water Works Association ("AWWA"). In response to a bench question as to his definition of "distribution system," the Public's engineering witness, Scott A. Bell, answered by referring to the AWWA's Manual: *Principles of Water Rates, Fees, and Charges*. Mr. Bell specifically referred to Table 7-1 in the section of the manual regarding "Allocating Costs of Service to Cost Components," and described how that table separates a water utility's components into Intangible Plant, Source of Supply Plant, Water Treatment Plant, Transmission and Distribution Plant and General Plant.

We believe that the AWWA manual and NARUC's accounting system are consistent with the general understanding in the industry of what can and cannot properly be described as distribution system improvements in the context of water utility plant projects. Items that fall within the other functional categories (EG: Source of Supply/Pumping Plant, Water Treatment Plant, and General Plant) should not be considered distribution system for purposes of a DSIC.

B. DSIC Laws in Other States. We also note, as referenced in the Public's testimony, the comparison of Indiana's DSIC statute with the DSIC statutes enacted in other states, specifically Pennsylvania and Illinois. The DSIC statutes in these states contain many obvious similarities to Indiana's statute. In its Exhibit No. 1, Attachment No. 4, the Public produced in evidence an Order from the Pennsylvania Public Utility Commission ("PPUC") that discusses that state's DSIC statute. One issue before the PPUC in that proceeding, and an issue presented by the Public in this proceeding, was a concern that the DSIC statute would be in conflict with the traditional ratemaking process. In Public's Exhibit No. 1, Attachment No. 4, pgs. 11 & 12 the PPUC states: "Recovery of this narrow set of (DSIC) costs is clearly permitted under Section 1307 (a)...and Pennsylvania case law; and, in the Commission's judgment, this proposal ("to file and implement an automatic adjustment clause to recover its distribution system improvement costs") is in no way a mechanism to "disassemble" the traditional ratemaking process for several reasons: first, the DSIC is designed to identify and recover the distribution system improvements costs incurred between rate cases; second, the costs to be recovered represent a narrow subset of the company's total cost of service; and third, the DSIC will be capped at a relatively low level to prevent any long-term evasion of a base rate review of these plant costs."

In this same Pennsylvania proceeding, the PPUC spoke generally about the purpose of a DSIC: "We agree with the company that the establishment of a DSIC would enable the company to address, in an orderly and comprehensive manner, the problems presented by its aging water distribution system, and would have a direct and positive effect upon water quality, water pressure and service reliability." Public's Exhibit No. 1, Attachment 4, pg. 8. This Commission agrees with and endorses such a purpose for a DSIC.

The evidence shows that in Illinois the only projects eligible for DSIC consideration are those that fall within the account numbers noted above: 331 (Transmission and Distribution Mains), 333 (services), 334 (Meters and Meter Installations) and 335 (Hydrants). Public's Exhibit No. 1, Attachment 5, page 4. These are the same accounts to which the Public proposes to limit DISC eligibility and, as shown in the above matrix, accounts to which Petitioner has assigned some of the projects for which it seeks approval of a DSIC. While not using the exact same account numbers, it appears from the evidence that Pennsylvania likewise generally limits DSIC-eligible property to services, meters, hydrants and mains. Public's Exhibit No. 1, Attachment 4, page 18.

C. A DSIC Proceeding is an Expedited Proceeding. In contrast to traditional rate case proceedings, Indiana Code 8-1-31 obviously intends for a

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determination on a DSIC automatic rate adjustment to be made in an abbreviated and accelerated fashion. First, public notice that a DSIC petition has been filed is not required. Indiana Code 8-1-31-8(c). In addition, the Public is under a statutory deadline to issue a report to the Commission, if it chooses to do so, no later than thirty (30) days after the petition is filed. And the Commission is required to conduct a public evidentiary hearing and issue an order within sixty (60) days of the DSIC petition being filed. Indiana Code 8-1-31-9. These short time frames are not indicative of a proceeding that would require any extensive discovery on the part of the Public or review on the part of the Commission of complex projects that are often, and appropriately, the subject of traditional rate case proceedings.

These short time frames are, however, consistent with purposes set forth in Eric W. Thornburg's memo to the Indiana Senate, urging passage of the DSIC legislation. As noted above, Eric Thornburg was Vice President of Indiana-American. Mr. Thornburg stated as follows:

Regardless of their size and complexity, a common challenge is the age of underground infrastructure, the water mains that convey the product to the customer's tap. The principal focus of regulatory and financial resources has been on improving the quality of our drinking water primarily through promulgating water treatment standards. However, once the water leaves our plants, it travels through piping systems that can be 125 years old.

With so much of the capital available going towards improving water treatment systems, little has been available for replacing pipelines. Compounding the situation is the cost differential. New water lines vary in cost depending on their size, but typical installations average \$20 - 100 per foot. We are often retiring pipe that cost less than \$1 per foot when it was installed and rate shock can result.

This new technique will allow for the replacement of aged infrastructure, primarily pipelines, without the necessity of filing for increases with the added cost to customers and delay of such undertakings. It does not include new main extensions that would produce additional revenue for the utility.

Petitioner's Exhibit No. 1, Attachment No. 1. (Emphasis added.)

If Indiana-American's request in this proceeding were consistent with its former Vice President's description of the DSIC legislation, it would not have included improvements to utility components such as water treatment or source of supply, or security improvements, but would have concentrated primarily on the replacement of pipelines, meters and hydrants within the distribution system. In this proceeding, however, Petitioner contends that the lack of qualifying language in Indiana Code 8-1-31-5 to specifically limit "water utility plant projects" to projects within the "distribution system" results in DSIC eligibility for any utility plant project that is in service, was not included in the utility's last rate case, and was not a project to hook-up new customers.

- D. Legislative Intent. To the extent Petitioner's reading of this statute has merit we rely on what the courts have said regarding the discernment of legislative intent. "The intention of the legislature, as ascertained from a consideration of the act as a whole, will prevail over the literal meaning of any of the terms used therein." Brown v. Grzeskowiak, 230 Ind. 110, 101 N.E. 2d 639 (1951). In City of Indianapolis v. Evans, 216 Ind. 555, 24 N.E.2d 776, (1940), the court said: "The legislative intent, however, is to be ascertained by an examination of the whole, as well as the separate parts of the act, and when so ascertained, the intention will control the strict letter of the statute or the literal import of particular terms of phrases, where to adhere to the strict letter or literal import of terms would lead to injustice, absurdity, or contradict the evident intention of the legislature." And in Rexing v. Princeton Window Glass Co., 51 Ind. App. 124, 94 N.E. 1031 (1912), we look to the language: "The purpose and scope of an act of the legislature must be determined from its title," and then to the title of Indiana Code 8-1-31, which is: "Distribution System Improvement Charges." When read as a whole, particularly with the intended and repeated reference to "distribution system," we find the most reasonable intent of Indiana Code 8-1-31 is to limit water utility plant projects to projects that are within the utility's distribution system.
- E. The Language of Indiana Code 8-1-31. In addition, we also find the actual language of Indiana Code 8-1-31 to be consistent with our finding as to legislative intent. We, therefore, do not accept Petitioner's assertion that a plain language examination of Indiana Code 8-1-31 necessarily results in the conclusion that eligible improvements under this statute include any utility improvements that do not increase revenue by connecting the distribution system to new customers; are in service; and were not included in the utility's last general rate case. Indiana Code 8-1-31-5 states:

As used in this chapter, "eligible distribution system improvements" means new used and useful water utility plant projects that:

- (1) do not increase revenues by connecting the distribution system to new customers;
- (2) are in service; and
- (3) were not included in the public utility's rate base in its most recent general rate case.

This statute specifically disallows DSIC eligibility for "water utility plant projects" that would increase revenues by connecting the "distribution system" to new customers. This is one place in the statute where the phrase "water utility plant projects" is juxtaposed against the phrase "distribution system," thereby imparting a meaning to "distribution system" that is narrower than that of "water utility plant projects." If the broad meaning of "water utility plant projects" was intended to carry through all of Section 5, why qualify Section 5(1) with the phrase "distribution system?" We find it a reasonable interpretation that the statute as written is stating what was obviously intended, which is that the type of water utility plant projects contemplated are necessarily within the water utility's distribution system.

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In addition, this juxtaposition of the phrase "water utility plant projects" with the phrase "distribution system" results only in a limitation that excludes from DSIC eligibility a particular category of utility plant project within the distribution system (connecting to new customers). Connecting to new customers describes a classic type of distribution system activity within the common meaning of "distribution system" as discussed above. We do not find it logical that this "Distribution System Improvement Charge" statute, with this single, exclusionary reference to a specific type of "distribution system" project, intended thereby to open the door of DSIC eligibility to any other "water utility plant project." Rather, we find that this one exclusion of a type of project within the distribution system is meant to thereby imply the inclusion, or DSIC eligibility, of all other types of distribution system improvements. We find the language and intent of this statute to include the requirement that a water utility plant project, in order to be eligible for DSIC consideration, must be a project within the "distribution system," limited, as to type of project, only by the ineligibility of projects that connect to new customers.

Accordingly we find, as applied to water utilities, that a common and consistent meaning of the phrase "distribution system" is found: in our previous Orders, in other states' DSIC laws, and in the water utility industry in general. We find that meaning identifies one component of a water utility that is distinguishable in plant and function from other components such as source of supply, water treatment and, in some instances, water storage. We also find that the evident legislative intent of Indiana Code 8-1-31, as well as the express language of that statute, conveys that same meaning. We cannot conclude that the Indiana General Assembly chose to adopt and repeatedly refer to "distribution system" in Indiana Code 8-1-31 as a way to generally identify, as Petitioner contends, the whole of a water utility. As to what water utility projects fall within the distribution system for DSIC eligibility, we find it within the purpose and meaning of Indiana Code 8-1-31 to look to the categories or accounts that the water utility industry uses, and specifically NARUC's system of accounts, to identify projects that are within a utility's distribution system.

F. Projects and Amounts to Be Included and Excluded as Distribution System Improvement Charges. Of the \$13,270,267 Petitioner has requested for DSIC eligibility, the Public sought to allow \$7,723,795. All of this \$7,723,795 is categorized on Petitioner's matrix within the following Subsidiary Accounts: "Mains (331001), Services (333000), Meter Installations (334200), and Hydrants (335000). And all of these Subsidiary Accounts are contained within the functional category: "Transmission and Distribution." Based on our discussion above, since these improvements are categorized as being within Petitioner's distribution systems, we find that they should be approved for DSIC recovery.

The Public sought to disallow \$5,546,472, which includes \$2,402,473 for security improvements and \$3,143,999 for non-security improvements that the Public claims are either not distribution system improvements or are otherwise not eligible. Of the total amount the Public seeks to disallow, \$1,499,158 relates to costs for non-security projects, and \$425,057 is for security-related projects, that Petitioner has categorized on its matrix within the functional categories of "Source of Supply/Pumping," "Water Treatment," and

"General Plant." Petitioner has categorized the remaining \$3,622,258 within the matrix category of "Transmission and Distribution." Of that Transmission and Distribution amount, \$1,644,841 accounts for the cost of a project to erect a tank in Hobart, Indiana, and \$1,977,417 relates to various projects to improve tank security.

Based on our analysis above of the DSIC statute, we find that all non-security projects that fall outside of improvements to the utility's distribution system; that consist of improvements to Source of Supply/Pumping, Water Treatment and General Plant, should be excluded from recovery of a DSIC charge. In this proceeding, therefore, \$1,499,158 should be excluded.

We turn our attention next to the \$1,644,841 attributed to placing a new water tower in service in Hobart, Indiana. We agree that the Hobart Water Tower was properly categorized by Petitioner on the account matrix discussed above as being functionally within "Transmission and Distribution Plant", in Subsidiary Account No. 330000 ("Distribution Reservoir"). Based on our discussion above, that fact argues for inclusion of the water tower as a DSIC. However, we also note that both Pennsylvania and Illinois do not include "Distribution Reservoir" in their definition of DSIC eligible, distribution system projects. That fact suggests, as we believe, that water storage may go beyond the distribution system improvements contemplated by this statute. We are not convinced that the replacement of three (3) water towers with one tower that is three (3) times the capacity of the three (3) replaced towers combined, at a cost of \$1.5M dollars, could be adequately reviewed by the Public and determined by this Commission within the time prescribed for the issuance of a DSIC Order.

The construction of new or replacement water storage tanks is accomplished at a considerable expense for water utilities. That expense is ultimately borne by water utility customers, who are the ratepayers. In this proceeding, the Hobart Water Tower is the most expensive single project that Petitioner has presented to this Commission for DSIC approval. As already noted, the DSIC statute does not require public notice that a DSIC petition has been filed. It is difficult to reconcile the inclusion of projects of this magnitude with the procedural constraints imposed by the DSIC statute. Consideration of the water tank in this proceeding is complicated even more by the fact that this tank project has resulted in an infrastructure very different from the infrastructure it has replaced. All of these considerations serve to emphasize the limitations built into the DSIC statute that are not found in a traditional rate case, such as a longer review period and more public notice, all of which are very important for projects of this size and scope. Referring to a Pennsylvania court decision, the PPUC stated: "...the purpose of (Pennsylvania's automatic rate adjustment law) is to permit reflection in customer charges of changes in one component of a utility's cost of providing public service without the necessity of the broad, costly and time-consuming inquiry required in a...base rate case." Public's Exhibit No. 1, Attachment 4, pg. 10.

It is also arguable that the costs of the Hobart Water Tower project are subject to allocation, with some costs being DSIC eligible and some not being DSIC eligible. But there is not sufficient evidence in this proceeding to support a cost allocation. Even if

such evidence did exist, timely review would be hindered by the complexity of allocation techniques and by the statutory deadlines inherent to DSIC proceedings that have already been discussed.

Mr. DeBoy testified that the Hobart Water Tower project was in the planning stage prior to Petitioner's acquisition of the Northwest Indiana Water Company, though not placed in service until after its last rate case was filed on June 29, 2001 in Cause No. 42029. This Commission approved Indiana American's acquisition of the Northwest Indiana Water Company on December 15, 1999. We note, however, our rate Order in Cause No. 42029 gave consideration to certain of Petitioner's projects (Tunnel Project, Newburgh Project, and Wabash Valley Project) that included estimated costs and estimated in-service dates for completion. Thus, the Commission has allowed for projects that are not yet in service and outside the test year to be included in rates during traditional rate case proceedings. Petitioner could have effectively included the Hobart Water Tower in this most recent traditional rate case, which allowed for a two-step increase to be phased in upon completion of the Tunnel Project.

We also note that the Hobart Water Tower was constructed, at least in part, with additional customer revenue in mind. Mr. DeBoy testified that it would have been shortsighted for Petitioner not to consider future needs in determining the capacity of the Hobart Water Tower and that additional customers were, in fact, a consideration in determining the size tank to build. Notwithstanding, therefore, the argument that the Hobart Water Tower can be described as a distribution system improvement, there is also evidence that a substantial portion of the much larger water tower will increase revenues by permitting connection of the distribution system to new customers, thereby making it ineligible for DSIC recovery. Of course we realize, first, that no water utility customer is directly connected to a water storage tank and, second, that some aging distribution system infrastructure, such as mains, could, for example, be replaced with larger diameter mains in response to or anticipation of new customers, yet still be DSIC eligible. A new or replacement water tower, however, can play a significant role in connecting new It is clearly the intent of the DSIC statute to exclude distribution system projects that connect to new customers, and we find this water tower, with its ability to generate new revenue, fits within the purpose of that exclusion.

This Cause is the first DSIC proceeding brought before this Commission, and our findings and conclusions will impact future DSIC petitions. It is a primary charge of this Commission to ensure just and reasonable utility rates. The traditional ratemaking process contains the safeguards needed for comprehensive review, particularly of complex and expensive projects, by the Public, the Commission, and the public in general. We find the DSIC statute is similar in purpose to other "tracker" statutes that allow utilities expedited adjustment to rates in matters that fall outside the need for the comprehensive review allowed in a traditional rate case.

We are, however, not prepared to find in this proceeding, as has been determined in Pennsylvania and Illinois, that any project categorized within "Distribution Reservoir" is not DSIC eligible. Distribution Reservoir projects presented to the Commission for DSIC recovery will be considered on a case-by-case basis. We find only, for all of the above reasons specific to this particular project, that the Hobart Water Tower project is not DSIC eligible.

Finally, we address the \$2,402,473 in security costs that Petitioner has proposed for DSIC recovery. An amount of \$425,057 for security improvements is DSIC excludable for the same reason as the non-security improvements above that did not take place within the distribution system. And even though Petitioner has categorized a portion (\$1,977,417) of its security costs as being projects within the distribution system, we find that those security costs should also be excluded from DSIC recovery. We agree with the Public's testimony that the purpose of a DSIC proceeding is to encourage, through an expedited and automatic rate increase, repair or replacement of a distribution system's aging and failing infrastructure. Security improvements, while providing overall improvement to a utility, are not the type of infrastructure improvements contemplated by DSIC statutes.

In addition, given the highly sensitive nature of all security system information, more time than the DSIC statute allows is needed to permit the Public as well as the Commission to fulfill its statutory duties. Indiana Code 8-1-31-9(b) states that the Public may issue a report on a DSIC request within thirty (30) days of the petition being filed. The Public testified, through Mr. Kaufman, that any discovery about improvements that are claimed to be sensitive is difficult and arguments about the recovery of those improvements are awkward, thereby suggesting a lengthier process to ensure adequate review. Given the time needed for the Public and Petitioner to enter into a standard confidentiality agreement, plus the time needed for possible discovery on these sensitive issues, would almost certainly require more than thirty (30) days for the Public to conduct a meaningful review. In addition, given the sixty (60) day time limit for the Commission to issue an order, the meaningfulness of our review is hampered by additional procedures that must be considered and invoked in order to ensure proper confidential handling of sensitive information. Again, the point simply being that the additional complexities of considering security improvements are better suited for a traditional rate case proceeding.

In response to Mr. Kaufman's concern that the review performed in a traditional rate case cannot be completed during the abbreviated process for a DSIC, Mr. Cutshaw stated that the DSIC process was not intended to and will not result in a final determination that the DSIC assets are in rate base for purposes of a general rate case and that the Public will have the opportunity to conduct a full rate base review in the utility's next general rate case. We note, however, that Petitioner's assertion that an imprudent investment can be subsequently removed from rate base does not justify its inclusion in a DSIC. If an investment is, in fact, subsequently excluded from rate base in a future rate case, then ratepayers will have paid both a return on and of an asset that was determined to be ineligible. It is unfair for ratepayers to have incurred such a cost. Moreover, if an asset does not belong in rate base then ratepayers should not have to pay a return on and of that asset. Given the limited time frame, DSIC eligible assets should only include assets that require a minimal review and whose inclusion in rate base is assumed to be reasonable.

For the foregoing reasons and without need to refer to specific categories or describe even in general terms Petitioner's security improvements and without need to make any determination as to the relative prudence of those improvements, we deny recovery of the security improvements in this DSIC proceeding. We find that, without regard to what component of a system they are designed to make secure, security improvements do not properly fall within the descriptor "distribution system improvement" and were not intended to be recovered in a DSIC proceeding regardless of their desirability. In so concluding, we also agree with the Public's testimony that a utility's undertaking of prudent security measures should not be dissuaded. With a heightened concern about terrorist attacks, we encourage utilities to take prudent measures to ensure that their facilities and employees are protected, and to ensure that a safe product can be delivered to consumers. Given, however, the need expressed by Petitioner to be sensitive to the need to maintain secrecy where appropriate, a DSIC case simply does not allow sufficient time to afford due process to the parties and adequate time for the Commission to balance the need for secrecy with the expedited review required by statute. Petitioner may seek to recover these expenditures in a subsequent general rate case.

In addition to the foregoing reasons to exclude security improvements as well as the other excluded items we believe our position here is reasonable given our practice of allowing utilities to recover depreciation of contributed property. In Cause No. 39595, the Commission stated on page 23, "The Commission's current policy of allowing the recovery of depreciation on the contributed property provides to the Company additional internally generated funds to cover at least part of the replacement cost." Indeed, Petitioner's last rate case, Cause No. 42029, had \$60 million in CIAC on which depreciation was calculated and included in rates.

Also, We agree with the Public's recommendation that future DSIC proceedings should include a projection of plans to repair and rehabilitate the distribution system, but find Petitioner's suggestion that such a projection be limited to a 5-year forecast, as opposed to 10 years, to be more reasonable.

G. Calculation of Distribution System Improvement Charges. As to calculation of a DSIC, both Petitioner and the Public agree the before tax rate of return should be 10.81% on certain additions less the amounts contributed by INDOT. The Public further reduces the amount on which the return applies by the original cost of those assets that are now no longer in service as they have been replaced by the assets eligible for the DSIC. Petitioner has acknowledged Indiana allows a return on the Fair Value of assets. Petitioner also acknowledges that if such asset values were not eliminated in the DSIC calculation, Petitioner would earn a return on assets no longer in service as well as earning a return on the replacement of those assets. On cross-examination by the Public, Petitioner's witness Mr. Cutshaw indicated, under Petitioner's method of calculation, it will be earning a return on the fair value of the assets which have been retired as well as earning a return on these new assets, some of which were replacements for those assets retired. In its proposed order, the Public notes that Mr.

Cutshaw asserted in his rebuttal testimony that retirements should not be deducted from rate base additions in a DSIC because, under mass accounting rules, when a utility retires an asset it has no impact on the utilities net book value. We observe that such a rationale may be technically correct, but it is also irrelevant since such a factor would only apply in original cost ratemaking. Petitioner's rate base is based on the fair value of its assets. When any asset with a positive fair value is retired that will reduce the utility's fair value rate base. Thus, if retirements are ignored and a utility is allowed to earn a return on new plant through a DSIC, they will collect a return on both the new plant through its DSIC and on the retired asset through its return on the fair value rate base determination from the utility's last rate case. (We asked Mr. DeBoy if it could be determined when individual assets that have been retired were purchased. He indicated that it would be possible by pulling fixed asset records. We note that this information appears to be found in the response to data request question 33 included in *Attachment No. 3* to Mr. Kaufman's testimony.)

Petitioner did not provide the fair value determination from their last rate case for the items retired. We agree with the Public as to the net amount eligible to receive a return on. We therefore find Petitioner may receive a 10.81% before tax return on \$5,859,778 of net additional plant.

In Cause No. 42029, the Commission determined that the fair value of Indiana American's rate base was \$562,680,669. The Commission also determined that Indiana American's original cost rate base was \$403,085,800. Mass accounting rules do not apply to the Commission's determination of a utility's fair value and any retirement of plant will impact the fair value rate base. In Cause No. 42029, Mr. Deboy used a replacement cost new less depreciation study to estimate Indiana American's fair value. His methodologies for the study are described on page 26 of our final order in that Cause. While aged plant that is retired may have a negligible original cost, the <u>fair value</u> of such retired assets may not be negligible and not so easily determined.

Both Petitioner and Public agree on the method of calculating depreciation. Each took what they considered DSIC eligible assets, deducted retirements, and applied the appropriate depreciation rates. The disagreement is in what constitutes DSIC eligible assets. Applying our previous decision as to what assets are DSIC eligible, we therefore find Petitioner may earn depreciation in the amount of \$163,849.

As to Petitioner's objection to Ms. Gemmecke's unbundling of the Water Groups, the Commission notes that Ms. Gemmecke provided not only each water group on its own, but also as a total of all water groups. The Commission does not have a blanket stance on single-tariff pricing, but considers each case on it own merits. Ms. Gemmecke's schedules were helpful in determining if we should take the same stance in this case as we took in Cause 42029 regarding the movement toward single-tariff pricing for Indiana-American. This abbreviated proceeding does not allow us to re-visit that issue; therefore we have determined to apply the increase to the Groups as an average. We therefore find the calculations of eligible DSIC assets should be calculated and applied according to the schedule below:

DSIC Calculation and Rate Schedule

	Total	Total Water Groups	Wabash	Northwest	Mooresville	Warsaw	West Lafayette	Winchester
		1, 2, 3	·					
Additions subject to DSIC	\$7,723,795	\$5,942,722	\$169,439	\$969,547	\$78,349	\$73,118	\$144,716	\$345,905
Less Reimbursement by INDOT	1,310,504	1,310,504	0	0	0	0	0	0
Less Retirements	553,513	406,378	23,638	83,146	6,974	3,566	16,027	13,784
Net Investor supplied DSIC Additions	5,859,778	4,225,840	145,801	886,401	71,375	69,552	128,689	332,121
Pre-tax Rate of Return	10.81%	10.81%	10.81%	10.81%	10.81%	10.81%	10.81%	10.81%
Pre-Tax Return on Net DSIC Additions	633,442	456,813	15,761	95,820	7,716	7,519	13,911	35,902
Depreciation on DSIC Additions	163,849	132,872	3,660	14,073	2,354	1,520	3,859	5,511
Total DSIC Revenues	797,291	589,685	19,421	109,893	10,070	9,039	17,770	41,413
DSIC Rate per MGAL	\$0.0219	\$0.0267	\$0.0256	\$0.0101	\$0.0288	\$0.0110	\$0.0142	\$0.2027
DSIC Rate per CCF	\$0.0164	\$0.0200	\$0.0192	\$0.0076	\$0.0216	\$0.0083	\$0.0107	\$0.1521

H. Confidential Information. The December 30, 2002 Docket Entry issued in this Cause made a preliminary determination that security-related evidence received during the *in camera* portion of the Evidentiary Hearing would be handled and maintained as confidential pursuant to Indiana Code 5-14-3. This preliminary determination was based on the trade secret exception to disclosure found in Indiana Code 5-14-3-4, as well as the need to protect security-related information that, if disclosed to the public, would jeopardize a security system that is within the state's and national interest to protect. The Commission hereby makes a permanent determination that the record of the *in camera* portion of the Evidentiary Hearing conducted in this Cause on January 29, 2003, shall be handled and maintained as confidential in accordance with Indiana Code 5-14-3.

I. Settlement Agreement. The parties' Stipulation and Settlement Agreement filed in this proceeding proposes several significant findings that differ from the findings we have made herein. First, the Stipulation and Settlement Agreement proposes a finding that the Hobart Water Tower is an eligible DSIC project. Second, the Settlement Agreement proposes to include as DSIC eligible a pump station project ("Taft Street Pump Station") that is excluded from eligibility herein because it was not categorized by Petitioner as being within the distribution system, except for an individual pump station project that was categorized on Petitioner's matrix as being a "Main" project within "Transmission and Distribution." The remainder of the Taft Street Pump

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Station projects were categorized as being within "Source of Supply/Pumping," and, therefore, excluded. Mr. DeBoy testified that the Taft Street Pump Station improves service to the distribution system. The Public, in its testimonial Proposed Order, states that the Taft Street Pump Station should be considered as being within the distribution system, though still DSIC ineligible because of testimony that it would increase the ability to connect to new customers. We are not convinced, however, that the best evidence shows anything other than a majority of the Taft Street Pump Station projects were correctly categorized as being outside of the distribution system. The third difference between the *Stipulation and Settlement Agreement* and our findings herein is the proposal that all security improvements, including tank security improvements, be excluded from DSIC recovery, but that the portion attributable to "tank security improvements" (\$1,977,417) be allowed to accrue "post-in-service" allowance for funds used during construction ("AFUDC") and deferred depreciation.

AFUDC is a recognized accounting mechanism that allows a utility to accrue the cost of debt related to major construction projects during the construction period. Once an in-service project is approved in a general rate proceeding for inclusion in rate base, the utility can begin earning a return on the value of the project. However, economic erosion to the utility can occur if there is a significant lag between the time the project is placed in service and the time of the utility's next general rate proceeding. This is because once the project is placed in service, but before it is approved for inclusion in rate base as an asset of the utility, not only does AFUDC cease as an available accounting tool, but also depreciation commences which is ultimately subtracted from the net original cost of the project to determine its value in rate base. In order to avoid the economic erosion that would otherwise result to the utility, the Commission can authorize, during this lag period, the continued, or "post in-service," accrual of AFUDC as well as deferring depreciation.

Most cases brought before this Commission seeking post in-service AFUDC and deferred depreciation ("AFUDC Remedy") contemplate that remedy from the outset. The AFUDC Remedy in this proceeding, however, was apparently not contemplated, and obviously not sought, until the submission of the late-filed settlement agreement. In determining the appropriateness of the AFUDC Remedy, we have previously said: "The precedents are clear that the requested treatment (the AFUDC Remedy) is appropriate in the case of major projects being placed in service and when the denial of the requested relief would have severe financial ramifications." Cause No. 39150, June 19, 1991. Evidence of these criteria was not produced in this proceeding. While evidence of the value of the security improvements was produced, we do not have evidence to support whether or not these security improvements are "major" in the context of the AFUDC Remedy, or whether our denial of the AFUDC Remedy would have severe financial ramifications on Petitioner. The AFUDC Remedy is a different form of relief from the DSIC remedy sought in this proceeding.

The Parties' joint settlement agreement asserts that Petitioner's recovery under the settlement agreement will be less than what it sought under the DSIC remedy and, therefore, falls within Petitioner's original request as lesser included relief. As stated

above, and regardless of the amount to be recovered by Petitioner under either remedy, we consider the AFUDC Remedy to be distinct from the DSIC remedy, each requiring proof of different elements. Therefore, given our finding that the evidence does not support approval of either a DSIC or AFUDC for security improvements, we conclude that neither remedy is appropriate in this proceeding.

We do not find it in the public interest that an automatic rate increase be imposed on ratepayers for improvements that we do not find, based on the evidence, to be within the utility's distribution system, or that Petitioner be allowed to continue to accrue AFUDC and defer depreciation when eligibility for those remedies has been neither sought nor proven. Accordingly, we reject the *Stipulation and Settlement Agreement*.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION, that:

- 1. Indiana-American Water Company, Inc. is approved a Distribution System Improvement Charge that generates \$797,291 in additional annual revenue.
- 2. We find that for purposes of determining the DSIC revenue, a before tax return of 10.81% should be applied to the net investor supplied DSIC eligible assets of \$5,859,778. Such a figure includes distribution assets added since Petitioner's last rate case less reimbursements by Indiana Department of Transportation for line relocations, less the distribution assets retired and replaced since the last rate case.
- 3. Recovery of DSIC revenues through an adjustment of rates shall be in accordance with the DSIC Calculation and Rate Schedule found herein in Finding Paragraph No. 8G. Petitioner shall file with the Gas/Water/Sewer Division of the Commission, prior to placing into effect the DSIC rates herein approved, separate amendments to its rate schedule with reasonable reference therein reflecting that such charges are applicable to the rate schedules reflected on the amendment.
- 4. In accordance with Indiana Code 8-1-31-15, Petitioner shall file a revised rate schedule resetting the DSIC when the Commission issues an Order authorizing a general increase in rates and charges that includes the eligible distribution system in the utility's rate base.
- 5. In its next DSIC case, Indiana-American should file a five-year forecast of its distribution system replacement program.
 - 6. This Order shall become effective upon and after the date of its approval.

MCCARTY, LANDIS, RIPLEY AND ZIEGNER CONCUR; HADLEY ABSENT: APPROVED:

FEB 2 7 2003

I hereby certify that the above is a true and correct copy of the Order as approved.

Nancy E. Mantey

Secretary to the Commission

- All other revenues and prudently incurred utility expenses considered part of the utility cost of service earnings.
- d. The following items are excluded from the earnings sharing calculation:
 - All other income (i.e., revenues not generated from utility assets) and deductions and related taxes
 - Revenues and/or expenses resulting from any audit addressing the Company's past treatment of pensions and OPEBs with respect to the Commission's Policy Statement⁹
 - All changes in accounting not contemplated in setting revenue requirement
 - Shareholder portion of property tax refunds
- e. Any earnings due customers under this earnings sharing mechanism will be reflected in the revenue requirement in the Company's next general rate case or as directed by the Commission.
- f. Within 90 days after the end of Year Three, the Company will provide Staff with its earnings calculation and supporting documentation.

VI. Distribution System Improvement Charge

- 1. The Parties propose that the Commission authorize implementation of a DSIC, commencing at the beginning of Year Two.
- 2. No later than 60 days prior to the beginning of Year Two of the Rate Plan, LIWC will develop a five-year plan (the "Plan") that identifies the specific mains (distribution and/or transmission) that should be renewed, replaced or constructed within the five-year period. For each project, the Plan will include an explanation of why such work is recommended and the

Case 91-M-0890, Statement of Policy and Order Concerning the Accounting and Ratemaking Treatment for Pensions and Postretirement Benefits Other Than Pensions (issued September 7, 1993) ("Policy Statement").

project's current priority in terms of dollar amount and schedule. The Company will attempt to coordinate the Plan with local roadway and rights-of-way plans such that any street rehabilitations or local development plans are reflected, in an effort to minimize street opening and restoration costs. The Company will review and update the Plan annually, or more frequently if required, to address potential changing priorities and changing prioritization drivers, such as additions or revisions to scheduled roadway and rights-of-way improvements. Staff will review the Plan with the Company and use the Plan as a flexible planning tool to monitor LIWC's activities. The Plan will also enable LIWC to react to changing issues that could impact DSIC project needs year to year or within a given budget year.

- 3. The Company will spend up to \$4 million annually of capital expenditures (and the associated incremental rate impacts) on the DSIC program. At a minimum, LIWC must spend \$1.3 million in each of Year Two and Year Three, representing the amount attributable to routine replacement of distribution mains, hydrants and services and associated work in Year One (which is prior to the beginning of the DSIC).
- 4. LIWC will recover the costs of the DSIC program through a DSIC surcharge mechanism as more fully described in this subsection.
- a. The DSIC surcharge will apply to costs associated with: distribution and transmission mains installed as replacements or reinforcements; cleaning and lining of mains; and replaced valves, services and hydrants (whether the installations are part of the main replacement program or are located elsewhere in the system and are replaced because of age or condition).
- b. When LIWC has incurred actual expenditures for this program and the renewed/replaced system facilities have been placed in service, then the amount of those expenditures (net of the associated (1) retirements, (2) accumulated deferred income taxes ("ADIT"), and (3) accumulated depreciation reserve, i.e., the net rate base ["NRB"]) will constitute the incremental rate base investment subject to the DSIC.
- c. LTWC will be entitled to assess a DSIC surcharge on customers' bills based on a pre-tax rate of return of 10.03% applied to the net rate base increase. The cost of

depreciation expense is added to that amount, and the total is divided by annual water revenues as defined below.

d. The DSIC surcharge will be a percentage, carried to two decimal places, and will be applied to the total amount billed to each customer. The formula of the calculation is as follows

$$\frac{DSIC \text{ surcharge} = (NRB \times Pre-tax ROR) + D}{AR}$$

Where:

NRB = the cost of the applicable transmission and

distribution facilities, net of associated (1) retirements, (2) ADIT and (3) accumulated

depreciation reserve

Pre-tax ROR = 10.03%

D = the annual depreciation expense on the net additions

AR = LIWC's projected annual metered and fire

protection revenues

- e. The DSIC surcharge will be assessed semi-annually for the applicable facilities placed in service during the six-month period ending 60 days prior to the effective date of each DSIC surcharge ("DSIC Period"). The first six months of the DSIC surcharge will be the six-month period ending September 30, 2006. LIWC will provide Staff with detailed project information within 15 calendar days regarding the DSIC (such as dates, actual paid expenditures, main size, length, location, replacements and retirements). During the interval between the end of the DSIC Period and the DSIC surcharge assessment, Staff will have the balance of the 60 days to verify such data.
- f. A reconciliation between authorized collections and actual collections related to the DSIC surcharge will be conducted annually and filed with the Commission within 60 days of the end of each rate year. Any undercollections or overcollections will accrue interest at the customer deposit interest rate established by the Commission each year. Adjustments of undercollections and overcollections will be reflected in the next DSIC surcharge filing.

- 5. The DSIC program will remain in place until the Commission issues a decision in the Company's next general rate case, at which time all costs previously collected through the DSIC will be accounted for and included in base rates. Those new base rates will recover all costs that had been recouped previously through the DSIC surcharge. Future expenditures under the DSIC program will be reflected in a subsequent DSIC.
- 6. Non-DSIC Capital Expenditures In addition to the capital expenditures that LIWC will incur in connection with the DSIC program, the Company agrees that it will expend a minimum of \$4.5 million in non-DSIC capital expenditures exclusive of AMR and/or iron removal plants and related activities over the three-year period of this Joint Proposal.

VII. Property Tax Reconciliation Mechanism and Property Tax Refunds

- 1. For the period April 1, 2005 through March 31, 2008, LIWC will defer for recovery through the property tax reconciliation mechanism 85% of any property taxes above the target level specified in Section IV.3 for each respective year, and the remaining 15% will be borne by shareholders.
- 2. For the same period, LIWC will defer and return to customers through the property tax reconciliation mechanism 100% of any decreases in property taxes below the target level set for Year One, subject to a potentially different percentage agreed to by the Parties based on the Company's efforts in aggressively pursuing tax challenges.
- 3. LIWC is entitled to recover, through the property tax reconciliation mechanism, 100% of any property tax increases in Years Two and Three (specified in Section IV.3.d) that exceed the Year One target level but fall below the target level for each of the two respective years.
- 4. The Company will notify the Commission of any property tax refunds in accordance with Public Service Law Section 113 (2) and Part 89 of the Commission's Codes, Rules and Regulations (16 NYCRR Part 89). LIWC will accrue interest, at the other customer capital rate established by the Commission each year, from the date it receives the refund until disposition.

OF THE STATE OF MISSOURI



In the Matter of the Application of Missouri-American

Water Company for Approval to Establish an

Infrastructure System Replacement Surcharge (ISRS)

| Case No. WO-2004-0116 | Tariff No. YW-2004-0274 |

REPORT AND ORDER

Issue Date: December 16, 2003

Effective Date: December 26, 2003

OF THE STATE OF MISSOURI

In the Matter of the Application of Missouri-American)	
Water Company for Approval to Establish an)	Case No. WO-2004-0116
Infrastructure System Replacement Surcharge (ISRS))	Tariff No. YW-2004-0274

APPEARANCES

<u>W.R. England, III</u>, Attorney at Law, 312 East Capitol Avenue, Jefferson City, Missouri 65102, for Missouri-American Water Company.

<u>Diana M. Vuylsteke</u>, Attorney at Law, 211 North Broadway, Suite 3600, St. Louis, Missouri 63102, for Missouri Industrial Energy Consumers.

<u>Lisa C. Langeneckert</u>, Attorney at Law, 720 Olive Street, Suite 2400, St. Louis, Missouri 63101, for Missouri Energy Group

M. Ruth O'Neill, Public Counsel, P.O. Box 2230, Jefferson City, Missouri 65102, for the Office of the Public Counsel and the Public.

<u>Keith R. Krueger and Thomas R. Schwarz, Jr.</u>, Deputy General Counsel, P.O. Box 360, Jefferson City, Missouri 65102, for the Staff of the Missouri Public Service Commission.

REGULATORY LAW JUDGE: Morris L. Woodruff

REPORT AND ORDER

SUMMARY

After reviewing Missouri-American Water Company's application for establishment of an Infrastructure System Replacement Surcharge, the Commission concludes that Missouri-American correctly calculated the amount of accumulated depreciation used in the company's calculation of its ISRS revenue requirement. However, the Commission

concludes that Missouri-American should not have included net cost of removal of the non-ISRS property in those calculations. In addition, the Commission concludes that those calculations should not include property taxes for plant placed in service after January 1, 2003. Missouri-American's proposed tariff to institute an ISRS is rejected, but Missouri-American is advised to submit a revised tariff consistent with this report and order.

FINDINGS OF FACT

The Missouri Public Service Commission, having considered all of the competent and substantial evidence upon the whole record, makes the following findings of fact. The Commission in making this decision has considered the positions and arguments of all of the parties. Failure to specifically address a piece of evidence, position or argument of any party does not indicate that the Commission has failed to consider relevant evidence, but indicates rather that the omitted material was not dispositive of this decision.

Procedural History

On September 2, 2003, Missouri-American Water Company filed an Application and Petition for Establishment of an Infrastructure System Replacement Surcharge. For convenience the surcharge is referred to by the acronym ISRS. A proposed tariff implementing the ISRS – with an effective date of October 2 – accompanied Missouri-American's application.

On September 9, the Commission suspended Missouri-American's tariff until December 31, the maximum amount of time allowed by the controlling statute. Also on September 9, the Commission issued an Order Directing Notice and Setting Date for Submission of Intervention Requests. That order directed that notice of Missouri-

¹ Section 393.1006.1(3), RSMo

American's application be given to the county commission of St. Louis County, to the media serving St. Louis County, and to the members of the general assembly that represent St. Louis County. The Commission's order also established September 29 as the deadline for submission of applications to intervene.

A timely application to intervene was filed by the Missouri Energy Group (MEG),² an *ad hoc* group of not-for-profit hospital systems and a large industrial company that purchase substantial amounts of water from Missouri-American in St. Louis County. MEG's application to intervene was granted on September 30. On October 31, the Missouri Industrial Energy Consumers (MIEC),³ another *ad hoc* group of large customers in St. Louis County, filed an application to intervene out of time. MIEC's application was granted on November 3.

On September 29, the Office of the Public Counsel filed a motion asking the Commission to set a procedural schedule and to hold an evidentiary hearing regarding Missouri-American's application. To that end, a prehearing conference was held on October 8. Following that conference, on October 14, the parties submitted a proposed procedural schedule that was adopted by the Commission on October 16. The procedural schedule did not call for the pre-filing of testimony but instead required the parties to file reports and responses to those reports. It also called for an on-the-record presentation to be held on November 21, at which the Commission could question the parties about their reports. The parties indicated that this schedule would be appropriate because the issues

² The members of MEG are: Barnes-Jewish Hospital; Emerson Electric Company; SSM HealthCare; and St. John's Mercy Health Care.

³ The members of MIEC are: The Boeing Company; DaimlerChrysler; Ford Motor Company; Hussman Refrigeration; Monsanto Company; and Pfizer.

before the Commission were likely to be legal rather than factual and because of the tight time constraints imposed by statute.

Staff filed its report on October 31. Staff agreed that Missouri-American should be allowed to establish an ISRS but argued that the annual revenue requirement for calculation of the ISRS should be set at \$1,887,301. Staff's calculation of the appropriate annual revenue requirement was substantially smaller than the \$4,038,923 calculated by Missouri-American. Missouri-American filed a response to Staff's report on November 10, agreeing with some of Staff's modifications, but disagreeing with many of Staff's assumptions. Missouri-American now contends that the appropriate annual revenue requirement is \$3,813,222. Staff, MEG, and MIEC filed replies to Missouri-American's report on November 14. Public Counsel filed its reply on November 17. Public Counsel's reply was filed late and was accompanied by a motion asking the Commission to accept its late filling. That motion was not opposed by any party and will be granted.

At the direction of the Commission, Staff filed a list of issues on November 13. A prehearing conference was held on November 19. As a result of discussions among the parties at that conference, an amended list of issues was filed on November 20.

A hearing was held on November 21, at which time the parties presented evidence and testimony. Missouri-American, Staff, Public Counsel, and MEG submitted post-hearing briefs on December 4. In addition, the Missouri Energy Development Association⁴ filed an amicus brief, accompanied by a Petition for Leave to File Amicus Brief. That petition was not opposed by any party and will be granted. MIEC did not submit a brief.

⁴ The members of the association include: Aquila, Inc.; Atmos Energy Corporation; Empire District Electric Company; Kansas City Power & Light Company; Laclede Gas Company; Missouri-American Water Company; Missouri Gas Energy, a division of Southern Union Company; and Union Electric Company d/b/a AmerenUE.

What is an ISRS?

Missouri-American's ability to establish an ISRS was created by the Missouri legislature during its 2003 session. In House Bill 208, the applicable portions of which were codified at Sections 393.1000 through 393.1006, RSMo, the legislature permitted Missouri-American to petition the Commission to allow it to establish a special surcharge, the ISRS, to recover the cost of replacing eligible infrastructure system equipment and plant, which is defined as: replacement mains, and associated valves and hydrants; main cleaning and relining projects; and un-reimbursed facilities relocations mandated by governmental entities. Missouri-American would then recover the special surcharge from its customers for a limited time until the Commission establishes its new rates in a general rate case. In effect, the ISRS would allow Missouri-American to begin recovering the cost of infrastructure replacement without having to wait for the Commission to review and approve a general rate case.

Missouri-American currently has a general rate case pending before the Commission in Case Number WR-2003-0500. Missouri-American's tariff that would implement its revised rates is suspended until April 16, 2004. Because the ISRS would only remain in effect until it is replaced by the rates established in a general rate case, Missouri-American's proposed ISRS would be in effect from the effective date of this order until the effective date of the Commission's order establishing new general rates, approximately April 16, 2004.

What is the appropriate amount of the ISRS?

In appendix A to its verified application. Missouri-American provides a detailed list of the facility relocations, and mains, hydrants and valve replacements made after its last rate case, for which it is seeking ISRS eligibility. Missouri-American indicated that it did not undertake any eligible main cleaning or relining projects during the applicable period. For each individual item of plant, Missouri-American lists the investment value, depreciation rate, date that the item was placed in service, accumulated depreciation and depreciation expense. Beginning with the actual investment it made in this eligible plant, Missouri-American identified the actual accumulated depreciation on those investments since they were placed into service, as well as the actual deferred taxes on those investments, and deducted those amounts - along with any contribution in aid of construction and reimbursement received for facility relocations – to arrive at a net original cost, or ISRS Rate Base. Missouri-American then applied the rate of return authorized in its last rate case to this ISRS Rate Base, and identified the annual expenses attributable to depreciation, property tax and state and federal income tax to arrive at a total annual ISRS revenue requirement of \$3,813,222. 6 Missouri-American would recover that amount, on an annual basis, from ratepayers through the proposed ISRS.

No party challenged Missouri-American's identification of the plant that is eligible for consideration under the ISRS statute and the Commission will accept those amounts as correct. Staff does, however, challenge three elements of Missouri-American's calculation of the ISRS revenue requirement: First, Staff argues that accumulated depreciation applied to facilities relocations and replacement mains and associated valves and hydrants should

⁵ The application was admitted into evidence as Exhibit 5.

total \$15,550,171 instead of \$792,177 as determined by Missouri-American; second, Staff excluded accumulated depreciation – net cost of removal of the retired plant being replaced from its calculations; and third, Staff excluded property taxes on ISRS plant placed in service in calendar year 2003. After making these modifications, Staff determined that the Missouri-American's ISRS revenue requirement is \$1,887,301.⁷

MEG's expert witness, Billie LaConte, testified that MEG agreed with Missouri-American on the question of accumulated depreciation. However, she testified that accumulated depreciation – net cost of removal of the non-ISRS plant, as well as property taxes for ISRS plant added after January 1, 2003, should not be included in the ISRS revenue requirement.⁸ Using those assumptions MEG calculated that Missouri-American was entitled to an ISRS revenue requirement of \$3,628,576.⁹

CONCLUSIONS OF LAW

The Missouri Public Service Commission has reached the following conclusions of law.

Missouri-American is a public utility, and a water corporation, as those terms are defined in Section 386.020(42) and (58), RSMo 2000. As such, Missouri-American is subject to the Commission's jurisdiction pursuant to Chapters 386 and 393, RSMo.

Section 393.1003.1, RSMo provides as follows:

Notwithstanding any provisions of chapter 386, RSMo, and this chapter to the contrary, as of August 28, 2003, a water corporation providing

⁶ Missouri-American's calculations are shown on Exhibit 6.

⁷ Staff's calculations are shown as attachment B to its October 31, 2003 Memorandum, which was admitted into evidence as Exhibit 1.

⁸ Transcript, Pages 223-224, Lines 21-25, 1-2.

⁹ MEG's calculations may be found as a schedule to its Reply to Missouri-American Water Company's Response to Staff Report and Recommendations. That reply was filed on November 14, 2003.

water service in a county with a charter form of government and with more than one million inhabitants may file a petition and proposed rate schedules with the commission to establish or change ISRS rate schedules that will allow for the adjustment of the water corporation's rates and charges to provide for the recovery of costs for eligible infrastructure system replacements made in such county with a charter form of government and with more than one million inhabitants; provided that an ISRS, on an annualized basis, must produce ISRS revenues of at least one million dollars but not in excess of ten percent of the water corporation's base revenue level approved by the commission in the water corporation's most recent general rate proceeding. An ISRS and any future changes thereto shall be calculated and implemented in accordance with the provisions of sections 393.1000 to 393.1006. ISRS revenues shall be subject to refund upon a finding and order of the commission, to the extent provided in subsection 5 and 8 of 393.1006.

Missouri-American provides water service in St. Louis County, which has a charter form of government and more than one million inhabitants. Therefore, Missouri-American is eligible for an ISRS under this statute. Missouri-American's proposed ISRS would produce revenues of at least one million dollars but not in excess of ten percent of its base revenue level and that requirement of the statute is met.

Section 393.1003.3, RSMo, provides as follows:

In no event shall a water corporation collect an ISRS for a period exceeding three years unless the water corporation has filed for or is the subject of a new general rate proceeding; provided that the ISRS may be collected until the effective date of new rate schedules established as a result of the new general rate proceeding, or until the subject general rate proceeding is otherwise decided or dismissed by issuance of a commission order without new rates being established.

Missouri-American currently has a general rate case pending before the Commission. Therefore, the ISRS Missouri-American seeks in this case will remain in effect only until new rates are established, which will occur approximately April 16, 2004.

Section 393.1006.2, RSMo, provides as follows:

(1) When a petition, along with any associated proposed rate schedules, is filed pursuant to the provisions of sections 393.1000 to

393.1006, the commission shall conduct an examination of the proposed ISRS.

- (2) The staff of the commission may examine information of the water corporation to confirm that the underlying costs are in accordance with the provisions of sections 393.1000 to 393.1006, and to confirm proper calculation of the proposed charge, and may submit a report regarding its examination to the commission not later than sixty days after the petition is filed. No other revenue requirements or ratemaking issues shall be examined in consideration of the petition or associated rate schedules filed pursuant to the provisions of sections 393.1000 to 393.1006.
- (3) The commission may hold a hearing on the petition and any associated rate schedules and shall issue an order to become effective not later than one hundred twenty days after the petition is filed.
- (4) If the commission finds that a petition complies with the requirements of sections 393.1000 to 393.1006, the commission shall enter an order authorizing the water corporation to impose an ISRS that is sufficient to recover appropriate pretax revenues, as determined by the commission pursuant to the provisions of sections 393.1000 to 39.31006.

Section 393.1006.4 establishes the factors that the Commission may consider when establishing the appropriate pretax revenues that Missouri-American can recover through its ISRS. That section provides as follows:

In determining the appropriate pretax revenues, the commission shall consider only the following factors:

- (1) The current state, federal, and local income or excise tax rates;
- (2) The water corporation's actual regulatory capital structure as determined during the most recent general rate proceeding of the water corporation;
- (3) The actual cost rates for the water corporation's debt and preferred stock as determined during the most recent general rate proceeding of the water corporation;
- (4) The water corporation's cost of common equity as determined during the most recent general rate proceeding of the water corporation;
- (5) The current property tax rate or rates applicable to the eligible infrastructure system replacements;
- (6) The current depreciation rates applicable to the eligible infrastructure system replacements;
- (7) In the event information called for in subdivision (2), (3), and (4) is unavailable and the commission is not provided with such information on an agreed-upon basis, the commission shall refer to the testimony submitted during the most recent general rate proceeding of the water corporation and use, in lieu of any such unavailable information, the recommended capital structure, recommended cost rates for debt and preferred stock, and

recommended cost of common equity that would produce the average weighted cost of capital based upon the various recommendations contained in such testimony.

The Commission's determination of Missouri-American's appropriate pretax revenues is also restricted by Section 393.1000(1), which defines "appropriate pretax revenues" as:

The revenues necessary to produce net operating income equal to:

- (a) The water corporation's weighted cost of capital multiplied by the net original cost of eligible infrastructure system replacements, including recognition of accumulated deferred income taxes and accumulated depreciation associated with eligible infrastructure system replacements which are included in a currently effective ISRS; and
- (b) Recover state, federal, and local income or excise taxes applicable to such income; and
 - (c) Recover all other ISRS costs;

ISRS costs, referred to in (c), are further defined by Section 393.1000(5) as "depreciation expenses, and property taxes that will be due within twelve months of the ISRS filing."

Not all infrastructure systems replacements are eligible for inclusion in the ISRS. Section 393.1000(3) defines "Eligible infrastructure system replacements" as:

Water utility plant projects that:

- (a) Replace or extend the useful life of existing infrastructure;
- (b) Are in service and used and useful;
- (c) Do not increase revenues by directly connecting the infrastructure replacement to new customers; and
- (d) Were not included in the water corporation's rate base in its most recent general rate case;

"Water utility plant projects," as used in the previous definition, is further defined by Section 393.1000(8) as consisting only of the following:

- (a) Mains, and associated valves and hydrants, installed as replacements for existing facilities that have worn out or are in deteriorating condition;
 - (b) Main cleaning and relining projects; and
- (c) Facilities relocations required due to construction or improvement of a highway, road, street, public way, or other public work by or on behalf of

the United States, this state, a political subdivision of this state, or another entity having the power of eminent domain provided that the costs related to such projects have not been reimbursed to the water corporation.

Section 137.075, RSMo 2000, provides that property taxes for a given year are assessed based on the property owned on January 1 of that year. Property taxes on property placed in service after January 1, 2003, will not be assessed until January 1, 2004. Such taxes need not be paid until December 31, 2004.

DECISION

After applying the facts as it has found them to its conclusions of law, the Commission has reached the following decisions regarding the issues identified by the parties.

Accumulated Depreciation

Missouri-American contends that the proper measure of accumulated depreciation is the actual accumulated depreciation recorded on the books of the company for each item of ISRS plant. In arriving at the measure of accumulated depreciation that it used in its calculations, Missouri-American simply totaled the accumulated depreciation on each item of ISRS plant.

No party disagrees with Missouri-American's calculation of the total accumulated depreciation on the ISRS plant. Staff's witness, in fact, agreed that Missouri-American had correctly calculated total accumulated depreciation on the replaced plant. Staff, however, contends that the amount calculated by Missouri-American should not be used in calculating the appropriate pretax revenue requirement for the ISRS. Instead, Staff compared the total amount of ISRS investment to the total change in invested plant since

the last rate case.¹¹ Staff calculated that Missouri-American's total invested plant increased by \$93,315,958 between its last rate case and July 2003.¹² Missouri-American's infrastructure replacement investment since its last rate case is \$20,723,376.¹³ Staff then determined the ratio of total invested plant to infrastructure replacement investment, approximately 22%, and applied that ratio to the increase in the company's depreciation reserve since its last rate case, \$53,573,609. \$53,573,609 multiplied by Staff's ratio equals \$11,897,494. It is this amount that Staff contends should be used as accumulated depreciation for mains, and associated valves and hydrants, in the calculation of Missouri-American's appropriate pretax revenues for purposes of its ISRS application. Staff performed the same calculations to arrive at \$3,652,677 as the amount of accumulated depreciation for facilities relocations for purposes of Missouri-American's ISRS application.¹⁴

Staff explains that it used this ratio approach rather than simply using the actual total depreciation because Missouri-American has accumulated \$53 million in depreciation since its last rate case and Staff argues that the company should be required to use a portion of that depreciation to offset the cost of constructing the ISRS plant.¹⁵

Staff also contends that its ratio approach should be used to offset what it claims to be the effect of regulatory lag that favors the company. Staff explains that the total value

¹⁰ Transcript, Pages 125, Lines 7-16 and 144-145, Lines 18-25, 1-5.

¹¹ Transcript, Page 112, Lines 21-24.

¹² These figures are taken from Exhibit 1, Appendix B, Attachment B, Page 2 of 4.

¹³ This is the amount of eligible investment in replacement mains, and associated valves and hydrants reported by Missouri-American in Exhibit 6, Line 3.

¹⁴ Transcript, Page 117, Lines 1-17.

¹⁵ Transcript, Page 116, Lines 16-25.

of a company's plant investment is used to establish a company's rates in a rate case. Those rates then remain unchanged until the company's next rate case when depreciation and new investment in plant are included in the company's rate base for consideration in rates. Staff points out that if all other factors remain equal – in other words, there were no new plant investment, no retirements, no change in revenue and expenses, etc. – then, because of depreciation, the company's rate base would decline and its revenue requirements would decrease. However, because rates do not change between rate cases, the company would be in a position to be earning more than its authorized return because of regulatory lag. Staff is concerned that unless its ratio approach to depreciation is adopted, Missouri- American could be imposing a surcharge on its customers while it is already over-earning.

Staff's argument must fail because it is contrary to the clear language of the statute. Section 393.1000(1)(a) requires that the company's ISRS revenue requirement is to be calculated by multiplying the company's weighted cost of capital by the "net original cost of eligible infrastructure system replacement, including recognition of accumulated deferred income taxes and accumulated depreciation associated with eligible infrastructure system replacements which are included in a currently effective ISRS." That definition clearly directs the Commission to consider "accumulated depreciation associated with eligible infrastructure system replacements." That is exactly what Missouri-American does in its calculation of its revenue requirement when it simply totals the depreciation that accumulated on the eligible infrastructure system replacements.

Staff, however, points to the last clause of the definition – "which are included in a currently effective ISRS" – to argue that since Missouri-American's initial ISRS application

has not yet been approved, there is no currently effective ISRS. Therefore, Staff would ignore the definition's admonition to consider "accumulated depreciation associated with eligible infrastructure system replacements." Instead, Staff would consider only the first part of the definition, "the weighted cost of capital multiplied by the net original cost of eligible infrastructure system replacement." According to Staff, this truncated definition is telling the Commission to net the original cost of eligible infrastructure system replacement against something. Staff chooses to net it against the total change in the amount of the company's investment in plant-in-service since its last rate case, thus arriving at its ratio approach. Staff's interpretation of the statute's definition of appropriate pretax revenues is incorrect.

Staff's proposed method of determining the ISRS revenue requirement clearly and explicitly considers depreciation that is in no way associated with ISRS plant. In fact, Staff's witness explained that under Staff's method of calculation, the ISRS revenue requirement would go up or down depending upon the amount of non-ISRS investment made by the company, independent of the company's ISRS investments.¹⁷ That same witness conceded that there is nothing in the statute that authorizes the consideration of non-ISRS investments when calculating the appropriate ISRS revenue requirement.¹⁸

Furthermore, a reading of the entire ISRS statute makes it clear that the legislature was directing the Commission to conduct a narrow review of an application for an ISRS. Section 393.1006.2(2) specifically states that the Staff of the Commission may examine information of the water corporation to confirm that underlying costs are in accordance with

¹⁶ See. Staff's Brief at Page 8-9.

¹⁷ Transcript, Pages 183-185.

the provisions of the law and to confirm proper calculation of the proposed charge. The section then states, "no other revenue requirement or ratemaking issues shall be examined." The approach advocated by Staff violates this provision by seeking to examine underlying rate case issues as part of the ISRS.

Staff states that it is very concerned that Missouri-American may be over-earning and argues that it would not be appropriate to allow the company to impose an ISRS under those circumstances. But the controlling statute does not allow the Commission to consider other ratemaking issues in this proceeding. The legislature, by enacting a statute, has determined that Missouri-American is entitled to impose an ISRS on its customers to encourage the company to make needed infrastructure improvements. Missouri-American's method of calculating accumulated depreciation complies with that statute. Staff's method of calculating accumulated depreciation does not comply with that statute. The Commission concludes that Missouri-American's ISRS revenue requirement must be calculated using the accumulated depreciation calculated by Missouri-American for the ISRS plant.

Accumulated Depreciation - Net Cost of Removal

Missouri-American's calculation of accumulated depreciation to be offset against the original cost of the ISRS plant included a further adjustment to its total accumulated depreciation to recognize the cost of removing the old plant that was replaced with ISRS plant. If the replaced plant has any salvage value, the salvage value is deducted from the cost of removal. However, in most cases, the salvage value is less than the cost to remove

¹⁸ Transcript, Page 185, Lines 20-22.

the old plant, leaving a "net cost of removal." Missouri-American calculated its net cost of removal associated with ISRS plant as \$1,036,533.75.

MEG's expert witness stated that the net cost of removal of non-ISRS property should not be included in the ISRS calculations. Because the adjustment that Missouri-American would make to the accumulated depreciation account for net salvage is due to the removal of non-ISRS infrastructure, it should not be part of the calculation of an ISRS.¹⁹

The Commission agrees that net cost of removal of the non-ISRS plant should not be included in the ISRS calculations. The statute narrowly prescribes the factors that the Commission may consider when calculating the ISRS. The Commission is persuaded by the argument of MEG's expert witness. The net cost of removal that Missouri-American seeks to include in the ISRS calculations is associated with the depreciation accumulated on the old non-ISRS plant. Missouri-American should not be allowed to adjust the accumulated depreciation account for ISRS property due to the removal of non-ISRS infrastructure.

Property Taxes

Section 393.1000(5) defines "ISRS costs" as "depreciation expenses, and <u>property</u> taxes that will be due within twelve months of the ISRS filling" (emphasis added). In its calculation of its ISRS revenue requirement, Missouri-American included the cost of property taxes for all ISRS plant. In its calculations, Staff excluded property taxes on ISRS plant placed in service after January 1, 2003.

Staff reasoned that plant placed in service after January 1, 2003, will not be assessed until January 1, 2004. That means that property taxes on that plant will not be

¹⁹ Transcript, Page 225-226, Lines 2-25,1-6. See also Brief of Missouri Energy Group at page 3-4.

"due" until December 31, 2004. That is more than twelve months after Missouri-American filed its ISRS petition. Under the plain language of the statute, those property taxes are not due within twelve months of the ISRS filing and are, therefore, not ISRS costs.

Missouri-American countered that it accounted for taxes on plant added in 2003 on its books within twelve months of the filing of the ISRS petition. It contended that the statute should be read broadly to permit recovery of costs that the legislature intended to be recovered.

The Commission agrees with Staff's calculation of property taxes. A plain reading of the statute indicates that ISRS costs include property taxes that will be due within twelve months of the ISRS filing. Property taxes on plant added after January 1, 2003, are not due until more than twelve months after the ISRS filing. Therefore, they are not an ISRS expense and may not be included in the calculations of Missouri-American's ISRS revenue requirements.

Other Issues

In the course of their negotiations, the parties have reached agreement on several other adjustments to Missouri-American's original ISRS application. The Commission need not address those adjustments in this report and order. However, Missouri-American must adjust its ISRS calculations based on this report and order and those agreements. As a result, Missouri-American's tariff that implemented its ISRS, as originally calculated, is incorrect. That tariff will be rejected and Missouri-American will be allowed an opportunity to submit a revised tariff that conforms to the decisions made in this report and order and to the adjustments agreed to among the parties.

IT IS THEREFORE ORDERED:

1. That the tariff sheet filed by Missouri-American Water Company on September 2, 2003, and assigned tariff number YW-2004-0274, is rejected. The tariff sheet rejected is:

P.S.C. Mo. No. 6 Original Sheet No. RT 18.0

- 2. That Missouri-American Water Company is authorized to file a tariff to impose an Infrastructure System Replacement Surcharge that is sufficient to recover appropriate pre-tax revenues as determined by the Commission in this order.
- 3. That Public Counsel's Request to Accept Reply Filed One Business Day Late is granted.
- 4. That the Missouri Energy Development Association's Petition for Leave to File Amicus Brief is granted.
- 5. That any pending motions that the Commission has not specifically ruled upon are denied.

6. That this Report and Order shall become effective on December 26, 2003.

BY THE COMMISSION

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge

(SEAL)

Murray and Forbis, CC., concur; Gaw, Ch., and Clayton, C., concur, with separate concurring opinion to follow; and certify compliance with the provisions of Section 536.080, RSMo 2000.

Dated at Jefferson City, Missouri, on this 16th day of December, 2003.

PENNSYLVANIA PUBLIC UTILITY COMMISSION HARRISBURG, PA 17105-3265

5% orginal order

Public Meeting held December 19, 1996

Commissioners Present:

John M. Quain, Chairman Lisa Crutchfield, Vice Chairman John Hanger David W. Rolka Robert K. Bloom

Pennsylvania American Water Company Distribution System Improvement Charge Tariff Supplements To Become Effective January 1, 1997. Docket No. R-00963792

ORDER

BY THE COMMISSION:

On March 15, 1996, Pennsylvania-American Water Company (PAWC) at P-00961031, submitted a petition for approval to file and implement an automatic adjustment clause tariff that would establish a Distribution System Improvement Charge (DSIC) pursuant to Section 1307(a) of the Public Utility Code. Section 1307(a) provides statutory authority for a utility to establish, subject to Commission review and approval, an automatic adjustment clause mechanism designed to provide "a just and reasonable return on rate base" of the public utility.

The purpose of the DSIC is to provide the Company with the resources it needs to accelerate its investments in new utility plant to replace water distribution infrastructure, which will facilitate compliance with evolving regulatory requirements imposed by the Safe Drinking Water Act (SDWA). Additionally, the implementation of the DSIC will facilitate solutions to regional water supply problems. The DSIC may also enable the Company to reduce the frequency

of its base rate cases and place them in a better position to absorb increases in other categories of costs for a longer period of time.

On August 26, 1996, the Commission entered an order at P-00961031, approving in part and denying in part, the petition submitted by the Company. In order to provide guidance to PAWC and any other water utility that may desire to implement a DSIC, the Commission developed and issued sample tariff language as Attachment A to the order for the utilities to use in any proposed Section 1307 tariff supplement. In general, as approved, the DSIC tariff would permit a water utility to recover the fixed costs (depreciation and pre-tax return) of certain non-revenue producing, non-expense reducing infrastructure rehabilitation projects completed and placed in service between Section 1308 base rate cases. The DSIC is to be applied as a percentage to the total amount billed to each customer under applicable rates and charges, excluding amounts billed for public fire protection and the State Tax Adjustment Surcharge.

The August order provides for a proposed tariff and initial DSIC, to become effective January 1, 1997. The tariffs are to be filed November 1, 1996, or at least 60 days prior to the effective date. Thereafter, the DSIC is to be updated quarterly with the filing to be made at least ten days prior to the effective date of the quarterly revision. The order provides for the DSIC to be reset to zero as of the effective date of new base rates as well as when, in any quarter, the company's most recent annual or Quarterly Earnings report shows that an excessive rate of return is being earned.

As a safeguard, the order provides that the DSIC will be capped at 5% of the amount billed to customers under otherwise applicable rates and charges. Additional safeguards include a provision for audit and an annual reconciliation between DSIC revenues and DSIC eligible costs. The difference between revenue and costs will be recouped or refunded, in accordance with Section 1307(e) of the Public Utility Code, over a one year period commencing on April 1 of each year.

The order at P-00961031 also granted in part and denied in part the protests, answers and other objections filed with respect to the PAWC petition. The order provides that to the extent that parties have objections and/or complaints to the rates to be charged by means of an automatic adjustment clause that provides for the recovery of a water company's infrastructure improvement costs, those objections and/or complaints would be appropriately addressed to an actual PAWC tariff filing that contains specific rates to be charged to consumers based on specific distribution system improvement expenditures. A Section 701 complaint would be the appropriate procedural vehicle to challenge such a tariff filing and, provided that factual issues are raised, the filing of such a complaint will entitle the complainant to a hearing before an administrative law judge and an adjudication of the complaint.

Discussion

On October 24, 1996, PAWC submitted Supplement No. 22 to Tariff Water PA PUC No. 4 to initiate a DSIC to become effective January 1, 1997. With the exception that the Company used estimated capital expenditures for October and November 1996 and an account classification error in the September data, staff has found the proposed DSIC tariff and surcharge to be consistent with the parameters set forth in the order at P-00961031. The Company intends to submit a revised DSIC calculation on December 20, 1996, ten days prior to the January 1, 1997, effective date to reflect the actual capital investments, completed in October and November, as well as to correct the account classification error.

On November 7, 1996, the Office of Consumer Advocate (OCA) filed a complaint at R-00963792C001 against PAWC's proposed DSIC tariff and surcharge. In its complaint, the OCA alleges that the Company's rate increase request is unjust, unreasonable, and in violation of law; may allow the Company an opportunity to recover an excessive rate of return on its utility property investment, in violation of the Public Utility Code; may discriminate against certain customers; and otherwise is contrary to sound ratemaking principles and public policy. The OCA has requested, inter alia, that we suspend the effective date of the Company's proposed tariff and

surcharge pending the outcome of its Petition For Review in the Commonwealth Court of our order at P-00961031 and the adjudication of the instant complaint.

In our order at P-00961031, we went into great detail as to the reasons for our belief that the recovery of these costs is permitted under Section 1307(a) and Pennsylvania case law; and, in the Commission's judgement, the DSIC proposal is in no way a mechanism to "disassemble" the traditional ratemaking process. In addition, we note here that the General Assembly has recently passed Senate Bill 537, PN 2457, which provides explicit statutory authority for the recovery of distribution system improvement costs via Section 1307. Upon signing by the Governor, the new legislation will become effective in 60 days and, thereafter, remove any remaining doubt regarding the legality of the DSIC tariff and surcharge rate mechanism. Under these circumstances, there is no reason why PAWC's proposed tariff should not be permitted to become effective January 1, 1997, subject to the adjudicated outcome of any timely filed complaints. With respect to such complaints, we note here that although the General Assembly has decided, with finality, the fundamental legal issue of whether a distribution system improvement charge tariff is lawful under Section 1307 of the Public Utility Code, a complainant may nevertheless raise factual issues regarding the utility's tariff filing and supporting data, as well as factual issues regarding the reasonableness of the tariff's use, structure and operation for a given utility. Therefore,

IT IS ORDERED:

- 1. That Supplement No. 22 to Tariff Water PA PUC No. 4 for Pennsylvania American Water Company (PAWC) to implement a 1307(a) automatic adjustment clause tariff that would establish a Distribution System Improvement Charge (DSIC) is hereby approved to become effective January 1, 1997, subject to the outcome of any timely filed complaints.
- 2. That PAWC is to submit a revised DSIC surcharge and supporting data to update its proposed DSIC of 0.37% to reflect actual capital improvements for October and November,

1996, and to correct September 1996's data by December 20, 1996, to become effective January 1, 1997.

- 3. That the normal auditing, reconciliation, reporting and public hearing procedures applicable to all 1307(e) filings will likewise apply to PAWC's DSIC tariff supplements.
- 4. That this order be served upon PAWC, the Office of Consumer Advocate, the Office of Small Business Advocate, the Office of Trial Staff, the Pennsylvania American Water Large Users Group, and the National Association of Water Companies.
- 5. That all timely filed complaints regarding this matter be referred to the Office of Administrative Law Judge for hearing and decision.

BY THE COMMISSION,

John G. Alford Secretary

(SEAL)

Order Adopted:

December 19, 1996

Order Entered:

DEC 19 1996

PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17105-3265

Public Meeting held August 22, 1996

Commissioners Present:

John M. Quain, Chairman Lisa Crutchfield, Vice Chairman John Hanger Robert K. Bloom

Petition of Pennsylvania-American Water Company for Approval to Implement a Tariff Supplement Establishing a Distribution System Improvement Charge Docket No. P-00961031

OPINION AND ORDER

BY THE COMMISSION:

I. Background

On March 15, 1996, the Pennsylvania-American Water Company (PAWC or company) filed the above-referenced petition with this Commission requesting regulatory approval to file and implement an automatic adjustment clause tariff that would establish a Distribution System Improvement Charge (DSIC or surcharge) pursuant to Section 1307(a) of the Public Utility Code. 66 Pa.C.S. §1307(a). Section 1307(a) provides statutory authority for a utility to establish, subject to Commission review and approval, a tariffed automatic adjustment clause mechanism designed to provide "a just and reasonable return on the rate base" of the public utility.

As proposed by PAWC, the DSIC would operate to recover the fixed costs (depreciation and pre-tax return) of certain non-revenue producing, non-expense reducing infrastructure rehabilitation projects completed and placed in service between Section 1308 base rate cases. The company maintains that the property additions eligible for the DSIC will be limited to revenue neutral infrastructure projects, consisting principally of replacement investments in so-called "mass property" accounts. The DSIC is designed to provide the company with the resources it needs to accelerate its investment in new utility plant to replace aging water distribution infrastructure, facilitating compliance with evolving regulatory requirements imposed by the Safe Drinking Water Act (SDWA) and the implementation of solutions to regional water supply problems.

To illustrate its point, the company states that it has 5,600 miles of mains, that it is currently rehabilitating between 25 and 30 miles of main each year, and that, at that pace, it would require between 185 and 225 years to make all of the needed improvements to existing facilities. The company also states that water service, more than any other utility service, is critical to maintaining public health as water is "a necessity of life and vital for public fire protection services." Petition at 3.

The company alleges that the DSIC may enable it to reduce the frequency of its base rate cases and place the company in a better position to absorb increases in other categories of costs for a longer period, particularly during times of relatively low interest rates. Any reduction in rate case filing frequency would generate costs savings which would inure to the benefit of customers and the Commission. In its petition, the company proposes certain

accounts for recovery, time-frames and other procedures to be followed in implementing the DSIC. The details of those procedures will be discussed below.

To begin with, the company proposes that the DSIC become effective for service rendered on and after July 1, 1996. The company also proposes that the initial charge to be calculated would recover the fixed costs of eligible plant additions that have not previously been reflected in the company's rate base and will have been placed in service between January 1, 1996 and May 31, 1996. Thereafter, the company proposes to update the DSIC on a quarterly basis to reflect eligible plant additions placed in service during the three-month periods ending one month prior to the effective date of each DSIC update. Petition at 3-4.

As to its geographic applicability, the company states that the DSIC will not apply initially to customers located within the authorized service territory formerly served by the Pennsylvania Gas and Water Company (PG&W) that was acquired as of February 16, 1996. Likewise, the company's investment in infrastructure improvements made within the service territory acquired from PG&W are not included in the initial calculation of the surcharge under the DSIC. Petition at 1-2.

The company also proposes that the DSIC be capped at 5% of the amount billed to customers under otherwise applicable rates and charges, exclusive of amounts recovered under the State Tax Adjustment Surcharge (STAS). If the cap is reached, the company would not seek any additional increases. Petition at 4.

As with any Section 1307 automatic adjustment clause, the DSIC will be subject to an annual reconciliation, whereby the revenue received under the DSIC for the reconciliation period will be compared to the Company's eligible costs for that period. The difference between such revenues and costs will be recouped or refunded to customers, as appropriate, in accordance with Section 1307(e). Petition at 5.

Lastly, in terms of procedures, the company proposes that the DSIC will be reset to zero as of the effective date of new Section 1308 base rates that provide for prospective recovery of the annual costs that had previously been recovered under the DSIC. Petition at 5. And to avoid over recovery of costs in the absence of a base rate case, the company also proposed that the DSIC will be reset to zero if, in any quarter, data filed with the Commission in the company's then most recent Annual or Quarterly Earnings Report shows that the company will earn a rate of return that would exceed the rate of return used to calculate its fixed costs under the DSIC. Petition at 5.

In terms of the legal issues raised by its petition, the company also states that its proposed automatic adjustment clause and procedures are lawful for a number of reasons found in statutory and case law. With regard to statutory law, PAWC states that Section 1307(a) of the Public Utility Code, 66 Pa. C.S. §1307(a), provides that a company may establish a sliding scale of rates or such other method for the automatic adjustment of the rates to recover a variety of costs. Petition at 19. Moreover, the company has cited circumstances in which the Commission has authorized the use of Section 1307 (a) automatic adjustment clauses to recover a wide array of expenses, depreciation and capital costs. See

Pennsylvania Industrial Energy Coalition v. Pa. P.U.C., 653 A.2d 1336 (Pa. Cmwlth. 1995) (PIEC) (recovery of electric utilities' demand-side management costs); 52 Pa. Code §69.181 (recovery of gas utilities' take or pay liabilities to pipeline suppliers); 52 Pa. Code §69.341(b) (recovery of gas utilities' gas supply realignment costs and stranded costs resulting from Federal Energy Regulatory Commission Order 636); and 52 Pa. Code §69.353 (recovery of water utilities' principal and interest due on PennVEST obligations). Petition at 20-21.

Answers were filed by the Office of Trial Staff (OTS) (Answer filed April 4, 1996), the Office of Small Business Advocate (OSBA) (Answer filed May 3, 1996), the Pennsylvania-American Water Large Users Group (PAWLUG) (Answer filed May 6, 1996), and the Office of Consumer Advocate (OCA) (Comments and testimony filed May 6, 1996). Protests to the petition were also filed by individual customers.

In its answer, the OTS requests that the Commission deny the company's petition based on legal and technical grounds. With regard to the legal objections, the OTS argues that, since the facilities are "new" facilities, the company is attempting to circumvent a base rate review through the use of a surcharge, in violation of the Court's decision in <u>PIEC</u>.

The OSBA's answer did not submit legal arguments opposing the implementation of the DSIC. Rather, the OSBA has requested that the Commission conduct a thorough investigation regarding the reasonableness and lawfulness of the proposed tariff supplement as they affect the company's various customer classes.

In its comments, the OCA argues against the implementation of the DSIC alleging that the company does not need the DSIC mechanism and that implementation of a DSIC mechanism would provide in excess of a fair return to the company. With regard to legal arguments, OCA challenges the legality of the surcharge based upon the same arguments outlined in OTS' answer based on its interpretation of Section 1307(a) and the <u>PIEC</u> decision.

On April 16 and May 30, 1996, the company filed replies with the Commission addressing the comments raised in the answers filed by OTS, OSBA, PAWLUG and OCA. In PAWC's reply to the various parties concerning the legality of the DSIC, the company continued to support the legality of a surcharge under Section 1307(a) of the Public Utility Code and the Commonwealth Court decision in <u>PIEC</u>, and supplied rebuttal arguments in support of its need for the DSIC and the legality of its proposal.

II. Discussion

At the outset of this discussion regarding the PAWC petition, we believe it necessary to clarify the Commission's view of the scope of this proceeding and the nature of the PAWC proposal. Because the PAWC petition requests regulatory approval to file and implement a certain type of automatic adjustment clause, we will not address, in this order, the specific factual issues that may be raised by the proposed tariff supplement and sample DSIC rate calculations submitted as Exhibits A and B to the petition. The Commission views these exhibits as no more than an illustration of how the company's proposal would operate. Indeed, as explained below, the specific tariff supplement proposed by PAWC will not be approved by this order.

Therefore, to the extent that parties have objections and/or complaints to the rates to be charged by means of an automatic adjustment clause that provides for the recovery of a water company's infrastructure improvement costs, those objections and/or complaints would be appropriately addressed to an actual PAWC tariff filing that contains specific rates to be charged to consumers based on specific distribution system improvement expenditures. A Section 701 complaint would be the appropriate procedural vehicle to challenge such a tariff filing and, provided that factual issues are raised, the filing of such a complaint will entitle the complainant to a hearing before an administrative law judge and an adjudication of the complaint.

Thus, the key issues raised by the PAWC petition, and to be resolved in this order, are generic threshold issues regarding (1) the legality of the type of automatic adjustment clause proposed by the company and (2) the appropriate general structure of such an automatic adjustment clause that conforms to the requirement of the statute and Pennsylvania case law. In other words, this proceeding will address the legal issue concerning the adoption of the surcharge pursuant to Section 1307(a) of the Code. In addition, the Commission will outline the general parameters of a surcharge mechanism that meets the requirement of the statute, that is consistent with the case law, that has adequate safeguards to protect consumers' interests and, therefore, constitutes a surcharge that is likely to receive regulatory approval when filed.

To begin with, we applaud companies who present this Commission with innovative ideas to address recurring problems for their respective industries. In the water industry,

companies are faced with the dual tasks of improving the quality of the water delivered to customers due to the new mandates of the SDWA and other governmental requirements and, at the same time, maintaining an aging water utility infrastructure. We recognize that, in recent years, PAWC and other Pennsylvania water companies have been required to make significant investments in new utility plant for projects such as: the filtration of surface water supplies; the replacement of aging water distribution plant; and, the implementation of meter replacement programs. In addition, water companies face the daunting challenge of rehabilitating their existing distribution infrastructure before the property reaches the end of its service life to avoid serious public health and safety risks.

In the Commission's judgement, the establishment of a DSIC along the lines proposed by PAWC can substantially aid the water company in meeting these challenges on behalf of the water consuming public. We agree with the company that the establishment of a DSIC would enable the company to address, in an orderly and comprehensive manner, the problems presented by its aging water distribution system, and would have a direct and positive effect upon water quality, water pressure and service reliability. For these reasons, we endorse the concept of using an automatic adjustment clause to address this regulatory problem for the water industry in Pennsylvania and, in particular, the type of DSIC proposed by PAWC.

A. Legal Issues

In Pennsylvania, utility costs are recovered from customers through Section 1308 base rates and through Section 1307 automatic adjustment clauses. The purpose of a Section 1307

automatic adjustment clause is to provide an automatic mechanism enabling utilities to recover specific costs not covered by general rates. <u>Allegheny Ludlum Steel Corporation.</u>

v. Pa. P.U.C., 501 Pa. 71, 75 n.3, 459 A.2d 1218, 1220 n.3 (1983). Moreover, Section 1307(e), 66 Pa. C.S. §1307(e), provides that the automatic adjustment clause procedures shall include an annual report detailing the revenues collected and the expenses incurred under the automatic adjustment clause, followed by a public hearing to reconcile the amounts and to determine any refunds owed to customers or additional recovery due from customers.

Until recently, an automatic adjustment clause has usually been applied only to gas and electric companies. However, the Commission has provided for the recovery of capital costs in at least one instance to date, i.e., for PECO Energy's costs to convert oil-fired units to units which burn natural gas. Philadelphia Electric Co. ECR No. 3, Docket No. M-00920312 (Order adopted April 1, 1993). The Commission has also adopted a policy statement which encourages water companies to seek Section 1307(a) cost recovery for their PENNVEST debt costs, 52 Pa. Code §69.361, and policy statements approving Section 1307 cost recovery for certain FERC Order 636 stranded costs, 52 Pa. Code §69.341(b)(4), and electric utility coal uprating costs, 52 Pa. Code §57.124(a). Moreover, since 1970, the Commission has authorized all utilities to use an automatic adjustment clause mechanism to recover certain incremental changes in state tax rates. 52 Pa. Code §69.44.

Pennsylvania case law regarding the permissible scope of Section 1307 cost recovery, while not extensive, supports a broad interpretation of that section. In National Fuel Gas Distribution Corp. v. Pa. P.U.C., 473 A.2d 1109, 1121 (Pa. Cmwlth. 1984), the

Commonwealth Court held that the purpose of Section 1307 of the Code is to permit reflection in customer charges of changes in one component of a utility's cost of providing public service without the necessity of the "broad, costly and time-consuming inquiry" required in a Section 1308 base rate case. Moreover, under the 1995 <u>PIEC</u> decision, the Commonwealth Court adopted the Commission's legal position that its use of Section 1307 was not limited to fuel and purchased power costs. At the same time, the Commonwealth Court cautioned that Section 1307 should have <u>limited application</u> and should not <u>override</u> the traditional ratemaking process. <u>PIEC</u> at 1349. In determining whether DSM costs could be recovered through the Section 1307 mechanism, the Court wrote:

Although we agree that Section 1307 should have limited application and the PUC should not use it to disassemble the traditional rate-making process, the General Assembly did not limit the allowance of automatic adjustment to only fuel costs and taxes which are generally beyond the control of the utility. Instead, the General Assembly specifically allowed the recovery of fuel costs and also allowed the PUC or the utilities to initiate the automatic adjustment of costs within specific procedures...In this case, Section 1319 of the Code specifically states that all prudent and reasonable costs should be recovered and sets forth requirements that the proposed programs be determined to be "prudent and cost-effective" by the PUC (or the Bureau of Conservation, Economics and Energy Planning as designated by the PUC), before any costs may be recovered through the surcharge mechanism.

<u>PIEC</u> at 1349 (emphasis added). The Court then concluded that the recovery of DSM costs under Section 1307 was lawful because the language of Section 1307 gives the Commission discretion to establish automatic adjustment clauses for the recovery of prudently incurred

costs, and because in Section 1319 the legislature specifically identified and provided for the recovery of prudent and reasonable costs for developing DSM programs.

Clearly, the Court in <u>PIEC</u> recognized the importance of the statute (Section 1319) in providing for the recovery of development costs of the DSM programs via Section 1307. However, the Court also recognized that the language of Section 1307 is not limited to a narrow set of costs (as advocated by the industrials), that whether the costs at issue should be recovered via an automatic adjustment clause is a matter of Commission discretion, and that the court "is not free to substitute its discretion for the discretion properly exercised by the PUC in establishing the surcharge method." <u>PIEC</u> at 1349.

Turning to the PAWC proposal to file and implement an automatic adjustment clause to recover its distribution system improvement costs, we find that the proposal is appropriately limited and narrowly tailored to recover a specific category of utility costs - the incremental fixed costs (depreciation and pre-tax return) associated with non-revenue producing, non-expense reducing distribution system improvement projects completed and placed in service between base rate cases. Recovery of this narrow set of costs is clearly permitted under Section 1307 (a) (which has no cost category limitation in its language) and Pennsylvania case law; and, in the Commission's judgment, this proposal is in no way a mechanism to "disassemble" the traditional ratemaking process for several reasons: first, the DSIC is designed to identify and recover the distribution system improvement costs incurred between rate cases; second, the costs to be recovered represent a narrow subset of the company's total cost of service; and third, the DSIC amount will be capped at a relatively

low level to prevent any long-term evasion of a base rate review of these plant costs. Indeed, the company's proposal recognizes that there will be a full review of these costs in a subsequent Section 1308 base rate proceeding. We also note that the DSIC is designed to reflect only the costs of the eligible plant additions that are actually placed in service during the 3-month periods ending one month prior to the effective date of each surcharge update; this key provision serves to avoid any potential violation of Section 1315 and this state's long-standing "used and useful" rule.

Additionally, we find that Sections 1307(d) and (e) provide broad auditing powers to the Commission and a formal reconciliation mechanism to carefully monitor the operation of such a surcharge. While admittedly Section 1307(d) is addressed to fuel cost adjustment audits, we do not view the Commission's auditing power over automatic adjustment clauses as limited to only fuel costs, given the broad auditing and investigative powers granted to the Commission via Sections 504, 505, 506, and 516 of the Public Utility Code. 66 Pa. C. S. §§504, 505, 506, 516. Nor would we be likely to approve a utility's request for approval of an automatic adjustment clause in the absence of its complete agreement that the Commission has such auditing powers. Moreover, Section 1307(e) provides for a mandatory annual reconciliation report regarding the revenues and expenses recovered via an automatic adjustment clause and a "public hearing on the substance of the report and any matters pertaining to the use by such public utility" of the automatic adjustment clause. As such, the costs to be recovered via the company's DSIC proposal will be subject to the Commission's auditing powers, an annual reconciliation report and public hearings.

B. General Tariff Parameters

The basic elements of a tariff supplement to implement a lawful DSIC mechanism include a statement of purpose and description of eligible property, a specification of its effective date and the dates of its subsequent quarterly updates, details regarding the computation methodology, and appropriate consumer safeguards. The proposed tariff supplement included with the PAWC petition, as Exhibit A, has no such details. Therefore, in order to provide guidance to PAWC and any other water utility that may need to implement a DSIC, the Commission has developed sample tariff language that, if used in a water utility's Section 1307 proposed tariff supplement, is likely to receive the Commission's approval. The sample tariff language is contained in Attachment A to this order.

A properly designed tariff supplement to establish a DSIC that meets the requirement of Section 1307 and contains adequate consumer safeguards should include the following features:

- specification of the eligible plant accounts by type and account number;
- elimination from eligibility of (a) the costs of extending facilities to serve new customers¹ and (b) the costs of projects funded by PENNVEST loans;

¹ For purposes of the DSIC surcharge, the existing customers of a newly-acquired water company are not "new customers" and, thus, the replacement of aging water distribution facilities by the acquiring water utility in order to maintain safe, reliable and adequate service to such customers would be eligible for DSIC recovery.

- include recovery of main extensions installed to eliminate dead ends and to implement solutions to regional water supply problems that have been documented as presenting a significant health and safety concern to existing customers;
- provision of a prospective January 1, 1997 effective date for the tariff supplement and the property eligible for the initial filing;
- if more than 2 years have elapsed since the utility's last base rate case, use of the equity return rate determined by staff and specified in the latest Quarterly Earnings Report released by the Commission;
- greater specification of the depreciation and pretax return elements in the formula to calculate the DSIC;
- added provision to provide interest to consumers for any over recoveries during operation of the DSIC; and
- provision for customer notice of any DSIC changes.

Thus, use of the sample tariff language will fully explain the DSIC computation, including a listing of DSIC eligible property and related account numbers, so that in future years the purpose and intent of the DSIC surcharge will be apparent from reading only the tariff supplement. Additionally, the inclusion of plant account numbers and descriptions of property eligible for DSIC cost recovery parallels the format used for other Section 1307 surcharges, such as the ECR for electric utilities, the GCR for gas distribution utilities and the SCR for steam heat companies.

With these key changes to PAWC's proposal, the eligible property, filing dates, calculation parameters, and consumer safeguards will be clearly specified. Moreover, we note here that the provisions (1) for resetting the DSIC to zero if the company's rate of return exceeds its allowable rate of return, and (2) for resetting the DSIC to zero as of the effective date of new Section 1308 base rates that provide for prospective recovery of the eligible plant costs both serve as effective and reliable rate mechanisms to insure that the DSIC automatic adjustment clause will not produce rates in excess of a fair return to the utility, as required by Section 1307(a). We also note that the provision of a 5% of billed revenues cap on the maximum amount of any DSIC insures that the surcharge mechanism will not evade the Section 1308 base rate process and its intensive top-to-bottom review of all company revenue, expense, rate base and return claims. See Attachment A, p.4. In other words, the 5% cap will insure that the surcharge will not allow the company to avoid a base rate review of the eligible property in perpetuity.

Accordingly, although we are denying the PAWC petition to the extent that it requests permission to file and implement a Section 1307(a) tariff supplement to implement a surcharge as set forth in its Exhibit A, we invite the company to file a new and more detailed tariff supplement consistent with the parameters outlined in the sample tariff language set forth in Attachment A to this order. The sample tariff language in Attachment A is identical to that recommended for the Philadelphia Suburban Water Company at Docket No. P-00961036 which has also requested permission to establish a DSIC surcharge.

As with other Section 1307 tariff filings, the new tariff supplement should provide for a notice period of no less than 60 days to allow sufficient time for staff review of the proposed tariff supplement and its initial rates for consistency with the sample tariff language and for accuracy of the plant account, depreciation, pre-tax return and other elements of the DSIC calculation. If recommended for approval by staff and formally approved by the Commission, the tariff supplement and initial rates to implement the DSIC will be permitted to go into effect, subject to the outcome of any timely filed complaints. Subsequent quarterly updates, however, may be filed on 10 days notice as originally proposed by the company.

THEREFORE,

IT IS ORDERED:

- 1. That the petition filed by the Pennsylvania American Water Company (PAWC) to file and implement a Section 1307(a) automatic adjustment clause tariff that would establish a Distribution System Improvement Charge (DSIC) is hereby approved in part and denied in part consistent with this order.
- 2. That all protests, answers and other objections filed with respect to the PAWC petition are hereby granted in part and denied in part consistent with this order.
- 3. That any complaints regarding the rates to be charged pursuant to a DSIC tariff supplement may be filed if and when PAWC files a tariff supplement with specific rates in accordance with the tariff parameters outlined by this order.
- 4. That the parameters set forth in the Appendix A are hereby adopted to serve as sample tariff language to be implemented for tariff supplements to establish a DSIC.

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5. That the normal auditing, reconciliation, reporting and public hearing

procedures applicable to all 1307(e) filings will likewise apply to all DSIC tariff

supplements.

6. That this order be published in the <u>Pennsylvania Bulletin</u>.

7. That this order be served upon the Pennsylvania American Water

Company, the Office of Consumer Advocate, the Office of Small Business Advocate, the

Office of Trial Staff, the Pennsylvania-American Water Large Users Group, and the National

Association of Water Companies.

BY THE COMMISSION,

Johnson aford

John G. Alford

Secretary

(SEAL)

ORDER ADOPTED: August 22, 1996

ORDER ENTERED: AUG 2 6 1996

Attachment A

Sample Tariff Language

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

I. General Description

Purpose: To recover the fixed costs (depreciation and pre-tax return) of certain non-revenue producing, non-expense reducing distribution system improvement projects completed and placed in service and to be recorded in the individual accounts, as noted below, between base rate cases and to provide the Company with the resources to accelerate the replacement of aging water distribution infrastructure, to comply with evolving regulatory requirements imposed by the Safe Drinking Water Act and to develop and implement solutions to regional water supply problems. The costs of extending facilities to serve new customers are not recoverable through the DSIC. Also, Company projects receiving PENNVEST funding are not DSIC-eligible property.

Eligible Property: The DSIC-eligible property will consist of the following:

- services (account 323), meters (account 324) and hydrants (account 325) installed as in-kind replacements for customers;
- mains and valves (account 322) installed as replacements for existing facilities that have worn out, are in deteriorated condition, or upgraded to meet Chapter 65 regulations of Title 52;
- main extensions (account 322) installed to eliminate dead ends and to implement solutions to regional water supply problems that have been documented as presenting a significant health and safety concern for customers currently receiving service from the Company or the acquired Company;
- main cleaning and relining (account 322) projects; and
- unreimbursed funds related to capital projects to relocate Company facilities due to highway relocations.

Effective Date: The DSIC will become effective for bills rendered on and after January 1,1997.

II. Computation of the DSIC

Calculation: The initial charge, effective January 1, 1997, shall be calculated to recover the fixed costs of eligible plant additions that have not previously been reflected in the Company's rate base and will have been placed in service between September 1, 1996, and November 30,1996. Thereafter, the DSIC will be updated on a quarterly basis to reflect eligible plant additions placed in service during the three-month periods ending one month prior to the effective date of each DSIC update. Thus, changes in the DSIC rate will occur as follows:

Effective Date

of Change
April 1

Date To Which DSIC-Eligible
Plant Addition Reflected
February 28

July 1 May 30

October 1 August 31

January 1 November 30

The fixed costs of eligible distribution system improvement projects will consist of depreciation and pre-tax return, calculated as follows:

Depreciation: The depreciation expense will be calculated by applying to the original cost of DSIC-eligible property the annual accrual rates employed in the Company's last base rate case for the plant accounts in which each retirement unit of DSIC-eligible property is recorded.

Pre-tax return: The pre-tax return will be calculated using the state and federal income tax rates, the Company's actual capital structure and actual cost rates for long-term debt and preferred stock as of the last day of the three-month period ending one month prior to the effective date of the DSIC and subsequent updates. The cost of equity will be the equity return rate approved in the Company's last fully-litigated base rate proceeding for which a final order was entered not more than two years prior to the effective date of the DSIC. If more than two years shall have elapsed between the entry of such a final order and the effective date of the DSIC, then the equity return rate used in the calculation will be the equity return rate calculated by the Commission Staff in the latest Quarterly Report on the Earnings of Jurisdictional Utilities released by the Commission.

DISC Surcharge Amount: The charge will be expressed as a percentage carried to two decimal places and will be applied to the total amount billed to each customer under the Company's otherwise applicable rates and charges, excluding amounts billed for public fire protection service and the State Tax Adjustment Surcharge (STAS). To calculate the DSIC, one-fourth of the annual fixed costs associated with all property eligible for cost recovery under the DSIC will be divided by the Company's projected revenue for sales of water for the quarterly period during which the charge will be collected, exclusive of revenues from public fire protection service and the STAS.

Formula: The formula for calculation of the DISC surcharge is as follows:

DSIC =	$\frac{(DSI \times PTRR) + Dep + e}{PQR}$
Where:	
DSI =	the original cost of eligible distribution system improvement projects.
PTRR =	the pre-tax return rate applicable to eligible distribution system improvement projects.
Dep =	Depreciation expense related to eligible distribution system improvement projects.
e =	the amount calculated under the annual reconciliation feature as described below.
PQR =	Projected quarterly revenue including any revenue from acquired companies that are now being charged the rates of the acquiring company.

Quarterly updates: Supporting data for each quarterly update will be filed with the Commission and served upon the Office of Trial Staff, the Office of Consumer Advocate and the Office of Small Business Advocate at least ten (10) days prior to the effective date of the update.

III. Safeguards

Cap: The DSIC will be capped at 5% of the amount billed to customers under otherwise applicable rates and charges.

Audit/Reconciliation: The DSIC will be subject to audit at intervals determined by the Commission. It will also be subject to annual reconciliation based on a reconciliation period consisting of the 12 months ending December 31 of each year. The revenue received under the DSIC for the reconciliation period will be compared to the Company's eligible costs for that period. The difference between revenue and costs will be recouped or refunded, as appropriate, in accordance with Section 1307(e), over a one year period commencing on April 1 of each year. If DSIC revenues exceed DSIC-eligible costs, such overcollections will be refunded with interest. Interest on the overcollections will be calculated at the residential mortgage lending specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law (41 P. S. sec.101, et seq.) and will be refunded in the same manner as an overcollection.

New Base Rates: The charge will be reset at zero as of the effective date of new base rates that provide for prospective recovery of the annual costs that had theretofore been recovered under the DSIC. Thereafter, only the fixed costs of new eligible plant additions, that have not previously been reflected in the Company's rate base, would be reflected in the quarterly updates of the DSIC.

Earning Reports: The charge will also be reset at zero if, in any quarter, data filed with the Commission in the Company's then most recent Annual or Quarterly Earnings reports show that the Company will earn a rate of return that would exceed the allowable rate of return used to calculate its fixed costs under the DSIC as described in the Pre-tax return section.

Customer Notice: Customers shall be notified of changes in the DSIC by including appropriate information on the first bill they receive following any change. An explanatory bill insert shall also be included with the first billing.

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

January 27, 2016		
IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN WATER)	
COMPANY FOR APPROVAL OF A QUALIFIED)	
INFRASTRUCTURE INVESTMENT PROGRAM, AN)	DOCKET NO.
ECONOMIC DEVELOPMENT INVESTMENT RIDER,		13-00130
A SAFETY AND ENVIRONMENTAL COMPLIANCE)	
RIDER AND PASS-THROUGHS FOR PURCHASED)	
POWER, CHEMICALS, PURCHASED WATER,)	
WHEELING WATER COSTS, WASTE DISPOSAL,)	
AND TRA INSPECTION FEE)	

ORDER APPROVING AMENDED PETITION

This matter came before Chairman James M. Allison, Vice Chairman Herbert H. Hilliard and Director Kenneth C. Hill of the Tennessee Regulatory Authority (the "Authority" or "TRA"), the voting panel assigned to this docket, at a regularly scheduled Authority Conference held on April 14, 2014, to consider the *Petition* filed by Tennessee American Water Company on October 4, 2013, and amended by a *Stipulation* filed on January 10, 2014 and by tariffs filed on March 25, 2014 (the "Amended Petition").

BACKGROUND

Tennessee American Water Company ("TAWC" or the "Company") provides residential, commercial, industrial and municipal water service to customers in Tennessee and North Georgia. TAWC is a wholly-owned subsidiary of American Water Works Company, Inc. On October 4, 2013, TAWC filed a *Petition*, along with necessary tariffs, pursuant to Tenn. Code

Ann. § 65-5-103(d)¹ and TRA Rule 1220-4-1-.04, seeking to implement a Qualified Infrastructure Investment Program ("QIIP") Rider, Economic Development Investment ("EDI") Rider, Safety and Environmental Compliance ("SEC") Rider (sometimes referred to as Investment Riders or Capital Recovery Riders) and a Pass-Through Mechanism for Purchased Power, Chemicals, Purchased Water, Wheeling Water Costs, Waste Disposal and TRA Inspection Fee (Production Cost and Other Pass-Throughs, or "PCOP").

During the October 21, 2013 Authority Conference, the panel assigned to this matter convened a contested case and appointed General Counsel or her designee to prepare this case for hearing.² Subsequently, the Hearing Officer suspended the proposed tariffs through February 4, 2014, granted the intervention request of the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General ("Consumer Advocate") and issued a procedural schedule with a hearing date of January 13, 2014.³

On January 10, 2014, TAWC and the Consumer Advocate (together, the "Parties") filed a *Stipulation* that purported to resolve outstanding issues between the Parties.⁴ By its terms, the *Stipulation* changed the terms of the riders requested by the Company. Although the Consumer Advocate agreed not to oppose the petition and tariffs as amended by the *Stipulation*, the Consumer Advocate took no position on whether the tariff riders were in the public interest.⁵ Simultaneous with the Hearing on January 13, 2014, TAWC filed new tariff pages consistent with the terms of the *Stipulation*. At the Hearing held on January 13, 2014, TAWC confirmed

¹ Tenn. Code Ann. § 65-5-103(d) went into effect on April 19, 2013, and authorizes the Authority to implement alternative regulatory methods.

² See Order Convening a Contested Case and Appointing a Hearing Officer, p. 1 (October 23, 2013).

³ See Order Establishing Procedural Schedule, p. 2 (October 29, 2013).

⁴ The Stipulation was filed on Friday, January 10, 2014 and the Hearing on the merits of the Petition was scheduled to be heard on Monday, January 13, 2014.

⁵ Stipulation, p. 3 (January 10, 2014).

that the *Stipulation* was an amendment to the *Petition*.⁶ Mr. Gary VerDouw, Central Division Director of Rates for TAWC, summarized the *Stipulation*. Members of the public were given an opportunity to comment.

Pursuant to Tenn. Code Ann. § 65-5-103(d)(1), the TRA has 120 days from the initial filing of a petition for an alternative regulatory method by a public utility to make a determination as to whether or not it should be approved. If there is a denial of the petition, the Authority must specify its reasons and the utility then has 60 days to amend the petition. The Authority is given 60 days to approve or deny the amended plan. The statute is silent as to the Authority's ability to make material changes to the terms of a petition, but contemplates an amendment of the petition by the utility after a denial by the Authority. Therefore, the panel determined that material changes made to a petition or the filing of an amended petition by a utility should be treated as a new petition under the statute. The panel concluded that the *Stipulation* should be treated as a new petition and that the deadline for a determination by the Authority was 120 days from the filing of the *Stipulation*.

Following additional revisions, data responses, and discussions between the Parties and TRA Staff for clarification purposes and the correction of errors, TAWC filed the final revised tariffs on March 25, 2014. The tariffs had an effective date of April 15, 2014. The original *Petition, Stipulation,* and revised tariffs, are collectively referred to as the *Amended Petition* and are described below.

THE AMENDED PETITION

The Amended Petition requests approval of four alternative rate mechanisms, which are briefly described as follows:

⁶ Transcript of Proceedings, p. 5 (January 13, 2014).

⁷ Tenn. Code Ann. § 65-5-103(d)(1)(C).

Qualified Infrastructure Investment Program ("QIIP") Rider

According to TAWC, a substantial portion of the Company's distribution infrastructure is between 50 and 100 years old and is nearing the end of its useful service life.8 The need to replace service lines, meters, hydrants, treatment structures, pumps, and equipment, is critical to maintaining public safety, continuous, and cannot be delayed. The timely recovery of the fixed costs of infrastructure replacement through the QIIP rider provides an incentive for increased and continued levels of capital infusion, resulting in a stronger and more reliable water distribution and production system. 10 According to TAWC, the QIIP will allow the Company to prudently invest in necessary infrastructure repair and improvement projects absent the burden of bearing or carrying the investment in full without an opportunity to earn a fair rate of return on that investment until the next rate case.11

Economic Development Investment ("EDI") Rider

The EDI Rider will allow TAWC to work alongside the communities it serves by making the investment in either the replacement of existing or placement of new infrastructure. The Company will install or replace the infrastructure so that the community can use the improvement for economic development purposes. 12 TAWC is requesting to recover expenses associated with these efforts to promote economic development within its service territory. 13

Safety and Environmental Compliance ("SEC") Rider

The SEC Rider will allow the Company to recover the operational expenses and capital costs related to safety requirements and environmental compliance.¹⁴ Additional infrastructure

⁸ Gary M. VerDouw, Pre-Filed Direct Testimony, p. 12 (October 4, 2013).

Deron E. Allen, Pre-Filed Direct Testimony, pp. 6-7 (October 4, 2013).

¹³ Id. at 8.

¹⁴ Id. at 9.

investment may be required to meet safety and environmental compliance mandates from both state and federal government. According to the Company, the most appropriate way to address a potential alternate rate-making approach for safety and environmental compliance is well in advance of the need to invest in the infrastructure. The SEC Rider will allow infrastructure investment on a proactive rather than reactive basis, while avoiding rate shock, if possible.¹⁵

Production Cost and Other Pass-Throughs ("PCOP")

TAWC is requesting pass-through recovery of purchased power, chemicals, purchased water, wheeling cost, waste disposal and regulatory expense related items. According to the Company, the cost of these essential expenses incurred during its regular operations is outside of TAWC's control. If there is an increase, the Company cannot recover for such increases until its next rate case, negatively impacting its opportunity to earn the rate of return set by the TRA.

Under the PCOP, the costs could be recovered in between rate cases and any decrease in costs would be passed through to customers via a monthly line item.

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The adjustments and clarifications that were made to the Company's original filing and included in the *Stipulation* filed with the TRA on January 10, 2014 changed the Company's original proposed revenue requirement surcharge amount very little. The Company's original filed QIIP, EDI and SEC Riders were to generate a total surcharge that would add 1.11% to the bills of Tennessee American customers. With the adjustments made and included in the *Stipulation*, the QIIP, EDI and SEC Riders will generate a total surcharge of 1.08%, with a

¹⁵ Gary M. VerDouw, Pre-Filed Direct Testimony, pp. 34-35 (October 4, 2013).

¹⁶ Deron E. Allen, Pre-Filed Direct Testimony, p. 9 (October 4, 2013).

¹⁷ Id. at 10.

resulting total annual revenue requirement of \$510,837.¹⁸ TAWC asserts that implementation of the PCOP mechanism will reduce consumers' bills by 1.15% during the first year.¹⁹

TAWC avers that the four alternative rate mechanisms are in the public interest. According to the Company, each of the proposed mechanisms is mutually beneficial to the ratepayers, the public, and TAWC. Among other things, the ratepayers benefit from the reduced need for general rate cases and from the lessening of the occurrence of "rate shock." The ratepayers and the public benefit from the safety and reliability components and from the more seamless and timely capital investment in infrastructure, coupled with the related support to economic development, growth and job creation. The Company benefits from a more efficient, streamlined regulatory process that presents TAWC with the opportunity to timely recover its expenses and earn a fair rate of return on its investments.²⁰

APRIL 14, 2014 HEARING

A Hearing in this matter was held before the voting panel on April 14, 2014.

Participating in the Hearing were the following Parties and their respective counsel:

<u>Tennessee American Water Company</u> – Melvin J. Malone, Esq., Butler, Snow, O'Mara, Stevens and Cannada, PLLC, The Pinnacle at Symphony Place, 150 3rd Avenue South, Suite 1600, Nashville, TN 37201

Consumer Advocate – Joe Shirley, Esq., Office of the Attorney General, 425 Fifth Avenue North, Fourth Floor, John Sevier Building, P.O. Box 20207, Nashville, TN 37202

Mr. Gary M. VerDouw appeared as a witness for TAWC and was subject to questions from the panel.²¹ Members of the public were given an opportunity to present comments to the panel.

¹⁸ Gary M. VerDouw, Pre-Filed Supplemental Testimony, p. 10 (January 17, 2014).

¹⁹ Gary M. VerDouw, Pre-Filed Supplemental Testimony, Revised Exhibit 2, p. 13 of 14 (April 1, 2014).

²⁰ Gary M. VerDouw, Pre-Filed Supplemental Testimony, pp. 10-12 (January 17, 2014).

All of the witnesses who submitted pre-filed testimony on behalf of TAWC and the Consumer Advocate were available for questions during the Hearing. However, only Mr. VerDouw presented testimony at the Hearing. The Consumer Advocate waived cross-examination of the witness.

FINDINGS AND CONCLUSIONS

Tenn. Code Ann. § 65-5-103(d)(1)(A) reads: "The [A]uthority is authorized to implement alternative regulatory methods to allow for public utility rate reviews and cost recovery in lieu of a general rate case proceeding before the [A]uthority." Further, Tenn. Code Ann. § 65-5-103(d)(2)(A) states:

A public utility may request and the authority may authorize a mechanism to recover the operational expenses, capital costs or both, if such expenses or costs are found by the authority to be in the public interest, related to any one (1) of the following:

- (i) Safety requirements imposed by the state or federal government;
- (ii) Ensuring the reliability of the public utility plant in service; or
- (iii) Weather-related natural disasters.

Under Tenn. Code Ann. § 65-5-103(d)(3)(A), "[a] public utility may request and the authority may authorize a mechanism to recover the operational expenses, capital costs or both related to the expansion of infrastructure for the purpose of economic development, if such expenses or costs are found by the authority to be in the public interest." Tenn. Code Ann. § 65-5-103(d)(4)(A)(i) states, "[a] public utility may request and the authority may authorize a mechanism to recover expenses associated with efforts to promote economic development in its service territory, if such expenses are found by the authority to be in the public interest. In addition, Tenn. Code Ann. § 65-5-103(d)(5) provides:

- (A) A public utility may request and the authority may authorize a mechanism to recover the operational expenses, capital costs or both related to other programs that are in the public interest.
- (B) A utility may request and the authority may authorize a mechanism to allow for and permit a more timely adjustment of rates resulting from changes in essential, nondiscretionary expenses, such as fuel and power and chemical expenses.

The General Assembly's enactment of the alternative regulatory rate-making methods under Tenn. Code Ann. § 65-5-103(d) did not alter or limit the Authority's general supervisory, regulatory and rate-setting powers over public utilities within its jurisdiction. Tenn. Code Ann. §

65-4-104 grants the Authority "general supervisory and regulatory power, jurisdiction and control over all public utilities." Under Tenn. Code Ann. § 65-4-117(a)(3) the Authority has the power to "fix just and reasonable standards, classifications, regulations, practices or services to be furnished, imposed, observed and followed thereafter by any public utility." Tenn. Code Ann. § 65-5-101(a) authorizes the Authority "to fix just and reasonable individual rates, joint rates, tolls, fares, charges or schedules thereof, as well as commutation, mileage, and other special rates which shall be imposed, observed, and followed thereafter by any public utility as defined in § 65-4-101." The Authority's jurisdiction over public utilities is to be liberally construed in favor of the Authority under Tenn. Code Ann. § 65-4-106.²² The Authority has a broad grant of authority under Tennessee law over the utilities within its jurisdiction.²³

Pursuant to its authority to implement alternative regulatory methods, as well as its general rate-setting powers, the TRA has the authority and discretion to determine whether an alternative rate mechanism produces rates and charges for public utilities services that are just and reasonable and in the public interest. In this regard, the Authority's power and discretion to consider the substantive impact of an alternative ratemaking method or mechanism applies not only to the initial rate adjustment, but also to all subsequent rate adjustments made under an approved alternative rate mechanism. In carrying out its responsibilities, the Authority may consider whether an alternative regulatory method: (1) is consistent with applicable TRA orders, rules, and established ratemaking policies and principles; (2) ensures that recoverable costs and

²² Tenn. Code Ann. § 65-4-106 states: "This chapter shall not be construed as being in derogation of the common law, but shall be given a liberal construction, and any doubt as to the existence or extent of a power conferred on the authority by this chapter or chapters 1, 3 and 5 of this title shall be resolved in favor of the existence of the power, to the end that the authority may effectively govern and control the public utilities placed under its jurisdiction by this chapter."

²³ See, e.g., CF Industries v. Tennessee Public Service Commission, 599 S.W.2d 536, 542 (Tenn. 1980); Tennessee Cable Television Association v. Tennessee Public Service Commission, 844 S.W.2d 151, 159 (Tenn. Ct. App. 1992); Laurel Hills Condominiums Property Owners' Association v. Tennessee Regulatory Authority, 2014 WL 1494126, *4-*8 (Tenn. Ct. App. Apr. 14, 2014), perm. app. denied (Tenn. Oct. 15, 2014).

expenses are reasonably and prudently incurred by the utility for provisioning regulated services;

(3) provides for timely, meaningful and transparent review and approval of all rate adjustments made under the alternative rate mechanism; (4) continues to be in compliance with TRA orders and tariffs establishing the alternative rate mechanism; and (5) remains in the public interest taking into account any changed circumstances or conditions.

At the regularly scheduled Authority Conference held on April 14, 2014, the panel considered the *Amended Petition* and tariffs filed on March 25, 2014. Based upon the pleadings of the parties, arguments of counsel and presentation of the witness, as well as review of the tariffs and entire administrative record, the panel made the following findings:

- 1. The Amended Petition and, specifically, the tariffs establishing the alternative rate mechanisms filed on March 25, 2014, meet the requirements of Tenn. Code Ann. § 65-5-103(d).
- The methodologies contained in the tariffs provide for recovery of operating expenses and costs related to investment in infrastructure which are generally permissible for utility ratemaking purposes.
- 3. The tariffs provide for definitions of investments and expenses authorized for recovery and formulas for computing revenue requirements and rate adjustments consistent with established ratemaking policies, principles, methodologies, and the authorized rate of return approved in the Company's most recent rate case.²⁴
- 4. The tariffs are designed to ensure that customers ultimately pay no more than the amount authorized for recovery under the alternative rate mechanisms through annual true-up provisions.

²⁴ In re Petition of Tennessee American Water Company for a General Rate Increase, Implementation of a Distribution System Infrastructure Charge and the Establishment of Tracking Mechanisms for Purchased Power, Pensions and Chemical Expenses, TRA Docket 12-00049, Order Approving Settlement Agreement (November 20, 2012).

- 5. The tariffs provide for filing procedures and requirements, including submission of supporting documentation, intended to ensure timely and transparent review of all proposed rate adjustments.
- The operating expenses to be recovered under the PCOP mechanism were reasonably and prudently incurred in the provisioning of regulated water services.
- 7. The expenses and costs related to investments in infrastructure to be recovered under the QIIP, EDI and SEC mechanisms are the type of expenses and costs that are generally allowable for utility ratemaking purposes. The reasonableness and prudency of such costs and expenses will be determined by the Authority after they are incurred.
- 8. The alternative rate mechanisms allow TAWC to recover the funds necessary to repair and replace necessary plant in a timely manner resulting in safe and reliable drinking water to customers.
- 9. The Company's timely recovery of prudently incurred costs related to investments in infrastructure and related expenses under the Capital Recover Riders, along with its recovery of prudent operating expenses under the PCOP Rider, should lessen the need for full-scale rate case proceedings, which in turn should result in a decreased amount of legal fees and rate case expenses included in customer rates.
- 10. According to evidence presented, the initial QIIP, EDI and SEC mechanisms will result in a combined 1.08% increase to consumers' bills, while implementation of the initial PCOP mechanism will reduce consumers' bills by 1.15%. In total, consumers will experience a decrease in their monthly bills of 0.07% during the first year.

After review of the filings and evidence presented in this docket, and in light of the foregoing findings and conclusions, the panel found that the proposed Qualified Infrastructure

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Investment Program, Economic Development Investment Rider, Safety and Environmental

Compliance Rider and Production Costs and Other Pass-Through Mechanism to be reasonable

and in the public interest. Therefore, the panel approved the Amended Petition and the tariffs

submitted on March 25, 2014, to become effective on April 15, 2014.

IT IS THEREFORE ORDERED THAT:

The Amended Petition filed by Tennessee American Water Company and as discussed

herein, is approved. The tariffs submitted on March 25, 2014 are approved and shall become

effective on April 15, 2014.

Vice Chairman Herbert H. Hilliard and Director Kenneth C. Hill concur. Chairman

James M. Allison concurred with the motion.

ATTEST:

Earl Jaylan

Earl R. Taylor, Executive Director

11

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois-American Water Company

:

Proposed Implementation of a

Qualifying Infrastructure Plant : 09-0251

(QIP) surcharge rider. :

ORDER

By the Commission:

I. PROCEDURAL HISTORY

On April 23, 2009, Illinois-American Water Company ("IAWC" or the "Company") filed tariffs to implement Qualifying Infrastructure Plant ("QIP") Surcharge Riders in its Champaign, Sterling, Pekin, Lincoln, South Beloit, and Chicago Metro Water and Waste Water Districts, pursuant to Section 9-220.2 of the Illinois Public Utilities Act (the "Act"). 220 ILCS 5/9-220.2 and 83 Ill. Adm. Code 656. The tariffs were suspended by the Illinois Commerce Commission ("Commission) on May 20, 2009 and resuspended on September 10, 2009.

Pursuant to notice given in accordance with the law and the rules and regulations of the Commission, hearings were held by a duly authorized Administrative Law Judge ("ALJ") at the Commission offices in Springfield, Illinois on June 16, July 9, and July 22, 2009. On July 7, 2009, the City of Champaign filed a Petition to Consolidate this proceeding with the pending IAWC rate proceeding, Docket No. 09-0319. This motion was denied by the ALJ.

Appearances were entered in this proceeding by the Company, The People of the State of Illinois, by Lisa Madigan, Attorney General of the State of Illinois ("AG"), City of Champaign ("City), Village of Bolingbrook, the Citizens Utility Board and Staff of the Illinois Commerce Commission ("Staff"). At the evidentiary hearing on October 19, 2009 at the Commission's Springfield office, Rich Kerckhove and Jeffrey T. Kaiser testified on behalf of the Company. Scott J. Rubin testified on behalf of the AG, and Thomas Q. Smith, Economic Analyst in the Water Department of the Financial Analysis Division of the Commission, testified on behalf of Staff. The record was marked "Heard and Taken" on October 19, 2009. An Administrative Law Judge's ruling was served on the parties on January 6, 2010 directing IAWC to file the required notices of publication and notices to customers pursuant to Part 656.30(c)(2). A response providing the required notices was filed by IAWC on January 11, 2010. Following the filing of the latefiled exhibit by IAWC, the record was re-opened and the exhibit was admitted into the record. The record was then again marked "Heard and Taken."

On November 16, 2009, the Company and the Staff of the Illinois Commerce Commission ("Staff") both filed Initial Briefs in this matter. On the same date, the City of Champaign and the Office of the Illinois Attorney General ("City/AG") filed a joint Initial Brief. Reply Briefs were filed by Staff, IAWC and City/AG. A Proposed Order was served on the parties. Briefs on Exceptions ("BOE") were filed by IAWC and Staff which noted some typographical errors in the Proposed Order, but did not take exception to any of the findings. A BOE was also filed by City/AG which took exception to the findings in the Proposed Order and offered two alternate changes in the language in the Commission Analysis and Conclusion portion of the Proposed Order; however, the City/AG BOE did not offer any alternate language for the Finding and Ordering Paragraphs, as appears to be required by 83 Ill. Adm. Code Part 83 Section 200.830(b). Reply Briefs on Exceptions ("RBOE") were filed by Staff and IAWC.

II. STATUTORY AUTHORITY

The Company's request is governed by Section 9-220.2 of the Act, which states:

- a. The Commission may authorize a water or sewer utility to file a surcharge which adjusts rates and charges to provide for recovery of (i) the cost of purchased water, (ii) the cost of purchased sewage treatment service, (iii) other costs which fluctuate for reasons beyond the utility's control or are difficult to predict, or (iv) costs associated with an investment in qualifying infrastructure plant, independent of any other matters related to the utility's revenue requirement. A surcharge approved under this Section can operate on an historical or a prospective basis.
- b. For purposes of this Section, "costs associated with an investment in qualifying infrastructure plant" include a return on the investment in and depreciation expense related to plant items or facilities (including, but not limited to, replacement mains, meters, services, and hydrants) which (i) are not reflected in the rate base used to establish the utility's base rates and (ii) are non-revenue producing. For purposes of this Section, a "non-revenue producing facility" is one that is not constructed or installed for the purpose of serving a new customer.
- c. On a periodic basis, the Commission shall initiate hearings to reconcile amounts collected under each surcharge authorized pursuant to this Section with the actual prudently incurred costs recoverable for each annual period during which the surcharge was in effect.

220 ILCS 5/9-220.2

The Commission adopted 83 III. Adm. Code 656, "Qualifying Infrastructure Plant Surcharge" ("Part 656") to implement Section 9-220.2 of the Act.

III. PARTY POSITIONS

A. IAWC's Position

IAWC submits that it has met its burden in complying with the requirements of Part 656, and, other than technical corrections proposed by Staff, notes that no witness in this proceeding asserts that IAWC's filing is not in accordance with Part 656.

IAWC witness Kerckhove testifies that the Company's proposed QIP Surcharge Riders will operate in exactly the same manner as the current QIP riders that were previously approved by this Commission in Docket No. 04-0336. He further testifies that the information filed in support of the Rider by IAWC mirrors the information proffered to the Commission as part of Docket No. 04-0336.

IAWC argues that Staff conducted a thorough review of the Company's request, and that as a result of that review, Staff witness Smith suggested several minor technical corrections to the Company's proposed tariffs, which changes the Company agreed to adopt. IAWC further notes that Mr. Smith also discusses the purpose of the QIP as well as the criteria for approval of the same, and ultimately finds that the Company has justified the need for the requested Surcharge Riders and recommends that the Commission grant the Company's request.

IAWC notes that AG witness Scott Rubin expressed his general opinion that it is poor public policy "to allow a utility to selectively revise its rates to reflect the costs of new capital investments." IAWC avers that Mr. Rubin appears to miss the point of this proceeding, as the bulk of his testimony presents general policy arguments against the Surcharge Rider concept. IAWC submits that the policy question of whether or not to allow for a QIP Surcharge Rider was decided by the Illinois Legislature when it enacted Section 9-220.2 of the Act, followed by Commission adoption of Part 656. In light of the unambiguous legislative and regulatory action to implement the QIP Surcharge Rider, IAWC argues that Mr. Rubin's arguments simply have no place in the instant proceeding and should be disregarded.

IAWC argues that throughout this proceeding, the City/AG have ignored the specific, established, criteria against which the Company's request should be judged in favor of broad policy arguments against riders, noting that the City/AG brief continues this pattern - attacking IAWC's proposal by painting riders generally, and the QIP rider specifically, as dangerous tools of utility abuse.

IAWC submits that the proper focus of the instant proceeding is whether IAWC's request meets the requirements to implement a QIP surcharge pursuant to the provisions of 9-220.2 and Part 656. IAWC does not disagree with the City/AG statement that "Section 9-220.2 is permissive, not mandatory in that it provides the Commission "may" allow the QIP surcharge. IAWC submits that the Commission, however, exercised its authority when it determined, in its judgment, that a QIP

surcharge rider concept was something that should be pursued, and then established the comprehensive rules of Part 656.

IAWC disputes the City/AG's claim that the QIP rider will result in double recovery of IAWC's expenses. IAWC notes that pursuant to Part 656 rules, the proposed QIP Rider can not recover costs related to QIP-eligible projects that are already reflected in current rates. Rather, the proposed QIP Rider is intended to recover costs for QIP projects that are properly recoverable in a manner consistent with the Part 656 rules, but are not recognized in current rates. IAWC notes further, the proposed QIP Rider, if approved before the end of the current rate case (Docket No. 09-0319), will be set to zero when new base rates are approved in that case. IAWC insists that, under the Part 656 rules, there is no risk of double recovery. Moreover, IAWC claims the ability to confirm the appropriateness of the revenue recovery (or to verify the absence of "double recovery") is provided in both the QIP Rider approval proceeding and subsequent QIP Rider reconciliation proceedings.

IAWC submits that no witness has challenged the Company's compliance with the requirements of Part 656, and that the appropriateness of the recovery of costs through a QIP Surcharge Rider was considered by the Illinois Legislature when it enacted 9-220.2 of the Act. IAWC notes that by such enactment, the Illinois Legislature specifically authorized the QIP Surcharge Rider, as well as defined what constitutes appropriate QIP costs.

B. Staff's Position

Staff does not oppose adoption of the Company's QIP Surcharge Rider. Staff witness Smith testified that a QIP Surcharge Rider provides timely rate relief and funding for the replacement of old and deteriorating distribution and collections systems and reduces regulatory lag. Mr. Smith further testified that IAWC currently possesses QIP Surcharge Riders applicable to the Alton, Cairo, Interurban, Peoria, Streator, and Pontiac Districts, which were approved by the Commission in Docket No. 04-0336 on December 15, 2004. Mr. Smith also noted that IAWC's proposed tariffs in the instant proceeding are substantially identical to the tariffs which were approved by the Commission in Docket No. 04-0336, with the only differences in the tariffs being items of identification.

In his testimony, Staff witness Smith identified some technical problems with IAWC's proposed tariffs, in that in various places the tariffs contain the phrase "file district", when the intended phrase is "fire protection district." Mr. Smith recommended the compliance tariffs be revised to reflect the intended phrase and the Company agreed.

Mr. Smith further testified that IAWC Exhibit 1.1 and IAWC Exhibit 1.2 both contain language indicating that it is intended that each set is applicable to customers in "All Districts," however IAWC indicates that IAWC Exhibit 1.1 be applicable to the entire Chicago Metro Division except the South Beloit District, and that IAWC Exhibit 1.2

should be applicable to only the South Beloit District of the Chicago Metro Division. Mr. Smith recommended the compliance tariffs be revised so that it is clear which set of tariffs is applicable to the Chicago Metro Division except for the South Beloit District, and which set of tariffs is applicable only to the South Beloit District. IAWC agreed to make the recommended revisions in its compliance tariffs.

Lastly, the proposed tariffs in IAWC Exhibit 1.4 pages 4, 5, and 7 contain mislabeled paragraphs. Mr. Smith recommended that the correct labeling of paragraphs be included in the compliance tariffs and the Company agreed. Staff witness Smith recommended that the Commission direct the Company to correct the above mentioned technical errors.

Staff notes that the requirements for approval of a QIP Surcharge Rider are outlined in 83 III. Adm. Code 656.90. Subsection a) states: "A utility's filing seeking initial approval of a QIP surcharge rider for a rate zone shall be accompanied with the necessary testimony and exhibits justifying the rider." Mr. Smith further testified that, in his opinion, IAWC has met the requirements to implement QIP Surcharge Riders which are authorized by Section 9-220.2 of the Act and implemented by rules in Part 656.

Mr. Smith testified that in his opinion there is no risk of double recovery of costs by the Company under Part 656, and further noted that when new base rates go into effect after the Company's pending rate case in Docket No. 09-0319, the proposed QIP surcharge percentage will be reset to zero. Mr. Smith further noted that to be classified as QIP, replacements must be installed after the conclusion of the test year in the utility's last rate case, and cannot be included in the calculation of the rate base in the utility's last rate case. Mr. Smith further testified that the QIP Surcharge Rider annual reconciliation proceedings will provide an opportunity to verify the appropriateness of the recovery of costs.

Staff notes that while in theory the City/AG argument that the Commission is not required to approve a QIP surcharge rider may be correct, the Commission has adopted Part 656 to implement Section 9-220.2 of the Act, which includes the general requirements for approval of a QIP surcharge rider. Staff argues that outside of Section 9-220.2 of the Act and Part 656, there are no other criteria which IAWC needs to meet in order for the Commission to approve a QIP surcharge rider.

While City/AG argue that the Commission should examine the necessity of a QIP surcharge rider and whether the rider would be good public policy in each case, Staff submits that the existence of Section 9-220.2 of the Act and Part 656 indicates that the General Assembly has already decided that if the requirements of Section 9-220.2 of the Act and Part 656 are met then approval of a QIP surcharge rider is necessary and good public policy.

Staff further notes that City/AG argues that proposed rate increases pursuant to Section 9-201 of the Act must be "just and reasonable and do so within the regulatory parameters which require use of a consistent test year and prohibit retroactive and

single-issue ratemaking." While Staff does not disagree that Section 9-201 of the Act requires rates that are just and reasonable, Staff notes that this proceeding was not brought under Section 9-201 of the Act. Rather, this proceeding was brought pursuant to Section 9-220.2 of the Act. Further, Staff does not disagree with the standards for review of traditional riders set forth in the case law cited by City/AG; however, this proceeding does not involve a request for a traditional rider. This proceeding involves a request for approval of a QIP surcharge rider which is specifically authorized by Section 9-220.2 of the Act and implemented by requirements set forth in Part 656.

C. City/AG's Position

City/AG take the position that the Commission is not required to approve a QIP surcharge rider, and that Section 9-220.2 of the Act did not direct the Commission to approve a QIP surcharge simply upon request. Rather, while allowing such a rider, City/AG argues that the law authorizes the Commission to examine the necessity of such a rider and whether it represents good public policy in any particular instance. City/AG opines that IAWC has the burden to prove that the surcharge is reasonable and necessary independent of any other matters related to its revenue requirement.

City/AG argue that IAWC should be strictly held to its burden as an automatic adjustment mechanism such as the QIP surcharge violates the matching principle of rate making and helps to destroy the underlying relationships between utility rates and levels of costs and investment. City/AG further opines that the use of a QIP Surcharge skews the repair/replace decision and result in the replacement of mains before the end of their economic life.

City/AG notes that the QIP Surcharge gives IAWC immediate recovery of the carrying costs of new capital investments; however expenditures on repair and maintenance are absorbed by IAWC until its next rate case. City/AG submits this gives IAWC an incentive to replace rather than repair.

Considered in light of these regulatory effects, to insure that inappropriate incentives are not created, and to insure that consumers are not harmed by allowing a pass-through for otherwise ordinary expenses and investments, City/AG argue the Commission should reject IAWC's request for a QIP surcharge.

City/AG avers that the Act and state and federal case law regarding the rate making process are based on the concept that riders should not be used unless there is a valid reason to remove certain costs from the ratemaking formula. City/AG argue that the evidence shows that five of the seven categories of cost for which IAWC seeks rider treatment have not fluctuated significantly comparing the five years between 2004 and 2008 and the five years between 2009 and 2013. Further the remaining two categories of cost (water and sewer collecting mains) have not fluctuated significantly beginning in 2009. City/AG argues that flat rate of investment shown for five of the seven categories of plant investment indicate no need for a rider.

City/AG cite the case of <u>A. Finkl & Sons Company v. Illinois Commerce Commission</u>, 250 Ill.App.3d 317, 620 N.E.2d 1141 (1st Dist. 1993), wherein the Illinois Appellate Court held that while riders are useful in alleviating the burden imposed upon a utility in meeting unexpected, volatile or fluctuating expenses, the Court noted that the amount of costs to be recovered through the rider at issue in the case was not significant, making rider recovery inappropriate.

City/AG argue that riders shift all of the risk and cost responsibility to customers who are least able to influence cost levels, and remove both the discipline of budgeting between rate cases and the review attendant to rate cases and test year analysis, while also increasing administrative complexity by adding an annual reconciliation and add complexity and volatility to customer bills.

City/AG also argues that IAWC should demonstrate that its financial integrity would be impaired absent the approval of the QIP surcharge, which it has failed to do. City/AG are also concerned about the possibility of double-recovery from ratepayers as IAWC proposes the use of the same test year for its rate case as the basis for its QIP surcharge. City/AG witness Mr. Rubin explained that double-counting will result because the QIP surcharge is based on annual projections, so starting at the beginning of a given year, IAWC will recover costs for projects that have not been started or completed.

City/AG note that both the Company and the Staff cite the Commission rules governing QIP surcharges that require a utility seeking initial approval of a QIP surcharge rider to file testimony and exhibits "justifying the rider." However, City/AG opines that neither party described the justification for the riders, which failure to provide evidence that the rider results in just and reasonable charges is fatal for IAWC since the rule regarding a QIP rider is subject to both Section 9-220.2 of the Act and Section 9-201 of the Act. City/AG argues that merely following the mechanics outlined in the Commission's rule on how to file a request falls far short of providing justification for the QIP rider.

City/AG notes that IAWC asserts that the requested riders will operate in exactly the same manner as the current QIP riders and that the information it provided in this case "mirrors" what it provided in a prior case. The Company also argues that the Staff "conducted a thorough review of the Company's request," although other than some technical corrections, the Company was unable to cite or discuss what Staff considered as part of its "thorough review." City/AG opines that the Commission should reject IAWC's attempt to clothe its request with Staff approval, while ignoring the substance of its request. City/AG further aver that Staff witness Smith's testimony does not address the substance of IAWC's request, but simply relates that the rule requires that testimony and exhibits be filed to justify a QIP surcharge rider request, and this lack of analysis or discussion provides no support for the Company's rider request.

City/AG submits that only Mr. Rubin addressed the justification for a QIP rider, which is what the testimony and exhibits are supposed to address. His testimony

properly emphasized the uneven incentives created by the Company's request and the danger of inefficient allocation of resources when a Company can increase its rates for infrastructure investment but not for infrastructure maintenance. City/AG avers that IAWC has not justified the imposition of a QIP surcharge on customers in the Champaign, Lincoln, Pekin, Sterling, South Beloit, and Chicago Metro Water and Waste Water Districts by the mere filing of testimony and exhibits with its request. City/AG argues that IAWC must affirmatively justify a QIP surcharge, and the Commission cannot be expected to approve a rider in light of the Company's failure to present that justification in its briefs.

City/AG notes that that IAWC currently has a rate case pending before the Commission in Docket No. 09-0319, and that rate case uses a future test year ending December 31, 2010, the same as the QIP rider, which City/AG believes is contrary to the statutory prohibition that investments in qualifying infrastructure plant cannot be "in the rate base used to establish the utility's base rates." City/AG argues that the better policy to avoid confusion on this matter would be to mandate that no QIP surcharge can take effect until January 1, 2011.

City/AG submits that the evidence submitted by IAWC shows that the QIP surcharge rider should be rejected because the costs IAWC seeks to recover do not justify rider treatment. Because IAWC has control over both the timing and the size of these costs, these costs should be subject to the same incentives applicable to other costs inherent in the regulatory bargain.

D. Commission Analysis and Conclusion

IAWC seeks approval of proposed QIP Surcharge Riders for its Champaign, Sterling, Pekin, Lincoln, South Beloit, and Chicago Metro Water and Waste Water Districts. The Riders would allow for the recovery of certain costs related to qualifying infrastructure plant, and are proposed pursuant to Section 9-220.2 of the Act and Part 656.

Section 9-220.2 of the Act provides in part that the Commission "may authorize a water or sewer utility to file a surcharge which adjusts rates and charges to provide for recovery of . . . (iv) costs associated with an investment in qualifying infrastructure plant, independent of any other matters related to the utility's revenue requirement." Section 9-220.2 of the Act also requires proceedings to reconcile the amounts collected with the actual costs prudently incurred for each year the surcharge is in effect.

The Commission notes that both IAWC and Staff are in agreement that, following some revisions suggested by Staff, the proposed QIP Surcharge Riders should be approved and placed into effect. City/AG takes the position that, among other things, the use of a rider in this case is improper; IAWC has failed to show the proposed riders are appropriate, and the proposed riders will allow double recovery of expenses and unnecessarily confuse customers.

The Commission is of the opinion that the majority of the arguments set forth by City/AG are more appropriate to a proceeding where a utility is attempting to institute a rider not created by statute, unlike the proposed QIP Rider. The Commission notes that the concept of a QIP Rider was codified by the Illinois General Assembly and made a part of the Public Utilities Act as Section 9-220.2. In furtherance of the adoption of this statute, the Commission adopted Part 656, setting forth the Commission's rules for the administration of the QIP Surcharge riders. The Commission believes that the City/AG arguments regarding Finkl go directly to this issue, as Finkl did not involve a statutorily authorized rider, such as we are presented with here.

City/AG also make various arguments about the fact that IAWC has not shown there is a need for these riders, or that IAWC's financial situation will be impaired if these riders are not approved. The Commission finds that in the matter of QIP riders, as presented here, there is no requirement on the part of the utility to show a financial need or impairment for the rider to be authorized. As to City/AG concerns regarding potential double-recovery of costs, the Commission is satisfied that the terms of the proposed QIP riders as well as the reconciliation process that has been in place since Part 656 was adopted are adequate to prevent such an occurrence. A review of the evidence shows that the concerns expressed by the City/AG are misplaced in this instance.

The Commission notes that the testimony of Mr. Kerckhove indicates that the existing QIP rider for the Streator and Pontiac water districts is being amended to include the Champaign and Sterling water districts. Similarly, the existing QIP rider for the Alton, Cairo, Interurban and Peoria water districts is being amended to include the Pekin and Lincoln water districts. It is the Commission's view that it is clear that the QIP surcharge riders for these districts have been previously examined and found to be appropriate. While the proposed QIP riders for the Chicago Metro Water District, the South Beloit District, and the Chicago Metro Waste Water District appear to be new QIP riders according to Mr. Kerckhove, the testimony further shows that these riders are substantively similar to the riders existing for other districts. As such, the Commission is satisfied that the proposed riders are in conformance with Section 9-220.2 and Part 656 and as such, should be approved.

The Commission therefore finds that the proposal of the Company to implement QIP Surcharge Riders for its Champaign, Sterling, Pekin, Lincoln, South Beloit, and Chicago Metro Water and Waste Water Districts, as revised, meets the requirements of Section 9-220.2 of the Act and Part 656 of the Commission's rules applicable to the implementation of QIP surcharge tariffs. The tariffs to be filed in accordance with this Order shall incorporate the proposed changes suggested by Staff, and agreed to by IAWC.

IV. APPROPRIATE START DATE OF TARIFF

The City/AG has suggested that should the Commission choose to approve the requested QIP Surcharge Rider, the start date for the rider should not be until January

1, 2011. In light of that request, the Administrative Law Judge at the evidentiary hearing specifically requested the parties address the particular issue of what the Commission's options are for the start date of the riders.

A. IAWC

It is IAWC's position that, in accordance with the requirements of Section 9-201 of the Act, the Commission ordered effective date of the QIP Surcharge Rider must fall within the resuspension period (i.e., be before March 20, 2010). IAWC argues that the Commission has no power to suspend the effective date of a schedule filed by a utility under the Act, beyond the suspension period, and when the suspension period expires without a finding that the rates of the proposed schedule were unjust and unreasonable, then the schedule, by operation of law, becomes effective; (citing Streator Aqueduct Co. v. Smith, 295 F. 385, 387-88, S.D. III. (1923) and Illinois Bell Tel. Co. v. Commerce Commission, 304 III. 357 (1922).)

B. Staff

The ALJ requested that the effective date of IAWC's proposed QIP Surcharge be addressed. Staff notes that the Order in Docket No. 04-0336 contains the following Ordering Paragraphs:

Within 30 business days from the date of this Order and no later than the 20th day of the month preceding the effective date, the Company should file, as a compliance filing, tariffs substantially in the form of the QIP Surcharge Riders marked as IAWC Exhibits 1.1 and 1.2, as modified by Findings 4 and 5 above; such tariffs to be marked with an effective date of January 1, 2005, or the first day of any subsequent month.

The Company should file the QIP Surcharge Percentage on an Information Sheet with supporting data no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage.

Staff witness Smith recommended the Commission order IAWC to file the QIP Surcharge Rider tariff sheets, within five (5) days of the final order in this proceeding, with an effective date of not less than five (5) working days after the date of filing, with individual tariff sheets to be revised within that period. Staff argues that no substantial deficiencies in the proposed tariffs have been identified. Staff knows of no reason to delay the effective date of the tariffs. Staff also recommends that after the QIP Surcharge Rider is in effect, the Commission order the Company to file the QIP surcharge percentage on an information sheet with supporting data not later than the 20th day of the month preceding the effective date of the QIP surcharge percentage, with an effective date of the first day of the following month.

C. City/AG

City/AG opines that the QIP surcharge, if it is approved, should not be implemented until January 1, 2011, in order to avoid undue consumer confusion, noting that the QIP surcharge might be in effect for only four months until the QIP surcharge is reduced to zero as a result of the pending rate order in Docket No. 09-0319. On January 1, 2011, the City/AG says, the QIP surcharge would reappear on customers' bills. City/AG believes the Commission should not allow a rate to take effect for four months in light of the customer confusion that will result. If, contrary to the arguments contained herein, the Commission approves a QIP surcharge, customer confusion can be avoided by simply providing that the surcharge will not go into effect until the end of the future test year for its general rate case; namely, January 1, 2011.

City/AG avers that the Commission's authority in reviewing a tariff filing includes the authority to set an effective date different from that requested by a company. City/AG do not disagree with IAWC that the Commission must act on its review of a tariff filing within the statutory period of eleven months under Section 9-201 of the Act. However, City/AG believes the obligation to act does not mean that the Commission must accept as the "effective date" of a tariff the date requested by the utility or the last day of the suspension period if that date would render the tariff unjust and unreasonable.

City/AG opines that if a tariff will result in a violation of the statute or double-counting, or is unreasonable because it would charge customers for plant that is already part of a pending rate case, that tariff as written is clearly unjust and unreasonable and can be rejected, while if the only problem with the tariff is that its effective date would allow double-counting, the Commission can rewrite the tariff to impose an effective date that is not unjust and unreasonable.

City/AG notes that IAWC cites two cases from 1922 and 1923 for the proposition that the Commission has no power to suspend the effective date of a schedule filed by a utility beyond the suspension period. City/AG argues that these cases stand for the limited principle that the Commission cannot simply ignore the statutory suspension period but must act within the time period established by statute. City/AG cite a later case, Central Illinois Public Service v. Illinois Commerce Comm'n., 5 III.2d 195 (1955) ("CIPS"), wherein the Court found that the Commission could simply reject a tariff that was not supported by evidence, rejecting the argument that the Illinois Bell case cited by IAWC required the Commission to put a rate in place by the end of the suspension period. City/AG argues that "CIPS" finds that if the suspension period has expired before a final decision has been made, this merely allows the utility to begin collecting charges under the new rate, but does not terminate the Commission's inquiry, and the new rates remain subject to permanent cancellation by the Commission's final order.

In the CIPS case, the utility had declined to provide cost information to support its tariff, and the Commission cancelled the tariff. The Court affirmed the Commission's

action, holding that the Commission could simply reject a tariff if the evidence did not show it to be just and reasonable.

City/AG notes that while no case specifically addresses whether the Commission can change the effective date of a tariff, City/AG argues that the Commission's power to rewrite tariffs is broad, and there is no reason that changing the effective date to assure a tariff's operation is just and reasonable is any different from changing a tariff to set a different charge to consumers. City/AG opines that Staff's argument that the reconciliation process would address any double-counting issues misses the point, as it does not address whether the effective date of the tariff can be changed to eliminate double-counting.

City/AG therefore suggests that should the Commission approve the QIP surcharge, the surcharge should not take effect until January 1, 2011. Under Section 9-201, the Commission is authorized to "alter or modify" rate filings by utilities and to establish rates or other charges that "it shall find to be just and reasonable." Under Section 9-201(c) the Commission's authority to revise tariff terms is broad, and mandating an effective date starting January 1, 2011 to avoid double counting is within the Commission's power to "establish the rates or other charges, classifications, contracts, practices, rules or regulations."

D. Commission Analysis and Conclusion

The Commission notes that from the arguments presented to the question raised, this may be an issue of first impression for the Commission. City/AG argues that should the proposed QIP riders be approved, their implementation should be delayed until January 1, 2011 to avoid certain perceived problems. IAWC is only able to point the Commission to two court cases from the 1920's for the proposition that if the Commission does not find the rates of the proposed schedule unjust and unreasonable, then the Commission has no authority beyond the statutory deadline. Staff merely states that it is aware of no reason to delay the implementation of the proposed riders, and suggests standard implementation language. City/AG argues that the Commission has wide discretion on implementation where the Commission finds that otherwise the rate would be unjust and unreasonable, and therefore suggests an implementation on January 1, 2011. The Commission notes that City/AG appears to be correct in noting that should the Commission be unable to reach a decision before a statutory deadline, the proposed rates will go into effect, subject to a final Commission decision after the deadline.

As the Commission is entering a final Order prior to the March 20, 2010 deadline, it does not appear that this is the situation presented. It is an interesting question as to whether the Commission could find that; absent an extended implementation date that the proposed rates were unjust and unreasonable, if the Commission could enter a later start date; however that is not the situation here. The Commission finds that the proposed rates are just and reasonable, and therefore there is no reason to extend the implementation date. The Commission also considers that should the Commission

have the power to set an effective date for tariffs far beyond the end of the suspension period, the question would become what are the limits of the Commission's powers in this regard, beyond just what the Commission finds "just and reasonable". In this instance, the Commission does not find it necessary or reasonable to delay the effective date of the QIP riders beyond what is usual and customary.

Within five business days from the date of this Order, and no later than the 20th day of the month preceding the effective date, the Company should file the Rider tariffs as a compliance filing, with an effective date of the first day of the following month. The Company should file the QIP Surcharge percentage on an Information Sheet no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage.

VI. HISTORICAL VS. TEST YEAR OPERATION

At the evidentiary hearing, the Administrative Law Judge requested the parties to address whether there is an issue in the instant proceeding similar to that presented in Docket No. 04-0336 regarding an agreement in that docket between IAWC and Staff to clarify the operation of the surcharge will only be used if the Company's immediately proceeding rate case used a future test year and an historical operation only be used if an historical test year was used in the immediately preceding rate case.

Both IAWC and Staff agree that the proposal in the instant proceeding utilizes prospective surcharge operation assumptions, is consistent with the prior clarification, and thus is not an issue. The Commission is satisfied that this is not an issue in this proceeding.

VII. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Illinois-American Water Company provides water service and waste water service to the public in certain areas in the State of Illinois, and is a public utility within the meaning of the Act;
- (2) the Commission has jurisdiction over the Company and the subject matter of this proceeding;
- (3) the facts recited and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) the proposal of the Company to implement QIP Surcharge Riders for its Champaign, Sterling, Pekin, Lincoln, South Beloit, and Chicago Metro Water and Waste Water Districts as revised in accordance with the conditions and determinations set forth herein, should be approved;

- (5) the Commission finds the suggestions by Staff for modification of the proposed riders to be reasonable and, as agreed to by Illinois-American Water Company, they are adopted and to be incorporated into the compliance tariffs;
- (6) within 5 business days from the date of this Order, and no later than the 20th day of the month preceding the effective date, the Company should file, as a compliance filing, tariffs substantially in the form of the QIP Surcharge Riders marked as IAWC Exhibits 1.1 to 1.5, incorporating Finding (5); such tariffs should be marked with an effective date of March 1, 2010, or the first day of any subsequent month;
- (7) the Company should file the QIP Surcharge Percentage on an Information Sheet with supporting data no later than the 20th day of the month preceding the effective date of the QIP Surcharge Percentage; and
- (8) the relief granted in this Order creates no presumptions with respect to whether the specific projects or types of projects described in the Company's filing in this proceeding meet the criteria for qualifying infrastructure plant set forth in Section 9-220.2 of the Act and Part 656 of the Commission's rules.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Illinois-American Water Company is hereby granted permission to implement a qualifying infrastructure plant surcharge rider ("QIP") in its Champaign, Sterling, Pekin, Lincoln, South Beloit and Chicago Metro Water and Waste Water Districts.

IT IS FURTHER ORDERED that within 5 business days from the date of this Order and no later than the 20th day of the month preceding the effective date, the Company should file, as a compliance filing, tariffs substantially in the form of the QIP Surcharge Riders marked as IAWC Exhibits 1.1 to 1.5, incorporating Finding (5) above; such tariffs to be marked with an effective date of March 1, 2010, or the first day of any subsequent month.

IT IS FURTHER ORDERED that after the QIP Surcharge Rider is in effect, the Commission order the Company to file the QIP surcharge percentage on an information sheet with supporting data not later than the 20th day of the month preceding the effective date of the QIP surcharge percentage, with an effective date of the first day of the following month.

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IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 III. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By order of the Commission this 16th day of March, 2010.

(SIGNED) MANUEL FLORES

Acting Chairman

ORIGINAL

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STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA-AMERICAN WATER)	•
COMPANY, INC. FOR APPROVAL OF (A) A)	
NEW DISTRIBUTION SYSTEM IMPROVEMENT)	CAUSE NO. 42351 DSIC 8
CHARGE ("DSIC") PURSUANT TO IND. CODE)	·
CHAP. 8-1-31; (B) A NEW RATE SCHEDULE)	
REFLECTING THE DSIC; AND (C) INCLUSION)	APPROVED: DEC 18 2013
OF THE COST OF ELIGIBLE DISTRIBUTION)	
SYSTEM IMPROVEMENTS IN ITS DSIC)	

ORDER OF THE COMMISSION

Presiding Officers: Larry S. Landis, Commissioner Aaron A. Schmoll, Senior Administrative Law Judge

On October 1, 2013, Indiana-American Water Company, Inc. ("Indiana-American" or "Petitioner") filed with the Commission its Petition and Submission of Case-in-Chief for approval of a new distribution system improvement charge ("DSIC") pursuant to Indiana Code ch. 8-1-31 and 170 I.A.C. 6-1.1. On October 2, 2013, Petitioner filed revisions to its case-in-chief to correct for an error in the calculation of the "Total Revenue to Use for Rate Calculation." On October 23, 2013, Petitioner filed a second revision to correct for an error in the calculation of depreciation expense. On October 17, 2013, the City of Crown Point, Indiana ("Crown Point") filed its Petition to Intervene in this Cause, which was granted by the Commission's Docket Entry dated November 6, 2013. The Indiana Office of Utility Consumer Counselor ("OUCC") and Crown Point filed their respective cases-in-chief on October 31, 2013. Petitioner filed its rebuttal testimony and exhibits on November 7, 2013. On November 12, 2013, Sullivan-Vigo Rural Water Corp. filed its Petition to Intervene in this Cause, which was granted at the evidentiary hearing without objection.

Pursuant to notice given as provided by law, proof of which was incorporated into the record by reference and placed in the official files of the Commission, a public evidentiary hearing was convened in this Cause on November 19, 2013 at 9:30 a.m. EST in Room 222 of the PNC Center, Indianapolis, Indiana. At the hearing, the prefiled evidence of Petitioner, Crown Point and the OUCC was offered and admitted into the record. No members of the general public appeared or participated at the evidentiary hearing.

Having considered the evidence and being duly advised, the Commission now finds:

1. Notice and Jurisdiction. Due, legal and timely notice of the public hearing in this Cause was given and published as required by law. Petitioner also provided notice of its filing in this Cause to its wholesale customers pursuant to 170 IAC 6-1.1-4. Petitioner is a "public utility" within the meaning of that term in Ind. Code § 8-1-2-1 and is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana. Pursuant to Ind. Code ch. 8-1-31, the Commission has authority to review a utility's DSIC request. Accordingly, the Commission has jurisdiction over Petitioner and the subject matter of this

proceeding.

- 2. <u>Petitioner's Characteristics</u>. Petitioner is an Indiana corporation engaged in the business of rendering water utility service to customers in numerous municipalities and counties throughout the State of Indiana for residential, commercial, industrial, public authority, sale for resale and public and private fire protection purposes. Petitioner also provides sewer utility service in Wabash and Delaware Counties.
- Relief Requested. Petitioner seeks approval of a DSIC pursuant to Indiana Code ch. 8-1-31, a new rate schedule reflecting the DSIC, and approval of the costs of the eligible Distribution System Improvements ("Improvements") in Petitioner's DSIC. Petitioner's most recent rate order was approved in Cause No. 44022 on June 6, 2012 (the "2012 Rate Order"). Petitioner's most recent DSIC was approved in Cause No. 42351 DSIC 7 on December 27, 2012 (the "DSIC 7 Order"), approving a DSIC for water customers of 2.12% on a calculation of bills basis, calculated to produce a \$3,666,274 net revenue increase after adjusting for over-collection through the surcharge approved in Cause No. 42351 DSIC 6 of \$372,094. In accordance with the Commission's rules, a reconciliation of the DSIC 7 rates will not be due for filing until the 30 days beginning December 27, 2013.

The rate base cutoff in Cause No. 44022 consisted of property in service as of June 30, 2011. The DSIC Improvements approved in DSIC 7 consisted of non-revenue producing projects placed in service between July 1, 2011 and August 31, 2012 and not included in Petitioner's rate base in the 2012 Rate Order. Therefore, Petitioner proposes to add to the DSIC approved in DSIC 7 the non-revenue producing projects placed in service between September 1, 2012 and August 31, 2013 that were not included in rate base in the 2012 Rate Order and were not included in the DSIC Improvements approved in DSIC 7. In addition, Petitioner proposes to include certain meter assets placed in service between July 1, 2011 and August 31, 2013 replacing meter assets that had malfunctioned or that would have been 10 years of age or older as of August 31, 2013 that were not approved in DSIC 7. Petitioner's proposed DSIC would produce total annual DSIC revenues of \$4,409,013, a percentage rate of 2.55% which, when combined with the 2.12% rate directed in the DSIC 7 Order would equate to an increase of approximately 4.67% above the base revenue level approved in Petitioner's 2012 Rate Order.

- 4. <u>Petitioner's Direct Evidence</u>. Petitioner presented the direct evidence of Gregory P. Roach, Manager of Rates for Indiana American, and Stacy S. Hoffman, Director of Engineering for Indiana American.
- A. <u>Calculation of DSIC 8</u>. Mr. Roach testified regarding the filing requirements and methodology for calculating the DSIC. Mr. Roach provided evidence concerning the calculation of the proposed DSIC and sponsored Petitioner's proposed rate schedules reflecting the DSIC in the same format as the existing tariff on file with the Commission. He explained that Petitioner is proposing to treat the DSIC as per the Commission's April 2, 2008 Order in Cause No. 42351 DSIC 4, in that the rate would be a percentage that would be applied to both the consumer's volumetric and metered service charge revenues. He further explained that, as per the Commission's April 30, 2010 Order in Cause No. 43680, Petitioner calculated the DSIC as a single percentage of bills that will be the same for all rate groups.

Mr. Roach testified that Petitioner proposes to include only non-revenue producing projects

placed in service between September 1, 2012 and August 31, 2013 that were not included in rate base in the 2012 Rate Order and were not included in the DSIC Improvements approved in DSIC 7. In addition, Petitioner proposes to include certain meter assets placed in service between July 1, 2011 and August 31, 2013 replacing meter assets that had malfunctioned or that would have been 10 years of age or older as of August 31, 2013, which were also not included in the DSIC Improvements approved in DSIC 7. He added that all DSIC projects included in Petitioner's request are new used and useful water utility plant projects that: (1) do not increase revenues by connecting the distribution system to new customers; (2) are in service; and (3) were not included in Petitioner's rate base in the 2012 Rate Order or in the DSIC Improvements approved in DSIC 7.

Mr. Roach then discussed how Petitioner calculated the Net Investor Supplied DSIC Additions. He stated that Petitioner started with DSIC Improvements of \$33,766,728 to which he added the actual amount of the cost of removal, net of salvage of \$4,071,093. Mr. Roach stated that there were total reimbursements from the Indiana Department of Transportation ("INDOT") and others of \$809,187. These reimbursements were removed from the DSIC Improvements, resulting in Net Investor Supplied DSIC Additions of \$37,028,634.

Mr. Roach explained that for purposes of computing the incremental depreciation expense associated with the eligible distribution system improvements, he calculated the Net Investor Supplied DSIC Improvements by removing retirements at gross original cost. For purposes of calculating the incremental pre-tax return associated with the eligible distribution system improvements, Mr. Roach explained that retirements were treated differently in that retirements were not removed at their original cost. Mr. Roach testified that this accounting treatment for retirements represented a change from Petitioner's prior DSIC proposals. He explained that the Commission had issued an Order in Cause No. 44182, Indiana Michigan Power Company's proposed Life Cycle Management Project ("LCM") for the Cook Nuclear Plant (the "I&M Order"), which is consistent with the treatment proposed by Petitioner in this case, holding that only depreciation expense and not return should be adjusted by the accounting entries to remove the original cost of retired assets from utility plant. Mr. Roach testified that there is no provision in the DSIC statute for offsetting against eligible distribution system improvements the original cost of associated retirements. Historically, Petitioner has offset retirements for purposes of the calculation of Net Investor Supplied DSIC Additions on the theory that retirements are associated with the DSIC Additions. In light of the I&M Order, however, and consistent with the respective impact that retirements have on incremental depreciation expense and incremental return, Petitioner has proposed the same treatment approved in the I&M Order.

Mr. Roach testified that if there is to be an offset for retirements for purposes of calculating "pre-tax return" as that term is defined in the statute, it should be the rate base impact from the retirement transactions. He described the three essential transactions in retirement accounting: one to record the retirement of the plant from Utility Plant in Service and Accumulated Depreciation, one to record the cost of physically removing the plant, and one to record any salvage value derived from the retired plant. He explained that only the second and third transactions produce an incremental rate base impact and it would therefore be inappropriate to reduce the additions subject to DSIC by the original cost of the assets retired and artificially reduce the amount of eligible investment subject to a pre-tax return. He stated the net costs of removal are the only rate base impact from the retirement of the asset that is being replaced with the DSIC Improvements.

Mr. Roach also sponsored Petitioner's Exhibit GPR-3, Petitioner's rate of return summary.

Mr. Roach explained that the rate of return used in this proceeding is Petitioner's weighted average cost of capital computed from Petitioner's capital structure as approved by the Commission in the 2012 Rate Order. He testified that Petitioner used the embedded debt cost rate as of June 2011 to determine the long-term debt cost rate. The common equity cost rate of 9.70% was determined in the 2012 Rate Order, and the weighted cost of capital of 6.95% and a pre-tax rate of return of 9.75% were derived as shown on Petitioner's Exhibit GPR-3. Mr. Roach stated the pre-tax rate of return was calculated using a gross revenue conversion factor of 1.6841, calculated using Utilities Receipts Tax of 1.4%, State Corporate Adjusted Gross Income Tax of 7.25% and Federal Income Tax of 35%. He explained that the State Income Tax was calculated using an average of the effective tax rate for the period July 1, 2013 to June 30, 2014 by averaging the rates of 7.5% (2013) with the rate of 7.0% (2014). Mr. Roach stated that the resulting pre-tax return is \$3,610,290 when the pre-tax overall rate of return is multiplied by the net investor-supplied original cost of the Improvements.

Mr. Roach stated that Petitioner determined its depreciation expense of \$798,723 by using the annual depreciation rates by primary plant account previously approved by the Commission, multiplied by the Improvements, net of related retirements.

Mr. Roach testified and provided exhibits showing that the proposed DSIC Revenues, when combined with the DSIC Revenues from DSIC 7 are within the 5% range of Petitioner's base revenues as approved by the Commission in the 2012 Rate Order.

B. <u>Description of DSIC Improvements</u>. Petitioner's witness Stacy S. Hoffman sponsored Petitioner's Exhibit SSH-1, which provides a brief description of each Improvement project, the costs of each project, the date each project was placed in service, the account number assigned to each project based on accounting standards found in the National Association of Regulatory Utility Commissioners ("NARUC") Uniform System of Accounts for Class A Water Utilities ("USoA"), and Petitioner's Operation area where each project exists.

Mr. Hoffman provided greater detail regarding the Improvements exceeding \$100,000 in total costs. For each of these Improvements, he explained why the improvement was needed, the resulting benefits to Petitioner and its customers and whether the plant had been retired. This is consistent with Petitioner's presentation in its past DSIC cases. At the hearing, Mr. Hoffman committed to add, in future DSIC cases, the total cost and new pipe diameters per project in his detailed description of Improvements exceeding \$100,000. Some of the projects described by Mr. Hoffman were replacing distribution system facilities that were in poor condition, and some of which still had book value for accounting purposes. Other projects included distribution system facilities replaced because they were located in right-of-way and had to be moved because of road or other projects. Because these were in the right-of-way, they had to be removed at Petitioner's cost and as such, had no remaining life. As such, all of the projects had reached the end of their useful life from a service standpoint, even though they may have continued to have remaining book value for accounting purposes. Mr. Hoffman stated that Petitioner has invoices and other cost support for all projects listed in Petitioner's Exhibit SSH-1.

Mr. Hoffman generally described the Improvements as either replacement or reinforcement infrastructure. He explained that replacement infrastructure includes water mains, tanks, tank coating systems, valves, hydrants, service lines and meters, while reinforcement infrastructure consists of mains, valves and hydrants with the purpose of improving pressure and flow of the existing distribution system. At the hearing, Mr. Hoffman testified that reinforcement infrastructure

has been included in several prior DSICs. He testified regarding two reinforcement mains included in DSIC 7, each of which have been connected to four additional residential customers since the DSIC 7 Order was issued. He stated that the annual revenue for water service for four residential customers would be approximately \$1,900, or \$3,800 for all eight additional connections.

Mr. Hoffman testified about the inclusion of tank-related projects in Petitioner's proposed DSIC, referring to the DSIC 7 Order in which the Commission authorized DSIC recovery on tank-related projects consisting of foundation rehabilitations, a paint rehabilitation, a tank roof replacement and some distribution pump work to enable Indiana American to take the tanks offline. He testified that the tank-related projects included in this DSIC 8 are similar to those included in DSIC 7 insofar as they consist of capital rehabilitation work on existing tanks and not construction of new tanks. He noted the projects are recorded in USoA distribution accounts, do not increase water storage capacity, and otherwise meet the statutory criteria to qualify as eligible distribution system improvements.

Mr. Hoffman testified that not all of the retirements associated with the new infrastructure have been completed because transfer of service lines from existing water mains to replacement mains was still in progress for some projects. He stated that retirements that were not physically completed as of the date of Petitioner's filing have been completed in the Petitioner's accounting for those retirements because Petitioner knows accurate asset type and quantities, and vintage of assets being retired.

In addition to the change in presentation of retirements in this DSIC 8, Mr. Hoffman described a change in Petitioner's accounting process for cost of removals for blanket mass assets, which are short-term projects typically taking only one day to complete, including replacement of meters, service lines, hydrants and valves. Mr. Hoffman explained that Petitioner had implemented a new process for monthly accounting for cost of removals ("CORs") with the implementation of its new SAP system. He stated the new COR accounting process for blanket mass asset projects accounts for CORs monthly using a multi-year historical percentage split of costs between additions and CORs for this type of work. With respect to non-blanket mass asset projects (including main replacements, main relocations, system main reinforcements, and tank painting system replacements), Petitioner's new COR accounting process accounts for CORs monthly using the specific project bid costs for CORs as a percentage of additions. At project completions, the total of the monthly CORs are reconciled to actual CORs. He explained that any variations between actual COR values and the sum of monthly accounted COR values are trued-up in the Petitioner's accounting software at the final completion of the projects, and proposed that any true-ups be reflected in the Petitioner's next rate filings. Mr. Hoffman stated these process changes were implemented to result in a more accurate, consistent and efficient process for accounting for CORs.

Mr. Hoffman then described two categories of meter replacements included in this DSIC 8: meters replaced as part of the Company's length of service ("LOS") plan, and meters replaced under the Company's accelerated automated meter reading ("AAMR") plan that were or would have been 10 years old or older as of August 31, 2013. He described the LOS plan, which consists of replacing meters at the LOS age approved by the Commission in Petitioner's 30-Day Filing No. 2610 approved on January 20, 2010 and of replacing stuck and broken meters regardless of age. He then described the AAMR category of meters, citing the DSIC 7 Order as support for inclusion of meters that were or would have been 10 years old or older as of August 31, 2013. Petitioner's Exhibit SSH-4 shows that approximately \$3.3 million of the Improvements related to meters are in

the AAMR category. The balance of meter-related Improvements shown on Petitioner's Exhibit GPR-2, Schedule 3, Page 1 of 7 are in the LOS plan category and amount to approximately \$6.6 million. Mr. Hoffman explained that meter replacements included in this DSIC either (a) under the LOS plan or (b) under the AAMR plan meeting the criteria of being 10 years old or older, date back to July 2011 because these meters were not included in the approved revenue from DSIC 7.

Mr. Hoffman testified that all Improvements listed in Petitioner's Exhibit SSH-1 meet the DSIC statutory requirements. Mr. Hoffman explained that as Director of Engineering he has familiarity with these projects through regular communication with Indiana American Engineering staff during the planning, design and construction phases of these projects. Indiana American project managers also confirm projects are in service through a physical inspection and then enter in-service dates for completed projects in the Indiana American accounting software system.

Mr. Hoffman testified regarding the funding of the Improvements. He stated that projects included in this DSIC 8 were funded by Petitioner or were reimbursed by INDOT or others, as noted by Mr. Roach.

Mr. Hoffman stated Petitioner has a five-year Strategic Capital Expenditure Plan that provides for budgeted amounts of approximately \$170,900,000 for replacement mains, reinforcement mains, DSIC tank related work, hydrants, services and meters for the period 2014-2018. He testified that included in this amount is approximately \$29,300,000 budgeted over the same period for water main replacements required by state and local governments as a result of road improvements and other projects.

5. OUCC's Case-in-Chief. The OUCC presented testimony of Harold H. Riceman and Margaret A. Stull. Mr. Riceman described his review of Indiana American's petition for a DSIC. He explained Petitioner presented approximately 1,000 work orders, including many blanket orders, totaling \$33,766,728, retirements totaling \$5,609,657 and costs for removal and salvage totaling \$4,071,093. The brief time permitted in this proceeding and the number of improvements requires the use of auditing procedures to only a representative sample of the improvements to project or extrapolate the sample results and make inferences about the entire population. Consistent with past practice in DSIC cases, Mr. Riceman selected a representative sample of work orders to review from Petitioners Exhibit SSH-1. Mr. Riceman concluded that, based on Ms. Stull's testimony, the OUCC recommends an additional DSIC of 2.23% for a total DSIC of 4.35% compared to Petitioner's additional DSIC of 2.55% for a total DSIC of 4.67%.

Ms. Stull testified in opposition to Petitioner's proposed accounting treatment for retirements. Ms. Stull noted that since the Commission's final order in DSIC 1, in which it determined how retirements should be treated, Petitioner has calculated the net original cost of eligible distribution system improvements by netting distribution plant additions against related distribution plant retirements. Ms. Stull noted the foregoing calculation included the following components:

DSIC Additions

Add: Removal Costs related to retired plant

Less: DSIC Retirements Salvage Value

Contributions-in-aid of Construction (CIAC)

Ms. Stull noted that for the first time since Petitioner's DSIC 1 filing, Petitioner proposes to exclude retirements from its calculation of the net original cost of eligible distribution system improvements, thereby increasing the net original cost of eligible distribution system improvements. She argued that Petitioner's proposal to exclude retirements from its calculation of the net original cost of eligible distribution system improvements is inconsistent with the Commission's order in Cause No. 42351 DSIC 1 issued on February 27, 2003 ("DSIC 1 Order").

Ms. Stull indicated Petitioner has already made this argument and the Commission has already rejected it. Ms. Stull noted that in its case-in-chief in DSIC 1, Petitioner likewise did not include retirements in its calculation of net original cost of distribution system improvements. She explained that the OUCC responded in that case by reducing what it considered to be the eligible distribution system improvements by the original cost of the related retirements. Ms. Stull noted that in that first DSIC, Indiana-American responded to the OUCC by arguing, "under mass asset accounting rules, retirements are treated as fully depreciated with the original cost being deducted from both utility plant and accumulated depreciation." Ms. Stull added Indiana-American's witness in DSIC 1 argued that since such a retirement results in no change to the net book value of the Company's assets, "it is inappropriate to reduce the additions subject to DSIC by the original cost of the assets retired and artificially reduce the amount of eligible investment subject to a pre-tax return." Indiana American, Cause No. 42351 DSIC 1 at 12 (Feb. 27, 2003). Ms. Stull advised that the Commission rejected this argument and found that in determining net eligible distribution system improvements, retirements should be included in the calculation. Ms. Stull noted that the Commission explained in its DSIC 1 Order that while retiring an asset has no impact on the utility's net book value under mass accounting rules, this factor is irrelevant since such a factor would only apply in original cost ratemaking, and Petitioner's rate base is based on the fair value of its assets. Ms. Stull also recited that part of the DSIC 1 Order, which noted that when any asset with a positive fair value is retired that will reduce the utility's fair value rate base, and "thus, if retirements are ignored and a utility is allowed to earn a return on new plant through a DSIC, they will collect a return on both the new plant through its DSIC and on the retired asset through its return on the fair value rate base determination from the utility's last rate case."

Ms. Stull advised that the Commission further noted in that Cause:

Mass accounting rules do not apply to the Commission's determination of a utility's fair value and any retirement of plant will impact the fair value rate base. . . . While aged plant that is retired may have a negligible original cost, the fair value of such retired assets may not be negligible and not so easily determined.

Ms. Stull rejected Petitioner's assertion that there is no provision in the DSIC statute for offsetting retirements against eligible distribution system improvements since the DSIC statute states that one component of the DSIC rate is the return on the "net original cost of eligible distribution system improvements." Ms. Stull acknowledged that the statute does not include a definition of the term "net original cost of eligible distribution system improvements," but noted that the Commission construed the term "net" to include both salvage value and retirements. Ms. Stull added that the Commission has the ability and expertise to interpret the statutes it is required to implement. Ms. Stull asserted that the Commission's determination in DSIC 1 properly construed the term "net original cost of eligible distribution system improvements" to authorize it to offset retirements against Indiana-American's eligible distribution system improvements.

Noting Petitioner's reliance on the Commission's final order in Cause No. 44182 for its proposed treatment of retirements, Ms. Stull referenced a more recent final order issued in Cause No. 42150 ECR 21, which reaffirmed the principle that in a tracker, a utility should not be permitted to earn a return on both the retired assets as well as the assets replacing them. Ms. Stull noted that the order indicated that ratepayers should not be required to pay for both additions "when only one is actually in service." *Northern Ind. Pub. Serv. Co.*, Cause No. 42350 ECR 21, at 14 (Oct. 16, 2013). Ms. Stull indicated this finding comports with the DSIC procedures established in the DSIC 1 Order and with the OUCC's position in this Cause. Ms. Stull concluded that based on the methodology used in all previous Indiana-American DSIC cases, the OUCC recommends an additional DSIC of 2.23% for a total DSIC of 4.35% (MAS-2).

6. <u>Crown Point's Case-in-Chief.</u> Gregory T. Guerrettaz, President of Financial Solutions Group, Inc., offered testimony on behalf of Crown Point. Mr. Guerrettaz recommended the exclusion from recovery in this DSIC 8 period the meters replaced under Petitioner's AAMR plan that were or would have been ten years old or older as of August 31, 2013 and were included in Petitioner's DSIC 7 filing but were not approved in that Order. He also recommended that Petitioner be required to continue to deduct retirements from additions in the DSIC process and observed that if such an accounting change is to be considered, it should be considered in a separate docket or as part of Petitioner's next base rate case, not in the compressed time frame of ongoing DSIC adjustments.

Mr. Guerrettaz disagreed with Petitioners' reliance on DSIC 7 to justify inclusion of the AMR expense in DSIC 8 denied in DSIC 7. He cited the DSIC 7 Order language that expressed concern that Petitioner failed to provide the AMR evidence the OUCC had requested:

Further, recovery of the replacement cost of newer traditional meters with AMR meters does not fit within the context of the DSIC in that the Commission stated in DSIC 1 that the purpose of DSIC recovery is to replace aged infrastructure. We agree with Mr. Kaufman's assessment that the replacement of meters older than 10 years could be recoverable in a DSIC. However, despite having the opportunity to respond to Mr. Kaufman, Petitioner did not include in the record the necessary information for the Commission to determine what the DSIC factor would be if only 10 year and older meters were considered. While Petitioner's Exhibit SSH-R1 indicates the number of meters replaced older than 10 years, it is unclear whether that discovery response is solely for the DSIC 7 period. Further, we do not have the retirement costs of the 10-year and older meters that were replaced, nor do we have the cost of meters and associated installation costs related to the AMR meters used to replace 10-year or older meters.

Unlike Mr. Hoffman, Mr. Guerrettaz did not view the Commission statement that ten year and older meters "could be recoverable in a DSIC" as an agreement of recoverability or an invitation to, in a subsequent DSIC period, provide that missing information. He viewed it as a past invitation for Petitioner to seek leave to file additional evidence within DSIC 7. However, instead of following that route within the context of DSIC 7, Petitioner unsuccessfully appealed the Commission's DSIC order. Mr. Guerrettaz testified Petitioner should not be allowed to carry forward the AMR amounts rejected in DSIC 7.

Regarding Petitioner's proposed change in DSIC accounting to not reduce DSIC Additions by Retirements, Mr. Guerrettaz testified Petitioner has again exceeded the intent and tolerance of the water utility DSIC process by trying to modify its DSIC accounting treatment based on an I&M Order for nuclear electric generation plant life cycle management. Mr. Guerrettaz stated that this proposal to modify the DSIC accounting process mid stream is inappropriate for the 60-day DSIC process and it abruptly results in higher charges to water customers.

Mr. Guerrettaz disagreed with Mr. Hoffman's assertion that "[t]he Commission agreed with our proposed treatment and held that retirements are only appropriately removed for purposes of computing depreciation expense and not return." Mr. Guerrettaz pointed out that the I&M LCM Project was a standalone docketed case of substantial size and effort that took more than 15 months to complete. The accounting treatment for that nuclear plant was given as part of "financial incentives" within LCM for nuclear generation plant. To request that same accounting treatment for Petitioner's DSIC water plant is at best misplaced. He testified if the Company wants in DSIC the same accounting treatment as given as part of "financial incentives," it should make that proposal in a base rate case or some other case, not in the DSIC. He testified Petitioner should stop trying to expand the broadness of DSIC and instead keep it simple, straight-forward, and appreciate the benefits from being able to track in rates its aged plant replacements. Mr. Guerrettaz also noted that as recently as October 16, 2013, the Commission issued an Order in Cause No. 42150 ECR 21 for NIPSCO treating retirements as they have been in past DSICs stating, "We conclude that NIPSCO shall be allowed to seek recovery of its full depreciation expense (return of investment) for the replacement layer. However, NIPSCO shall only be allowed to seek recovery of the incremental amount of the return on its investment for the replacement catalyst laver that exceeds the return on investment currently included in its base rates and charges for the original catalyst layer."

7. Petitioner's Rebuttal.

A. Retirements. Mr. Roach offered testimony to respond to Ms. Stull's and Mr. Guerrettaz's suggestion that Petitioner's proposed accounting treatment for retirements be rejected. Mr. Roach explained that Petitioner's retirement accounting entries are made in accordance with NARUC 1996 USoA, accounting Instructions for Additions and Retirements. He walked through the journal entry for retirements, consisting of a debit to accumulated depreciation of the original cost of the retired unit and a credit to utility plant in service ("UPIS") of the original cost of the retired unit. He stated this has a net zero impact on the rate base calculation, while generally resulting in a reduction of depreciation expense. He testified that it would not be appropriate accounting practice, or fair to Petitioner, to reduce DSIC additions by the original cost of the replaced asset because that treatment disregards the fact that the accumulated depreciation reserve is charged with an equal amount, resulting in net zero rate base impact upon retirement. Mr. Roach further noted that Ms. Stull's proposed netting of UPIS for retirements assumes that Petitioner's rates reflect a return on the gross original cost of the replaced asset when in fact the return is calculated on the net original cost.

Mr. Roach explained it could be appropriate to offset the DSIC Improvements for depreciation expense that has accrued on the assets from their in-service date to the filing date, thus producing the "net original cost" of the DSIC Improvements. He acknowledged that Petitioner's filing did not include a deduction from the revenue requirements of accumulated depreciation recorded on DSIC additions from the in-service date through the DSIC recovery period of August 2013. He testified the total amount of accumulated depreciation for that purpose would be

\$705,102. The resulting Net Investor Supplied DSIC Additions net of this amount would be \$36,323,532, pre-tax return on additions of \$3,541,544, Total DSIC Revenue for this DSIC 8 of \$4,340,267 for a DSIC Percentage Applied to Bill of 2.51% and DSIC Percentage Increase of 2.19%. The resulting net reduction to the DSIC 8 revenue requirement would be \$68,746.

Mr. Roach addressed Ms. Stull's reliance on the NIPSCO Order. He first reiterated that Petitioner's proposed treatment of retirements is completely consistent with the I&M Order, which he explained is consistent with the USoA. Mr. Roach noted that the NIPSCO Order was issued after Petitioner had filed its case-in-chief in this Cause and reaches a different result from the I&M Order. He pointed out that the NIPSCO Order indicates that the Commission intended to be consistent with the provisions of the I&M Order, but the actual result of the two orders is somewhat difficult to reconcile. Under the NIPSCO Order, he explained, the retirements are removed at net original cost in computing the incremental return that would be allowed, but are not removed for purposes of computing incremental depreciation expense. He also stated that the result reached in the NIPSCO Order is inconsistent with the treatment of retirements proposed by Ms. Stull. Ms. Stull proposed that retirements be removed for purposes of computing both return and depreciation expense. In addition, the NIPSCO Order does not require removal of the retirements at gross original cost as Ms. Stull proposes, but at net original cost. If the NIPSCO Order was followed, Mr. Roach explained, Petitioner would not make any reduction to the depreciation expense for retirements and would be required to estimate a theoretical reserve associated with the retired assets to net against UPIS in the return calculation. He explained that the offset to accumulated depreciation based on this theoretical reserve could, in some instances, exceed the original cost of the retired asset if its actual life exceeds its estimated useful life for depreciation purposes. He supplied the following information showing the estimated percentages of the DSIC 8 retirements falling into various age categories (stated in terms of amount of useful life remaining at retirement) to illustrate the impact it would have on Petitioner's DSIC calculation if the NIPSCO Order were followed:1

Indiana American Water Company DSIC 8 Retirements Remaining Estimated Useful Life % at Retirement

0.00% (reached or exceeded life)	(\$1,179,703.17)	21.03%
1.00% to 25.00% life remaining	(763,306.61)	13.61%
25.01% to 50.00% life remaining	(2,095,277.24)	37.35%
50.01% to 75.00% life remaining	(603,215.66)	10.75%
75.01% to 95.08% life remaining	(968,154.34)	17.26%
	(\$5,609,657.02)	100.00%

¹ Using this information, Mr. Roach testified that the offset for retirements would not be \$5,609,657 as proposed by Ms. Stull but would be for a lower amount to reflect the accumulated depreciation that would have theoretically been recorded on these retired assets. Under the most conservative estimate (e.g., all of the amount which had reached or exceeded its useful life was precisely at 0% (i.e., the end of its useful life), all of the amount from 1% to 25% remaining was at 25% remaining, etc.), the most the offset for net original cost of the retired assets would be \$2,659,031.

Mr. Roach also testified that Petitioner's proposed accounting treatment is an appropriate issue to be determined in a DSIC proceeding, because the proposal is simply to follow the USoA as required by the Commission's rules.

Mr. Roach also addressed Ms. Stull's contention that Petitioner's treatment of retirements should be impacted by the fact that Indiana is a fair value state and that Indiana American receives a fair return on fair value. He explained that since 1996, the only incremental return associated with the Commission's making a fair value determination and fair rate of return finding with respect to Indiana American has been to increase the return associated with the fair value increment to purchase the Indiana Cities system. The Commission has not authorized an additional return over net original cost ratemaking because a particular main, hydrant, valve, etc. has a fair value in excess of its net original cost. Instead, Mr. Roach explained, in all subsequent orders, the Commission's fair value finding has simply been an update of the prior fair value finding from that 1996 order and the treatment for fair value is solely to reflect a full return on the Indiana Cities acquisition.

In summary, Mr. Roach testified on rebuttal that the Commission needs to first decide whether to follow the I&M Order or the NIPSCO Order. If the I&M Order is followed, the accounting treatment prescribed by the NARUC USoA would apply. If the NIPSCO Order is followed, the result would be a much more limited reduction to the DSIC total investment than Ms. Stull proposes, because the retirements should be offset by associated accumulated depreciation using the percentages Mr. Roach supplied. Retirements would not be offset in computing the depreciation expense on the DSIC Improvements under the NIPSCO Order's approach.

B. AAMR Meter Replacements. Mr. Hoffman addressed Mr. Guerrettaz's testimony that meter replacements that were not approved in DSIC 7 should not be included in this DSIC. Mr. Hoffman disagreed with Mr. Guerrettaz's interpretation of the DSIC 7 Order. He clarified that all AAMR meters included in this DSIC 8 were installed in the time period from July 1, 2011 through August 31, 2013 and none of those meters have heretofore been included in rate base. He testified that Petitioner has now provided the information the Commission identified in its DSIC 7 Order as being necessary for approval in a DSIC. He explained that he is unaware of any principle in rate proceedings that would prohibit a Petitioner from requesting review of an issue discussed in a prior case, especially when supplemental information is being provided. He asserted that this principal of allowing fair review is all the more pertinent given the Commission had never previously discussed in detail DSIC eligibility parameters for AAMR meters.

Mr. Hoffman responded to Mr. Guerrettaz's suggestion that Petitioner should have included supplemental information in rebuttal in DSIC 7 or petitioned for leave to submit additional evidence in DSIC 7 after the Order was issued. He pointed out that the only party who has suffered detriment by not having done so is Petitioner, which has gone for an extra year without recovering costs of ten year old and older AAMR meters. He further pointed out that, by waiting to include the additional information in DSIC 8, the parties and the Commission have actually been provided more time to review the additional information in the full time allotted in this proceeding as compared with the abbreviated time that would have existed had Petitioner submitted the additional information on rebuttal in DSIC 7 or after the DSIC 7 Order was issued.

8. Commission Discussion and Findings.

A. <u>DSIC Requirements</u>. Indiana Code ch. 8-1-31 requires the Commission to

approve a DSIC in order to allow a water utility to adjust its basic rates and charges to recover a pre-tax return and depreciation expense on eligible distribution system improvements. Indiana Code § 8-1-31-5 defines eligible distribution system improvements as new used and useful water utility plant projects that:

- (a) do not increase revenues by connecting the distribution system to new customers;
- (b) are in service; and
- (c) were not included in the public utility's rate base in its most recent general rate case.

Under Indiana Code § 8-1-31-6, the rate of return allowed on eligible distribution system improvements is equal to the public utility's weighted cost of capital. Unless the Commission finds that such determination is no longer representative of current conditions, Indiana Code § 8-1-31-12 provides that the cost of common equity to be used in determining the weighted cost of capital shall be the most recent determination by the Commission in a general rate proceeding of the public utility.

B. Approval of Proposed DSIC.

(1) <u>Retirements.</u> Petitioner proposed to treat retirements as an offset for purposes of calculating the incremental depreciation expense but not for purposes of calculating the incremental pre-tax return associated with the DSIC Improvements. This proposal differs from how the Commission stated, in DSIC 1, that DSIC retirements should be calculated, and Petitioner's proposal in this Cause was rejected by the OUCC and Crown Point.

In support of its position, Petitioner cited to our Order in Cause No. 44182, which stated:

With regard to the OUCC's concern that there could be additional recovery on replaced equipment in base rates at the same time new equipment will be tracked through the LCM, we are not persuaded that this concern is justified. As Mr. Krawec explained, I&M's proposal mitigates this potential by virtue of the Company requesting recovery of incremental depreciation expense, incremental property tax increase, and carrying charges for post-in-service equipment. Further, we agree with Mr. Krawec that when the replaced item is retired, the remaining original cost is transferred to the accumulated depreciation reserve account. This causes depreciation expense to decrease, but there is no effect on net plant balances, and accordingly, no effect on rate base. And because rate base is unchanged by the retirement, it would not be appropriate to reduce the incremental carrying charge on the new asset as suggested by Mr. Blakely.

I&M, Cause No. 44182 (IURC July 17, 2013). Petitioner stated that its proposed treatment of the original cost retirements in this Cause is similar to the treatment approved for I&M.

Our Order in DSIC 1 directly addressed this issue, and we see no reason to adopt a new methodology in this Cause, especially given that Petitioner's current proposal is essentially the same as what this Commission rejected in DSIC 1. We note that our Order in Cause No. 44182

dealt with an entirely different statutory scheme to incent energy utilities to undertake "clean energy projects," and thus provides little guidance in this case.

Moreover, contrary to Mr. Roach's statement that there is no provision in the DSIC statute for offsetting the original cost of associated retirements against eligible distribution system improvements, Ind. Code § 8-1-31-11 requires the Commission to determine an "appropriate pretax return." "Appropriate pretax return" is defined as "the revenues necessary to [] produce net operating income equal to the public utility's weighted cost of capital multiplied by the net original cost of eligible distribution system improvements." While "net original cost" is not defined in statute, our treatment of retirements from DSIC 1 appropriately nets the original cost of the retired asset from the DSIC improvement. Otherwise, "if retirements are ignored and a utility is allowed to earn a return on new plant through a DSIC, they will collect a return on both the new plant through its DSIC and on the retired asset through its return on the fair value rate base determination from the utility's last rate case." DSIC 1 at 23. Any proposal to change existing DSIC accounting methodologies should be addressed in Petitioner's next rate case, not in the context of an expedited DSIC proceeding.

In conclusion, for purposes of determining the appropriate DSIC revenues in this Cause, we direct Petitioner to calculate retirements as set forth in OUCC Exhibit 2 by Ms. Stull.

(2) <u>AAMR Meter Replacements</u>. Crown Point's witness Guerrettaz recommended we disallow recovery for Petitioner's meter replacements that were included in Petitioner's filing in DSIC 7 but not approved in our DSIC 7 Order.

In that Order, the Commission stated:

We agree with Mr. Kaufman's assessment that the replacement of meters older than 10 years could be recoverable in a DSIC. However, despite having the opportunity to respond to Mr. Kaufman, Petitioner did not include in the record the necessary information for the Commission to determine what the DSIC factor would be if only 10 year and older meters were considered. While Petitioner's Exhibit SSH-R1 indicates the number of meters replaced older than 10 years, it is unclear whether that discovery response is solely for the DSIC 7 period. Further, we do not have the retirement costs of the 10 year and older meters that were replaced, nor do we have the cost of meters and associated installation costs related to the AMR meters used to replace 10-year or older meters.

Given our statement in DSIC 7, we find that Petitioner has not waived the right to seek DSIC recovery in this Cause for meter replacements of older meters during the period July 1, 2011 through August 31, 2013. Petitioner's decision to appeal the Order in DSIC 7 versus seeking leave to supplement the record in DSIC 7 resulted in a substantial self-inflicted delay in recovering its AAMR investments. Nothing in the DSIC statute prevents a utility from seeking recovery of DSIC-eligible assets that were not previously included in a DSIC or a rate case. Accordingly, we include the AAMR meter replacements (meters ten years old and older) from DSIC recovery in this Cause.

While we grant relief as requested by Petitioner with respect to AAMR replacements, we believe that as an accelerated meter replacement plan, Petitioner would be better served by proposing a different mechanism for AMR recovery, outside of the DSIC process, in its next rate case. See Indiana-American Water Co., Inc., Cause No. 44059 (IURC, Dec. 19, 2012) (approving

settlement agreement that provided for deferral accounting treatment for IT system replacement). Such a proposal could provide Petitioner the opportunity to recover costs for all AMR meter replacements, and allow the DSIC proceedings to continue to focus on replacement of aging infrastructure.

Improvement Charges. The OUCC used the DSIC 1 methodology to calculate the DSIC revenue requirements of \$3,862,073. The total cost for the net investor supplied DSIC Additions is \$31,418,976, and the evidence shows the pre-tax return associated with those additions, as calculated in accordance with Indiana Code ch. 8-1-31 is \$3,063,350. The revenue requirement for depreciation on the Improvements is \$798,723. The total revenue requirement associated with the DSIC 8 Improvements is 2.23% of the revenues authorized in Petitioner's last rate case and thus is not subject to reduction under Indiana Code § 8-1-31-13.

Furthermore, the evidence shows that all of the projects reflected in the proposed DSIC are in service, do not result in the addition of new customers to Petitioner's system and fall into NARUC Uniform System of Accounts for Water Utilities Accounts 330, 331, 333, 334, or 335. As such, they are eligible for inclusion in a DSIC. Crown Point questioned whether Petitioner's reinforcement mains provide for customer growth. We find that while new customers may eventually connect to replacement or reinforcement mains once they have been installed, the possibility that such connections may occur in the future does not change the initial eligibility for DSIC inclusion.

Finally, at the hearing, Mr. Hoffman suggested that DSIC revenues in the next DSIC could be offset by the annual revenues added by the eight new customers. We appreciate Mr. Hoffman's proposal, but as previously noted, DSIC eligibility is not conditioned on whether future connections occur. We decline to make a finding in this Cause on what amount of new connections may suggest that a project was intended to connect new customers despite labeling to the contrary, and thus not eligible for DSIC treatment.

- (4) <u>Filing Requirements</u>. In response to a request from Crown Point, Petitioner committed to add, in future DSIC cases, the total cost per project in his detailed description of Improvements exceeding \$100,000. In response to a request from the OUCC, Petitioner also committed to add the new pipe diameters of replacements in its description of those projects. We find those changes to be appropriate and find that Petitioner's use of a materiality threshold in its presentation of the DSIC Improvements is appropriate.
- C. Reconciliation of Petitioner's DSIC. Petitioner should be prepared to reconcile the DSIC approved by this Order in the manner prescribed by Indiana Code § 8-1-31-14 and 170 I.A.C. 6-1.1-8. Under Indiana Code § 8-1-31-14, at the end of each 12-month period a DSIC is in effect the difference between the revenues produced by the DSIC and the expenses and the pre-tax reflected in it should be reconciled and the difference refunded or recovered as the case may be through adjustment of the DSIC.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION, that:

- 1. A DSIC calculated on a percentage of bill basis and designed to generate \$3,862,073 in additional annual revenues shall be and hereby is approved for Petitioner Indiana-American Water Company, Inc.
- 2. Prior to placing into effect the above-authorized DSIC, Petitioner shall file with the Water/Sewer Division of the Commission an appendix to its schedule of rates and charges for water service.
- 3. The above-authorized DSIC shall be subject to reconciliation as described in Paragraph 8(C) above.
 - 4. This Order shall be effective on and after the date of its approval.

ATTERHOLT, LANDIS, MAYS, AND ZIEGNER CONCUR:

APPROVED:

DEC 1 8 2013

I hereby certify that the above is a true and correct copy of the Order as approved.

Brenda A. Howe

Secretary to the Commission

target levels are for calculating the RPCRC for any period of time not equivalent to a normal rate year for LIAW.

C. Base Rates

a. The percentage increases, dollar increases and revenue forecasts for the base rates in each year for the term of the Rate Plan are as follows:

	% Increase	Increase	Revenues
Year One	6.02%	\$2,955,218	\$52,018,377
Year Two	2.64%	\$1,375,826	\$53,394,203
Year Three	2.17%	\$1,160,601	\$54,554,804

- b. The revenue requirement calculations for each year and any adjustments contained in this Joint Proposal are contained in Appendix A.
- c. The effect of this proposal on customers' bills is summarized in Appendix B.
- d. Appendix C contains the proposed tariff leaves detailing the base rate increase and the effective date for Rate Years One, Two and Three.

D. Acquisition Considerations

a. Currently, LIAW's corporate parent is in the process of acquiring the New York assets of Aqua New York, Inc. (Aqua NY) (Case 11-W-0472). The JP revenue requirement recognizes \$901,331 of ratepayer synergy savings throughout the three-year period of the rate plan (\$133,777 + 383,777 + 383,777 for rate year 1, rate year 2 and rate year 3, respectively). This amount represents the Company's best estimate for the three-year rate plan.

- b. Staff intends to examine synergy savings in Case 11-W-0472 and the savings identified above may be subject to adjustment based on the determination of the Commission in the acquisition proceeding. Any adjustment would be taken care of through the RPCRC Mechanism.
- c. If the acquisition does not occur the Company will recover the \$901,331 in synergy savings through the RPCRC Mechanism.

E. System Improvement Charge ("SIC")

The Company is authorized to continue the use of its SIC mechanism. The SIC mechanism applies to specific reviewed and approved projects. The mechanism will allow recovery of carrying costs (i.e., return and depreciation expense) on specific projects placed in service in Rate Year Two, Rate Year Three and beyond. The use of the SIC mechanism is approved for the following projects and associated capital expenditures:

- Iron removal facilities at Plant 15 \$8,450,000
- Storage tank rehabilitation at Plant 13 \$1,900,000
- Plant 5 common suction well rehabilitation, Phase 2 -\$525,000
- Business transformation EAM/CIS \$4,926,481

The Company must make a compliance filing with the Secretary to the Commission after each project is placed in service. Further, after the Company makes its initial SIC filing, it must also make annual filing within 60 days of the end of each rate year to reconcile authorized compared to actual collections and update the surcharge for any accumulated depreciation associated with the projects in service. The submitted

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surcharge will go into effect 60 days after submittal unless Staff submits a letter to the Company indicating that the surcharge should be adjusted.

After LIAW has incurred actual capital expenditures for the projects listed above and the new facilities have been placed in service, then the amount of those expenditures (net of associated (i) retirements, (ii) accumulated deferred income taxes ("ADIT"), and (iii) accumulated depreciation reserve, <u>i.e.</u>, the net rate base ("NRB")) will constitute the incremental rate base investment subject to the SIC.

LIAW will be entitled to assess a SIC surcharge on customers' bills based on a pre-tax rate of return of 10.14% applied to the net rate base increase. The cost of annual depreciation expense will be added to that amount, and the total will be divided by projected annual water revenues as defined below.

The SIC surcharge will be a percentage, carried to two decimal places, and will be applied to the customer service charge and the volumetric charges billed to each Residential, Commercial & Industrial and Lawn Sprinkler customer. The formula of the calculation is as follows:

SIC surcharge = $[(NRB \times Pre-tax \times ROR) + D] / AR$

Where:

NRB = the cost of the specific approved facilities listed above, net of associated

(i) retirements, including cost of removal and any related tax benefits, (ii)

ADIT and (iii) accumulated depreciation reserve

Pre-tax ROR = 10.14%

D = the annual depreciation expense on the net additions

AR = LIAW's projected annual metered revenues

The SIC surcharge will be used for the pre-approved applicable facilities placed in service during the Rate Plan and beyond. LIAW will provide Staff with detailed project information within 30 calendar days regarding the SIC (such as in service dates, actual paid capital expenditures, replacements and retirements). Staff will have 60 days to analyze and verify such data.

A reconciliation between authorized collections and actual collections related to the SIC surcharge will be conducted annually and filed with the Secretary to the Commission within 60 days of the end of each rate year. Any under-collections or over-collections will accrue interest at the customer deposit interest rate established by the Commission each year. Adjustments of under-collections or over-collections, as well as updates for accumulated depreciation reserve, will be reflected in the subsequent SIC surcharge filing. The submitted surcharge will go into effect 60 days after the submittal unless Staff submits a letter to the Company indicating that the surcharge should be adjusted.

The SIC surcharge will remain in place until the Commission issues a decision in the Company's next general rate case, at which time all costs previously collected through the SIC will be accounted for and included in base rates. Those new base rates will recover the costs that had been recouped previously via the SIC surcharge.

F. <u>Distribution System Improvement Charge ("DSIC")</u>

a. The DSIC surcharge, as described in the Settlement Agreement approved by the Commission in Case 04-W-0577,2 and extended with some

Case 04-W-0577, Order Establishing Rate Plan (Mar. 21, 2005).

modification by the Commission in Case 07-W-0508,3 shall end on the effective date new rates are implemented in the instant proceeding.

- b. The Company agrees to spend \$7.75 million per rate year on distribution system related work, including but not limited to, mains, services, hydrants, valves over the term of the rate plan. The carrying costs associated with the \$7.75 million capital investment in each of the rate years have been included in the base rates for each of those years. A list of water main replacement projects anticipated to be completed as part of the distribution system improvement program in this rate plan is included in Appendix F.
- c. Within 60 days after each Rate Year, the Company will submit to the Secretary to the Commission the capital expenditures for distribution system related projects under accounts 343, 344, 345 and 348. If the Company spends less than the authorized yearly amounts (\$7.75 million per year), the Company will defer the revenue requirement impact of any shortfall below the target levels for the benefit of ratepayers. Such analysis will be done on a cumulative basis at the conclusion of the rate plan.
- d. The existing DSIC surcharge, as described in the Settlement Agreement approved by the Commission in Case 04-W-0577, was subject to an annual reconciliation between the authorized collections and actual collections. The annual reconciliation was required to be filed within 60

³ Case 07-W-0508, Order Determining Revenue Requirement and Rate Design (Mar. 5, 2008).

days of the end of each rate year. Any reconciliation amount, with applicable interest, was then included in the next DSIC filing. Another reconciliation filing for this DSIC surcharge is required for the twelve month period ending March 31, 2012. Accordingly, with the expiration of the DSIC surcharge upon adoption of this JP, the Company will file with the Secretary to the Commission a single and final DSIC reconciliation for the twelve month period ending March 31, 2012. The resulting final DSIC reconciliation amount will be recovered or refunded via a one—time surcharge or credit 45 days from the date of the filing via operation of the Final DSIC Reconciliation Statement No. 1 ("FDR"). Staff will have the 45 days from the final reconciliation filing date to review the Company's submission and calculations. A template for the FDR is shown in Appendix G.

G. Rate Structure

The rate increases authorized for Years One, Two and Three will be calculated as follows: In each year of the rate plan, the full percentage increase needed to reach the authorized revenue requirement is applied equally to Service Classification No. 1 (Residential), No. 1A (Commercial & Industrial), No. 2 (Private Fire Hydrant Service), No.3 (Lawn Sprinklers), No. 4 (Public Fire Protection), No. 5 (Construction and Other Purposes) and No. 6 (Private Fire Protection).

H. Earnings Sharing

a. The Signatories have agreed to an Earnings Sharing Mechanism ("ESM").
 The capital structure used in determining the overall rate of return is

WATER



Agenda Date: 9/11/15 Agenda Item: 5B

STATE OF NEW JERSEY

Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

IN THE MATTER OF THE PETITION OF NEW)	ORDER ADOPTING
JERSEY-AMERICAN WATER COMPANY, INC.)	STIPULATION OF SETTLEMENT
DISTRIBUTION SYSTEM IMPROVEMENT CHARGE)	
("DSIC") FOUNDATIONAL FILING)	
)	BPU DOCKET NO. WR15060724

Parties of Record:

Robert J. Brabston, Esq., New Jersey-American Water Company, Inc., Petitioner Stefanie A. Brand, Esq., Director, New Jersey Division of Rate Counsel

BY THE BOARD:1

On June 12, 2015, New Jersey-American Water Company, Inc. ("Company" or "Petitioner"), a public utility corporation of the State of New Jersey, filed a petition pursuant to N.J.S.A. 48:2-21 and N.J.A.C. 14:9-10.1 et seq. for approval to file and implement an automatic adjustment clause tariff that would establish a Distribution System Improvement Charge ("DSIC") for the renewal of water distribution system assets for the period of 2015 through 2018 (the "Foundational Filing").

BACKGROUND/PROCEDURAL HISTORY

The Company's initial DSIC Foundational Filing was approved by the Board on October 23, 2012 in BPU Docket No. WR12070669. The Company filed its base rate filing, BPU Docket No. WR15010035, on January 9, 2015, which incorporated the entirety of the Company's DSIC charge from its first DSIC recovery period (October 23, 2012 through April 30, 2013), second DSIC recovery period (May 1, 2013 through October 31, 2013), third DSIC recovery period (November 1, 2013 through April 30, 2014) and fourth DSIC recovery period (May 1, 2014 through October 31, 2014). Additionally, it incorporated DSIC eligible projects that were placed in-service between November 1, 2014 and July 31, 2015, the end of the test year.

The Petitioner ultimately filed its second Foundational Filing on June 12, 2015, as a separately docketed matter from the base rate case. The Company, the Division of Rate Counsel, and the Staff of the Board of Public Utilities (collectively, "the Parties") worked collectively to issue and respond to discovery questions in a timely manner, which would permit this matter to be acted

¹ President Richard S. Mroz and Commissioner Upendra J. Chivukula recused themselves due to a potential conflict of interest and as such took no part in the discussion or deliberation of this matter.

upon by the Board within the ninety (90) day period specified in N.J.A.C. 14:9-10.4(c). The Petitioner responded to discovery requested from all Parties. A discovery conference was held on August 7, 2015, with representatives from all Parties in attendance. At that conference, representatives of the Company responded to questions from Board Staff and Rate Counsel.

After proper notice, a public hearing was held at the Howell Municipal Building on August 26, 2015, at 6:00 pm, located in Howell, NJ. Two (2) members of the public appeared at the hearing and one (1) member provided comments on two issues: affordability concerns resulting from living on a fixed income of social security; and water quality concerns, specifically, undrinkable water that leaves black stains. The Company said after the meeting that it will address the water quality issue with the customers at the Villages, in Howell, NJ. The public comment hearing was transcribed and made a part of the record.

DISCUSSION AND FINDINGS

As a result of an analysis of the Petitioner's Foundational Filing, which included a review of the discovery that was responded to by the Petitioner and a public hearing held in the service territory, the Parties have come to an agreement on this matter. On August 28, 2015, the Parties executed a Stipulation of Settlement ("Stipulation"). Specifically, the Stipulation stated:

- The Parties agreed that a Stipulation of Settlement in the base rate proceeding was executed and the Company expects to conclude that proceeding and implement new base rates pursuant to an Order of the Board in BPU Docket No. WR15010035 acted on at the Board's September 11, 2015 Agenda Meeting. Therefore the Company has met the requirement specified in N.J.A.C. 14:9-10.4(c) regarding the setting of new base rates.
- The Parties recommended that the Board find that the Company's Foundational Filing, including a revised Appendix C-Project List, summary of which is attached to the Stipulation as Exhibit A, satisfies all of the requirements of N.J.A.C. 14:9-10.4(b) and that the Board approve the Foundational Filing as modified by revised Appendix C.
- 3. The Parties recommended that the Board find that the projects listed in the revised Appendix C-Project List, summary of which is attached to the Stipulation as Exhibit A, are "DSIC-eligible projects" within the scope and meaning of the definition set forth in N.J.A.C. 14:9-10.2 and N.J.A.C. 14:9-10.3(a) and that the Board approve the Project List. The Company represents that the projects listed in the revised Appendix C-Project List only include projects that are scheduled to begin construction after the effective date of this Foundational Filing.
- 4. The Parties agreed that Exhibit C contains two project titles, Emergent Large Diameter Pipe Failures and Unscheduled Municipal Main Replacements, which by their nature are not identifiable by project ID, location, duration or specific description at this time. However, the Parties agree that the projects done in response to emergent large diameter pipe failures and projects done in response to changing municipal paving or other construction schedules are typically DSIC eligible, in that they consist of: water main replacement or rehabilitation; water main cleaning and lining; valve and hydrant replacement; service line replacement; and/or unreimbursed utility relocation costs associated with relocations required by governmental entities; are not revenue-producing; and are in excess of the Company's base spending, as otherwise required by N.J.A.C. 14:9-10.2 and N.J.A.C. 14:9-10.3(a). The Company agrees to identify each and every project performed in either of these two project titles, provide specific project

details (e.g., length, diameter and material of the main, project location and in service date, and project costs) and certify that the project meets the DSIC criteria as part of an appropriate filing with the Board.

- 5. The Parties agreed that the revenue requirement associated with the actual costs of the approved projects, attached to the Stipulation as Exhibit A, be recovered through future "DSIC filings" made during the "DSIC period" as those terms are defined in N.J.A.C. 14:9-10.2 at intervals and in a manner consistent with the requirements of N.J.A.C. 14:9-10.5.
- The Parties agreed that the annual "base spending" requirement as defined in N.J.A.C. 14:9-10.2. is \$23,922,104, based on the information filed in the Company's last annual report on file with the Board (the 2014 Annual Report) at the time new base rates are expected to be set.
- 7. The Parties agreed that the maximum amount of annual DSIC revenue that may be collected by the Petitioner is \$32,570,922, or 5% of the revenues expected to be set in the Company's current base rate case.
- 8. The Parties agreed and recommended to the Board that the Company's Foundational Filing, including its revised project list, be considered by the Board at the next agenda meeting, scheduled for September 11, 2015, which date is ninety-one (91) days after the date of the filing of the Company's petition and Foundational Filing.

Based upon the information presented in the petition and agreed to by the Parties in the Stipulation, the Board <u>HEREBY FINDS</u> that the Company's 2015 overall revenue for DSIC purposes is \$651,418,432. The Board <u>FURTHER FINDS</u> that the Petitioner's maximum amount of annual DSIC revenues that may be collected is \$32,570,922, or no more than 5% of the Company's total water revenues established in the Company's most recent base rate case.² The Company will implement the DSIC surcharge if, and when, it achieves specific levels of infrastructure investment and completes and places the facilities into service as required by N.J.A.C. 14:9-10.1 <u>et seq.</u> As an example, an average residential customer with a 5/8 inch meter may be subjected to a maximum monthly DSIC surcharge of \$3.54. These proposed rates are estimates and may change, however the maximum annual DSIC revenue requirement, \$32,570,922, cannot be exceeded.

The Board <u>HEREBY ORDERS</u> that, in accordance with <u>N.J.A.C.</u> 14:9-10.5(b), the Petitioner shall make DSIC filings on a semi-annual basis, commencing approximately six months after the effective date of the Foundational Filing. Petitioner must submit its semi-annual DSIC filing within 15 days of the end of the DSIC recovery period. DSIC filings shall be reviewed by Board Staff and the Division of Rate Counsel. Petitioner may recover the interim surcharge associated with the DSIC-eligible projects closed during the DSIC recovery period not objected to by Board Staff or the Division of Rate Counsel beginning 60 days after the end of the DSIC recovery period, subject to refund at the Board's discretion. It is <u>FURTHER ORDERED</u> that Petitioner must comply with the base spending requirements set forth in this Order. Failure to comply with the base spending requirements will result in a reduction and refund, where appropriate, of the DSIC surcharge. Thus, Petitioner's DSIC surcharge is interim, subject to refund, and shall not exceed the annual maximum revenue requirement of \$32,570,922 set forth in this Order.

² The rate case is expected to be decided on the Board's September 11, 2015.

The Board FURTHER ORDERS, that in accordance with N.J.A.C. 14:9-10.4(e), if within three (3) years after the effective date of this Order, Petitioner has not filed a petition in accordance with the Board's rules for the setting of its base rates, all interim charges collected under the DSIC shall be deemed an over-recovery, and shall be credited to customers in accordance with the Board's rules.

The Board FURTHER ORDERS, that as of the effective date of the New Jersey-American Water Company September 11, 2015 Base Rate Order, Docket Number WR15010035, the prior foundational filing (effective October 23, 2012, Docket No. WR12070669) was concluded, the DSIC rate was reset to zero and no additional DSIC filings or DSIC rates may be collected. made or implemented pursuant thereto.

Having reviewed the Foundational Filing and the Stipulation, the Board FINDS that the Parties have voluntarily agreed to the Stipulation, and that the Stipulation fully disposes of all issues in this proceeding and is consistent with the law. The Board FINDS the Foundational Filing and Stipulation to be reasonable, in the public interest, and in accordance with the law. Therefore, the Board HEREBY ADOPTS the Stipulation, attached hereto, including all attachments and schedules, as its own, incorporating by reference the terms and conditions of the Stipulation, as if they were fully set forth at length herein, subject to the requirements set forth in N.J.A.C. 14:9-10.1 et seg., and the conditions set forth in this Order.

Based upon the foregoing, the Board HEREBY APPROVES the Company's Foundational Filing and **ORDERS** that the Company may implement a Distribution System Improvement Charge, subject to this Order and Petitioner's ongoing compliance with the DSIC regulations, as well as conformity of the base spending requirements and semi-annual true-up submissions.

The effective date, of this Order is September 21, 2015.

BOARD OF PUBLIC UTILITIES BY:

ØSEPH L. FIORDALISO

COMMISSIONER

DIANNE'SOLOMON

COMMISSIONER

ATTEST:

IRENE KIM ASBURY

SECRETARY

I HEREBY CERTIFY that the within document is a true copy of the o in the files of the Board of Public tital

IN THE MATTER OF THE PETITION OF NEW JERSEY-AMERICAN WATER COMPANY, INC. DISTRIBUTION SYSTEM IMPROVEMENT CHARGE ("DSIC") FOUNDATIONAL FILING BPU DOCKET NO. WR15060724

SERVICE LIST

Robert J. Brabston, Esq., New Jersey-American Water Company 167 J. F. Kennedy Parkway Short Hills, NJ 07078

Stefanie A. Brand, Esq., Director Division of Rate Counsel 140 East Front Street, 4th Floor Post Office Box 003 Trenton, NJ 08625-0003

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF NEW JERSEY-AMERICAN WATER COMPANY, INC. DISTRIBUTION SYSTEM IMPROVEMENT CHARGE("DSIC") FOUNDATIONAL FILING BPU DOCKET NO. WR15060724

STIPULATION OF SETTLEMENT

APPEARANCES:

Robert J. Brabston, Esq., on behalf of New Jersey-American Water Company, Inc., Petitioner;

Carolyn McIntosh and Alex Moreau, Deputy Attorneys General, on behalf of the Staff of the Board of Public Utilities (John J. Hoffman, Acting Attorney General of New Jersey); and

Debra F. Robinson, Deputy Rate Counsel, and Susan E. McClure, Assistant Deputy Rate Counsel, on behalf of the Division of Rate Counsel.

TO THE HONORABLE BOARD OF PUBLIC UTILITIES:

On June 12, 2015, New Jersey-American Water Company, Inc. ("Petitioner"), a public utility of the State of New Jersey, filed a Petition with the Board of Public Utilities ("Board") pursuant to N.J.S.A. 48:2-21 and New Jersey Administrative Code (N.J.A.C.) 14:9-10.1 et seq. and such statutes and regulations and Board orders that may be deemed by the Board to be applicable, for approval of its Foundational Filing to enable the implementation of a Distribution System Improvement Charge ("DSIC" or "Surcharge") for the renewal of water distribution system assets for the period of 2015 through 2018.

NJAWC is a regulated public utility corporation engaged in the production, treatment and distribution of water, and collection and treatment of wastewater within its defined service territory within the State of New Jersey. Said service territory includes portions of the following counties: Atlantic; Bergen, Burlington; Camden; Cape May; Essex; Gloucester; Hunterdon; Middlesex; Mercer; Monmouth; Morris; Ocean; Passaic; Salem; Somerset; Union; and Warren. As of December 31, 2014, NJAWC serves approximately 613,000 water and fire service customers and 36,000 sewer service customers in 216 municipalities and 18 counties throughout the state.

In support of its Petition, NJAWC submitted a Foundational Filing, consisting of the following information required by N.J.A.C. 14:9-10.4:

- a) An engineering evaluation report ("Engineering Report") of the water utility's distribution system that:
 - i. Identifies the rationale for the work needed to be accelerated for the water
 utility to properly sustain its water distribution network; and
 - ii. Demonstrates that the plan proposed to accelerate the renewal of the distribution network is the most cost effective plan; and
 - iii. To the extent that elements of the distribution network are failing, identifies what mechanisms are causing the failures; and
 - iv. Identifies what is being done to extend the life of the water utility's assets.
- b) Information about proposed "DSIC-eligible projects" as defined in N.J.A.C. 14:9-10.2 and 14:9-10.3 for the upcoming "DSIC period" as defined in N.J.A.C. 14:10.2 that includes the following:

¹ Currently, NJAWC treats wastewater at its Pottersville, Deep Run, and former AWWM facilities.

- i. Aggregate information capturing blanket type DSIC-eligible infrastructure to be rehabilitated or replaced (e.g., estimated number of valves, number of hydrants, or number of service lines replaced)² and the estimated annual cost of such blanket type replacement programs (see Section 2 of the Foundational Filing Engineering Report);
- ii. Vintage, condition, and other similar relevant, reasonably available
 information about the eligible infrastructure that is being rehabilitated or replaced (see
 Sections 3 through 6 of the Foundational Filing Engineering Report);
- iii. The nature, location, estimated duration of project work (including estimated in-service dates) and a description and reason for project necessity (see Sections 3 through 6 of the Foundational Filing Engineering Report and Foundational Filing Appendix C);
- iv. A list of projects with project identification numbers, DSIC-eligible asset class or category, and estimated project costs (see Foundational Filing Appendix C);
- v. Other such relevant and appropriate information to assist in making an informed decision regarding any given project.
- c) The expected amount of NJAWC's base spending including underlying detail documenting that the base spending has been made on the appropriate types of infrastructure; a proposed DSIC assessment, calculated in accordance with subsection N.J.A.C. 14:9-10.8; and

² N.J.A.C. 14:19-10.4(b)2.iii requires the submission of the number of valves, hydrants, or service lines to be rehabilitated or replaced as part of the Foundational Filing. The Company asserted in its response to SE-4 that such details are not available for Blanket projects and provided instead historic information for 2013 and 2014, asserting that it would be representative of activity for this Foundational Filing. The Company agreed in subsequent discussion to provide Blanket project details in its DSIC filings made under N.J.A.C. 14:19-10.5.

work papers showing the detailed calculations supporting the proposed assessment schedule.

(See Foundational Filing Appendix D)

In BPU Docket No. WO10090655, the Board approved a Distribution System

Improvement Charge (DSIC), which was published in the New Jersey Register on June 4, 2012

and effective on that date. The DSIC rules were adopted as an amendment and addition to the

N.J.A.C. as §§ 14:9-10.1 et seq. The rule sets forth the conditions and procedures pursuant to
which regulated water utilities may seek recovery of eligible capital investments through
monthly surcharges, set semi-annually, on customer bills.

In that same docket, the Board ordered that regulated water utilities may make a Foundational Filing, which is the subject of this petition. The present Petition is filed in accordance with N.J.A.C. 14:9-10.1 et seq. and 14:1-5.1 et seq.

On August 7, 2015, a discovery conference was held.

On August 26, 2015, a public hearing was conducted at 6 p.m. in Howell Township, New Jersey at the Howell Municipal Building. Two (2) members of the public appeared at this public hearing. One member provided comments regarding both affordability and water quality.

As a result of the foregoing, the Parties agree to the following settlement terms:

SETTLEMENT AGREEMENT

NJAWC recently completed a full base rate case in BPU Docket No.
 WR15010035, which is expected to be approved by the Board at its September 11, 2015 agenda meeting, after which the Board's Order will be served and become effective consistent with N.J.S.A. 48:2-40, at which time the previous DSIC rate will be reset to zero, and this Stipulation for the DSIC Foundational Filing herein is also expected to be reviewed by the Board on

September 11, 2015, and the Board Order approving this Stipulation will likewise become effective in accordance with N.J.S.A. 48:2-40.

- 2. The Parties recommend that the Board find that the Company's Foundational Filing, including a revised Appendix C—Project List, summary of which is attached to this Stipulation as Exhibit A, satisfies all of the requirements of N.J.A.C. 14:9-10.4(b) and that the Board approve the Foundational Filing as modified by revised Appendix C. The revised Appendix C omits those projects originally identified by the Company as "DSIC-eligible projects" which the parties agreed to remove from the project list due to the projects having been completed during the Company's pending rate case.
- 3. The Parties recommend that the Board find that the projects listed in the revised Appendix C—Project List, summary of which is attached hereto as Exhibit A, are "DSIC-eligible projects" within the scope and meaning of the definition set forth in N.J.A.C. 14:9-10.2 and N.J.A.C. 14:9-10.3(a) and that the Board approve the Project List. The Company represents that the projects listed in the revised Appendix C-Project List only include projects that are scheduled to begin construction after the effective date of this Foundational Filing.
- 4. Exhibit C contains two project titles, Emergent Large Diameter Pipe Failures and Unscheduled Municipal Main Replacements, which by their nature are not identifiable by project ID, location, duration or specific description at this time. However, the Parties agree that the projects done in response to emergent large diameter pipe failures and projects done in response to changing municipal paving or other construction schedules are typically DSIC eligible, in that they consist of: water main replacement or rehabilitation; water main cleaning and lining; valve and hydrant replacement; service line replacement; and/or unreimbursed utility relocation costs associated with relocations required by governmental entities; are not revenue-producing; and are in excess of the Company's base spending, as otherwise required by N.J.A.C. 14:9-10.2 and

N.J.A.C. 14:9-10.3(a). The Company agrees to identify each and every project performed in either of these two project titles, provide specific project details (e.g. length, diameter and material of the main, project location and in service date, and project costs) and certify that the project meets the DSIC criteria as part of an appropriate filing with the Board.

- 5. The Parties to this Stipulation agree that the revenue requirement associated with the actual costs of the approved projects listed in Exhibit A be recovered through future "DSIC filings" made during the "DSIC period" as those terms are defined in N.J.A.C. 14:9-10.2 at intervals and in a manner consistent with the requirements of N.J.A.C. 14:9-10.5.
- 6. The Parties to this Stipulation agree that the annual "base spending" as defined in N.J.A.C. 14:9-10.2. is \$23,922,104.00, based on the information filed in the Company's last annual report on file with the Board (the 2014 Annual Report) at the time new base rates are expected to be set.
- 7. The Parties agree that the maximum amount of annual DSIC revenue that may be collected by the Petitioner is \$32,570,922.00, or 5% of the revenues expected to be set in the Company's current base rate case.
- 8. Adequate public notice of this filing, and the effect thereof, was made by serving the public notice by mail upon the clerks of municipalities within the Petitioner's service area, upon the Clerks of the Boards of Chosen Freeholders within Petitioner's service area, and upon the County Executives within Petitioner's service area, at least twenty (20) days prior to the dates set for the public hearings, which notice included and specified the times and places of said hearings.
- 9. Customers were notified of this filing and the effect thereof as well as the time and place of the public hearing by publication of the public notice at least twenty (20) days prior

to the date set for the public hearing, in newspapers of general circulation within Petitioner's service territory. In addition, customers were also made aware of this filing and the effect thereof by bill message included on customers' bills and by posting the entire Foundational Filing on the NJAWC company website.

- 10. Proof of Service of the Notice as previously referred to herein will be filed with the Board on August 27, 2015, which is the first business day after the public hearing.
- 11. The Parties agree and recommend to the Board that the Company's Foundational Filing, including its revised project list be considered by the Board at the next agenda meeting, scheduled for September 11 2015, which date is ninety-one (91) days after the date of the filing of the Company's petition and Foundational Filing. The Parties understand that service of the Board Order approving this Stipulation shall be in accordance with N.J.S.A. 48:2-40.
- 12. This Stipulation shall be binding on the Parties to this proceeding upon approval hereof by the Board. This Stipulation shall bind the Parties in this matter only and shall not be considered precedent in any other proceeding involving the Parties hereto.
- 13. This Stipulation contains terms, each of which is interdependent with the others and essential in its own right to the signing of this Stipulation. Each term is vital to the agreement as a whole, since the signatory Parties individually and jointly state that they would not have signed the Stipulation had any term been modified in any way. In the event that any modifications whatsoever are made to this Stipulation, each of the Parties hereto is entitled to certain procedures in the event of such occurrence.
- 14. If any modification is made to the terms of this Stipulation, the signatory Parties must be given the right to be placed in the position in which each Party was before this Stipulation was executed. It is essential that each party be given the option either to modify its

own position, to accept the proposed change(s) or to resume the proceeding as if no agreement had been reached.

- 15. The Parties believe that these procedures are fair to all concerned and, therefore, they are made an integral and essential element of this Stipulation.
- 16. This Stipulation may be executed in as many counterparts as there are signatories to this Stipulation, each of which counterpart shall be an original, but all of which shall constitute one and the same instrument.

STEFANIE A. BRAND, DIRECTOR DIVISION OF RATE COUNSEL

By:	
	E. McClure
Assis	ant Deputy Rate Counsel
Dated:	
NEW JERSE COMPANY,	Y-AMERICAN WATER INC.
Согра	H. Brabston/Alc t. Brabston rate Counsel
Dated: 8/	28/15
	FFMAN FORNEY GENERAL OF NEW JERSEY THE Staff of the Board of Public Utilities
By: Alex Mo	reau Attorney General
Dated:	

STEFANIE A. BRAND, DIRECTOR DIVISION OF RATE COUNSEL

By:	
	Susan E. McClure
	Assistant Deputy Rate Counsel

Dated:

NEW JERSEY-AMERICAN WATER COMPANY, INC.

By: Robert & Brubston / Lic Robert & Brabston Corporale Counsel

Dated: 8/28/15

JOHN J. HOFFMAN ACTING ATTORNEY GENERAL OF NEW JERSEY Attorney for the Staff of the Board of Public Utilities

Alex Moreau

Deputy Attorney General

Dated: 8/28/15

STEFANIE A. BRAND, DIRECTOR **DIVISION OF RATE COUNSEL**

Susan E. McClure

Assistant Deputy Rate Counsel

Dated:

NEW JERSEY-AMERICAN WATER COMPANY, INC.

Robert I. Brabston Corporate Counsel

Dated: 8/28/15

JOHN J. HOFFMAN

ACTING ATTORNEY GENERAL OF NEW JERSEY

Attorney for the Staff of the Board of Public Utilities

Afex Moreau

Deputy Attorney General

Dated: 8/28/15

New Jersey American Wrater Company, Inc. 2015 Foundational Filing

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9476	Horth Generaling Area	MENDEM	In Market fram Weter St. to Manufacthore Rg.	\$394,875	Replace	2.463	8	Duction Inter-	Uniterm	A United	United and United	3	the pad Reliability/Structural	2	9		2 2
5477	North Doorsting Area	BEINDER	Poul St. Prime Well St. be Minnes St.	\$301,000	Beplace	0101	8 8	Durtible Ives	Unhabem		Delinoven Undergone	1:	Try and Achies thy	2 5	92		91
247	Marth Operating Area	BELVIOURE	Fast Je- Well Street to end	\$42,300	Apples	1	8	Dectile iran	Changer		Unitrawa Unitrawa	1.1	After and feriabets	11	3 3		2 2
\$14	Huma Demoting Area	BEREILET HICHTS	Bertuley Hoghts - Painfield Are. Rom Valley to Herseldee Phote 2	\$610,000	Begrace	9,600	9 2	Dectile eras	19961	*	Cast hon	3	safety and herability	170	92	104	2
380	Nearth Openating Area	BERKELLT MENDATES	Bestalisy Heights - Painfield for from 400 horth of Lestwitting to Advanced in Aris	\$630,000	Replace	1,800	12.00	Destide Inge	19901	•	Cast was	1	letery and Achebany/Smuchard	971	ĝį.	T _B	91
12	HWITH Operating Area	BEAKLIET MEIGHTS	Serbetey Houghts. Plandeld Ave hom Valley to Harseston Plans 3	\$900,000	0705640	4,000	8	Duette iren	1960's	=	Ouctile has		abory and Bellebilly 3tructural	821	ğ	\$	=
8168	Merth Operating fire	BENEFIEV MEGNES	Berbeitry keegkis: Springfield Avenue from Central Amenie No Plandesti Avenue	\$1,054,350	Beglace	0.250	8	Ductile Iran	19901	•	Cast bas	3	latery and figherally/Structural	130	8		æ
6919	North Openstong Area	Be beculer outstoffs	Aphab Latting Clevilles mains in Barbay regitts	\$1,275,000	Apple	\$1,000	8	Cutings	19801	•	Cast from	3	Sphythesia Bellebally Shuther	130	OUL		2
6449	Menth Operating Area	BEREILEY MENGATS	•	5381,000	Replace	1,405	8	Ductile ires	1946	*	Cost from	1	Selects and Reneality/Structury	3	8		2
000	Marth Operating Area	PROPERTY NEWSON	Dertustrice (or Process Administration Access to good tage	2463,000	Replace	1133	8 8	Ductile from	1930	• •	CASE INON	3 3	The send Reinstalling Structural	2 5	9 5		2 :
2	Starth Operators Area	GENERALET MEIGHTS		549,879	Papilace	#	8	Dectile iron	1960	•	3	13	Safety and Rehability/Structural	2	3		2 2
1643	Month Opentiting Aves	BERRELLY MENGATS		8171300	Replace	98	9	Ductife iran	396	•	CHES	3.	Thy and Rebability Structures	021	100		9
1 2	Hearth Operating Area	BEARELLY MEGATS	Cegnissed Lane man Meantain and to Langer Lane Landes Lane from Desirated Lants Lonathe Dr.	\$389,000	Berolece	1.646	8 8	Decide man	1000	• •	Caning	5 3	ANOTY SAID RESIDENCY STRUCTURE	2 2	9 9		2 2
20.00	Narth Operating Area	BENKELET HEIGHTS		\$133,000	Berblace	640	8	Ductine less	1940	•	1	À	Lafory and Ralushdry/Structural	19	OF.		2
44.97	Marth Dpereong Area	BRAKELLY HORGATS	Balley Any Trans Cana Proce to Yabre VgPt-4.15 Aprilhamps of Prydram (1981-1-6.7	133,000	Aephace	415	8	Ductio tran	1940	*	Cost Pos	7	stram flows and Prysoles	170	110		01
8448	Nerth Operating Area	MAKEUT MEMIS	estables Ave from Timber Or to Forn PI	000'8475	Beplace	2,345	9 00	Ductile Iren	19501	•	Chrt kee	Mea	hanse Quelley	130	T C		92
6433	North Coenating Area	BE PRELET HEIGHTS	essing then Land M Trom Mauritan And up right thin Lane	\$174,000	Poplace	878	8	Ductille Inten	19701	•	CAR INDA	3	Selemy and Retablishers/Structural	971	OB.		2

Now Jersey American Weter Conguny, Inc. 2013 Foundational Filing

						Parent C 4101											
w	Dretries	Municipality	Project Title	MIXIN Fonded (defiant)	Project Type	Proposed Sangth (foot)	Proposed Dis. (Indies)	Proposed Pipe Meterial	Docado Installed	(a. Diq. (buthor)		Agalessed Albert Investment Conspany	Project Duration	Estationard In Estates Parted	Previously Submitted for BPU Review	Rounded Weighted Supre	
6700	North Operating Area	BERKELEY HEIGHTS	Holly Glen Lane From and cap east of Helly Glen Lane 16 to Combinded Dr	\$126,000	Aepieca	630	8 00	Ductile Irgs	1950°e		Caus tree	System Flows and Pressure	130	100		10	
6701	Morth Operating Area	BERKELEY HEIGHTS	Helly Glen Lane 3 from Helly Glen Lane to Privat Ct.	\$792,000	Replaca	1.010	2.00	Durate Iron	1950's		Cast Iron	Water Guality	130	780		10	
6793	horth Operating Area	SERVERTA HEIGHEZ	Combridge Or from Mountain Are to Helly Glen Lone	\$156,000	Replace	780	8 00	Ductile Iren	1910'4		Coot bron	Water Quelty	110	TBD		10	
6703	fearth Operating Area	BEAKELEY HEIGHTS	Deep Dale Dr from Mountain Ave to and cap	\$106,623	Replace	1,135	6.00	Ductile tree	1930 0		Case tren	Salety and Rehability/Structural	120	100		10	
6704	tearth Operating Area	BERKELEY MEIGHTS	Tangerwood Lane from Deep Bale Dr to and cap	\$126,075	Replace	725	6.00	Durthe wen	2950°o		Cost tres	Water Quality	830	780		10	
6705	Nerth Carreting Area	BERRELLY MEIGHTS	Orchard Lane from Clid Form Rd to Emerson Long	\$351,000	Reglace	1,755	8 00	Quette vos	1850'4		Cast Man	Water Quelty	Lio	Tão		10	
8708	Morth Operating Area	BERKELEY HEIGHTS	Forest Ave from Park Ave to Colombus Ave	\$979,000	Réplace	1,845	8.00	Ductive iron	1950's		Cast Iron	Selleny and Robobility/Structural	120	780		10	
6709	Storth Operating Area	BERKELEY HEIGHTS	Laten Ct. from Ferest Ave to one cap	175.750	Replace	410	6.00	Outtle Iren	1950's	4	Cast tren	System House and Procesure	130	780		10	
6710	Rorth Operating Area	BERRELEY MEIGHTS	Cornell Ave from Mountain Ave to Hillcress Ave	\$315,000	Repute	1,075	8 00	Dructile from	1940's	6	Cast tron	Salety and Reliability/Structural	120	0.07		20	
6770	MALIN CAMBRIDGE INCO	Secretary mergers	BE RELEY HEIGHTS - Berkeley Are between Columbus	\$112,000	und Sentera	8,073		Publicat salar	1996.6		PRM NOU	Thursd and Intercounts/Stuffernar	110	100		10	
6766	North Operating Area	BERKELEY HEIGHTS	& Park	\$40,000	Analoca	900	4 00	Ductife tres	Unknown		Cost tren	Safety and Reliability	120	180		20	
6769	Storth Operating Area	BEBEELEY MEIGHTS	BERKELLY HEIGHTS - Berkeley An botween Park and Columbia	\$160,000	Replace	800	8 00	Ductile Iron	Unknown		Cast Iron	Safety and Resolutry	130	TRO		10	
6770	North Operating Area	BERETLEY HEIGHTS	BERKELEY HEIGHTS - Berkshirk Drive from Mouncom Ave to cocoment	\$360,000	Augiere	1,800	9 00	Ductée man	1950'0	4	Carl Iren	Safety and Ballutality/Structural	120	180		10	
8271	iterth Operating Area	BERKELEY HEIGHTS	BEAKELEY MESCHIS. Manuton Ave from Darmond Int. Ad to Park Ave	\$3,350,000	Reglece	14.000	12.00	Ductile Irgs	Unbown	6	Court tren	Safety and Retability/Structural	120	180		20	
6272	learth Operating Area	BEREELEY WEIGHTS	BEREZEE'S HEIGHTS - Park Ave from Euclid to Mountain	\$840,000	Replace	4,200	8 00	Ductals iron	1950'a	4	Cast was	Safety and Relability	120	180		20	
6771	Worth Deviating Area	SERECLEY HEIGHTS	BEAKELET HEIGHES - Park Av between Eutild and Proinfield	\$360,000	Arphico	2,800	8 00	Durtille Inen	Unio pupis	4	Cart Iron	Salary and Rehability	120	180		30	
6775	North Operating Area	BEAUCLEY HEIGHTS	BEREELLY HEIGHTS. Springfield Are the New Providence line near Union Are and the Long HER Two	\$2,117,500	Reprace	9,500	13 00	Ductile Iren	Untropom		Cast Iren	Latery and Railability	120	7016QA		90	
93	North Operating Area	BERNAROS TWP	Berneds Marthousile Read from Alon to Volley	\$200,000	Aegraca	1,300	8 60	Ductile min	1940's		Cost Wan	Solety and Rehability/Structural	120	Tap	Tes	10	
339	Rorth Operating Area	BERNARDS TWP	Bernards Turp - South Maple Ave, from Owens to Prespect	\$1,247,500	Aeplece	\$,100	12 00	Ductile tree	19874	13	Ductile fren	Safety and Rehability/Structural	120	180	Tes	10	
\$15	depith Operating Supe	BERMARDS TWP	Bernards Tury - Hoes Ad (between Stanehouse and Fond HIII)	\$840,008	Replace	4,300	6.00	Durtile iron	1950's		Cast tree	Safety and Balanday/Structural	820	180	Too	10	
5534	Storth Operating Area	SERNARDS TWO	Prespect Scorus	\$247,500	Replace	1,100	12.00	Ductile was	Unknown	SAME PARTY	n Unknown	Safety and Bobok Bits/Structural	120	TBO		10	
4182	tearth Operating Area	BERNARDS FWP	CREST DANYE	\$880.000	Reproce	1,900	8.00	Ductile from	1930'e		Cest Wen	Lefety and Relate Bry/Structural	110	180		10	
			Freidykone Sr from Meuristawn Rd to Merristown													••	
£163	Itenth Operating Area	BERNARDS TWP	Road	\$478,000	Raptoce	9,365	4 00	Ductile Iron	1956'4		Cast tran	Safety and Retability/Structural	120	480		10	
6282	trarch Operating Area		Addison Or from Archgole Ad to Worskib Long	\$319,000	Poplace	1.095	0.00	Ductile Iran	2346'1		Cast tree	Water Quality	130	teo		10	
6289	Storth Operating Area	SI RHARDS TWP	Franklin Dr. from Parliview to end cop	\$111,129	Replace	635	6 00	Diectifie Impin	1960'e	•	Cost wen	Lefony and Robotolony/Sifructural	120	TBO		10	
4784	Hortik Operating Area	BEAHAADS TWP	Thockerby Dr from Fand HIB Rd to Keets Rd	\$258,000	Replace	1,263	9.00	Ductile iron	1960'e		Card Iron	Safety and Rekebby/Structural	230	TBO		10	
6365 6286	North Quereling Area Scoth Geeraling Area	BERNARDS TWP	Temlerd Tarrisco from ON Cooch Rd to Victoria Drive Contex Dr From Mt. Jury Road to Gallosony Hill Road	\$\$77,000	Replace	2.885 1.710	8.00	Ductile iron	1960's		Cost from	Weter Quality Lefety and Remability/Structural	120	780 Teo		10	
6297	North Operating Area	SERMARDS TWP	Battle HIS Rd Rem Guren Anne Or to Favorer Dr	\$170,000	Replace	830	8 00	Ductile tron	194071	4	Cast Iron			777		10	
										•		Sofety and Rehability/Sinuctural	F30	190		10	
4398	Harth Operating Area	BERMARDS TWP	Gorald Are from Wasds End Dr to Sture Place	\$429,000	Replace	2.143	9 00	Ductile Iren	1960's		Cort Iron	Safety and Remobility/Structural	120	100		10	
4389	borth Operating Area	BÉRHARQS TWP	Weedstone Dr. from Paschtree Rd to Cress Rd	\$428,000	Replace	2,140	9.00	División desen	1940'0	6	Cott tren	Safate and Reliability/Skructure!	120	TBO		10	
8290	fronth Operating Ares	BERHARDS TWP	Renkin Ave from W. Henry Street to Coder Street	000,0062	Replace	1,100	8.00	Ductile tran	1960'4		Call Iren	Weter Quelity	120	180		20	
8291	Rorth Operating Area	BERNAROS TWO	Cordor Street from Renatis Ave to 5 Folloy Ave	\$113,000	Regiace	\$40	8.00	Buctile Iron	1960'4	4	Cast tren	Water Quality	120	EBD		10	
6292	Renth Operating Area	BERHANDS TWP	H Flatey Ave from Orchard Place to Mr. Dob Street	\$946,373	Replaca	4,315	12.00	Dwciffe Iron	2940'4		Card trees	Sefery and Besselliny/Structural	120	(SEE)		20	
6795	Harth Operating Area	BERHARDS TWP	Allen St from Lee Place to IV. Fodey Ava	\$186,000	Replace	930	9.00	Ductile Iren	1940's	4	Cert Iran	Action Greated	130	180		10	
6294	North Operating Area	BERHANOS TWP	W. Oak Street from N. Abward Ave to S. Finley Ave	1122,000	Replace	2,610	8 60	Ductile tree.	19900		Cast bon	Safety and Relability/Skinctural	110	180		50	
6295	Worth Operating Area	BERHARDS TWP	Manchester are from Prospect are to 5. Maple are	\$430,000	Arplece	7,100	82.00	Ductile tree	1940'4	8	Cost was	Safety and Behability/Structural	120	180		60	
6296	North Operating Area	BERNARDS TWP	Mt. May Road from P18 Hill Rd to Countrysler Rd	\$\$15,250	Replace	2,976	12 00	Buctile trops	1970's	4	Cost tron	Water Querry	120	TAD		30	
6312	Rearth Operating Area	SERMARDS TWP	MT ARY RO BETWEEN MEEKER AND STACY	\$142,500	Replace	1,700	12 00	Ductile Iren	2870's		Duttile Iron	System Flows and Pressure	120	Teo		30	
6649	North Operating Area	SCRIMAROS TWP	Lyons Piece from Lyons Ad to Valve VBER-2138 West of Hydroni HBER-730	\$915.000	Replace	1.575	0.00	Ductile Iren	1930's		Cast Iron	Water Quality	120	100		10	
6451	borth Operating Area	SERMAROS TWP	Victoria Dr Brom Konsington Rd to Polmerston Dr	\$374,000	Replace	3,376	8.00	Ducte men	1960's	6	Cast Iron	Auster Green.	320	180		60	
4432	Marth Operating Area	BERHARDS TWP	Grandle Way from Equality on Rd to Palmorston Place	\$337,000	Reptace	1.193	8 00	Ducthe Iron	1966's	4	Cast tren	System Flows and Pressure	130	180		80	
6454	North Deerstang Ares	SERNARDS TWP	Arrende Drive from Hilliam Rd to Lord Sterling Rd	\$774,000	Reglace	9,870	8.00	Ductile Iron	1960's		Cast tree	Safety and Rehability/Strectural	120	180		10	
6455	North Operating Area	BCRHARDS TWP	Sherwood De fears Land Stirling Rd to and cal	\$142,000	Replace	810	8 00	Ductile Iryn	1960's		Cost free	Selety and Rohebilly/Sinuctors	170	180		10	
6434	Storph Operating Area	BERMAROS TWP	Dury Lane from Sterweed Dr to Abserted Dr	\$100,000	Replace	900	0.00	Ductile tren	1960'6		Cost Iron	Sefery and Resolutity/Servetural	130	180		10	
		Address Street	Culberson Re from Spencer Rd to the end cap west of	# 104 apr	527				-444		- Control	Challe and the control of the controls	-5550			***	
6978	Worth Operating Area	REAMARDS TWP	\$ Abvert Ave BERNARDS TWP - Boots hid between Panish hid hid and	\$295,000	Rephase	1.475	8.00	Outsile from	1950%		Cast Iren	Safety and Rehability/Structural	120	180		10	
4716	Issael, Consusting free	RESMARKS TWO		1110-000	Banlaca	7 600	# 00	Court Sie Lenes	1968/v		Cast Inda	Enters and Bullability (Courts and	1 20	200		**	

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BPU Docket WR15060724 Stipulation - Exhibit A

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ч	District	dischipology	Project Title	MANY Fundad (do-Rorre)	Project Type	Proposed Length (Seet)	Proposed Dis. (Indices)	Proposed Pipe Material	Decade Installed	Ez. Dio. (Prehed)	Estating Pure Material	Assolvented About two solvent Colonyary	Project Durytien		Previously Bounded Submitted for BPU Review Weighted Scare
5838	Saythwest Operating Area	CAMOEN	Carndon Thompson Street Horth 28th Street to Horsh 30th Street	\$172,900	Replace	910	\$ can	Ductile tran	1900's	. 4	Cast Iron	System Flows and Pressure	820	780	30
5059	Southwest Operating Acce	CAMDEN	Comden: Roads 29th Street Pleasant Street to Mitchell Street	\$120,250	Regrace	675	9.00	Ductile from	1900's		Cast lege	Safety and Rehability/Structural	130	180	10
1843	Southwest Operating Area	CAMOEN	Carndon Rearth 28th Street Thorngoon Street is Cramor Street	\$128,000	Restoce	L200	9.00	Duciple wen	1900's	4	Cost were	Sefety and Rehability/Structural	120	180	90
3846	Southwest Operating Area	CAMPEN	Comden North Dudley Street / Mermon Street electh 90th Street to Federal Street	\$813.500	Replace	1,650	8.00	Ductile Man	1900's	4	Cost tron	System Flows and Pressure	120	180	30
3847	Southwest Opmoting Area	CAMBER	Caredon Church Street Versifield &venue to Federal Street	\$123,500	Replace	630	8.00	Ductile Irea	1900's	4	Cast Iron	System Flows and Pressure	120	THO	30
1845	Southerest Operating Area	CAMBEN	Comden - Harth 35th Street - Lemuel Avenue to Fabrica Drive	\$247,000	Asprace	1,900	9 00	Questio fran	1920's		Cost Iron	Salety and Reliability/Structural	130	780	90
1849	Sourcest Operating Area	CAMOEN	Comden Pethon Place - North \$2nd Street to Herth 34th Street	\$114,000	Regisco	600	8.00	Ductes was	1930'4		Cost Iron	System Flows and Pressure	120	180	30
3850	Southwest Operating Area	CAMPEN	Committee South 35th Street - Federal Street to Mighland invenue	\$190,000	Replace	1,000	0.00	Discussio tress	1920's		Cost tron	System Flows and Pressure	129	100	80
5058	Southwest Operating Area	CAMDEN	Comden Seath 33rd Street Federal Street to Highland Avenue	\$307,800	Regtuce	1,420	0.00	Ducthe tran	1930'0	4	Costeron	System Flows and Pressure	120	160	30
1014	Southwest Operating Area	CAMDER	Complex: Renth 87th Street: Westfield Avenue to Chestnut Avenue to North 38th Street	\$290,700	Aegraca	1.510	9.00	Ductile from	11301		Cost Iron	Salaty and Beautimity/Structural	130	TBD	30
1857	Sautifreest Operating Area	CAMPEN	Comden - North 18th Street - Harrison Avenue to Diver Avenue	\$251,750	Proproce	2,525	9 00	Ducche tree	1920's		Cost tron	System Flows and Pressure	120	760	20
5053	Southwest Operating Area	CAMDEN	Camdon - Stowart Street Housell Street to East State Street	\$123,500	Replace	650	6.00	Outtile wen	1920'4	4	Cast Iron	System Flows and Presoura	320	100	30
3960	Southwest Operating Bros	CAMDIN	Comises - Rever Avenue - Herth 27th Street to Herth 36th Street	\$800,000	Replace	4,000	12.00	Ducille tree	19004		Cost Iron	System flows and Pressure	120	760	30
\$041	Southwest Operating Area	CAMOEN	Common - North 29th Street - Reer Avenue to HCA-88	1484,300	Replace	2,550	4.00	Decthe was	1990's	4	Cost tren	System Flowe and Pressure	330	180	10
5862	Southwest Operating Area	CAMPEN	Comdon - hacite Street and South 26th Street adurtion Avenue by Fodoral Street	\$347,000	Replace	1,100	0 60	Ductile tran	1900's		Cost tron	System Flows and Pressure	120	180	50
5664	Southwest Operating Area	CAMDEN	Compan : Morriel Avenue : North 36th Street to Morth 34th Street	\$100,700	Replace	510	8 00	Ductely Iran	1930's	4	Cost tren	System Figure and Processes	170	160	30
1845	Southwest Operating Area	CAMDEN	Compan - Horsh Sitch Street - Montel Attenue to Resolub Avenue	\$110,750	Replace	625	8.00	Ductile tress	1990's		Cast fron	System Flows and Pressure	320	FBO	90
1044	Southwest Operating Area	CAMDEN	Compan - Rever Sevenue - East State Street to Morth 37th Street	\$608,000	Replace	1,300	12:00	Gottally Iron	1920's	13	Cost tron	Safety and Reliability/Structural	130	180	10
5967	Southwest Operating Area	CAMOCH	Cambon - Marth 35th Street - Morriol Avenue to Recedate Allence	\$110,200	Replace	380	9 00	Ductile was	10101	4	Cost Iren	System Flaws and Pressure	130	780	30
5000	Southwest Operating Area	CAMPEN	Comdon Recodule Avenue North 34th Street to learth \$5th Street	\$47,500	Restoce	350	8 00	Quettre from	1930'e	4	Cast #64	System Flows and Pressure	120	160	80
5069	Southwest Operating Area	CAMDEN	Camden Wayne Avenue - East State Street to 18th Street	\$152,000	Replace	800	9.00	Ductile from	19204	6	Cost from	Retection/Opportunity	120	100	20
3870	Southwest Operating Area	CAMDEN	Campon Buren Avenue -27th Street to deed and east of 19th Street	\$237,500	Replace	1,250	8.00	Ductifie tron	1990'8		Cast Men	Releasters/Opportunity	120	T80	20
5871	Sandhwest Operating Area	CAMDEN	Compan North 27th Street River Ave to 10" HOPS Inside 12" Cl or RR bridge south of Shermon Avenue	\$340,000	Represe	1,700	12 00	Ductile man	1100's	13	Cast Iren	Renocemen/Opportunity	130	780	10
1973	Southwest Operating Area	CAMOTR	Campen - Morth 37th Street - High Street to 10" HQPE Inside 12" Clar RR bridge near Pleasant St	\$3+0,000	Replace	F300	12.00	Ductille Iren	1900%	12	Cacl box	Belocation/Opportunity	120	TRO	30
3879	Smythwest Operating Area	CAMBEN	Commen - et 28th Street - Arthur Avenue to Concord Avenue	\$142,900	Regisco	750	6.00	Ductile Men	1940/1	2	Cartinan	Relocation/Opportunity	230	TRO	30
3874	Southwest Operating Area	CAMBEN	Consider St. 33th St sursting E* (N north of Herrison Ave to dead and south of River Ave	\$183,000	Pepleca	700	100	Ductile Iron	1900's	4	Cast Hen	Releases/Departmently	120	780	30
5875 5876	Southwest Operating Area Southwest Operating Area	CAMPEN	Comdon - Polit Ave - 27th St to 29th St Comdon - Tyler Ave - 27th Sr to 29th St	\$109,000	Replace Replace	1,100	6.00 6.00	Ductile from	1990's 1990's	:	Cast Iron	Relocation/Opportunity Relocation/Opportunity	120 120	180	10
3677	Southwest Operating Area	CAMDEN	Comdon - Martton Ave : 32" in Federal St to 12" in Recoment due	\$720,000	Replace	3,600	17.00	Ductile Iron	1920°e		Cast Iron	Relocation/Deportunity	120	180	30
3878	Southwest Operating Area	CAMPEN	Comdon: \$ 27th \$4 - 16" in Westfield Are to 12" in Morton Ave	1380,000	Replace	2,900	13.00	Ductile Iren	1920's	6	Cost tren	Retoursen/Opportunity	320	180	10
3660	Southwest Operating Area	CAMOEN	Comdon: E State St. Rever Airs to 12" morn south of volvo VCA-425	\$130,000	Replace	650	12 00	Ductile tron	1960,0		Cast tron	System Figure and Pressure	129	PRO	10
1661	Southwest Operating Area	CAMDEN	Comdon : Bergan Avenue : Entagut Avenue to Hayes : AVenue	\$484,400	Replace	1.340	9 00	Ductile Iren	1100%	4	Cost tree	System Figure and Processes	120	180	10

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	Ediptrict	Shunkipality	Project Tris	HSAW Funded (dellars)	Project Type	Proposed Length (foot)	Proposed Dis. (Briches)	Proposed Pipe Abportal	Double Installed	Es. Die. (Deches)		Amolerand Appet Investment Category	Project Durotien		Laborated but	Anunded Wroghood Score
1002	Southwest Operating Area	CAMDEN	Compen Beldeman Are Shor Aye to Cleveland Are and Cleveland Are from Boldeman Are to to 32nd St	\$294,500	Replace	1,550	8 00	Ouctile Iron	19004	4	Cost tren	System Flows and Presume	120	110		10
5884	Southwest Operating Area	CAMDEN	Compen: South \$24d Street - Fermant Ave to tegritand Ava	\$130,000	Aegrece	625	8.00	Ductile tree	1970's	- (4	Castiron	System Plants and Pressure	120	780		80
5485	Southwest Operating Area	CAMDEN	Comdon South Dudley Street - Federal Street to Frymont Avenue	\$265,000	Replace	1,500	8 00	Ductile tren	1900 s		Cost from	System Flows and Pressure	110	TRO		3.0
3496	Saythwest Operating Area	CANDEN	Comden Marta Street - Bard Blind to Resoment Avenue	\$323,000	Replace	1,700	6 00	Ductive Irpn	2940's	4	Cost trea	System Flows and Pressure	120	180		90
5007	Southwest Operating Area	CAMPEN	Common Cormon Street Moriton Avenue to Bond Shrd	\$294,500	Replace	1,350	9.00	Ductile tren	1900's	4	Cast Iron	System Flows and Pressure	130	100		30
1000	South-west Openishing Area	CAMPEN	Compen South 20th Street Federal Street to Morkeyn Avenue	\$148,200	Regisco	780	9.00	Ductile Iren	1900's	14	Cost Iron	System Flows and Pressure	120	100		30
5489	Southwest Operating Area	CAMBEN	Comdon Cooper Street East State Street to HCA- 204	\$\$7,000	Regiora	100	8 00	Ductile Iron	1930%	4	Cost Iron	System Flows and Pressure	120	TBQ		90
5091	Saluthwest Operating Arms	CAMDEN	Common Remongton Street North \$2nd Street to North 84th Street	\$114.000	Reglace	400	8 603	Ductate Iran	1930.0	4	Cost tree	System Reas and Pressure	120	Teb		30
5092	Southwest Operating Area	CAMDEN	Considen Rowe Street North 32nd Street to Marth 35th Street	3171,000	Replace	900	4.00	Ductile tree	1920%		Cast Iron	System Flows and Pressure	310	183		20
3091	Southwest Operating Area	CAMDEN	Conden Altiched Street - North 32nd Street to Herhi Sen Street	\$114,000	Replace	400	8.00	Ductile Iron	1930'4	4	Cost tree	System Flows and Pressure	130	TBQ		30
\$894	Southwest Operating Area	CAMADEM	Conden Recodale Avenue - Herth \$3rd Street to Morth \$6th Street	\$117,800	Replace	620	8 00	Ductile Hes	1930's	4	Cost from	Settem flows and Prossure	120	780		30
1095	Southwest Operating Area	CAMPEN	Comden Horth 35th Street Resouble Avenue to Federal Street	\$115,900	Replace	610	0.00	Ductile Iran	19101	4	Cast tren	System Flows and Procure	330	160		30
458	Soul Invest Operating Area	CAMIETS PONT	Compys Pamil 6-29% lock and Bare at Georgessian Road	\$800,000	Replace	L300	12.00	Ductife Iren	1960's		Steel	Retacemen/Opportunity	120	160	Yes	10
\$\$33	Southwest Operating Area	CAMMETS POINT	Corneys Peint Johnson Street Horth Breadway to Division Street	\$172,000	Replace	640	8.00	Ductile from	1920's	4	Cost Iron	Settlened Economic Grawth	110	160		90
5918	Southwest Operating Area	CARNETS POINT	Comeye Potet : Butch Street : Cookings Avenue to Corner Street	\$44,500	Replace	930	\$ 000 1 000	Duccille Iren	3000.4	1.23	PVC	System Flows and Prossure	130	201603	DEA.	30
34	Morth Operating Ares	CHATHAM TWP	Chathain - Rever Ad (Henry to Club)	\$240,000	Agglaca	3,300	8.00	Ductas nam	1950%		Cast wen	Safety and Rehability/Structural	110	TRO	Tes	20
1892	Harth Operating Area	CHETHAM TWP	Magne Street from School Ave to one	3170,000	Regiace	850	3 CD	Ducte Irea	1940's		Cost won	System Flows and Pressure	120	180		20
3494	Morth Operating Area	CHATHAM TWP	Lafeyette Avenue from Southern Strid to Pine Serest Clean and Line - Chiham Tirse Lafeette Sottem	1787,300	Regisco	9,300	13.00	Ductile tree.	1940'1	•	Cast Iron	System Flows and Prosture	120	097		20
3493	Morth Operating Area	CHATHAM TWP	approx. 23300 Ef of Cl meins	\$4,867,500	Rehob	29,500	6.00	Cast tree	1940's	4	Cast Iron	Weter Quality	130	101601		30
4440	tearth Operating Area	CHATHAM TWP	Green Village Rd from Meyersome Ad to DumpAe Ad	\$1,387,000	Regrace	6.910	8 00	Ducthe tren	1946's		Cost Iron	Water Quarty	120	180		10
6661	Marth Courating Area	CHATMAN TWP	Langua Trail from Shangries Rd to Lafayette Ave	\$412,000	Replace	2,060	0.00	Ductale tran	1950's		Asbertas Coment	Water Quality	120	0.87		10
6664	Storch Operating Area	CHERNAM TWP	Lafavetta Ave from Evro Street to Watchung Ave	\$466,675	Reptace	2,075	13.00	Ductile Iren	1940's	4	Cost tree	Safety and Rehability/Structural	120	180		10
4465	tearth Deviating Area	CHATHANA TWP	Southern Blud from Shungille Rd to Weadment Dr.	\$1,834,250	Replace	5.050	13.00	Ductile Iron	1340's		Cost Iron	Solvey and Reliability/Seructural	130	180		10
6446	Inarth Operating Area	CHATHANA TWP	May Drive from fees Avenue to Robert Dr	\$493,000	Asplace	2,465	8.00	Ductile year	1950%		Cost Iron	Water Guelly	120	190		30
6467	House Operating Area	CHATHAM TWP	Hungs Dr and Macovey Ave from and cop to Yes. Megican Ave.	\$765,000	Replace	3,825	8 00	Ductile tres	1960's		Cost Iron	Weter Cheldy	120	180		10
4441	Menth Operating Area	CHATHAM TWP	von Neuton Ave from end cop West of MCT- 216 to Macovay Ave	\$783,000	Applocs	3.925	6 00	Outtile Iron	1960's	4	CHITTON	Sefery and Resodery/Serurtural	120	100		10
4670	Irenth Operating Area	CHATHAM TWP	Wroadlows Dr from Cypross Rd to Long Hill Long	\$76,123	Replace	495	6.00	Durille tress	1960	2	Cost tren	Bystom Floure and Pressure	130	TBO		10
8675	storth Operating Area	CHATHAM TWP	Co exempt Re from the end can be l'arrequed Avenue	\$121,300	Replace	618	4.00	Ductile from	1950's	2	Cast Iren	Sestem Flows and Pressure	120	160		10
6477	North Operating Area	CHATHAM TWP	Edgewood Rd from Shungilla Rd to and cap asks of Invitant HCT-304	\$220,000	hoptoco	1,100	8 60	Ducte iron	1940'6		Cost from	Safety and Rehability	230	Tap		10
6478	Morth Operating Aree	CHATHANA TWP	Fairles Terroce from Edgewood fid to Chethem Baro Fairles for Interconnect 83	\$1.72.000	Replace	860	8 00	Ductile Iren	1940%	•	Cest Won	Selety and Balability/Siructural	120	180		30
6679	North Operating Area	CHATHAMS TWP	Magne Ave from School Ave to Lafeyette Ave	\$167,000	Peplace	815	8 00	Ouctile from	1940's		Cast men	Safety and Reliability/Structure!	120	180		10
6480	North Operating Area	CHATHAM TWP	School Ave from Floral Street to Maprie Street	\$170,000	Replace	850		Ductile Iren	1940'4		Cost tron	Safety and Rehadiny/Structural	320	160		10
4461	Inertin Operating Area	снатнам ТWР	hoe Avenue from Southern Blvd to Wetchung Ave	\$736,87\$	Replace	3.275		Ductify Iren	18300		Cast trees	Safety and Revaluates/Seructural	120	180		20
6682	Horsh Opereting Aree	CHATHAM TWP	Overteen fild from Fernadule Rd to Sandy HIR Rd	\$199,000	Replace	993	8 00	Dwctile Iren	1950's	2	Cast Iron	Solety and Resolutiny/Suructural	120	T80 .		20
4483	search Operating Area	Снатнала Тмр	Worwick Rd from Forndale Rd to Oak 163 Rd	\$253,000	Replace	1.263	0.00	Ductão from	1990's	6	Cast Iron	Wreter Quelity	110	780		10
6684	Morth Correting Area	CHATHAM TWP	Theretay Or from Seath Ct to Glammery Or	\$305,000	Restoce	1,525	8 00	Ductille from	1970'4		Cast fron	Water Quelity	120	180		10
6725	Horsh Operating Area	CHARMAN TWP	CHATISAM - Reling Hill Rd between Jouthern and Date	\$760,000	Asplace	3.900	8 00	Ductile won	1950'e	4	Cost tron	Safety and Reliability	120	780		10
6721	Starth Operating Area	CHITHAM TWP	CHATHANA TWP : Jay Aid from Southern Blud to the cut do-see	\$297,500	Replace	1,700	4 00	Ductile tren	19401		Asbesses Coment	Sefery and Refeability	120	TBO		30
6054	learth Operating Area	CHATHANA TWP	CHATHAM - Ormans Ad from col-de-sec east of Henry to deed and west of Mauricanada	\$400,000	Replace	3.000	9 00	Ducate Iren	Uniarus	6	Cáct Iren	Salety and Reliability	120	760		10

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2015 Foundational Filting Assessed Colombia BCS/2015

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м	District	Municipality	Project Title	SLIAW Funded (dellars)	Project Type	frepaint Langua (fort)	Proposed Dis- (Inches)	Proposed Pipe Material	Docada Installed	En Din. [Inst-on]		Actalorated Asset Hyspinions Category	Project Dereifen		Previously Submitted for SPU Seview	Rounded Weighted Score
6057	Hearth Operating Area	CHATHAM TWP	CHATHALE River Be from Southern to Possoic	3540,000	Replace	2,700	8 03	Ductile Iren	Unknown		Cast tree	Safety and Relubility	120	TBD		20
6661	Morth Operating Area	CHATMAM TWP	CHATICAIA Rover Rd Inpro Passant to 607 event of HCT- 160 (20007 east of Formant)	\$940,000	Replace	4,600	E 00	Ductile tran	Unknown	6	Cart Iren	Safety and Rehability	120	780		20
6865	North Operating Aree	CHATHMAN TWP	CHATHAM Alver Ad from Fairmont to Henry	\$740,000	Replace	3,700	8 00	During tren	Untrown		Cart Wen	Safety and Releasility	120	TBO		20
6895	Horth Operating Area	CHATHWAY THAP	CHATHAM Spring St from Lateyette to Date	\$200,000	Replace	1,400	8 00	Decide wan	1940's	4	Codt teen	Latery and Recobsity	110	TBO		10
\$902	North Operating Area	CHATHAM TWP	CHATTERNS Southern 8 hd from River to Shungsha	\$2,600,000	Replace	13,500	6 00	Ductile Inco	Unknown		Cast from	Safety and Reliability	110	3036Q4		30
127	Southwest Coursing Area	CHENCA HOST	Cherry 1981 - West / East Affend Evenue - Berkehire Avenue to Edgemoor Rood	\$722,000	Replace	3,800	9.00	Ductes son	3960'9		Cast trees	Safety and Reliability/Structural	130	160	Yes	10
810	Southwest Operating Area	дли увязир	Cherry Hill - Park Circle - Cherchill Read to Churchill Read	\$114,000	Asplace	600	4.00	Ductes tree	1950 ¢	2 9	Cast Iron	Sofety and Reliability/Structural	130	TBO	Yes	20
995	Southwest Operating Area	CHERRY HILL	Cherry NSI - Morris Drive and Morris Place - Lankaper Read to Springdate Read	\$794,300	Bagnete	4,390	8-00	Decide Iron	£960's		Cost Iron	Safety and Beliebby/Saructural	120	190	Yes	20
481	Sauthwest Operating dres	CHERRY HILL	Cherry HR - Guilland Rood - Croyden Drive to South Crogwoll Rood	\$475,000	Aeplece	2.500	0.09	Ductile eren	1960 e		Cost from	Solony and Belan-Sity/Strectural	120	TOD	Tes	30
483	Southwest Decreting Area	CHEMBA HAIT	Cherry Hill Lamp Post Lane Gatchouse Lane to Old Orchard Road	\$370,000	Replace	3.000	00	Ductile Iren	1966's		Cost Men	Safety and Heliobility/Structural	120	TBO	Tos	10
460	Southwest Operating Area	CHCHRY HILL	Cherry Hill: Use Lane: Hydtington Brive to Kings Petit Road	\$141,500	Replace	190	8 00	Swindle tren	1960's	Unknown	Cost Wen	Solony and Renobility/Structural	320	100	7m	10
465	Southwest Operating Area	CHEBBY HILL	Cherry Hill Provincesown Road - Ezesson Road to Old Town Road	\$\$70,000	Reproce	3,000	9.00	Outtile trea	1960's		Cast from	Safety and Rekability/Structural	130	110	Yes	10
437	Southwest Decreting Area	CHERRY HILL	Cherry Ind Parandpa Lane - Narrowgase Drive to Creativell Bood	\$414,000	Aspisco	2,400	8 00	Durille tren	1940'0		Cost tren	Solety and Resubdity/Structural	130	180	Yes	10
400	Southwest Operating Area	CHERRY HILL	Charty HEB: Phymouth Drive: Old Town Road to Salam Board	\$347,000	Replace	1,300	6.00	Duct te won	1940's		Cast wen	Solony and Retailably/Structurel	£20	TBO	Tes	10
489	Southwest Operating area	CHERRY HILL	Cherry Hill Horth Riding Drive VCH-6293 to Markings Boad (CR-672) - Rehading Loop	\$414,000	Replace	1.500	8.00	Ductile Iron	1960's		Cost Iron	Safety and Retability/Structural	120	TRO	Tes	10
490	Southwest Operating Area	CHICANY HILL	Cherry Hill - East Riding Drive and M-Shouse Lane - between scesson Reed (CB 471) to VCH 6298	\$760,000	Replace	1,900	0.00	Durthe trees	1940's		Cast tree	Sofety and Ballability/Structural	220	190	Tes	10
494	Southwest Operating Area	CHERRY PHIL	Cherry Indi Wayuda Orlive - Peartcraft Road to Old	\$209,000	Replace	1.100	6 00	Ductile men	1960's	4	Cast Non.	Sefere and Renebility/Seructural	120	780	Tes	10
9328	Southwest Operating Area	OWRRY HILL	Charry Hill Mana Court DIF Charlenn Circle	\$37,000	Regisco	300			1950%	2	Cart Iree	System Flows and Pressure	120	180		30
\$330	Southwood Operating Area	Chicago earl	Cherry Hill: Utah Avenue - Kings Highwey to Dead	\$87,400	Repipes	450	400	Ductile Iron	1960's	,	Cast Iron	System Flows and Pressure	320	180		302
1671	Southwest Operating Area	CHEMRY HILL	Cherry 998 - Coloman Swenue : Mapre Swenue te Dond End	\$76,000	Replace	400	6.00	Ductife Irea	1970°e	1.23	Coct tron	System Flows and Prossure	120	180		90
5491	Southwest Operating Area	CHERRY HILL	Charry HM. Charlesson Read (A) Project) - Burcraft Drive to White Cab Rand	\$69,400	Aepuca	260	8.00	Ductile tron	1960's		Cast from	System Flows and Proseurs	120	TRO		30
		7.2020.000	Charry Hill Bodford Avenue, Marcin Avenue; Holle		12022000		0000	120020000	1 22 22 2	1164	202100		A752	220		1857
1839	Southwest Operating Area	CHIEBEA MITT	Avenue, Graham Avenue, Sherwood Avenue Morcer Street to Hoddonfield Road	\$259,890	Regisca	1.365	4.00	Ductile Iron	19671	1	Cost tren	System Planes and Pressure	130	TBO		30
6417	Southwest Operating Area	CHERRY HILL	Charty Httl: Jeneweed Drive - Country Club to Levender Hill	\$150,000	Replace	800	0.00	Ductile Iron	Unknown	Uwkneud	n Linbegum	Safety and Reliability/Structurel	120	780		10
6418	Southwest Operating Area	CHERRY HILL	Cherry Hill: Queen Ann Rood, Sarweed Drive to Country Club String	\$920,000	Replace	1,675	8.00	D-ectdle tness	Unknown	Unknown	A Unknows	Safety and Rehability	129	160		10
7144	Southwest Operating Aves	CHEBRA HIFF	Cherry Hill Brior Road Off of Broatmend Drive Cherry Hill Horth Volleybrush Road, West	\$17,000	Aeptoce	180	4 00	Ductile Iron	1910%	2.25	Cast Iran	Sofery and Rehability/Structural	120	TED		30
7371	Southwest Operating Area	CHERRY HILL	Velleybrant Rood, Valleybrant Court - Hoddonfield- Berlin Rood (CP-565) to Asbrank Road	\$725,000	Replace	3.800	9 00	Ductile wan	Unbnews	UABARNA	n Unkapum	Soloty and Reliability/Scructural	130	TBO		10
7173	Southwest Operating Area	CHERRY HALL	Cherry HIB: Portidge Lane EAST: Cropwell Road (CR- 675) to Portical Strine	\$43,500	Agplace	8,460	0 C02	Ductile tree	Unbown	Unknown	n Undnown	System Flows and Pressure	120	160		10
7174	Southwest Operating Area	CHEMBY HALL	Cherry Hill: Portidge Lana WEST - Powischer Dreve ta- Brick Rose	\$47\$,000	Reptoce	2,500	8 00	Duckée Iron	Unknown	Unkapa	n Unbhown	Solety and Rehability/Sarvetyral	130	TED		10
7176	Southwest Operating Area	CHERRY HILL	Cheery Hill Dynall Bury Rymal Torrace; Bymall Place Partridge Lane to Partridge Lane	\$310,400	Reptace	2,920	8 00	Duttile Iren	Unknown	Unhann	n Umbrayan	Solety and Relability/Structural	120	180		19
6280 6337	trotth Operating Area trotth Operating Area	CHESTER BORDUGH CHESTER BORDUGH	Route 306 well line explacement Clean & line Cl many to Chester Borquets	\$270,000 \$3,250,000	Replace	1,910	8 00	Concrete Ductile from	1940'4		Cast tran	Safety and Reliability Wester Quality	120	TB0		20
347	Southwest Operating Area	CHANNALION	Consmission - Golf Road - Grannward Avenue South	193,000	Represe	500	6.00	Ductile Iron	19304	4	Cast tree	Select and Reliability	120	160	701	80
496	Southwest Decrating Area	CIMPLABITISON	Consmission - Reverties Road and Chathers Court - Wayne Drive to Branch Prins	\$465,000	Replace	2,660	8.00	Ductife Iren	1940's		Cast Iren	Safety and Reliability/Structural	120	TBD	Tes	20
523	Southwest Operating Area	CHHIALMIN SON	Cinnarithsea - Hersh Pempess Avenue - Saver Road to Delaware Avenue	\$76,000	Replace	400	9.00	Ductile Iron	Pre-1900		Galvanteed Stool	Solety and Relability/Structurel	110	TBO	Yes	30
304	Control Operating Area	CLARK TWP	Clork : Arladyson Hill Road - Cleaning and Lining	\$750,000	Retab	10,000	6 00	Other	19253		Cast tren	System Flaus and Pressure	120	TRO	Yes	20
636	Cantral Operating Ares	CLARE TWP	Clark - Territoral Average	\$60,000	Replace	340	16 00	Ductile Irea	Uninqua	16	Ductile iron	Sofety and Rehability	120	180	Yes	•

Page 2 of 40

ce proc strug																
00		001	920	energy bes twell matty?	344	t	19161	Own patraco	00+	37000	pacidag	00070483	Cantimetron Sedal Court Hermanitem Way to Dood End	THE HOTOMATIAN	early gross responsively.	1009
04		CBL	110	enutered bits smooth mesterd	344	2	*0166	And selected	00 P	Oto	polyned	005'\$8\$	Lestempton - toni Chila - Methyshem Way to the methyshem Way	TWT HOTHWATZAS	seria grate regió tramines?	0009
06		COL	art	emeter's but ever's methy	344	1	1810.1	Dective Hee	00 #	900	820pR4g	000,422	Deed End Less Ends Dring Deep Deep Deep Deep Deep Deep	TASTAMPTON TWP	serif gedenness innernituos	2355
66		CRL	625	Selective Trymbles & bee yield.	344	t	TRUST	Course trees	00 P	051	gabjeca	005'685	End or eving trans, Lanco trans or the bead for	WAT HOPMATZAS	tary Best sedi standard	2000
96		481	330	granteed the empty analysis	204	t	1970%	During tree	00 0	330	AvaignA	005,54\$	Bood of every eventsimes - Pryco.2 areas - mesternations Book	WAT HOTHWATZAS	dank gelteredd tresented	1446
04		Oli	110	assessed has parel materil	344	t	1030.0	Ducting Hon	00.0	1'300	getteen	\$316,000	Estampson - Darby Circle (West) and Dorby Circle (6.815) : Knightsbridge Road to Knightsbridge Road	ewy HOTHMATEA)	Series (See Street	2005
96		COL	art	enuctors has ever's merity?	344	1	1,0161	Ductio hos	00 >	200	gebjeca	000'58\$	Sectamphon Bodistd Comp Hothinghom Way to Dood End	WIT HOTHWATZAS	serk protected mendant	1445
39		091	130	STATIONS SHOWS SHOULD THE STATE OF THE STATE	C958 (k.6w)		1870.9	DATE HOM	8 00	540'1	604y64y	2378 000	E let 40 Athant E. pust norganicalvi. H	PUNKEL (N BOROUGH	Control Operating Area	7000
90		681	130	AMERINA PRO TAMBLE INSTITUTE	UB4 1693		(proving)	DRICKE MEN	00 0	166	evertery	S118'equ)	Orange St. New Morkes de S. Westington.]	HOROWOR WITTING	Control Described Aves	6469
45		COL	130	SAMPLE LIBERT SHIP SHIP SHIPS	Win HET	1	1930.0	DACING NAM	00 8	1313	publics	2366.A00	One Partmery (New Adelets to Meeple)	DOMETTEN BOWONCH	Canal protection faces.	8569
30		001	130	symmany pure tomograments	V94 H53		8.0241	WAR HERMO	8 00	1710	avelded	2337,500	Mediton Ave. [Round to 1919)	HISTORIOR NETTENNO	Control Operating Area	4669
92		001	130	ametald pur small waters	V64 2943		1930.8	Decore has	00.8	\$80°1	429y889y	008,4868	following fourth co List?	наложов изтанла	stry Busested (essue)	1447
30							10161	ANN METAN	00 \$	1,611	esenden	1111100	Fairway Ave. [Walingt to Contex]	MOVOROR MILITANGE	Contral Operating Avea	5849
		COST	130	sheered bee evert month	Cost tree		1,0161	AND SETTING		\$29°E	gangey	5115,800	[working as wearing on at 175 and	DOMESTICAL BONDONCH	cont grittered levens	1449
95		OUT	021	awatters has rugts marry	444 516.3	•			00.9				IN St. I IN Waterbarr to Dead End]	HONOWOR HETTEN	Carteri Operated facts	E849
30		CBT	011	enutser! but could mercy.	Agel Ibd.)	,	1200£	OWERS STORY	00 0	2,529	energed.	000,2022		M99120	SETA SWITHHAD HEW-Flood	607
10	501	cart	130	Parachene Metablish and Principal	944 HP)	EE.	1,0561	Ned HEING	00°11	T290	enelosii	\$100,000	Mancacan Croos HG Cranning	MAN 150	SEAS SWINNESS SPRINGES	604
	104					-							To been the transfer so trainer at become of become	TYRO	DELY BURE HARD (\$1000)	5605
10		MOSTOR	011	Welet Cuelty	less betweeleD		13+0.0	ment sittswick	00.8	\$59	acoptag	2130,000	Ment Jeed ove northalf themosologic motification		CARTIL Operang Area	205
30	Ten	903604	130	Solvey and Roleandy/Scructural	Gelinosized Seeel	t	1,00%	Ductine Nee	00.11	300	anahqe#	2140,000	neergraf on exactly ment, box basinkes -lead.	DIAL	Casetal Operands Area	
30	80A	301604	130	Saleny and Multiplicy/Scructures	foot between b	I	1,00%	men elmud	12 00	1,000	oneyday	\$130,000	BOE-TOM of boowneld mays god, spillett -4400	7710		285
90		COL	130	Streem from the treets	A84 1363		1900,0	Sucrisio financia	8 00	919	gebyben.	\$163,600	Buchanan St. (Centerwish to Bood End.)	ENVERONMENTS	Central Operating Area	9949
04		CST	011	distribute the county matter?	C911 StBW		1950.0	Deerso how	00.0	1,364	Paplets	006.1 118	(neighber 92 blobfiel) 56 andersa.)	WAY DRO INANO	Central Operating Ares	1949
90		CBT	130	enversely bee empty material	report feet.)		1950.0	man anthwa	00 0	118	Asalgon	000,2212	(months of Clark to Country)	CAMPIORD TWP	Control Operating Area	9949
90		CST	110	System flows and Presums	COM Bron		1920.9	OWITH BELLEVI	9 00	1993	polipoca	000'666\$	Crave thy. (Mondell to Collins)	AWT GAGTHARD	Cantral Operating Area	4949
96		CAT	130	SHEEDING POR SAMPLE WASSING	CHII MAN		10161	DAKING MON	8 00	196	410984g	005,5112	(name) and as elected) . NeT eddly	CHAMMORD TWP	Constitution Operating Area	5969
30		OHA	get	process I had swort masters	Cost Non		1,0961	Drickly base	00.8	3,506	grouding	002,4152	Evergine St. (Facilitated to Locardinan)	CHYMNOSD LANA	Control Opposement Area	1949
20		OBT	021	Services from the section of the services	VBH 1897		10101	DOLDE MAN	001	3,812	and a september	CD0 7496\$	(prograves on program) 16 Agricu	CHANT CRO TWA	Course Obsessed year	0969
30		OST	130	SUPPRIEM DAG SWEET MARTER	984 1983		10001	DAKAN MAN	00.9	1111	ponday	008,7953	[Northern da nammed) and amplicate).	CHANGING TWP	Christic Obsessing Seaso	6549
20		OFF	130	enusery bas could marry?	Chilbren		1820.0	DAKING BANK	00.8	100.1	podyday	2335'900	It (embleme Dr. (Channer Lang to Cemberne) III	CONNECTION TWO	CANTAL CONTRACT ALES	9549
				amenand has exual merry?	CHILDRA		1890.0	WR4 041390	00 8	476	414)64g	5183.800	Londor Ave. [Colong to Pt. Union]	CALAMADAD TWO	CANCER OBSTRACE AND	4549
30		OUT	130		Walter)	1000	1830.0	MAY SENAG		062.5	gabpeca	2218,000	[SHE BASHO AN TONNINE] ALI PALO	4ML GIGHNAD	Charle Operation Area	9549
QE .		CAST	130	erustered has raceful matrice.		•		ment setting	00.6	901,8	Azéréeu	2621.600	Familiary of Calengrapes by W. Uncome	CHAMICALD TWP	Control Operated Aves	6822
90		COST	130	Proceed has eved mained	Cast Ires		1330.0		00 0				S. United And J. Learning on to United St.	WAT CHO WALLS	Seek Seekset Street	1543
30		GST	130	grammer & has empts energy &	Cast Impn		1100.0	Agrille Irea	60 1	101.8	Rophoca	000.0642		CVPHLORD TWP	Contrat Operating Asso	1549
et		GST	110	System Flows and Proseure	COR NO		1,0641	Ductile wee	00.8	1,840	modes	corence	[and brefrest) or and agnard) mot retranslative	COMMINDED TWP	Christi Operatory Area	\$100
96		OFF	130	Beneticial free toward matching	wia HP)	13	1900%	neri med	00 11	E458	darek	969,596,13	(Minelinetis) of his little employ), and it hold		Control Operating Area	7888
30		001	120	shusserd bna awai's messy?	MONTHAN	t	1220.0	ment extract	00.8	215	polyday	258,762	(bed) beed of all ered) 13 areals/	SWIT GROWINGS	Cantrid Operating Area	2000
30		190	130	ewater4 has swell matry t	464 1163	I	\$420.0	MINT DETTAND	00 9	310	Begince	228,000	(bn3 besd at .bh eisbéann). It slabéann	CHAMEORD TWP	Cantral Counting Area	1199
02		084	130	messery has read mony?	966 1163	t	1.0561	Curtibe Inem	00'9	\$4	434464A	\$29.91\$	(bm3 bdoG or) .euch enemt)	PART GRO MAARS		
90		COST	130	ewerry his swaft matry.	Med 1003	9	1,0961	Ductile Iven	00 8	908	424164g	21017200	(exercise or sustaint). Lift nedevoted	WAY MALD	Control Operating Area	9904
30		DOT	130	mustard bed swell melty?	UBUS 100'S		10161	Selvanted Steel	OULT	1,141	Bagbles	2756.725	Weinut Ave { Newhole Dr. to Morence Dr. 1	CLAMIL TWP	Control Operating Area	6807
90		GOT	110	antesoup pur smart messel	Cost mon	9	10161	Ducting mon	00 1	1,700	esetge A	\$940,000	How sence Da.	CLAIM TWP	Coming Benning News	1304
30		GBT	021	processed bine award mydour	V443403		1.0961	Duttile man	00 9	926	# spieca	040,122	Girent Dr. (Cat-de-tot #2)	THAT MAIN	Control Operating Area	8400
30		COL	130	sunstand bee emply matty?	Per byn		1.0041	Dutte Hon	00 9	\$02	Replace	210,462	Chross Dr. (Cut-00-102	CTANK TWP	Communication (Series	4109
30		190	110	surreus gross and published	W44 1993		1200.0	DAKERS WAR	90.0	8183	propiday	2397'eop	I HISSAN HAND ST ATERNY SAME WAREH HOSTIN	CTVWC 1MS	Complete Secretary Ares	9249
ot		CST	130	proceed and event morest	V04 1107	,	1240,4	MAN BETTANO	00.0	1.939	proplete	000,1062	Annual of Late to Shanchdge ?	WAT TANJO	Control Coperating Area	6449
30		280	130	success pur smell messys	CHIEBBA		P.D541	ment extract.	00 8	928	greyony	4168.200	4 egint that at moved) gave amount	CLARK THIP	Control Operating Area	PC69
30		COL	120	System flows and Processes	CAR MAN		10761	DACKS NAM	00.8	17812	grayers	ODD. ETER	KACHIYA BC (WOSTROID IS DOOR END)	CLAKE TWP	Contra Operating area	6100
90		COL	230	Shitter for the fact methy	Cost 2000		1,0541	Doctor brow	08'8	09'9	godydog	2138'000	Grand 3r (branc do Dood Ind)	CEVER LIMB	Control Opposited Area	6760
90		CB1	120	eventer fant awars messys	V94 3443		1,0141	DOLLING MAN	00'8	TILL	and property	2525,000	Georgian Sr. 6 Sout to Sharmood)	CIVER LINE	Control Desirand Area	6469
33		691	120	Sufferent Bod streets weekle	VB# 2007		1920.0	Dutche wen	09.6	1943	gebrece	009'96'53	[Thristoff of Thronout 10 panessed	CLASS TWP	Control Operated Avea	0.69
20		der	130	aversary pue seeds weeks	999399		# Conti	DACING NOW	00.0	4587	Apendan	00811485	Collegewen Rid. (Summer to Lament)	CLAIM THP	CONTRACTOR OF STATE	6769
30		910	130	enulated has eved I metage	wind the l		2220.1	Decise sen	00.0	606	404pkby	\$184,000	Chaust No. (Schooles to Blobs)	ANT MALD	Court Designed trees	P242
62			130	student bra todal maket	Chitable		1900.1	Ower by	00.6	17900	470y64g	1361,600	Able 64 (Colderen to James)	COME TWP	Control Operating Area	4949
		ORE					1910.1	CHI ban	00.8	22,000	Study	52.650,000	Rever & Surresco	SUMMER TARP	Combined Manual	8499
90		ORT	130	stactored first recell metrys	(61) ben (53) ben		1970.0	nerd then then	12.00	1117	esouth	001,88h2 000,028 £2	(.Pl Burned at filts needplut } and blotterwy	CLANK TWP	Control Operating fares	6613
DE		190	150	entered has read mater?	and Ma)		- thfat	and silved	00 11			904 0073	. To be a second			****
medicad been	-	poped	*******	Ambury	revendors.	(terepal	pograve	Phillips	property	(reat)		(maliab)		02/02/03/03/		325
behved roos bedeet	tel barrandez	golvete at	Deland	Innertherni Joseph belanskynik	odia Branca			self besservi		Control	self trepped	DODUCT MINING	BIRT Project	Elitopichwid	ENALANCE .	m
habe-all	Assessed	-	malant	The same of the sa		-HI 8	4			Present		* . A				

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New parsey Agnostran Water Company, tro 2015 Foundational Filing

Stipulation - Exhibit A

w	District	Municipality	Project True	tsshir Pended (dellers)	Project Type	Proposed Longth (foot)	Proposed Dis. (Indho)	Proposed Pape Majorial	Occade Installed	En Die (Inches)	Essetting Plans Motortal	Agrolospeed Appet towestyment Category	Project Digretion	Erimonad in Barrica Parted	Previously Submitted for BFU Review	Rounded Wedgeted Score
6002	Sautherest Operating Area	EASTAINPTOR TWP	Eastampton - Prince William Court - Mortinghom Wey to Dood End	\$17,000	Rapiaca	800	400	Ducthe Impri	1970's	2	evc	System Flows and Processes	120	FBO		30
6001	Southwest Operating Area	EASTAMPTON THIP	Esstaington - Stafford Court - Nottingham Way to Dood End	144,500	Regions	350	400	Daride trea	1970'8	1	PKC	System Planes and Pressure	120	TED		10
6005	Southwest Operating Area	EASTAMPTON THP	Cottompton Employ Court Employ Road to Employ Read	\$44,500	Replace	250	4 00	Ductifie from	1970%	1	PVC	System Flows and Presoure	129	180		90
4006	Southwest Operating Area	EASTAMPTON TWP	Eastempton Beninck Court Nettingtion Way to Dead End	\$93,000	Reptace	\$00	4.00	Ductile tree	1970's	2	PVC	System Flows and Pressure	120	180		30
3337	Constal Operating Area	ENSONTOWN	Estamown Locust Ave Main reprocement	\$102,000	Replace	660	6 80	Durisle was	1940's	2	Galvon rad Stool	Safety and Recobing	120	190		19
6419	Southwest Operating Area	EDGEWATER PARE	Edgewater Forb. Chente Ave. Frontillo Ave. to. Vireshington Ave.	\$190,000	Replaca	1,000	0.00	Ductile trea	Unknown	Unknown	unterna	Earlety and Reliability	120	TBD		10
7192	Correct Desisting Area	EDISON TWP	30" Valve Replacement @ Oak Tree Facility	\$42,000	Replace	1	30 00	Ductile trem	Desirance.	Unknowe	Unbagun	Safety and Rebability	110	160		10
114	Coastal Operating Area	EGG HARBOR TWP	Egg Harbor Two - Cordove Ave Boy Dr Bit. Horse Pine	\$112,500	Applace	410	8.00	PVC	3920° c	1	Cohonized Steel	Safety and Relability/Strettyral	170	CST	Yes	10
137	Cooked Operating Area	EGG HARBOR TWP	Egg Horbor Torp.: Totade Ave. Bay Dr 8th, Herse Ave.	\$93,750	Reptoce	375	0.00	PVC	1920'e	1	Galverand Steel	Safety and Researchy/Structural	130	190	705	30
6941	Coastal Operating Area	EGG HAREOR TWP	Longdott Somers Point Ad Browson Laurich Ave and 800" asst of Anchorage Dr	\$800,000	Replace	3.100	12 00	PVC	1970's	20	Ductifie Iren	Solvey and Behanday/Structural	330	180		30
7211	Countal Operating Area	EGG HARBOR TWP	Zon Rd Gradge Phase !	596,340	Replace	720	12.00	Ductile tree			triffend Selected	Safety and Reliability/Security as	120	1016Q3		10
168	Costal Operating Area	fam haven	Weedland Dr.: Revet Road to Lindon	\$900,000	Anglece	2,000	£ 00	Ductile tres	19974	1	Golvenged Steel	System Flows and Pressure	120	2016Q4	Yes	20
570	Coastal Operating Area	FAIR HAVES	Brookside Ave - Weedkavin to Undon	\$120,000	Replace	800	8 00	Ductile wen	39901	2	Cohenized Steel	System Flours and Prossure	120	3036Q4	746	20
578	Courtel Operating Area Countel Operating Area	FARHAVEN	Milde Pt. Buena Vieta te terminus. Farmon Strost - Cadar to Honce Ave.	\$105,000	Replace	700 1,500	8.00	Ductile Iran	1950's	2 2	Galvenired Steel	System Flows and Pressure Selety and Remobility/Structural	120	3015Q4	Yes	30
705.2	Constat Operating Area	TAIR HAVEN	Tysen	\$113,000	Rehab	260	6 00	Other	1950'4		Cast Iren	Water Quelty	120	101402	784	30
7333	Coastal Operating Area	FAR HAVES	Weedland Rd	\$109,080	Replace	404	8.00	Decthe tree		one Select	trimone Selected	System Flores and Pressure	120	3014Q4		10
7316	Coastal Operating Area	FAM HAVER	Chestnut Scroet Algen Replacement	\$142,500	Replace	950	8.00	Ductile lines	1940'¢	1	Cost from	Mater Orestal	120	201604		10
7219	Constal Operating Area	FAM HAVER	1 pt Si Moin Replacement	\$187,500	Replace	1,710	6.00	Cost won	1930°4	2	Cast from	System Figure and Presoure	120	2016Q4		30
1488	Control Quereting Ares	COOWWAT	Paterson Rd.	\$671,000	Reproce	2,356	\$ 00	Ductile mon	1970 1	4	Cost tran	System I tops and Pressure	150	201603		20
5499	Central Operating Area	FARWOOD	Forest Rd. (Bow. Shankrose and Shidway)	\$173,000	Reptece	1,341	8:00	Ductée tree	39304	•	Cost Iron	Sestem Flows and Pressure	120	3016@3		30
5440 6411	Central Operating Area Central Operating Area	FARWOOD	Farmend Distribution System Improvements Inserts Ave. Serrit Rd de Minimov 1	\$16,681,000	Base Project Replace	6,300	14.00	Cost Iron Ductile Iron	1920's	34	Cast from	System Flows and Pressure Solety and Rollsadilly/Structural	120	180		30
7001	Control Operating Area	JAMWOOD	Booch Ave. (LaGrende to South)	1109,200	Replaca	F884	8.00	Ductile was	1900's	-	Cast tree	System Flores and Pressure	170	180		20
7001	Control Operating Avec	6AMMOOD	Surna Wray (Jeelen to S. Morting)	\$312,200	Replace	2,341	9 60	Cast Iron	1970's	- 1	Cast Iren	System flows and Prosure	170	100		30
7004	Control Operating Area	PANWOOD	Paress Rd (Midway to North)	\$767,000	Aspuce	2333	8.00	Ductile Iran	1910's		Cost lega	System Flows and Pressure	130	IBO		20
7003	Control Operating Aces	FARWOOD	Record Rd (Midwey to Horth)	\$400,400	Replace	2,002	8.00	Ductile Iron	1990's		Cast Iron	System Flows and Pressure	130	780		20
7006	Central Operating Area	FANWOOD	Woodand Are (N. Mortino to Dood ond)	\$412,400	Replace	2.113	8 00	Outtile Irea	19971	4	Cast Iren	System Flows and Procure	120	TBO		20
6214	teorith Operating Area	FARMULE	DOUGLAS RO	\$900,000	Regisco	4,500	8 00	Ductile Iren	Unknown	3	Cast tren	System Flows and Pressure	130	780		20
21	Control Operating Area	FRANKLIN TWP	Franklik - Irossau Streetfrom Griggs to Fort	\$42,000	Reptace	380	9.00	Durche Iron	Pro-1900		Cott tran	Sefety and Reliability/Structure!	120	TED	Yes	10
23	Central Gentoting Area	FRANKUN TWP	Frenklin Fart Streetfrom Codor to Hossau	\$112,500	Replaca	730	0.00	Decine was	Pre-1900	6	Cost from	Salety and Retail Bry/Structural	120	180	Tes	10
5283 5659	Control Operating Area Control Operating Area	FRANKLIN TWP	Frenklin Twp. Warcy Street Griggs \$4 to Resid Laurel Avenue B* Résim replacement	\$310,000	Replace	3,240	8 00	Ductile tren Ductile tren	Unknown 1936's	E E	Cost Iron	Solety and Renobility/Structural Solety and Renobility/Structural	120	CST		10
7018	Control Operating Area	FRENCHTOWN BOROUGH	10Tis Street Blain Replacement	\$85,000	Replace	360	800	Ductão was	1990'4	1	Garventzed Steel	Salety and Relability/Structural	130	2016Q1		10 10
8936	Casstal Operating Area	GALLOWAY	Mess Mill Road between Rt 9 and Lake Meone (Millant Smithville Parking)	\$114,000	Rappos	370	16.00	Ductife Iron	1950's		Cast was	Safety and Retrability/Structural	120	THO		20
307	Corneral Operating Aces	CARWOOD BOADUGH	Gerwood/Cronford Rehab: Ph3 25000 LE of Distribution makes 3 of Unions Fork	\$1,875,000	Betab	25,000	6.00	Diher	1970's	4	Cast tren	System Flows and Pressure	130	160	Yes	20
306	Control Operating Aces	GARWOOD BOROUGH	Banwand/Granierd Rehab: Ph4 23000 EFef Distribution mains N of Unami Park	\$1,735.000	Renes	31,000	6 00	Osares	1970'0	4	Cost tree	System Flows and Pressure	110	790	Yes	20
630	Control Coursons Area	GARWOOD BOROUGH	Convend/Conford Reliab Phile 6,330 (Fof 36" main stong Cirtish & Sycamore Ave Garwand/Conford Reliab Philip 7,600 (Fof	\$1,481,000	Retob	6.330	16.00	Other	19701	16	Cast from	System Flows and Pressure	120	180	701	20
693	Control Operating Area	GARWOOD BOROUGH	Describution mams Int of Unamy Park	\$4)4,000	Artab	7,600	6.00	Other	1930.1	4	Cost tren	System Flows and Pressure	110	180	Yes	30
6627	Control Operating Area	GARWOOD BOADUGH	William Ave. (New St. to Dood End)	\$43,000	Replace	340	6.00	Ductile Iron	19101	5	Cast Iren	System Flows and Presture	130	180		20
7007	Control Operating Area Control Operating Area	GARWOOD BOROUGH	North Ave. (4th Ave. to Golleurs Hill Rd.) Locust Ave. Corner to Boad End.)	\$1,164,975	Roylace	5.175 2,390	13 00	Cost trees	1910's 1920's	13	Cost Irea	System Flows and Pressure	120	180		90
7007	Central Operating Area	GARWOOD BOROUGH	Abrito Ave. [Conter to Grandviou)	1511,400	Replace	2,613	8 00	Ductile iron	1910,0		Cast tree	System Flows and Pressure System Flows and Pressure	120	OST CST		20
7009	Control Operating Area	GAAWOOD BOROUGH	William Ava (Contor to Dead End)	\$479,000	Replace	2,395	6 00	Duckle tron	19101		Cost tree	System Flows and Pressure	120	180		20
7010	Central Devroting Area	GALLIN BADDE TWP	Lengs Ave (Fitzrandolph to Highland)	\$296,000	Replace	1,400	8.00	Ductife from	1920'4	- 2	Cast Iron	System Flory and Prospers	120	180		30
7013	Control Operating Area	GREEN BADDY TWP	Mauntain Pty (Blue HRs to Greenbrook)	\$224,800	Reptocu	1,124	8.00	Dueste from	1910'1		Caus Iron	System Figure and Propoure	120	130		20
851	Southwest Operating Area	HADDON HEIGHTS	Hadden Heights Sycomore Street, 30th to Bellmour, done in 2011	\$930,000	Replace	2,000	8.00	Ductile wen	2930's	4	Cast tree	Safety and Rehability/Structures	110	110	Yes	10
470	Southwest Operating Area	HADDON HEIGHTS	Madden Heights: East High Street, East Atlantic America to White Horse Pilia	195,000	Arptoco	500	12.00	Ductile trees	1940's		Cast Irea	System Flaves and Prosume	120	160	Tes	20

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BPU Dacket WR15060724

Mean servey American Water Company, Inc.
2015 Frampational Filing

м	District	Municipe Bry	Project Trib	itsAW Pumped (deltere)	Project Type	Proposed Longth (loot)	Proposed Dis. (Indias)	Preposed Pipo Adetorial	Decade installed	Ex. Dis. (Inches)	Estating Proc Statestel	Asseturated Asset Investment Cologory	Project Durotion		Previously Rounded Submitted for Waghted Score SPU Seview Waghted Score
5324	Southwest Operating Area	HACCON HEIGHTS	teadfor Harghes 4th Avenue (est Eings Highway to Highland Avenue	\$833,000	Beplace	4,500	8 00	Ductile from	1900's	4	Compet	Sarety and Remobility	130	160	30
1957	Southwest Operating Area	HADDON HEIGHTS	Hadden Heights - Rearth Fark Avenue and Station Avenue - Green Street to White Hoose Files	\$642,200	Applace	3,100	2 00	Ductoe Fron	1900's	ĕ	Cast tren	System Flows and Pressure	120	100	10
3828	Southwest Operating Area	нароси неавита	Heddon Hoghes South Fack Avenue - Bellmour Avenue to Station Avonue	\$181,200	Reproce	1,480	8 00	Dugitte Irgan	190071		Cast Iron	Sectioned Economic Growth	130	TBO	90
1919	Southwest Operating Area	HADDOW HEIGHTS	Haddon Horgitts 3rd Average - East Kings Highway to High Street	\$\$11,100	Reptace	2,690	8.00	Ductile trea	1900's	4	Cost Iron	System Flows and Pressure	120	180	30
3060	Southwest Operating Area	HADDON HEIGHTS	Haddon Heighte - Bith Avenue - Gertion Street he West High Street	\$169,400	Replace	860	0.00	Ducthe was	1900's		Cost from	System Flows and Pressure	170	160	30
5961	Southwest Operating Area	HADDON HTIGHTS	Nuddon Heights - East Ingh Street - White Horso Pills to Mik Avenue	\$143,400	Regisco	960	0 00	Doctile Iron	1950'4	*	Cost from	System Flows and Prospers	110	160	90
5963	Southwest Operating Area	HADDON HEIGHTS	Hadden Heights - Herberth Avenue - Wynnefield Avenue to South Black Horse Pike	\$129,200	Replace	680	8.00	Ductile Iren	1820.0		Cast trop	System Flows and Pressure	130	780	30
5863	Southwest Operating area	HADDON HEIGHTS	Product Heights Sylven Drive and Courts (n2) - Dakes Avenue to Glaver Avenue	\$\$12,000	Asplace	2,809	8 00	Ductale Iren	395074	6	Aubertes Comens	System Flavo and Pressure	170	180	20
7217	Southwest Operating Area	нароон неісніз	Hoddon Hotghts: Groon Street & Atlantic Svenue (CR- 729) - Retroad Creesing	\$200,000	Replace	250	13 00	Ductile iron	1900/1	6	Cert Iran	Safety and Benability/Structural	120	Teg	20
\$830	Southwest Operating Area	HABBON TWP	Hadden Township - Berunch Avenue - Black Herse Pine to Card Spring	\$344,000	Regione	1.400	8 00	Ductile iron	£990°+	4	Cast Iron	System Flows and Prossure	120	780	80
\$931	Southwest Operating Area	HADDON TWP	Naddon Epomphia Lincoln Arrange - Black Harts Pile to Deed End	\$336,900	Replace	1.770	à 00	Ductes wan	1910.4	4	Cost Iron	System Firms and Prossure	170	Tep	10
5933	Southwest Operating Area	нароон тир	Headen Township Delaware Avenue Parshing Avenue to Maribarough Avenue	1265,000	Replace	1,300	9.00	Ductile Iren	1910's		Cast them	System Flows and Pressure	110	100	10
5933	Southwest Operating Area	HADDON TWP	Haddon Township - Markeraugh Avenue - Black Herse Pille to Hit halven Read	\$542,300	Replace	2,860	8.00	Ductile Iron	1990'6	4	Cast Iron	System Flows and Pressure	230	180	30
5914	Southwest Operatory Area	HADDON TWP	Hadden Tarmship - Herr Tark Avenue - Richalson Read to VHT-2393	\$79,800	Replace	120	4.00	Ductile Iren	1990'4	1.5	Cost tren	System Plans and Proceurs	120	TRO	30
5935	Southwest Operating Area	HADDON TWP	Hadden Township : Shelburro Avenue Crescent Bird to Dead End	\$81.700	Peplece	430	0.00	Ducths from	1930's	2	evc	System Flows and Prosoure	120	160	10
5119	Southwest Operating Area	HAMESPORT TWP	Humassum? Morne Highway - Washington Street to Brood Street and Broad St, Marine Hury to Edutin St	\$500,000	Asplace	2,500	12 00	Ductrie tren	1970'4		Cost won	Systems Flavor and Procesure	120	100	30
5539	Southwest Operating Area	HAMESPORT TWP	Manager North Cumberland Ave Marie Improvey to MMAS-B	\$330,000	Replace	L100	4.00	Ductile Iron	1950's	4	Aubeston Coment	Water Quality	120	700	30
1140	Southwest Operating Area	HAMESPORT TWP	Hampsport - 3st Street - Harth Cumberland Avenue se Hertik Hunterdan Avenue	\$95,000	Replace	300	6.00	Outlie irea	1940)	•	Cest tren	Weter Quarry	110	180	30
5543	Southwest Operating Area	HAMESPORT TWP	Hamesport - 2nd Street Harth Hynterdan Arahya ta Dead End	\$171,000	Aeplece	900	6.00	Ductile Iron	1930%	*	Aubentos Coment	Weter Country	1,70	180	30
\$542	Southwest Operating Area	HAINESPORT TWP	Managhait - Morth Humerdan Avenue 2nd St be Brd St and 3rd St from M Humerdan Ave to N Comberland Ave	\$161,500	Replace	810	6.00	Ductille iron	19474		Asbestes Comons	Water Quality	130	TED	30
6901	Southwest Operating Area	HAINESPORT TWP	Hamespert - North Cumbersand Avenue - Merne Highway (Ch-573) to Deed End	\$347,000	Reptace	1,300	6 00	Ductile wen	1910's	6	Asbestos Comens	Wrater Quality	150	160	20
6902	Southwest Operating Area	MAUNISPORT TWP	Hebrospart - Morth Hunterdan Avenue - Bleine Highway (CR-S73) to Dood End	\$209,000	Replace	1.100	8 00	Durthe trea	1940's	6	Cost tree	Weter Quelty	330	100	20
4104	Southwest Operating Area	HAMESPORT TWP	Meunt halfy - South Cumberland Avenue - Morne Highway to Atlantic Avenue	\$84,000	Regisco	410	8 00	Decide tren	1940's		Cost Iron	Wester Chastry	120	TRO	20
6103	Southwest Operating Area	HAINESPORT TWP	stainesport - South Hunterdon Avenue - Motne Highwey (CR-573) to Atlantic Avenue	\$133,500	Regioce	610	0.00	Durdle Iran	19404	6	Cars tren	Anada GhassiA	120	Tep	30
6484	North Operating Avea	MAKOMIS TWP	MARDING - Spring Valley Rd from Douglas to Mayorsville	\$400,000	Replace	2.000	8 00	Ductale Irem	(Indepute		Cart Iren	Selety and Bolatalay	120	180	10
5417	Coastal Operating Area	HIGHLANDS	ingresses Chestnut \$1 / Deli \$1 Replecement	\$195,000	Replace	900	6.00	Duckling Impa	1940'6	1	Gall-onized Steel	Safety and Belakiney	120	7014Q4	30
5436	Coastal Operating Area	HIGHLANDS	ringraphings - Eurit Ught Mass Replacement	\$117,000	Regroce	773	6.00	Duchle Iren	1940's	3	Cost Iron	Safety and Bakopithy	130	2016Q4	20
3843	Coestal Operating Area	HIGHLANGS	Lindon Aut Main Replacement	\$300,000	Replace	1,425	0 00	Ductee wen	1940'4	4	Cost fron	System Flores and Pressure	120	101603	80
5843	Constal Operating Area	HIGHLANDS	Wraterwitch Ave Main Replacement	\$76,750	Sentous	523	0.00	Checure from	1900's		Cast Non.	Lystein Flows and Pressure	120	Tan	20
3838	Courtal Operating Area	HIGHLANDS	Huddy Ave Mein Replacement	\$210,000	Replace	1,400	8 00	Ductile Iron	1940'4	- 7	Carctron	System Flows and Prospure	120	101401	10
3834	Constal Operating Area	MG-RANDS	Atlantic St Mass Replacement	\$142,500	Aeplace	#50	8 00	Ductile tree	1940'4	- 2	Card Item	System Flows and Prospure	120	101604	20
3433	Cantral Operating Area	HILLSBOROUGH TWP	Taylor Are from Duke Plany to Johanson Are	\$315,000	Regiace	2,579	8 00	Ducidle Iren	1910'4	- 2	Astrostee Coment	Safety and Rehability/Etherough		TBO	
		INUSBOROUGH TWP	Johanson Are from Dubes Pluny to Egyfor Road	\$715,000			2.00			ì			120		10
3634	Central Operating Area	HIRT SECKDOOM LINA			Replace	3,575	100000	Ductile Man	1910's	*	Authoritin Coment	Safety and Robab bity/Scruetural	320	180	10
\$672 \$678	Control Operating Area Control Operating Area	HILLSBOROUGH TWP	Exhibite hand from Duker Perray to Johanson Avo Hammler hand from Taylor Ave to Cloudle Read	\$340,000	Replace Replace	1,600	8 60	Ductile Iren	1930's	÷	Aubretos Coment	Safety and Retability/Structural Safety and Retability/Structural	120	180	60 60
****					223020			2000		2.5			100	1200	222

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JAMESBURG JAMESBURG JAMESBURG Iddalde Ave from Front Street to Divingo Ave El-Balde Ave from Benton Are to Gatzmer Ave Porgole Ave from Ferge Street to dead end

how Jarsey American Water Company, inc. 3013 Foundational Filing Appendix C. Revised 0/1 N/2013

In Service Period Longton (Neat) 8 00 6 00 1930's 1930's 180 5680 Control Operating Area HILLSBORONGH TWP \$140,000 700 350 Ductile Intel Adhertos Comen Safety and Rehability/Structural 120 \$50,000 120 1481 Control Operating Area Safety and Resoluty/Str \$308,750 \$155,000 \$787,725 1,350 775 2,501 1830's 1830's 1816's Cost Iron Cost Iron Cost Iron 8 (II) 8 (III) 13 (III) 180 180 3016QJ 1686 5687 6491 101601 1,748 12 00 Cost from 120 6492 HILLSIDE \$199,300 19201 6101 410 12 00 3950'0 120 100 400 13.00 TRO 4107 HOLLSIDE \$80,000 Replace
Replac Ductifie Iron 120 810 11 00 HILLIOT \$32,000 4310 HRIDE \$200,000 1,010 500 540 110 170 1,610 610 345 440 710 314 523 441 925 500 200 L100 16 00 1930'e MUTTING MUTTING MUTTING MUTTING MUTTING MUTTING MUTTING 4.39 contable And From Horman St to Cheshout A standardsmery St Perm Milholist And to dead of Standardsmery St Perm Milholist And to dead of Standardsmery St St Standardsmery St Standardsmery Standardsmery Standardsmery Standardsmery Seaton Standardsmery Standard 1940's 1930's 1930's 1930's 1930's 1930's 6817 6342 6547 6331 6332 6334 6333 \$84,000 1930% MATTER MA Ductife from Ductife trans Ductife from Ductife from Ductife from Ductife from 1930's 1930's 1930's 1930's 1930's 1940's Cost tren Cost tren Cost tren Cost tren Cost tren Cost tren \$34,750 \$13,450 \$104,600 \$46,400 \$41,200 \$197,000 6391 6596 7023 7034 7019 7016 352 120 120 120 120 120 120 120 -Galvermed 183 \$95,000 west Doorsting Area HOWILL TWO 2014Q3 7237 130 130 130 120 120 120 120 120 7016Q3 7016Q4 780 780 780 780 780 MERLETIM MOTERINE MOTERINE MOTERINE MOTERINE MOTERINE BRUEZHAA BRU supply
Ductile inter
Ductile i 1716 \$110,000 18-00 8-00 8-00 8-00 8-00 8-00 2970'9 Duct-life lines Retacement Caportunely 1509 750 200 1,800 900 \$412,500 \$150,000 \$840,000 \$840,000 1930's 1940's 1940's Unhapore 1920's 1820's Cast from Cool from Cool from Cool from Cool from 62 6722 8734 6879 6881 Cost trea \$303.000 \$3.05.000 \$250,000 \$400,000 \$403,710 \$125.000 \$175,000 \$160,000 \$160,000 Aubreton C Aubreton C Aubreton G Stave Pipe 3723 3734 6424 6426 6427 6428 6429 6430 6492 1,500 1,000 2,800 2,190 1,175 875 400 800 1,500 8 00 8 00 12 00 12 00 8 00 8 00 8 00 8 00 8 00 1910's 1950's 1940's 1940's 1940's 1940's 1940's 6445 1.675 3.00 1940's 120 \$111.000 180 4444 DAVESTAN 820 0.00 1940's 180 IAMESBURG \$310,000 1,330 \$ 08 194071 Stone Pipe 120 180 6469

> 915 9 00 975 9 00 2,900 8 00

\$143,000 \$75,000 \$180,000 19400

3940's 2940's 1940's

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120 120 130

BPU Docket WR15060724 Stipulation - Exhibit A

W	District	Municipality	Progost Title	HJAW Funded (dellary)	Project Type	freesed tength (feet)	Proposed Dis. (Indice)	Proposed Pape Material	Docardie Installed	Es. Die. (Inches)	Existing Pipe Material	Agraturated Agent Investment Category	Project Durotten	Estimated In Service Period	Proviously Submitted for BPU Booleer	Rounded World-sad Score
8475	Control Operating Area	MANESBURG	Gorne Street from Porcels Ave to send and	\$25,250	Resisce	190	6.00	Bucille Iron	19471		Stave Pripe	Safety and Rokeb@ty/Structural	120	190		13
4476	Cortrol Operating Area	MARESOURG	Walnut Street from Pergola Ava to dead end	\$109,000	Replace	125	8.00	Ductile Iron	1940's		Hore Place	Lafety and Brospality/Structural	120	180		10
6477	Control Operating Area	DAMESBURG	Quebelow Ave Trom Valve & VIS-345 to sead and	\$380,000	Replace	2,900	8.00	Ductite Iren	1940's	-	Stove Pipe	Safety and Reliability/Structural	120	TBO		10
6478	Control Operating Area	HMESTURE	Forge Street from But he'en- Ave to beyond volve B	\$700,000	Replace	1,000	8.00	Ductile from	19471	- 2	Stove Plee	Selecty and Reliability/Structural	330	TRO		10
6478	Central Department Area	BANKSOURG	V28-375 Altigneed 50 from Buckeler Aire to dead and	\$146,000	Reglaco	730	6 00	Quetile Irea	3940'1	4	Stave Page	Salety and Retability/Structural	170	180		10
6460	Control Operating Area	Demographen	William Street Rom Buckerew Ave to deed ands (Both	\$234,000	Applace	1,190	8.00	Drectific tren	1940's		Stove Pipe	Safety and Retability/Structural	120	180		10
6481	Control Operating Ares	AMESBURS.	pages of Buckelous Ave) New Street from Buckelous Ave as good and	\$120,000	Restace	800	8.00	Duttile Iron	2940%	4	Stove Pipe	Safety and Reliab-My/Structural	120	180		10
4482	Central Operating Area	MANESBURG	Starrport St from Buchelow Ave to dead and	\$140,000	Replace	700	8.00	Dutte tree	1940'4	4	Stove Pipe	Safety and Rekobility/Survictural	120	TED		10
6403	Central Operating Area	IAMESBURG	Little Break Lone from Buthelow Ave to Grace HIEI Road	\$820,000	Replace	1,600	6 00	Durale tron	1940'0	6	Stave Papa	Salary and Reliability/Structural	230	19.0		10
5484	Central Descriting Ares	PANESBURG	Grace INE Read from Buckelow Ave to dead and	\$175,000	Beptace	075	8 00	Ductile was	1940'4	4	Stove Pipe	Sofety and Ballebillty/Structures	120	Teo		10
5401	Control Deceasing Area	DRUGSDAM	Trovio Ct from Little Brook Lane to dead and	\$12,500	Regiace	100	6.00	Ductale even	1940's	4	Steve Page	Sefery and Rokeblisty/Structural	120	780		10
3376	Control Operating Avea	HENCH WORTH BOROUGH	Samples Read [Rt. 2] to 35" @ Slack Break Park]	\$293,000	Asplace	1.471	600	Ductile men	1950's		Cast tree	System Flows and Presoure	820	2016Q1		20
5377	Control Descripting Area	KENEWORTH BORDUCH	Sampled Rd. (36° Φ black Breek Park to Bargini &	\$864,000	Replace	3,317	6.00	Ductile Iron	3950's	6	Cast tren	System Flows and Pressure	120	361601		30
			retakeure]		act vibrates					9						
5378	Control Operating Area	KENEWORTH BOROUGH	14th St. [Leftyette to Boulevard]	\$\$45,000	Replace	2,272	6.00	Ductine Inen	1940's	*	Cost Iron	Instern Rows and Prostours	120	2016/02		20
6420	Control Operating Area	NEW MONTH BOROVCH	Pesset Ave (5. 23rd to 5. 25th)	\$100,000	Asplace	\$00	0.00	Ductile wee	1930's	4	Cast tren	System Flows and Pressure	120	160		20
6636 5628	Control Operating Area	EZHILWOSTH BOROUGH EZHILWORTH BOROUGH	\$ 33/65t (feware to find of 4") Boulevard (Shady La to N 8th St.)	\$91,600	Regioco	479	8 90	GuctFe Ires	1980'1	*	Cast Iron	System Flows and Preseure	120	TBO		50
	Central Depreting Area	KENKWORTH BOROUGH			Replace	1.166	11.00	Ductile tron	39300		Unknown	System Flows and Prossure	130	180		30
6430	Control Operating Area Control Operating Area	KENNEWORTH BURGUGH	es. 9th St. (Bouteverd to Shorldon Avg.) Shorldon Avg. (its 8th to Doad End.)	\$504,450	Replace	2,242	8 00	Ductile Iron	1940's	- 5	Cost tren	System Flows and Prossure	120	TBD		20
7017	Control Courseling Area	KEMEMORIN BOROUCH	In 17th St (Morroe to Dead End)	\$292,000	Aegraca	1,460	8.00	Ductes new	193074	•	Cast Iron	System Flows and Pressure	120	180		30
7018	Central Desirating Area	KENEWDETH GOSOUGH	Farlante Are. (Significial to Biocompagne)	\$727,200	Replace	1.114	8.60	Ductile sales	19301	- 1	Cast Iron	System Flows and Pressure		TBO		10
3619	Control Operating Area	KENNEWDRTH BOROUGH	Market St. [Umon to Woodbood)	\$105,000	Replace	\$30	8.00	Ductile keen	19101	- 2	Cast Iron	System Flows and Pressure System Flows and Pressure	120 120	780		30
3020	Control Operating Area	STHREWORTH BOROUGH	Vernon Ave. (S. Bákhtgan to Market)	\$171,800	Replace	810	8.00	Ouctile Iren			Cout tron	System Flows and Pressure	320	760		20
268	Control Operating Area	LANEWOOD	Escoward: E. Fifth Street, throm Interests Ave to start	\$112,000	Replace	800	4.00	Ductile Iron	1930'e	4	Cast Iron					20
244	Cookin Obsessed was		of Holly \$1) Likewood -Fallsh Street (From Madison Ave to Ciftish		manaca	900	4110	Decase sales	Tame 6		Colt tren	System Flows and Prossure	130	3036Q4	Tou	20
369	Coestal Operating Area	FREEMDOD	Auri)	154,000	Realece	400	6 00	Ductile Iren	Unknown	*	Cost tren	System Flows and Prospute	120	2016Q4	Tes	30
273	Counted Operating Area	FREEMOOD	Lakewood - Uncom are them to'	\$130,000	Roplesa	800	\$ 00	Ductile Iron	19304		Concrete	Renkston/Oppertunity	130	301eO4	764	20
373	Coosed Operating Area	LAKEWOOD	Enhanced -hispir Lane (from to)	\$150,000	Replace	200	10.00	Ductile Irea	Unknown	10	Casa Irea	Safety and Reliability	130	101604	Yes	90
279	Coastal Operating Area	PEE MOOD	Lahoused Fork Avenue 3nd street to Misin street Miller Read (from Hope Chapel Rd to Shady Lone	\$150,000	Aephocy	1,000	8.00	Ductife Iron	1830'4		Cost from	System Flows and Proseuro	119	\$016G6	Yes	30
444	Coastal Operating Area	PERMOOD	Organia (Librar Labbid Crahles up 10 3 Librar (2015)	\$143,000	Regiocs	1,100	8.00	Ductile tress	1990's		Cost Iron	Safety and Releability/Structural	120	101401	144	10
337	Constal Operating Area	LAKEWOOD	Jamesburg Lake Street [Fram_to_]	\$300,000	Replace	309	9 00	Ductre Iron	1950's		Cast Irea	Resocution/Departmenty	120	TBO	Top	20
6279	Coople! Quarating Ares	LAREWOOD	Carry St from Lesington Ave to Squarkum Rd	1303.000	Replace	1,929	8.00	Ductile Iran	1930-0		Asbestas Coment	Safety and Reliability	130	301604		20
6174	County Opprotting Area	PREMOOD	86h Street from Sieth Street Tank to Forest Ave, then north to 7th St. than east to Lealington	\$490,000	Replace	2,410	12.00	Ductorie Iran	1930'6	8	Cast was	Salety and Relability/Structural	120	301907		30
6175	Coastal Operating Area	PAREMODD	Languesed Ave from 5th Screet to 9th Street	\$292,000	Avalecs	L+10	9.00	Durche trem	1930'4	6	Asbestos Coment	Safety and Rehability/Structural	130	180		20
6176	Cantal Deviating Area	LAREWOOD	tenington Ave from 7th St. 19 131 Street	\$410,000	Replace	2,190	8 00	Ductile from	11301		Cost was	Selety and Releasility/Structural	120	201404		30
6177	Coestal Operating Area	LAREWOOD	Sth Screet from Louisgeen Aug to Story's Lane	\$284,000	Replace	1.430	8.00	Ducille tren	19100		Cast wen	Safety and Reliability/Structural	120	7016Q1		20
8178	Coastal Georeting Area	EAXEWOOD	13th Street from Monmouth Are to Equanium Ad	\$814,000	Replace	1,380	8.00	Ductile Iron	1940'e		Asterotes Coment	Selety and Behobility/Elrectural	110	1016Q4		20
6178	Coestal Operating Area	DECEMBER	Codes Bridge from Rt 9 to Dr. MLK Drive south to Place So	\$963,700	Restoce	1,972	12 00	Ductile Iren	1960's		Cost Wen	Safety and Rehability	120	3016Q4		20
6100	Coastal-Deersting Area	LANEWOOD	Semerset St. Roge, Manetta, E Stn St, School &	\$1,111,730	Asplace	4,930	12 00	Swct8e man	Unknown	Unknown	Unbhown	Safety and Roloth May/Structural	120	100		10
6181	Coastal Operating Area	LAXEWOOD	Clover St. from E 7th St to Loure! Ave Corey St from Forest Ave to Lesington Ave	\$314,000	Replace	1,300	6 00	Ductile Iren	Unknown	Unharus	Linkson	Safety and Reliability/Structural	120	100		10
6197	Coestal Operating Area	LAREWOOD	E. County Une Rd. from Clifton Ave to Lesington, then	\$110,000	Aspecs	2,200	16 00	Ductile Iren	Unbagun	Uthnow	Unknown	Sustained Economic Grawth	120	The		10
			in Learnighon to 13th St. Learnighon Ave Brown 13th St. to 7th St., then in 7th to	4440.000										4000		1777
6196	Coastal Operating Area	CALLANDOD.	Manneyth Ave	\$550,000	Replaca	1,100	36 00	Ductille iren	Unknown			Sustained Economic Growth	120	TBO		30
6300	Coastal Operating Area	COOMIXY	9th Serest from Forest Ave to Launghon Ave	\$944,000	Replace	1.830	6 00	Ductile tron	Unknown	UNMARKA	Unbacoun	Salety and Renobility/Structural	170	301601		10
6297	Coestal Operating Area	rintwood	W County Use 8d from Ciltan Ave to Well No 6 discharge	1891,000	Replace	1,140	16 00	Ductile won	1950%		Asbestos Comans	Sustained Economic Growth	120	2016Q4		20
6307	Coestal Operating Area	LAKEWOOD	W County Line Rd from Wall the & discharge to Hope Chapel Rd	\$470,500	Replace	2,900	12.00	Ductile Iron	Unkapen	UNLhows	Unknown	Sustained Economic Growth	120	2016Qe		20
6310	Countyl Operating Area	UMERWOOD.	Helly Street from School Street to Ocean Avenue	\$414,000	Replace	2.070	8 00	Ductile free	Unknown	Unknown	Unhappa	Safety and Rate biley/Saructural	120	180		30
6311	Course Operating Acce	LAKEWOOD	Helly Street, Leutel Avenue & Pearl Street from Ocean Avenue to Dicase Avenue	\$420,000	Replace	1.400	4 00	Ductife Iron	Unbnown	Unhnone	Unhnows	Salety and Renability	620	780		36
6313	Coestal Operating Area	LACEWOOD	5th Sarent from Medison Avenue to Learington Avenue	\$294,000	Replace	1.270	8 00	Ductile Iren	Qeangun	Unknown	Unknown	Seleny and Relability	130	101601		10

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treer Jersey American Weter Company, Inc 2013 Foundational Filing

w.	District	Municipality	Project Title	RIAW Funded (dollare)	Project Type	Proposed Langth (Next)	Proposed Dis. (Indies)	Proposed Pips Material	Decode Indiplied	En Dio. (Inches)	Estating Psps Material	Accelerated Asset Investilland Category	Project Duretten	Estanosed In Service Paried	Proviously Submitted for BPU Review	Reunded Weighted Score
6437	Courtel Operating Area	PHEMOOD	Source &From Lindon to easiling \$2" near volves VLE 8755, 3236	\$390,000	Replace	1.450	12.00	Ductille Iren	195074	4	Cost trun	System Flows and Pressure	120	3016Q1		30
6638 6639	Coestal Operating Area Coestal Operating Area	TWEMDOD TWEMDOD	Stn Street Labewood Ave to Forest Ave Stn Street Labewood Ave to 8t 9	\$345,000 \$460,000	Replace Replace	1,725	3 00	Ductrie Iren	1930's	1	Asheries Coment Cast Iron	Selety and Rekability/Structural Sulety and Rekability/Structural	120	2016Q1 2016Q1		20
4441	Coestal Coersting Area	LAKEWOOD	6th Street Essewood live to Smith Street Tork and	\$412,000	Seplece	1.040	600	Ductile tree	19101		Cast from	System Flows and Proseurs	120	303601		10
		LAKEWOOD	Forest Ave to FE 9 1th Street Laborated Ave to Et 8	\$460,000	Beplace	2.300	8 00	Ductifie Iron	1990's		Cast Iran	System Flows and Pressure	110	301603		20
6642	Coastal Operating Area Coastal Operating Area	COOWIEAL	Sunset Read From Control to James	\$610,000	Aspiace	3,100	1100	Dectile Iren	1930'4		Unknown	Salary and Reliability/Senetures	170	201407		30
4919	Coastal Operating Area	LAKEWOOD	Forest Avenue from West Courty Line Read to 71% Servet	1140,000	Replace	8,700	33 00	Outtle Pen	199071		Amberties Comment	System Flows and Prosuce	120	3014Q4		39
4974	Coortel Operating Area	COOWSEA	Hope Chapel Road from W. County Line Road to Jack Street	\$105,000	Reptace	1.103	12.00	Dyctile tree	1910's	6	Asbertos Coment	System Flows one Prosture	120	3016Q4		10
2198	Coastal Operating Area	LAXEWOOD	James St water stubs	\$36,000	Applace	1	8.00	Ductille Iron	Unknown	Unknow	n UMARquin	Safety and Robatality	120	180		10
3995	Southwest Operating Area	LAYNEL SPRINGS	Laurel Springs Fermiouni Avenue Stone Road to rearth White storse Pille Existing 6" Ducting Lean Misself	\$304,000	Replace	1,600	8.00	Ductille Irga	1950/1	4	Cost tres	Water Queley	130	100		10
5036	Southwest Operating Area	LAUREL SPRINGS	Laurel Serings - Fork Avenue - Stone Reed to VL- 14499	\$317,500	Regrace	L250	8 00	Durisle trees	1997s	40	Cast Iron	System Flows and Pressure	130	teo		30
1937	Southwest Operating Area	LAUREL SPRINGS	Levrel Springs - Walnut Avnous - Stone Road to Bood End	\$380,000	Replace	2,000	8 00	Ductife Iren	2870's	4	Cost Iron	System Flows and Pressure	120	160		10
5930	Southwest Operating Area	LAUREL SPRINGS	Lauret Springs - Tombrison Avenue - West Atlantic Avenue to Drad End	\$\$19,500	Replace	1,650	0 00	Ductile Iren	1950's	4	Duritle from	System Flows and Prospure	120	160		39
8608	Southwest Operating Area	LAURE; SPRINGS	Laurel Springs: Glan Avenue: State Reed to Laherton Ave	\$209,000	Replace	L140	0.00	Ductife tren	Unknown	Unknow	n Unbhown	System Flows and Pressure	130	790		10
5946	Southwest Operating Area	LAWNSIDE	Lawresia: Mact Street - North Warwick Reed to Deed End	\$181,500	Ropiaco	810	8.00	Duride Iren	1980,7	4	Ductile tren	System Flows and Proseurs	120	180		30
6809	Southwest Operating area	PANALIDE	Vigraud Road & HT Turnative Training Passet Motor Replacement, Lindon, Phase &	\$1,000,000	Peplece	\$00	33.00	HOPE	1950's		Steet	Salety and Reliability/Seructural	120	\$010ClT		20
300	Control Operating Area	FINGS H CILA	South Wood Avenue - 12" main from Grossell Rood to American Cyconomide Conoco Philips 12" main under oil rock	\$1,135,000	Replaca	1,710		Ductile tree	1910'0	12	Cast sren	Safony and Ratiobility/Servetural	120	201601	704	10
3523	Control Operating Ares	UNDER CITY	Wedding Are.	\$153,000	Replace	1.265	8.00	Ductile Iron	19374		Cast Iron	Sefery and Reliability/Structural	110	COSTOL		30
2548	Control Operating Area	FINDEN CITA	Emma Pt.	\$104,000	Megtece	\$17	8 00	Ductile Iron	1960's		Cost were	Selety and Religibility/Structural	120	301401		30
3172	Control Operating Area	LINDEN CITY	Gable La. (Silies to Dood End)	\$86,000	Reptace	438	0.00	Ductile Iren	1960's	6	Cast from	Safety and Reliability/Structures	120	201401		30
3573	Control Operating Area	FINDSH CITA	Hording Are. E W.13th St. to W.15th St.	\$153,000	Replaca	775	0 00	Direct stip drawn	19500		Cast Iron	Safety and Rahability/Structural	110	301401		20
6075	Cantrol Operating Area	EINGEN CITY	Tramby Passe Main Regiscement, Phose 1, Under	\$1,100,000	Replace	3,650	12.00		1910.0	12	Cast from	Safety and Robability/Sinuctural	230	101401		10
6077	Control Operating Area	FINDEN CLLA	Tremony Point Main Replacement Phase & Lindon	\$479,000	Replace	2,110	12 00	4	35300	12	Cost bren	Safety and Bokesdity/Structural	123	2016Q3		10
6435	Central Operating Area	THIDIN CITY	Denny M (Gree to Bodie)	\$154,200	Replace	771	0.00	Ducthe Iron	1820'4	10.5	Cast Iren	System Flours and Pressura	120	1.000		20
6436	Central Operating Area	FINED (IN CITY	GRichites Ave. (Gitter to Rhom) Warth Ave. (Resits 1 to Giter Ave.)	\$103,400 \$128,000	Replace	347	9.00	Ductile Iron Durting Iron	19204		Cast from	System Flows and Pressure	120	183		30
6644	Centrel Operating Area	LINDEN CITY	S. Wand Ave. (W. Stimpson to Cadar)	180,000	Replace	450	8 60	Ductile Iren	1920.4	:	Cast from	System Flows and Pressure	120	180		20
6445	Control Operating Area	CHICKN CITY	Samer St. [St. George to Husso]	1444,800	Aeplace	3,324	8 00	Ductes sales	19104	i	Cost Iron	System Flours and Prosume	330	180		20
7028	Control Operating Area Control Operating Area	EMDEN CITY	Bryanick Ave. (Park to Merces Bill) Baymay Refinery	\$720,000	Replace	3,200	17.09	Ductile Iron	3900.9	12	Cast Iron	System Flows and Presoure	120	180		10
7023	Control Convening Aires	TIMOSM CLLA	Cranford Ava. (St. George to Essex)	\$466,600	Replace	2,344	8.00	Cost from	193004		Cost tron	System Flows and Prossure	120	780		20
F024	Control Descriping Area	UNDEN CITY	E. Curtos It: (Wrood to Mospie)	\$154,800	Reptage	1,774	8.00	Ductile Iron	19100		Cost from	System Flows and Procure	120	180		20
7023	Central Degrating Area	UNDEN CITY	Dewell St. (W. Curtis to W. Blancke)	5411,600	Replace	2.166	6 60	Ductile wen	19201		Cost tree	System Harve and Pressure	120	790		30
2034	Central Operating Area	FLHIDI H CILA	DRI Ave. (Grans to Ports)	\$347,600	Replace	1,738	9.00	Ductifie Iron	1930'0		Cost Iron	System Flows and Prosture	120	100		20
7027	Central Operating Area	EMINOS IN CITY	Grant St. (St. George to AMdred)	\$288,000	Replace	1,190	000	Ductile Iren	39300	4	Cost Wan	System Flows and Prossure	130	180		20
\$920	Southwest Operating Area	THIDE HANDED	Underwoold - Columbia Avenue - Eake Blid to Wada Avenue	\$95,000	Paplace	100	£ 00	Durtille How	1870's	4	Ductile Iron	System Planes and Procesure	120	101601		20
212	Coastal Operating Area	COONNEL	Linewood Share Read Detarent Ocean Heights Arenne & Garlield Avenue	\$487,500	Rephys	1,950	13 00	Dutthe Iren	1914.1	6	Cart from	System Flows and Pressure	130	160	Tes	10
233	Coastal Operating Area	rhimboo	Limited Share Read Between Garflerd Avenue & Jana Avenue	\$140,000	Replace	340	13 00	Ducale from	1930's		Asbettes Comunit	System Flores and Pressure	120	180	Tes	10
214	Coastel Operating Area	CINWOOD	Unwand - Share Road - Detwoon tone Avenue & Greenatch Avenue	\$35,000	Replace	140	12 00	Outtile Iran	3920'0	4	Ductile tren	System Flores and Prossure	120	TBO	Tos	*
215	Coastal Operating Area	UNWOOD	Europead Share Road Between Greenwich Avenue & Saeven Avenue	\$167,500	Reglace	670	12.00	Ductile Iren	1920's	4	Cast tree	System Places and Proseuro	120	180	Tes	10
223	Coastel Operating Area	FINADO	Lineway Ocean Heights Avenue - Between Shore Road & Webesh Avenue	\$112,000	Replace	800	16 00	Ductre Iren	1950'4		Cert Iron	System Flows and Pressure	120	TRO	Tee	10
136	Coastal Operating Area	U>NYOGO	Elmwood: Ocean Prolights Avenue - Between Websell: Avenue & Steelman Avenue	\$317,900	Replace	820	16 00	Ductine won	1900's		Ductile Iren	System Flores and Prossure	130	100	Tes	•

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UTTUEFALLS

How Jersey American Water Company, Inc. 2013 Fewngettenel Filing

120 327 \$227,900 \$188,000 8.00 1950'e 130 10 1407 \$196,000 4.00 1960'6 Cast Non 130 4099 Countyl Operating Area \$376,000 Replace 2.319 0.00 101076 130 160 10 \$930,000 1,900 14 00 19104 120 180 0483 \$220,000 880 16 00 1940's Couttres 120 180 6442 \$4\$0,000 16 00 1950's 120 TBO Cast Wen 6465 \$161,350 2,923 14 00 4503 \$340,000 1,700 12 00 1960's 1.70 mo Coul trans 6337 2.313 120 4538 \$175,000 890 0.00 19150 Cast Iren 130 180 6334 \$118,000 120 6541 \$75,000 433 8 00 19400 110 6543 Coustal Operating Area \$123,500 Replace 0 00 Ductile Iron 1930's COST HOA Safety and Bel-spillty/Scructure 130 TEO Contal Operating Avea \$125,000 6545 \$243,000 1,215 12 00 1920's Cast tron Safety and Rehability/Sin 120 tep Author
LPI—US Route 9 from Control Ave to Angeroe Ave,
Cesting & Diving
UH: Berr Annous between Ibig ple Ave and William
Avenue & Exercit N on Wallagen
UH: Bagila Avenue between US Rt 9 and William 6346 \$800,000 4,423 12.00 1960's Weter Cushy 120 180 Canalat Operating Area Cost was Cast from 4348 1.525 760 8 00 Solony and Bellebillty/Structural 120 180 6549 Counted Oppositing Area \$1\$2,000 1970's Cast tren 6350 \$412,000 2,060 Cast Iron F30 6553 \$442,500 2,650 16 00 1920°e Cast Iren 120 TBO 6557 \$867,500 8,350 16 00 12101 130 180 Cast Irea 6341 Lus 6829 IMMOOD \$\$\$,000 160 4 00 1990's Cohestred Itee 120 TRO 310 6435 4 00 120 190 45 , UTTLE FALLS \$833,500 9,700 13.00 Cast Iron 120 180 uttle falls - Ednom St from Paterson Ave to UTTLE FALLS 954 1918.000 Replace 3,700 36.00 1930's Cast from 120 780 tourth Operating Area Salesy and Reliability/So Replace Replace Replace Replace Replace 2,100 4,300 3,700 900 1,900 UTTLE FALLS UTTLE FALLS \$472,500 \$1,417,500 \$832,500 11 00 12 00 12 00 2920's Unknown 2920's Cast Iron Activities C Cast Iron 5548 5549 5552 120 120 120 120 8 00 UTTLE FALLS 1180,000 180 6739 North Operating from Cast tren Safety and Bellepilley/S OF Codes Grove

UTTLE FALLS: Hoston Rd from in 46 to Longhill Rd

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LITTLE FALLS: Hoston Rd from Develops him to
Little FALLS: Overlook Ave from Lawer Hoston Rd to 8 00 180 6799 UTTLE FALLS 6743 UTTLE FALLS 1,300 8 00 130 6744 Morth Operating Area LITTLE FALLS 1460,000 3,300 6 00 Safety and Reliability/Saructure TBO 20 6745 CITTLE FALLS 8 00 Cast Iren Salony and Ballahi

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hour Januay Adherican Water Company, Inc 2015 Foundational Filling Appendix C -Bonsod 8/13/2015

Longth (Seet) LITTLE FALLS: Wanger Ad Between Prospect I Isl Ave LITTLE FALLS: John Ave between Main St and 6748 North Gaerating Area UTTLE FALLS \$350,000 1,710 8 00 Ductifu tron Cart Hon Salety and Rehability/Structure 130 190 20 \$300,000 6814 UTTIE FALLS 2,400 8 00 Durille wen Coutteen Solety and Ren 130 TRO LITTLE FALLS 5192,000 8 00 19501 Cest Iran 110 North Doorsting Area DITTLE FALLS \$90,000 450 8 90 Durtille Iron 1950's Cost Iron Setima and Rehability/S: 120 120 TBO Ductes Man \$ 000 1930'0 190 INTEL SAVEA \$100,000 Cast man Contai Operating Area UTTLE SAVER UTTLE SAVER UTTLE SAVER UTTLE SAVER UTTLE SAVER UTTLE SAVER \$348,750 \$183,750 \$255,000 \$154,500 \$258,750 \$105,000 1990's 1940's 1940's 1940's 1930's 7,325 L.223 1,700 1,036 1,025 700 252 LONG MANCH \$450,000 1,600 16.00 PVC 1890's Cost from 130 Teo EQ LONG BALKCH \$11,500 9.00 PVC 1990's 120 Teo 261 Long Branch John Street from Hendrickson Ave to communa 1722 LONG BRANCH \$145,000 600 8.00 3900's LONG BAANCH LONG BRANCH LONG BRANCH \$27,000 \$10,000 \$192,000 1930's 1930's Ductile from Steel Golfrenwood St 780 180 2014Q4 5914 3913 5933 East St Main Replacement 180 181 750 8.00 8.00 130 130 System Flows and Pres 10 10 10 East 31 Moon Rookscoment Vanderbuilt are Hullick Place Eumann Place burbusen Lang Branch Aw James Stores Warndolf is Rooksco 2" Lang 1981 High Street: Maphy to Control 6467 LONG SAMHCH \$19,000 544 900 19204 Caherued Steel 120 190 Replace Replace 6648 89 Coastal Operating Area Hearth Operating Area LONG BRANCH LONG HILL TWO \$100,000 \$300,000 450 1,500 6 00 8 00 1920's 1930's Gaternized Steel Cost from Water Quality Safety and Rehability/Seructural 2016Q/ 180 445 Springhold Ave - Volley Ad - Ritung - Become 9737 LONG HILL TWP \$100,000 300 11.00 1930% Hillade Grive from Long Hill fid to Locey Ava Long Hill fid from Merorswille fid to Imparent HUH-84 east of Gillette fid. Replace 6244 LOWG HILL TWP \$154,000 780 6 00 19554 Cest Ingo Soleny and Rehabeity/Struct 120 cer 10 LONG MILL TWY 12.00 6500 House Operating Area \$949.500 4,220 1930's Achemos Co System Floors and Presours 120 100 20 6104 SOME HILL TWY \$441,000 9,940 8.00 1960'4 Cast Iren Weter Quality 120 TRO Assertable Ref from Year's Present Ref by Greenweed R Passack Are from Year's Pet to Hydrone 1947-73 has Sealth of Sammers St. Under Steverin Are Sealth of Sammers St. Under Steverin Are Are Stated Them Are from Sommers to end north of Chestmat St. Seaso LT shorn Tests Are from Sommers to end Andread Stever David Parista Ches to end Chestmat Stever from Parista Ches to end Chestmat Stever from Parista Ches to end Chestmat Stever from Front Are to Central Area Chestmat Stever from Front Are to Central Area Chestmat Stever from Front Are to Central Area Chestmat Stever from Front Area to Central Area Chestmat Stever from Front Area to Central Area Chestmat Stever from Parista Chestmat (Chestmat Chestmath Stevers (Chestmat Area (Chestmath Stevers (Chestmath Stevers Area (Chestmath Stevers (Chestmath Stevers Area (Chestmath Stevers (Chestmath S Replace Replace Replace 6306 Morth Operating Area LONG HILL TWP \$370,000 L850 8 00 Ductile fren 1850% COUL STOR Solety and Reheastly/Struct 110 160 10 6528 LONG HILL TWP \$912,000 1,540 8 00 Cost from 180 System Flows and Pressure North Operating Area LONG HILL TWP \$375,000 1,175 8.00 Cast Iron 6325 Borth Operatory Area LONG HELT TWP
LONG HELT TWP Safety and Rahability/Struct Safety and Rahability/Struct Safety and Rahability/Struct Safety and Rahability/Struct Surtile Iron
Ductile Iron 8538 6528 6539 6534 6536 6723 6760 6750 6751 6752 \$395,000 \$327,000 \$327,000 \$174,125 \$54,000 \$190,000 \$190,000 \$400,000 \$400,000 \$190,000 \$310,000 \$310,000 \$310,000 Replace 1,975 1,685 1,685 993 368 913 1,793 030 2,000 950 1,150 1,500 8 000 6 000 6 000 8 000 8 000 8 000 8 000 8 000 8 000 8 000 8 000 290°s Unincomi 190°s 1930°s 1930°s 1930°s 1990°s Unincomi Unincomi Unincomi Unincomi Unincomi Unincomi Cost Iron
Cost Iron 780 780 780 780 780 780 780 780 780 780 6755 Love nas, "memory way o'm carptur y to may Server!
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Cartien Read, From White Bridge Rd, so Degreese
Lumberson. Creek Road: Intel® Storest on HULLA 65
Lumberson. Read Servet. Chosehart Street to Main-Servet! 6070 LONG HILL TWP \$210,000 1.050 8 00 1850'e Cost tren Safety and Releasing 120 TBO 10 LONG HILL TWP 7054 North Operating Area \$933,500 12.00 19704 12 Cartinos 20160 SUMBERTON TWP \$20,000 6 00 1970'1 Cart Iron LUMBIRTON TWP \$115,000 17 00 Cast Iren System Flows and Prosours

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New Jersey American Water Company, in 2015 Foundational Filing

425 120 6012 185,500 120 1,000 6019 \$190,000 \$ 00 Ductile tren 1950'4 Cast tron 110 téo 20 7189 4 00 120 101601 363 MANTOLDEING Abandophing: Shell Bladd promises a price of the Manageologie of Performant Lain Offrom Table Pland it Terriments.
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Asbertos Coment 71 27 \$49\$ \$770 \$773 \$772 \$773 \$774 \$912 100 1,500 1,000 1,700 1,700 800 1,000 1,200 708 19479 1930's 1930's 1940's 1940's 1940's 1940's 1940's 120 120 120 120 120 120 120 120 120 109601 109601 109601 109601 109601 109601 109601 109601 6161 MANVILLE BORDUGH 0 00 Safety and Reliability/St \$014Q4 Linknown
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Seriom Flows and Pressure \$90,000 \$125,000 \$185,000 \$102,000 \$310,000 \$193,000 160 300 458 L150 610 Ductile from Ductile from Ductile from Ductile from Ductile from Ductile from 1016Q4 2016Q4 2016Q4 2016Q4 7016Q4 7016Q4 1940's 1940's 1940's 1940's 1910's 6577 6759 6768 6763 5708 120 130 130 120 120 120 \$705 MAPLEWOOD 3747,500 Replace 1.100 12.00 130 180 1810'0 5706 5712 6787 1910's PHYSTACOD PHYSTACOD \$4\$0.000 \$113,000 Replace 2.009 673 11 CO 8.00 301504 Ductile Iren Cost from 120 6 00 Cost tran MAPLEWOOD \$4,500,000 10,000 Cart from North Operating Ares 1910.1 Water Quality 301601 120 MENDHAM GOROUGH MENDHAM BOROUGH SKENDHAM GOROUGH 6308 6334 1.610 1.610 6 00 6 00 Cast Irea Cast Irea 6127 North Operating Area \$764,000 8,830 0.00 Ouctile men System Flows and Premiure 139 TED Buctile Iron
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Cast Iron 6329 6329 8330 6332 6333 \$198,000 \$260,000 \$1,181,250 \$164,400 \$990,000 L965 L300 5,210 8)5 6,800 8 00 8 00 12 00 6 00 6 00 Cost Iron Aubertos C Ductife Iron Cast Iron Cast Iron Safety and Releasing Safety and Releasing System Flows and Pressure Selety and Releasing/Source System Flows and Pressure 180 180 180 180 180 120 120 120 120 120 6934 9,950 9 00 120 180 Behab 6333 \$1,990,000 9,950 8 60 Cast Iron 8 Cast Iron 110 6335 6340 \$1,350,125 6,921 6,585 12.00 Duttle iron Duttle iron n Cost Irun Cost Irun System Flows and Prosoura System Flows and Prosoura 120 120 180 \$1,428,750 6.350 4793 MENOHAM BORDUGH \$330,000 1,630 8 00 120 185 THE REPORT OF THE PARTY OF THE 6 Cast box 6792 9 00 120

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Non-Jersey American Water Company, Inc. 2023 Foundational Filing

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M	Dietrica	Municipality	Prodect Titte	MIAN Funded (delars)	Project Type	Proposed Longith (foot)	Proposed Dis. Backers	Proposed Pipe Material	Details Installed	En Din (inches)	Exacting Pipe Meanted	Acceptance Association of Consideration	Project Durotten		Provincely Submitted for SPU Review	Rounded Wolghod Store
6630	Fronth Operating Area	МЕНОНАМ ВОКОИСН	ANEJODANAN THEP -Floring Form Rid From Education Auto- to Engineered Trail	\$562,500	Replace	2,500	12 00	Ductile tren	Unknown	12	Ductile man	Safety and Reliability/Structural	129	760		10
7036	Horth Operating Area	менрими волоцен	Englished Well to Harton tank feed	\$600,000	Replaca	3,000	12 00	Other	1960's	13	Case trem	Safety and Rekeptiny	139	180		90
6323	North Operating Area	MENDHAM TWP	Browning Court from Corey Lane to and	1245,300	Rehab	F110	6.00	Cost tren	Unknown		Cast Iren	Water Quality	120	190		10
6334	North Operating Area	MERDHAM TWP	Thickery Lane from Carry Lane to end BAENDHAM TWF - Hillings Cir from Oper Bun to Chorry	000,8062	Retrob	2,010	6 00	Cost tres	Uningwi	•	Cast Iren	parate Orogalia	110	CBS		30
6794	Morth Decreting Area	MENDHAM TWP	time	\$940,000	Replace	4,500	9 00	Ductile wen	Unit sepun		Cast from	Safety and Residents/Structural	130	TBO		89
4795	North Operating Area	RAE HOHIAM TWP	MENDHANA TWP Englished Trail from Deer Run to Form R4	1860,000	Replace	4,300	8 00	Ductore from	Unhasen		Cost from	Safety and Reliability/Structural	129	TBO		89
222	Coastal Operating Area	MICOLI TWP	Aligida Tawnship Mechanic Street Between Magnello Drive & Geshen Road (CNI-8-II)	\$175,000	deplose	100	12.00	Duckie Iren	1930/	4	Cost Iron	System Flows and Pressure	120	Teo	Yes	100
229	Caustal Operating Area	MEDDLE TWP	Anddis Taumstop Goshon Road Sonwood Mechanic Street & Homona Anthrop (Col 8-6)	\$375,000	Regisce	700	12 00	Ductile sea	1930's	2	Galvenzed Steel	System Please and Pressure	120	190	Too	36
343	Countel Operating Area	MIDDLE TWP	Made Township : Stone Harbor Blvd - Between projeton Rd & Boyberry Crivs	\$100,000	Replace	400	16 00	Ductile tress	1900's	6	Costinen	Responsess/Departurity	130	780	Tes	40
5334	Coastal Operating Area	MIDDLE TWP	Valley flood between Pacific and End	50	Replace	1.500	8 00	Ductile tren	Unterwe	2	Gehanized Steel	System Flows and Pressure	120	TED		be
535F	Enertal Operating Area	MIDDLE TWP	Eldredge Road from Bennett Road to End	\$300,000	Replace	LSOD		Ductille Iron	3940's	4	ACP	Sarety and Rehability/Structural	120	TBO		10
1408	Coettal Operating Area	MIDDLE THIP	Mechanic Street from 8 Inch 01 to Otes Creek Read	\$140,000	Replaca	700	11 00	Ductile Iren	19500		Cout wen	System flours and Pressure	120	180		10
1409	Control Operating Area	MIDDLE PWP	Marhanic Street from the retroed tracks to learth Bayd Street	\$110,000	Replace	110	13 00	Ductile Irea	1980's		Cost tree	System Flours and Pressure	120	100		10
1410	Coestal Operating Area	MIDDLE TWP	Shiphone Screet from the 6-Wch CI connection to Ball and Arenue	\$\$4,000	Reptace	270	E2 00	Ducthe mon	2000'4		Ductrie Hen	System Flows and Pressure	130	100		39
3411	Cooks Operating Area	AMPOLE TWP	Gethen Read from Mechanic Sweet to the 3 inch connection	\$110,000	Replace	750	17 00	Ductile Iron	1950's	4	Cast Iron	System Flows and Pressure	130	780		10
3614	Coastal Operating Area	MIDDLE TWP	Diss Creek Road from Methenic Street se Hand	\$134,000	Replace	620	12.00	Ductile Iron	1950's		Asbertos Comons	System Flows and Pressure	120	180		90
6233	Coestal Operating Area	MINDOLE TWP	BIT Allentic Avenue between Boyd St and Route 9	\$131,250	Replace	710	8.00	Ductile trea	£990'e		Cett from	System Flows and Pressure	120	180		10
6194	Caestal Operating Area	INVOOLE TWP	MT Bennett Read between Route 9 and GSP	1216,210	Replace	1.850	8 00	Ductile tree	19400		Aubenter Comenc	System Floors and Pressure	320	TRO.		10
6185	Coostal Operating Area	MADDLE TWO	MT - Boyd Street between Remney Place and Mechanic St	\$162,730	Reptece	990	8 00	Ductile tran	1950's	4	Cast tren	System Flows and Pressure	130	780		10
6236	Countal Operating Area	AHDBLE TAP	MII - Boyd Street between Stites are and Pocific Ave	\$330,250	Replace	1,410	8 00	Ductile Iron	1930's	6	Cast Iren	System News and Pressure	120	160		10
6198	Counted Operating Area	WEDDLE TWP	MT Daugious Ad bottomen Suranett Ad and southern and of Daugious	\$27,125	Replace	135	6 00	Ductile wee	1980's	4	Ductife Iran	Safety and Renaptity	120	CST		15
6199	Constal Operating Area	MIDDLE TWP	Mill: Popler Street between Mechanic St and Church St	\$94,900	Replace	540	8 00	Ductile Iren	1970%		Asbenze Coment	System Haws and Procesure	120	180		20
6143	Coestal Operating Area	MIDDLE TWP	INT Stdredge Read between Steel Rd and Enil of Eldradge	\$105,000	Replace	600	6.00	Ducthe Iron	1940'1	4	Arbettos Coment	Salety and Religantry	130	TBO		10
6143	Coastal Operating Area	MIDDLE TWP	MT - FRich Road between Steet Ad and End of Frich Ad	5122.500	Replace	700	600	DuctPe Iren	1940's	6	Achertes Coment	Section Flows and Prossure	120	180		10
6344	Coestal Operating Area	MIDDLE TWP	Ref - Stood Road boswoon Howell Re and End of Stoot Ref	136,710	Represe	310	6 00	Ductile man	1940's		Asbertes Compat	Safety and Reliability	120	160		10
6345	Coestal Operating Area	MIDDLE TWP	MIT - Bonnett Road between GSP and Fren Rd	\$183,300	Replace	940	8.00	Ductile tren	2940%		Appesses Comune	Safety one Renewilly/Structures	120	160		10
6147	Constall Operating Area	MIDDLE TWP	Maratan Lin between Cirbs St and End of Member	\$43,000	Replace	368	6.00	Ductile Iren	1940')	4	Azbestos Cement	Solety and Releasibly	120	180		50
6153	Coestal Operating Area	MICOLE TWP	AVT Orbit Lane between Reyte 9 and End of Orbit Lin lengt	\$229,250	Peplace	1,110	e co	Ductes you	1850'1	4	Aphretos Comoni	System Roses and Pressure	120	100		10
6353	Constal Operating Ares	MIDDLE TWP	MT Casanial Avenue between Raute 9 and End of Calanial	\$196,000	Reptace	1,820	8.00	Ductile Irea	1990%	6	Asbertos Coment	System Flows and Prossure	120	T80		30
6155	Constal Operating Area	MADDLE TWP	MT - Stites Avenue between Bayel St and Must St	\$33,250	Replace	190	8.00	Duckle trea	1950%	4	Asbettes Coment	System Flows and Pressure	120	183		10
6156	Counted Operating Area	MICOLE TWP	MT - Easy Street between Royle 9 and End of Easy St	\$120,750	Replace	690	8.00	Duritle Iron	197071		Auberton Coment	Safety and Reliability	320	180		10
\$240	Central Operating Ares	HOUGINGS ESESSIONS	Chestour St. From Rarttan Ave, in C Street	\$263,600	Replace	1,300	0.00	Ductile Irpn	1950'1		Cost was	Safety and Rehealthy/Scructural	130	201601	Yes	30
1243	Control Operating Area	AMODULISEX BOADUCH	# Street From Chestnut St. to Ashland Ave	\$101,400	Beglace	700	8 00	Ductile Irea	1950's	6	Cast Iren	Safety and Rehability/Structural	129	3016Q1	Yes	30
580	Constal Operating Area	PARODIELONAL	Modelcom Campboll Aronus Bridge over Creek	\$30,000	Beolece	100	6 00	HOPE	1950's		Asbertos Començ	Safety and Reliability/Structural	120	180	Tes	10
293	Constal Operating Area	MIDDLETOWN	Adddoomen - Stept Road, ACClos's propi-	\$200.000	Restoca	900	15 00	HOPE	199074	12	Carl Iron	Safety and Reliability/Structure!	120	190	704	30
5301	Coastal Operating Area	MODLETOWN	MUddlessent Surgen St Mein Replacement	\$161,230	Replace	1.073	8 00	Duralle from	1950'0	3	Garvenzzed Steet	Sofety and Rolls billing	130	160		30
5429	Country Operatory Area	MIDDLETOWN	10th Street Main Regiscomen	\$195,000	deplace	1,300	8 00	Decide Iran	1950%	1	Get-ontred Steel	Solety and Rehability	320	160		30
5448	Constal Operating Aven	MODETOWN	Mappingum - Fine St main Replacement	\$122,000	Reglace	860	6 00	Ductile Iren	1930'1	2	Gatvanizad Steel	Refocation/Opportunity	170	TEO		20
5799	Coestal Operating Area	MIDDLETOWN	Vols Are Man Replacement	\$40,000	Paglace	+00	6.00	Ductile wan	18301	2	Galvanized \$1445	Safety and Reliability	120	2016Q4		20
1808	Constal Operating Area Constal Operating Area	MODETTOWN MINISTOWN	Summit Ave Main Replacement Appleton Ave Main Replacement	\$294,750 \$150,000	Replace	1,000	8 00	Ductile Iran Outlie Iran	1930's	2	Golvansod Stool	System Flours and Pressure	120	780 201404		90
3817	Courts Operating Area	MIDBLETOWN	Bischigen Ave Man Replacement	\$255,000	heplace	1,700	8 00	Ductile Pen	19404	2	Cast tree	Seferty and Relubbing Seferty and Relubbing	120	101904		20
3619	Constant Operating Area	MICOLETOWN	Montans are litera Replacement	1210,000	Replace	1,700 L400	8.00	Ductile tres	19401	1	Cast Iren	System Filose and Prospure	120	3016Qs		30
					1000.000								0.000			

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New Jersey American Wisser Company, Inc. 2015 Faund Monay Filing

Stipulation - Exhibit A

5819 5830 5821 3832 5900 7040 7133 7168 40 3709 5710			Project Title	(dallers)	Project Type	(foot)	(Inches)	Proposed Pipe Material	Docade Installed	Er. Oto. (Inches)	Exercise Pape Material	Azcelorated Asset threatment Category	Project Duretten	In Service Period	Previously Submitted for SPU Revious	Roundod WatgMod Scare
\$821 \$852 \$800 7060 7133 7160 40 \$709	Constal Operating Area	MIDDLETOWN	York Ave Main Regiscoment	\$360,730	Beplace	1.125	8.00	Dugged Irpn	1930's	2.25	Cost tree	System Figure and Peggure	120	TBO		20
3652 \$900 7040 7133 7168 40 3709	Country Operating Area	PAROTETOWN	Wood Are Man Replacement	\$338,730	Regtoco	1,525	8.00	Ductile Iren	1830.0	2	Cast tren	System News and Pressure	120	TRO		50
\$900 7040 7133 7168 40 3709	Cooks! Operating Area	MIDDLETOWN	Georgie Ave Mass Replacement	\$94,000	Beplece	360	8 00	Ductile from	19300	2	Cast Irpn	Sefety and Renobility	120	180		20
\$900 7040 7133 7168 40 3709	Capital Operating Area	MIDDLETOWN	Writrent Street Miss Repairment (east)	\$\$25,000	Replace	3,300	12 00	Ductile tress	1940's	12	Cost Iron	Sofety and Retability	320	180		20
7040 7133 7168 40 3709	Coastal Operating Area	MIDDLETOWN	Represent Miver Road (west) Main Replacement	1400,000	Regiece	2,900	13 00	Ductre Irea	194071	12	Caus trees	Solety and Rehability/Structural	128	Tag		20
7133 7168 40 3709	Counted Operating Area	MIDDLETOWN	Lealington Ct ddain Replacement	\$150,000	Replace	1,000	9 00	PVC	1960's		Asbertes Comment	Safety and heliability/Structure/	120	7016Q4		20
7168 49 3709	Cooplar Operating Area	MIDDLETOWN	VMT 1059C & VMT-1043 Yeave Replacement	\$1\$0,000	Replaca	30	74.00	Decide work	1960'6	34	Concrete	Safety and Reliability/Structural	120	201601		30
40 3709		MADDLET DWH	Busines 2 16" Valves at East and Park	\$100,000	Regisco	20	16 00	Ductile iron	2950°s	16	PCCP	Safety and Retability	120	201601		10
3709	Coostel Operating Area								Unknown						-	
	Worth Operating Area	MILEURN	Millbura: Brawning Rd. Fennyson to Wilte Oak	\$380,000	Replace	1,900	8.00	Ductile Iren			Cart Iron	Safety and Rehab-Ry/Sinyctural	£30	TBO	Tes	30
	North Operating Area	MUBUM	Lindon Street from Sycamone Road to Wyoming Ave	\$180,000	Replace	900	9.00 8.00	Ducate mm	1910's		Cast Iron	System Flows and Pressure	130	780		20
	North Operating dree	MILLBURDS	Eles Street from Sycamore to Wyomang Coder Street from emiting main between Segamore	3119,000	Replace	785	800	Ductile tren	19101			System Flows and Pressure	130	180		20
1211	drarth Operating Area	MAKE BUILDE MAKE BUILDE	and Wyening EMOLLWOOD FADAN WELLS TO PARE	\$100,000	Regioco Regioco	450	8 00	Ductile Iran	1900.0	,	Cost Iron	System Flows and Pressure System Flows and Pressure	120	780		20
4183	Herth Operating Area															
6308	Marth Operating Area	MILLBURN	FIELDING MILLBURN	\$93,000	Pableca	110	6.00	Ductile Iren	19500	2	Cost Iron	System Flews and Prosuure	150	180		10
6316	Neith Deersting Ares	PATTBOAM	SHORT HILLS AVE	530,000	Replace	100	8 00	Ductile tren	1910%	6	Cost Iren	Relocation/Opportunity	120	teo		30
6790	MOTTH Operating Area	WILLIAM	Wygemmig Historic District rehabilitation of unimodi cost from water stamps	\$4,500,000	Betrok	20.000	6 607	Cast tren	1910'0	6	Cast Iren	Water Quality	120	2016Q1		30
6796	North Operating Area	MILLBURN	MILLBURN East Pine Terr from Blatueral Way to Complets Rd	\$180,000	Auptore	908	000	Ductile Iron	Unknown		Cost from	Solety and Rokobbity/Structural	120	180		30
6792	North Operasing Area	MILBURN	MILL BURN - Highwess Rd from Hertshorn Dr and Fortstook Dr	\$220,000	Replace	1,100	8 00	Duralle Irea	Untergreen		Cart Iren	Safety and Resiability/Structural	820	780		30
6799	morth Operating Area	MILLBURN	BALLBLICH Rose Ad from Winthrop Bd	\$460,000	Replace	1,300	9 CIB	Ductille Iren	Unknown		Cast Iren	Soleny and Reliability/Structural	320	YBO		10
4400	North Operating Area	MILBURN	MILLSURY Siver Sering file from South Gronge Ave to CNB Short Hite Rd	\$1,200,000	Rogalycu	6,000	6 00	Ductile trans	Unknown		Cast from	Soluty and Rehability/Structural	330	190		10
6618	Hearth Operating Area	MILBURN	MILLBURIN White Oak Aidge Ad Bern Hobert Ave to the grade Sho	\$460,000	Replace	1,300	€ 00	Dortlie Iren	Unkapun	4	Cost from	Safety and Resolutey/Structural	120	160		90
6031	trarth Operating Area	MILBURN	antilBuffer - Hartshorn Dr from Highwese Rd to Oakey Ad	\$880,000	Applace	1,900	8.00	Durine wen	Unbaque		Cost from	Saleny and Resubstity/Structures	120	TRO		10
\$600	Herth Operating Area	MILL BUMPS	MILLEURN INSTANCES IN NEW BANGOT DE 10 GEORGE Anna	\$430,000	Replace	2,109	6 00	Decide Iron	Unknown	4	Cost Iron	Safety and Rehability/Structural	120	180		26
6414	Morth Operating Area	MILEURY	Alt; BURN: Righland Ave from Western Dr to Hobert Ave	\$480,000	Nepfore	2,400	9 CED	Ductile Iron	Unknown		Cost tree	Selety and Rehability/Structural	120	110		30
6879	Morth Operating Area	MILEUM	MILLIBURY Great Mile Rd from Old Short 1996 to Wildwood	\$100,000	Replace	1,400	0.00	Ducte inse	3900's	4	Cart wen	Safety and Rollability	120	T80		20
6876	North Operating Area	MILLSHAM	MALLELINE Angel St from Route 78 to Esses St	\$860,000	Replace	3,400	9 00	Duc'tle limit	Umbapum	4	Cast Iren	Relocation/Opportunity	120	101504		40
6687	Iteeth Operating Area	MILIBURN	has Libert Co. Short hallo he from Street Spring grade tine nase Fee MB	\$740,000	Regioce	3,700	8 00	Decide Iron	Undnown		Cast tren	Sofety and Renability	120	180		30
6486	Irenth Operators Area	HAUBURN	SHELBURSE Did Short Hills Rid from Personage Hill to Grade line near 5 Beachcroft	5320,000	Reploca	2,600	¢ 00	Doctile Iren	Unkapun		Cost tren	Solety and Relability	120	180		30
4897	tearth Operating Area	PWFFBFBBB	MILLEURIN HOBBET from White Cat Ridge to Brantwood	\$160,000	Replace	1,400	8 00	Ducise mon	Unkapun	•	Cast Iron	Safety and Rehability	120	180		10
6490	Marth Operating Area	MOLEUMN	MRILBURM - Hebert from Smalls St in White Oak Ridge	\$480,000	Registr	2.600	2 00	Ductile Irea	Unknown	4	Cost Iron	Sofety and Robalding	120	160		30
6819	North Decemy area	PHITETHE	MELECULE Hobor from registers to Scoron St MELECULE Hobor from DM Short rolls Ad to	\$170,000	Replace	850	8 00	Durate Hon	Unknown		Cost Iren	Selety and Reliability	120	180		10
6900	tearth Operating Area	MHL(BLIRM	Mary with the contract and the trees and and and an	\$110,000	Asplace	1.100	9 00	Doctor wow	Unknown		Carttran	Solony and Ronabilly	120	180		10
7055	Narth Operating Area	MILLBURNE	Great Hittle Rd from Willelmood to Holly Dr	\$460,000	Replace	2,300	6 00	Ducte wen	Unknown		Cast Iron	Belocation/Oppertunity	120	2014Q2		20
7111	North Operating Area	ANLLOURN	Canno Greek Rd Mass Replacement	\$182,000	Replace	910	8.00	Ductile Iron	Unknown	Untrawe	neonday .	System Hours and Pressure	110	780		10
5804	Countal Departing Area	MONMOUTH BEACH	Griffin St Main Reprocomens	\$325,000	Roglace	1,500	8.00	Ductile tree	19474	4	Asbertos Comons	Sofety and Robability	120	2016Q4		20
1805	Coastel Operating Avea	МОНМОЛТИ ВЕАСИ	Riverdale Ave Main Replacement	\$352,000	Replace	2,310	12.00	Ductile tree	19201		Cost Iron	Safety and Betapiety	320	100		30
7157	Council Operating Area	монмочти велен	Estall Avenue from Wesley to Graffin, replace 3" gathenized	\$90,000	Regioce	380	8 00	Ductile Iran	(950')	1	Galvanieod Stool	Solety and Behabber	320	101401		20
400	Southwest Operating Area	MOUNT HOLLY TWP	Mount from Charanut Street Weshington Street to Easting 6*	\$95,000	Replace	500	6.00	Ductine origin.	1930'0		Cost tran	System Floors and Prossura	120	180	Tes	20
401	Southwest Operating Area	MOUNT HOLLY TWP	Mount Helly Coary Avenue - Ridge Avenue to Coder Street	\$218,000	Regisco	1.200	8 00	Duetile from	39600	4	Cost from	System Figure and Prospers	120	Tap	Yes	30
5408	Sauthwest Operating Area	MOUNT HOLLT TWP	Mount Hally - Charry Street - Ridgersy Street to Garden Street	\$160,000	Aeplacs	1.310	800	Ductile Iron	1810's	3	Cast Iron	Water Quelty	120	180		30
5511	Southwest Operating Area	MOUNT HOLLY TWP	Shound Helly Adeses Helly Avenue - MES Street to Bidgowey Street	\$437,000	Replaca	3,300	0 00	Ouctile iron	193074	4	Cast tree	System Flows and Pressure	120	180		20

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from Jersey American Wreser Company, Inc. 2015 Foundational Filing

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	Snamet	Managedity	Progest Title	NIAW Funded (dellars)	Project Type	troposed tength (feet)	Proposed Dig. (Indivo)	Proposed Plys Motortal		Es. Dis. Briches		Accelerated Asset Investment Category	Project Durstien		Provingly Submitted for BPU Seview	Rounded Weighood Score
5313	Southwest Operating Area	MOUNT HOLLY TWO	are Holly - engineers moor intersection of MAI 51 and engh 51 and intersection of throad 32 and distremented 51	\$30,000	Replace	110	6.00	Ductile free	Unbrews	Unbagu	a UMbapum	System Flows and Pressure	130	180		10
\$\$14	Southwest Operating Area	MOUNT HOLLT TWP	Mount habitumberton Madison Avenue/Main Street Washington Street to VLUM SES (North of ERA Avenue)	\$1,000,000	Assisce	4,500	15 00	Ductile iren	1930 1	*	Cart Iron	System Flows and Prossure	120	190		80
5819	Layerwest Operating Area	MOUNT HOLLT TWP	Million Holly Bancocae Read Ingh Street to essuing 8° Of mein worst of hydrant HMITH-170 mear Levis Orive	\$700,000	Regisco	1,500	12 00	Ductes man	3900%		Cost Irea	System Figury and Pressure	120	790		39
5524	Southwest Operating Area	MOUNT HOLLY TWP	Alt Helly Inchsorolle Rd Servens Dr to Broad St and Rancoces Valley Bog H.S. Otherway	\$440,000	Replace	2,500	8.00	Ductile wen	1990's		Cost tree	System Flows and Pressure	120	180		30
3517	Southwest Operating Area	MOUNT HOLLY TWP	648 Holly Hydrants near Intersection of Pine St and Hydrog St	\$30,000	Replace	190	6 00	Ductile Into	Unknown	Unknow	n Unknown	System Flows and Pressure	130	180		20
3310	Southwest Operating Area	MOUNT HOLLY TWP	Mount holly then Street Invested Avenue to East South Avenue	\$190,000	Replace	950	12.00	Duttle Impo	1920's		Cast from	System Flows and Pressure	130	700		30
3520	Southerest Operating Area	MOUNT HOLLT TWP	Maunt Inelly Marine Highway / Washington Screet King Street to Descen Road	\$1,200,000	Regioco	8,300	16.00	Ductile was	1950'e		Cost tren	System Flows and Pressure	120	180		20
3348	Southwest Operating Area	MOUNT HOLLT TWP	Mount Hotty - Riemor Street: Washington Street to dirth Street and Arch Street from Renter Street to Ont Street	\$100,000	Reglace	3,050	4.00	Ductile Iren	1940,4		Cast Iron	Water Quality	120	780		20
\$545	Southwest Operating Area	MOUNT HOLLT TWP	bits, Nelly / Namespart Clean and Bing for replace in Aind) Critishs on multiple streets	1975.000	Refeb	6.500			1990's	4	Cost tren	Water Quality	120	180		20
1940	Southwest Operating Area	MOUNT HOLLY TWP	Adount Holly: Groon Street: Station to Indictor Rd via Groon St, MMISE, and Burtanwood St	\$960,000	Replace	4.900	12 00	Ductile tran	Pre 1900	11	Cart tree	Safety and Rehability	120	TBD		30
3966	Southwest Operating Area	MOUNT WOLLY TWP	blowns Helly Wesley Court Intoory Street to Dood End	\$37,000	Replace	300	4 00	Ductile Irea	295071	1	Asbertos Comens	System Flows and Pressure	130	100		30
3947	Southwest Operating Area	MOUNT HOLLY TWP	Mount Holly - Windoor Place I nomeyload Avenue to Dead End	\$17,000	Reptace	100	4 60	Ductile free	1950%	4	Aubertos Coment	System Floors and Pressure	120	160		80
5994	Southwest Operating Area	MOUNT HOLLY TWP	Abount Helly - Clover Street - Union Street to Gordon Street	\$172.000	Replace	900	8.00	Direttle Iran	39201		Cast Iran	System Flows and Prospure	120	180		90
4254	Southwest Operating Area	MOUNT HOLLY TWP	Lift Holly Clean and line neighborhood north of Green St Station	\$1,\$75,000	Asses	10,300			1920 s		Coult Irgn	teracer Charles	130	TãO		39
5887	Southwest Operating Area	MOUNT HOLLY TWP	Mount Holly 3nd Street Herth Hunterdon Avenue so makin Cumbarland Avenue	\$104,500	Peplece	550	9 00	Dweldig stem	3950%	2	Gelvenzed Steel	Water Quality	120	180		30
6104	Southwest Operating Area	MOUNT HOLLT TWP	Mount Holly - 2nd Street - Herth Hunterdon Avenue to Dead End	1171,000	Reploca	900	0.00	Ductile iron	293071	,	Auberton Coment	Mases Chessi	120	TBO		30
6985	Southwest Operating Area	MOUNT HOLLY TWP	Mileuns Holly Est Street - Horth Hunterdon Ave to Horth Cumberland Ave Mount Holly - Samerost Avenue, Hotomon Street,	\$95,000	Argisce	900	000	Ducine yes	1940's	4	Cast Iron	Weter Questy	120	TRO		30
6909	Southwest Operating Area	MOUNT HOLLY TWP	Carrien Avenue Westungton Street to Washington Street	\$247,000	Renag	1,300	0.00	Ductile Iron	1900's	4	Cast Iron	West Chees	150	Teo		20
6991	Southwest Operating Area	MOUNT HOLLY TWP	Mount trolly - Liaguacett Lane and Eagle Avanue : Washington Street to Dood Eng	\$294,500	Rehab	1.110	800	Ductile Iren	1930's		Cost Irea	Water Quality	130	TEO		38
6992	Southwest Operating Area	MOUNT HOLLY TWP	Adount Molly - Dob Street and Chestout Street Weekington Street to VMCH-146	\$190,000	Auptoce	1,000	0.00	Ductés man	1920's	4	Cest Iren	Mitter Chromis	130	Caf		20
7011	Southwest Operating Area	MOUNT HOLLY PWP	Majore Helly - Maple Avenue (CR-582) - Marine - Highway to Hydroni HHAS-7	581,920	Regiace	425	8.00	Duckle Iron	3950'1		Cast Irea	Safety and Resolutey/Structural	120	100		20
7201	Southwest Operating Area	MOUNT HOLLY TWP	Mount monly: Levis Drive: Rencoces Rend (CR-638) to ingh Street (CR-691)	\$495,400	Replace	2,440	8 60	Decide pen	1950'9		Aubertos Comesa	Systemed Economic Growth	120	190		20
7309	Sectionest Operating Area	MOUNT HOLLY TWP	Shount helly. Storth and South Atenta Avenue. Loss Drive to Levis Drive	\$425,600	Replece	1,140	8 00	Ductile free	1950's		Asbestos Coment	Safety and Rollability/Structural	120	TBO		20
5939	Southwest Operating Area	ыт срикам	Mount Ephraiss - Cleveland Avenue - Wrest Kings Highway to Dood End	\$210.500	Regisce	1,150	8 00	Ductes son	1940's		Cast Wan	System Flows and Prospers	120	180		90
\$840	Southwest Operating Area	MI [HANN	Majort Ephraim Juliarean Avenue - West Kings Segtimen to Dood End	\$228,000	Papiece	1,300	0 00	Decide Irgin	8940's		Cock from	Salony and Robe birty/Structural	130	780		20
3941	Southwest Operating Area	МТ ЕРИВЛИЯ	Annunt Ephresm (MEAvenue - East Kings Inghway be VAIG-03	\$121,600	Replace	540	9 00	Ductile Iren	3940's	4	Cast tron	System Flows and Pressure	120	180		30
5942	Southwest Operating Area	MT EPHRAMA	Mount Ephraim - Lambert Avenue and Park Circle Drive - Staten Avenue to VME 378	\$169,500	Replace	2.030	8.00	Ductille Iran	19474	6	Case Iron	System Flavor and Presoure	120	180		20
2949	Seattlewest Operating Area	MT CPHANNA	Mount Ephroom: Budderow Arroque - Bell Road to Dood End	\$114,000	Replace	600	6 60	Ourtile Inen	1940 e	4	Cost Wee	System Floors and Prosture	120	TRO		30
6409	Savaness Operating Area	SAT EPHRAMA	Méwal Estratu - Herding Avenue - West Kings Highway to Wintmée AVenue	\$304,000	Replace	1.400	8 00	Ductile Iron	15001	4	Cest Iran	Solvey and Resobility/Structures	170	Tep		20

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6347	#	6617	9189	5333	1199	6119		6812	8809	100	9600		1040	6803	6403	1069	553	34	5100	1065	MIL	7069	7047	1009	5000	1000	6023	5000	597	3976	200	5249	\$144	SE	7	3	1 5	ŧ	Ĭ			
Herth Operating Area	Hearth Operating area	Hards Operating Aveg	Month Operawing Area	esorth Operatury Aree	NAMES OFFICE AND STREET	date Sundated states		Warth Operating Area	Harth Operating Area	Borth Operating days	marth Operating Area		North Operating Area	Morth Operating Area	Hersh Operatory Area	Marth Operating Area	Harth Operatory Area	Merth Operating Ares	Coordal Operating Area	Count of the State	Constal Operatory Area	Caestal Operatory Area	Cookin Operative Area	Coastel Operating Area	Caestal Operating Area	Cantal Operating Avea	Countal Operating Area	Bary Fuch and prices	Courtal Operating Area	Coastal Operating Avea	Coasta Decision (ness)	Caestal Operating Area	Canetal Operating Area	Cassal Operating Area	Cookled Operating Area	Cassial Operating Area	County Day ying Aree	Coastal Operating Area	Southwest Operating Ares	Depris		
STANDONORM MEN	THIRDWON MIN	ENTONORS WIN	STREET WORK WITH	NEW MONDENCE	EDWINDLY ON A MEN	The other hands	trial parameters	23M3ONOR9 M3M	DMIDNOWS MIN	MIM MONDING	22M MANAGEM AN INC.		STANDONOMA MATH	ENIMANDEME	PLAN NOVOENCE	ENHONORA MIN	SOURCE MAN	TONDONOM MIN	MET SMALL SHE	MI Florid City	Jan La Jan	MUTATIO	Mentaline	DATLE DO	DM124300	Perfective	PWLLTW	INCLETE	Manage	MUTTA	MALLAN	Defil be	MALIAME	PACL 01%	MOTOR	JULIE IN	Punteby	MUTEIN	MT (Profused	SALunck Spalling		
INTW PROVIDENCE. The february from Majore St to	MEW PROYDERCE: Sewhyste Rd from Sevih St te Natheway Dr	Terring Programmer : Sample Se Programmer Control	Springfield has and Stifferent has	Lenngston ave to Sermytheid Ave	MCW PROVIDENCE: Pros Ct from Place Way	Tichler PI	MEN PROVIDED Poor It from Covery days to	ONLY PROVIDERCE PRIVAL STROM Springflers Ave to Commissions Africans	HIM PROVIDENCE Magnets by from Springhard Ares	to hearth.	beringfield free	MERY PROVIDENCE: Gaves By from Lourn 31 to	NEW PROPROTICE: Covers Ave from Magde to throse	WEW PROVIDENCY - Control And Prom South St to Sorroghold for	Tell Gets	Springfield Ave From Control Ave to Pine Way NEW PROVIDENCE - 6TH Ave From Divingston Ave	Springfield Ave	Shull of Greenwood Ed	Stanner Ave	Contributes	Marrisey Road 6"Cl main replacement	Lyuronce and hitsh Register property	Construent for Man be placement	Coused Ind	Larrance Off.	Part Pf Repoune Siles Elemented Or	Aughty Flat a	Clayton ave	Robbint of	All Dermort Rd Shri	Vendy yes	Regitives - Personagorania any listan Reprocessiona	Heptune Control Ave Idean Brokecoment	and from 6 drifts to because were ordinate to consume	Hepture Securit has them hadge to writtenite?	Regiture Hillyda Road, from Brighton to terminus	Ocean Grave Employ St. Fram Book to Ocean	Ocean from Maan to Plymon	Mount (phroom. Grant deserve: West English (Money (CR-51)) to bed hood	Project Title		
\$400,000	\$940,000	\$740,000	\$440,000	\$420,000	\$100,000	dest'imp &	2000	\$344,000	2230.000	\$ 360,000	2400,000		2440,080	\$1,100,000	\$230,000	\$1,922,900	\$440,000	\$440,000	\$410,000	\$480,000	2161,300	\$137,000	440,000 440,000	\$254,000	2130,000	2125 000	\$79,000	0000013	\$210,000	\$214,000	000'4:15	3474,417	3614,072	\$\$25,000	good tit	\$128,400	2100,000	2130,000	\$17600	(dodan)		
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2.000	1,000	3,700	2,700	7,100	8	-	ŝ	2,800	1770	COOL	2000	i	2,700	1,500	1.130	M0 8.100	100	1300	2,030	200	1,000	900	68	THO	8	ē 6	690	50	1.100	L740	F 600	1,800	3,640	1,300	8	858	200	900	1 608		Manager C and	
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Untrown	Undergoo	United	Unknopen	Unitrates	Undrawa	-		Unknowe	Undergo	(unbacous	Unitediate		Unknown	Uninom	Granges	Undergrand	tonet	1945	1970's	2960's	1850'	1870 0	1970	19397	19201	1980	1940'6	1947	1970	*Dedt	1965	fotel	1900	19401	1830'0	1990'0	1981	18081	1940's	legished		
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Safety and Rehability/Structural	Soliety and Repleting/Structural	Safety and Rehability/Structural	Safety and Rengality/Structural	Safety and Rahabbley/Structural	Selety and Reliabling/Serumanist	State Bed widehing 15 June 4 and	The same of the sa	Safety and Reliability/Strectural	Solety and Rehability/Structural	Safety and Reliability/Structural	Sarphy and Reflability (Stinctional		Solvey and Rehability/Strustural	Salety and Resolution/Structural	Safety and Reliability/Scheckers	Salety and Rehability/Structural Salety and Rehability/Structural	Safety and Rehability/Skructural	Safety and Rehability/Structurel	System Flows and Pressure	Partitional champings pare topology	Soften and Reliability/Structural	Salety and Rubspiller	Professional Compression and Control	Solety and Rehability	Wroser Dyghtty	Safety and Reliability	Safety and Believally	Drace Chapter	System Flows and Prostors	Sodery and headplicy	Safety and Raidabelly	Solety and Redubully	System Planes and Processes	Safety and Reliability/Structural	lakely and flessplitty/[amuchanic	Sofery and Rahabdity/Streetures	Statem Flows and Prompte	System Flows and Prospure	Salety and Rehability/Structural	Aux shursted Ausst Investment Geograpy		
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New Jersey American Water Company, Inc. 2015 Feam-colleged Filling Accessible C. Americal B (1) (2015

Stipulation - Exhibit A

м	Bluerco	Municipality	Project Title	histiff funded (dellars)	Project Type	Proposed Longth (feet)	Proposed Dia. (Indias)	Proposed Plps Material	Docado Installed	Ex. Die. (Imphes)		Assolution Associative Confession	Project Couration		Provincely Submitted for SPIJ Rovins	Sounded Weighted Leave
5849	North Geerating Area	HEW PROVIDENCE	RESW PROVIDENCE: Watten Ave from Passer: \$8 to Redden PI	1440,000	Replace	1.300	8 00	Ductile Iron	Unknown	4	Cart Iron	Salety and Resignify/Structural	130	TBQ		10
311	Control Contains Area	нояти рідни фід Нополож	Horts Planfeld Rehab	\$1,125,000	Rends	15,000	6.00	Other	1820's	•	Cast Iron	System Figure and Prossure	130	180	Tes	10
6630	Control Operating Area	HORTH PLANFIELD BOROUGH	Verden St. (Summe to Grandvon)	\$73,000	Reprace	343	8 00	Duchile HeA	1910'0	3	Cast tree	System Flows and Pressure	£20	180		10
6421	Central Operating Area	MORTH PLANN KLD BOROUGH	Alten PI (Tamnew to Drad End.)	\$34,250	Replace	218	6 00	Ductive wen	1980's	4	Cast Wen	System Flows and Prosoure	110	180		20
7232	Control Operating Area	NORTH PLANT &LO	Brook Ave. (Areadowhrose Ad. to Dood End.)	\$\$1,900	Replace	294	6 00	Ductifie Main	lene Selecte	one Selec	tu have Selected	Water Chroliny	110	140		10
7213	Control Depressing Area	NORTH PLANFILD BOROUGH	Break Ave (Massaubrack Rd. to Deed End)	\$\$1,800	Replace	314	6.00	Ductale Iron	1940's	2	Cost Iron	Wester Champy	130	180		20
204	Coestal Operating Area	MORTHFIELD	Harthheld Titos Read Berwoon Mill Read and Waltesh Avenue (Titon Marktonum ands 2013)	\$107,000	Replace	480	9.00	Ductile Irea	1960'4	2	Cast Iron	System Flows and Pressure	120	180	Tes	10
207	Constal Operating Area	HOATH ELD	Hartsheig Titton hand Between Wesesh Avenue & Zion Road (Titton Mareterium ands 2013)	\$44,000	Replace	246	6 00	Ductile Irea	1970's		Cast tren	System Flows and Process	120	180	Fee	•
3197	Courtal Operating Ares	NORTH/ELD	Cave Avenue from Share Read to and of Care Avenue	\$99,000	Replace	640	4 00	Desting Iron	1910'0	3	Cost Iren	Relocation/Opportunity	120	100		30
6101	Coastal Operating Area	HORTHFIELD	Zion Road between New Road and Wabash Avenue	\$420,000	Ampleca	2,100	0 00	Ductes wen	1960's	6	Cast Iron	Selety and Releables/Structural	120	FBO		10
etat	Constal Operating Area	MORTHRELD	Morthfield Avenue between Jigm Road and Share Road	\$162,750	Replace	1.010	9.00	Ductile area	1910's	•	Cast Ne4	Selvey and Robability/Structural	120	780		10
6318	Coestal Operating Area	#OBJHERD	RF Share Boad between E. Vernan Ave and MAII Read	3778,750	Replace	9.323	16-00	Shuttelly trans	1910's		Cost tren	Salety and Desaphlity/Structural	120	780		30
4339	Casstel Decretting Area	MORTHFELD	MF Shere Reed between MRR Road and Slen Road	\$497,300	Replace	1.750	16.00	Ductile Irea	1910's		Cast Irpn	Safety and Baluphty/Structural	120	780		30
6349	Cauctar Operating Area	NORTHHILD	of Share Reed between Zion Road and Datphin Australia	\$787,500	Augmen	2,910	16-00	Ductile Iren	1910's		Ductée Iron	Safety and Rebability/Structural	130	780		20
6362	Caustal Operating Area	HORIHARED	REF W. Quacrest Avenue between US Rt 9 and Share Road	\$410,000	Replace	1,100	6.00	Ductile from	1930'4	6	Cast tree	Selety and Rebaptity/Structural	120	TBO		30
4544	Coestar Operating Area	HORTHFIELD	sef - W. Glencove Avenue between US Rt 9 and - Waterit Avenue	\$380,000	Replace	1,400	8 00	Overtile impn	2840's	4	Cart Iron	Safety and Remobility/Structural	130	Tép		30
8585	Coestal Operating Area	HORTHHELD	Itf : W. Yareshire binnive between Share Road and Wabash Ave	\$146.000	Report	790	8.00	Ductile Iren	1950's		Automos Comen	Sefety and Robet-Mty/Stryctoral	130	180		10
6546	County Operating Area	HORTHFILD	MF Regards Acons between US Bt 9 and Ellion Read	\$103,000	Replace	1.023	8.00	Ductile Hon	19500	4	Aubertes Comore	Selety and Relability/Structural	120	780		30
6340	Coartal Operating Area	DISTHITACH	NF : Lake Ave/Maghs Ave between Evergreen Ave and Lee Fracer Dr	\$240,000	Anglace	1.200	9.00	Dutte Iron	1950%		Carl Iron	Selety and Rekobility/Structural	£20	TRO		10
4570	Coortal Operating Area	MORTHFELD	No. Chestout Surnus between US Rt 9 and Magde Ave.	\$104,000	Regrace	\$40	8 00	Ductile Ires	1930)	2	Cost Iron	Safety and Reliability/Structural	130	180		20
6572	Coastal Operating Acres	MORTHWILL	NF 3prace Are between US M B and Meple Are	\$169,000	Replace	\$90	8.00	Suctify layer	1950's		Asbertos Coment	Safety and Reliability/Structural	120	190		20
6972	Coastal Operating Area	NORTHHELD	ISF (William Drive between Titten Road and Zien Road	\$140,000	Replace	700	9 00	Duttify Iran	1930%		Asbettos Comunit	Salony and Resoluting/Structural	120	TBO		10
6578	Countal Operating Area	MORTH ILLO	MF - Locust Drive Between Tilton Road and Zion Road	\$212,000	Regisco	1,060	8 00	Ductile Iren	1950's	•	Arbettel Coment	Safety and Rehability/Structural	120	100		10
6574	Courtal Operating Aces	MONTHIFEED	tef - Wabach Avenue between Titan Raud and Zion Road	\$124,000	Aepteca	630	8 00	Duckle were	194074	*	Cost Iron	Sefery and Behability/Structures	130	100		10
4597	Coustal Operating Area	MORTHFIELD	Herthfield Ave between Zien Road and Titten Road	\$470,000	Replace	850	0.00	Dectile Iron	2940°p		Ductide Iran	Safety and Reliability/Structural	130	780		10
6601	Coastal Operating Area	MORTHFELD	initeld Avenue between Titten Re and Westall Ave	\$185,000	Asplece	929	12.00	Ductile Iron	1940's	6	Cast Iron	Selety and Relapility/Structural	110	180		39
6402	Cooked Operating Area	HORTHRELD	Est Street between Infield Avenue and Devis Avenue US Reute 9 between Cantral Ave and Coder Bridge,	\$1\$2,000	Replace	660	12.00	Ductile wan	1950's	*	Asbestes Coment	Safety and Rohability/Structural	130	180		10
6908	Coestal Operating Area	MORIMFIELD	Clean and Line County Club Drive, Circle Dr & Heather Dr Maun	\$430,000	Artab	3,365	32.00	Cast topo	1960.1	13	Cast tren	Metho Chapta	330	TBO		30
6816	Coastal Operating Area	HORTHPELD	Replacements Banase Loo Dr Botween County Club Dr and Heather	\$325,000	Replace	1,800	8.00	Ductile Iron	1950's	3	Cost tren	System Repos and Protinger	120	TSO		20
6917	Education Opposetting Areas	MORTH/dLD	Dr Add Road botween Maple from Bridge and Philines Dr.	191,400	Regisco	530	9.00	Ductre inen	1950's	4	Aubestes Coment	Solety and Rei-stality/Structural	L20	180		10
7002	Coestal Operating Area	HORSHFELD	County Forms	\$700,000	Replace	3,500	12 00	Ductile Iron	3990's	10	Cast tree	Safety and Rehability/Structural	130	180		30
34.9	Southwest Operating Area	CARLIN	Oaklyn Kendoll Shell Black Herse Pile to Goff Availue	\$413,000	Replace	1,706	8.00	Ductle unn	1930's	6	Cast Iron	Safety and Reliability/Skructural	120	180	Yes	30
5346	Southwest Operating Area	OARLYN	Oallyn - hisner Avenue - West Clinson Avenue to Dood End and Goff Avenue	\$399,000	Replace	2.100	\$ 00	Durctine treas	1926A	4	Cast Iron	System Flows and Pressure	120	TRO		10
\$725	Southwest Operating Area	Dvrf 4.0	Oaklyn Reading Avenue - Hillcrest Avenue to Manhorth Avenue	\$164.000	Require	1.400	3 00	Ductile Irea	1920+		Cost tran	System Flows and Prossure	120	180		80

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How sersey American Weter Campuny, Inc. 2013 Foundational Fling

Stipulation - Exhibit A

м	District	Municipality	Project Title	ecikW funded (dutard)	Project Type	Proposed Longth (Host)	Proposed Dis. (Inches)	Proposed Pipe Maneral	Decade Installed	(inches)		Accelerated Appet towersmant Cotagony	Project Ourotion	Entimened In Service Period	Proviously Submitted for BPU Review	Reunded Wroghted Score
\$726	Sauthwest Operating Area	CARTW	Oaklyn: Wosi Park Avenue: Mange Avenue to Mople Avenue	\$193,800	Replace	1.010	6 00	Durille Iron	19001	4	Cost tren	System Flows and Pressure	120	180		30
\$333	Southwest Operating Area	DAILTH	Qualyn - Wrast Codor Avenue : Adahar Avenue ta Bendali Blvd	\$146.200	Воргоси	780	8 00	Ductile Iren	19164		Cost Iron	System Clows and Prossure	120	100		10
\$738	Southwest Operating Area	OWITAN	Debtyn - Congress Avenue - Manos Avenue to Kendell	\$150,100	Acatore	790	6 00	Dectife wan	1910'6		Cast bron	System Flows and Pressure	338	180		30
5779	Southwest Operating Area	DAIRTH	Congress Avenue West mody Szenue to Congress Avenue	\$201.400	Replace	1.060	8 00	Ductile eren	1910'0		Cost Irea	Septem files and Pressure	120	TEQ		30
\$780	Southwest Operating Area	OARLYN	Oshiyn Oshiavm Avernue - Laurre Lone to East Climan Avenue	\$338.000	Reptace	1,700	8 00	Ducthe tron	1900's	•	Cost Iren	System Flows and Pressure	120	CFT		30
\$191	Southwest Operating Area	QAIS WE	Collyn East Lateurus Once - Vinite Noise Pite to Johnson Avenue	\$106,400	Replace	540	6.00	Ductile Iron	1900.0	4	Cest Iren	System Flows and Pressure	110	Teo		30
5790	Southwest Operating Area	DAKUM	Cobbyte Wrost Boochwood Avenue White Horse Pilip to billythean Avenue	\$190,000	Replace	1.000	8 00	Ductile wen	1900'4	4	Cort Iron	Sestem Flows and Pressure	120	100		80
5919	Southwest Operating Area	QARLTH	Cobin Copiel Avenue - Horth White Herse Pile to Newton Avenue	\$97,000	Replace	500	§ 000	Ductes tres	1900's		Cost won	Safety and Reliability/Servetural	170	201601		30
6614	Southwest Operating Area	OAKLYN	Collyn Kendall Blod Golf Avenue to Wrest Helly Ave	\$480,000	Regiote	2,500	8 00	Ductile tres	Unknown	Unbague	Unterem	Safety and Reliability	120	100		10
7172	Southwest Operating Area	QARLYN	Cobbyn Ridgemay Avenue - Kendell Blud (CR 450) to	\$325,000	Replace	1,700	0.00	Ductile Iren	United and	Unkhava	Linknown	System Flows and Pressure	330	TED		10
264	Country Operating Area	OCEAN	Washington Avenue Ocean Laurel Sonner (from to]	\$40,000	Regisco	400	8 60	Ductile iron	Unkrown	1	Gatentief Meet	System Flows and Pressure	129	TBO	Tes	lin .
163	Countel Operating Area	OCEAN	Ocean Frighward From Wandcrest to Hyl 36	\$375,000	Replace	3,500	8 00	Ductife tree	19201	2.3	Cast Iron	Safety and Refeasing/Structural	120	201604	Yes	20
		OCIAN	(Brookside) Coase - Berneth from Popler to terretrus	\$170,000	Registe	1,600	A 00	Duratile won	1930's			Salety and Resauditry/Structural	120	780		10
363	Caustal Operating Area Caustal Operating Area	OCLAN	Ocean Magic Street Parser to Shermon	\$112,500	Regrace	750	8.00	Ductore ≥ron	1830.0	•	Cast Iron Calventred Steel	Selety and Resoluting/Structural	120	180	Tes	20
347	Coastal Operating Area	OCLAN	Ocean Galf Read from Shorman to Runyan	\$150,000	Replace	1,000	8.00	Ductile Iron	1930's		Galvenited Steel	Salesy and Renobility/Structural	120	180	Tet	20
5254	Constal Deerstong Area	OCEAN	Ocean Grant Ave	\$70,000	Replace	400	4.00	Ductile Iren	Unknown	,	Gairphijed Steel	Mate Creek	120	180	Tes	20
5401	County Operating Area	PARTO	Wrestrest Road from Norwell Sup to Redmand	\$330,000	Replace	1,600	4.00	Duettle Iren	19974	,	Cast tree	Safety and Refebblity/Structures	120	180	***	10
		OCEAN	Procest food from Harrish food to Wells Road	\$87,500	Peplace	300	4.00	Ductile from	1920's		Asbestes Coment	Lafety and Reliability/Structural	120	TBO		20
1970	Constal Operating Area									2				780		20
3979	Coastal Operating Area	OCIAH	Progress Ad from Receives Ave to Scottished Ave Eliminate Soud From Harriell Avenue to Redmand	\$114,625	Profese	433	4 00	Ductile trea	1920'4		Cananged Steel	Safety and Rehability	170	160		10
5978	Cassal Departing Area	OCTAH	Read	\$992,500	Reproce	1,900	6.00	Ductile Irgs	1960')	2	Galvanized Steel	Salaty and Rehability	120	790		20
3984	Coastal Operating Area	OCEAN	Cithweed Bood from Harnell to Redmand Cashuret Road from Harnell Avenue to Redmand	\$367,500	Replace	1,100	6.00	Ductile Iren	1930's	3	Colveniesed Steel	Safety and Rehability	120	283		20
1983	Coastal Operating Area	DCTAN	Anthre	\$348,250	Replace	1,990	4 00	Ductile Iren	Unblum	Untres	Linkhows	Safety and Reliability/Structural	130	180		10
6004	Constal Operating Area	OCIAN	Receive & Avenue from migroupod Bood to Monmouth Reed	\$340,000	Replace	1,800	8.00	Ducille irea	1930's	6	Asbeston Comens	Safety and Researchy/Structural	130	180		10
6014	Coaylof Operating Area	OCTWO	Freehold Street from Highwood Road to Whalepond Road	\$270,000	Regiaca	1,350	9 00	Ductife was	Unknymn	UNAN PUR	Quantum	Safety and Rehability/Servetural	120	TBO		30
6499	Coscial Operating Area	OCEAM	Delawere Avenue from volve VOT-2402 to valve VOT- 1234	\$362,230	Replace	2.070	6.00	Ductile Iron	193074	3	Columned Stool	Safety and ReLability/Structural	120	180		n
6049	Coestal Operating Area	OCEAN	Balange Avenue from the Bacolin Avenue to Elizabeth. Street	\$355,750	Replace	2,010	6 00	Ductile Iren	19904	3	Cohemical Steel	Safety and Rehabitey/Structural	120	160		20
6018	Coestal Operating Area	OCEAN	Ampore Avenue from W Lincoln Avenue to Freehold Street	\$753,750	Angless	1,450	8.00	Ductee Iron	1947+	2	Good Steel	Sofety and Relability	120	TBO		10
6074	Coastal Operating Area	OCEAN	Membon Street Born Freehold Street to Elizabeth Street	\$249,600	Replace	655	6 00	Ducte tree	1940'9	2	Galvertred Steel	Solvey and Robotolog	120	180		30
6076	Courtal Operating Area	OCEAN	Phoenix Parturey from Whalepond Read to Whalepond Read	\$262,500	Replace	1,300	6.00	Quartile Iren	1960'0	1	Calumned Steel	Safety and Rehebility	120	160		10
6078	Coastal Operating Area	OCEMA	Gerwand Avenue from Bother Avenue to Dotowere Avenue	544.973	Regisca	100	6.00	Ductile Iron	Unknown	Unknow	A Unknown	Safety and Retablity	120	160		10
6091	Constal Operating Area	DELMI	Elizabeth Servet Bross Chatham Avenue to Deterrate Avenue	\$41,125	Asplace	215	6.00	Drectife from	1920's	2	Concessed Steel	Safety and Religibility	130	TBO		20
4014	Courtal Operating Area	OCLAN	Orango Street, Wildreals Avenue & Artington Street from Grange Avenue to Dover Avenue	\$183,750	Replace	1.010	6 00	Ductile free	Unknown	Unhaous	h Umhnown	Selety and Resolutey	120	180		10
4128	Counter Operating Area	OCEAN	Surger Avanua from Harry and Road to VQT-1451 & From VQT-1462 to Michael Street	\$153.125	Replace	875	6.00	Ductile tren	Unknown	Unknow	untnown	Safety and Residency	120	301604		10
6191	Caselal Operating Area	OCEAN	Shichael Avenue from Berger Avenue to Garheld	\$148,625	Replace	833	6.00	Ductile iron	19571	1	Calvertand Steel	Safety and Reliablishy/Servetural	120	Teo		10
	Tana Market Carlotte		Avenue				1000							2.5		200
6151	Constant Operating Area	OCEAN	Overtreet Are han flamount 6d to HOT-22 terome Avenue from Larchined Avenue to Michael	\$112,000	Regions	640	4 00	Ductile fron	Unknown	Unknown	n Uninessa	Safety and Rehability/Structural	120	COT		30
6160	Coestel Operating Area	MAIDO	Avenue	\$311.750	Replaca	650	6.00	Ductale treas	1950'4	2	Galventred Steel	Selety and Religibility	130	TBO		10
6162	Castal Operating Area	OCEAN	Liverance Avonus from Linthurped Avenue to Michael Avenue	\$124,250	Replace	110	6 00	Ductile was	1950°e	2	Galverneed Street	Selety and ReLability	120	2016Q4		20

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rsos American Water Company, Inc 2015 Foundational Filing porndia C Aericad S/13/7013

4163 OCEAH \$112,000 400 130 4164 OCLAN \$417,000 B.193 E 00 120 180 1950's DCLAN \$738,000 \$122,500 11 00 4 00 6171 6172 3.340 700 120 8333 Coestal Operating Asea OCLAN \$1,041,000 4,180 18.00 Dutille wen 120 180 10 DCZAN OCEAN CITY \$103,500 440 6 00 1920'0 Cast wen 219 OCLAN CITY \$45,000 6.00 39201 120 180 331 \$300,000 11 00 1930 e 780 PVC 110 701 175 PVC 233 OCEAN CITY \$10,375 1 00 1930'0 Cast Iron 170 180 441 10 293 OCEM OT \$344,330 L045 12.00 1920's TRO 130 234 DCEAN CITY \$82,230 410 1920's Capt Iren OCEAN CITY
OCLAN CITY
OCEAN CITY Gohanzard Sacel
Abbarras Coment
Cart Tree
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Cast \$72,000 \$446,000 \$271,214 \$16,433 \$300,110 \$42,200 \$451,400 \$194,400 \$194,400 \$172,600 \$172,600 \$172,600 \$112,0 719
2.210
1.210
72
8.53a
211
1.257
664
530
844
892
428
526
60
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218
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541 1910's
1910's 5448 OCEAN CITY \$178,600 8.00 1910 Cost Iren 120 5449 5431 OCEAN CITY \$140,475 \$392,600 623 1,163 13.00 8.00 PVC 1910°e 1950°e Cast from Asbestos Comens 110 180 180 5433 1930% Stencon Place Frame Commission American to Book 280 6.00 PVC \$146 OCEAN CITY \$42,000 1920/4 130 TBD tween Control Avenue and Asbury 5452 \$40,000 790 \$ 00 19401 183 OCEAN CITY 120 6088 6087 6090 6090 6094 6095 6245 6245 OCEAN CITY 190,631 Replace Replace Replace Replace Replace Replace Replace 633 8.00 1950'e PVC PVC OCCAN CITY Bay Avanua from 36th Street to 3 End Street \$320,000 1,100 15 00 1950's 12 System Clows and Pressure 180 180 DCEAN CITY \$215,000 13 00 1950's Cast Iron System Flows and Pressure 120

1970's 1910's 1910's 1910's

\$150,000 \$210,500 \$130,500 \$41,800 \$470,400 \$410,000

from Hersey American Water Company, Inc. 2013 Foundational Filing

Stipulation - Exhibit A

W	District	Municipality	Project Trate	NJAW Funded (dellars)	Project Type	Proposed Langth (feet)	Proposed Dis. (Indias)	Proposed Pipo Material	Docado Installed	Ex. Ole. (Inches)	Esiming Plea Motortal	Azzelorgied Asset threatment Category	Project Duration	Estancias In Service Period	Provincely Submitted for BPU Seven	Rounded Weighood Scare
6248	Casttel Operating Area	OCEAN CITY	Control live replacement from 20th to 15th	1372,000	Replace	1,040	9.00	PVC	1910's	4	Cast Iron	Lafety and Releasing	120	100		10
6349	Constal Operating Area	OCEAN CITY	Bay Are replacement from 31st to 18th	\$700,000	Replace	2,800	13 00	PVC	1950'6	13	Autoratos Comont	Safety and Rokability/Structural	1.70	TED		20
6250	Courtel Georgeong Area	OCEAN CITY	Control Ava regiscoment from 33rd to 20th	\$332,000	Replace	1,640	8.00	PVC	19500	6	Asbertos Coment	Safety and Reliablimy/Structural	110	190		30
6293	Coustal Operating Area	OCEAN CITY	west Ave replacement from 25th to 37th	\$472,200	Replace	8,363	8 00	PVC	1950's		Aubertos Cement	Safety and Reliability/Structural	120	TBO		10
6252	Coostal Operating Area	OCEAN CITY	Bay Ave replacement from 33rd to 25th	\$1,789,400	Replace	6,937	\$ 00	eve	1940's	12	Asbestes Coment	Solety and Rollshillty/Seructural	130	180		20
6253	Caestal Operating Area	OCEAN CITY	Bay Ave replacement from 4th to 2nd	3336,400	Replace	2,797	a 00	PVC	19104	4	Cast Iron	Safety and Rehability/Structural	120	180		10
625-0	Constal Operating Area	OCEAN EITY	Westery Ave replacement from 6th to 1st	\$342,000	Replace	1,710	9 00	PVC	19104		Cast tree	Safety and Reliability/Structural	120	Tho		10
6333	Coastel Operating Area	DCEAN CITY	Ocean Are replacement from 4th to North	\$4\$5,000	Reprocé	2,175	8 00	PVC	19301		Cast Iren	Safety and Refiab dry/Structural	120	100		10
6254	Coastal Deersting Area	OCEAN CITY	Aubury and replacement from \$1st to 68th	\$367,000	Replace	2,633	12.00	PVS	1950'e	13	Asheston Compat	Safety and Balability/Structural	120	TBO		10
6237	Coostal Operating Area	OCLAN DITY	Anchorage Dr replacement from \$2nd to \$5	\$247,400	Replace	1.437	0 00	PVC	1970%		Asbastos Coment	Safety and Retobility/Swurtural	120	TOO		10
6758	Constal Operating Area	OCEAN CITY	Control Aus replacement from \$1st to 38th	\$810,000	Replace	4,039	6 00	eve	1950%		Authoritos Coment	Safety and Reliability/Saructural	120	780		10
6239	Courtel Operating Area	DCEAN CITY	Control live replacement from \$500 to 45th	1790,000	Replace	1,950	4 00	PVC	1930's		Cast Iron			790		
6720		OCEANCITY				5,647	8.00			70		Safety and Redga-day/Structural	120			20
	Coostal Operating Area		Control Ava replacement from 45th to 65th	\$1.259,400	Replace			PVC	1940's		Cast tree	Safety and Betsbillty/Structural	120	880		30
6262	Coestal Operating Area	OCEAN CITY	Dary Dr replacement from 33th to 92nd	\$107,000	Replace	1,499	6 00	PVC	1910's	4	Aubernes Comons	Safety and Relation/Structural	120	100		20
6563	Coastal Operating Area	OCEAN CITY	trains Aire replacement from SSth to \$2nd	\$441,300	Steplace	1,306	8 00	PVC	3970's	- 8	Actoristes Convent	Selety and Renability/Structural	130	180		10
6369	Constal Operating Area	OCEAN CITY	Simpson live replacement from S&th to 53nd	\$444,300	Replace	5.331	6 CED	PVC	28700		Asbeston Coment	Safety and Bellebillan/Structural	820	TBO		10
636-0	Coastel Operating Area	DCEAN CITY	Boy Ave replacement from 96th to \$3nd	\$458,800	Roplete	2.299	E\$ 00	rvc	1950's	12	Asbestos Cement	Safety and Rollability/Structural	\$50	TRO		20
6265	Coastal Operating Area	OCEAH CITY	Central Ava replacement from S8th to S5th	\$314,400	Replace	F223	9.00	PVC	19464		Cost from	Salony and Reliability/Structural	150	180		20
4364	Coostal Operating Area	OCEAN CITY	Wrost Ave replacement from 30th to 52nd	\$767,000	Reglace	1,935	9 00	PVC	1970's	8	Asbesess Coment	Safety and Reliability/Structural	120	180		10
6267	Coestal Operating Area	OCEAN CITY	Ocean Ave reprocement from 8th to 4th	\$444,000	Reposts	2,220	9 00	PVC	19301	. 4	Cast Iron	Safety and Beliability/Structural	120	780		30
6268	Coastal Operating Area	OCEAN CITY	2nd St repleatment from Alberty to Basedmalk	\$\$18,000	Replace	2,545	8 00	PVC	19304	6	Cost Iron	Safety and Reliability/Structural	120	TRO		20
6269	Coastal Operating Ayes	OCEAN CITY	Waterway Rd replacement from Boy to End	\$414,900	Replece	2,074	8 00	PVC	3940'0	8	Aubertee Coment	Safety and Reliability/Structural	130	TRO		10
6370	Constat Operating Area	OCEAN CITY	Psymputh Preprintement from and to Drean	\$253,600	Replace	£378	6.00	PVC	19164	6	Coul Wes	Safety and Retability/Structural	120	TOO		20
6271	Ceastal Operating Area	OCEAN CITY	Edinburgh Ad replacement from and to Westey	1219,000	Replace	1.209	8 00	eve	19504	6	Asbertos Cartrent	Sefery and Reliability/Structural	t20	TBO		20
4272	Courts! Operating Area	OCEAN CITY	Glenwood Dr replacement from and to Anchor	\$285,600	Replace	1,428	3 00	PVC	1950's		Asbertos Comens	Safety and Responsy/Sarvetural	120	180		39
6278	Coastal Operating Area	OCEAN CITY	52nd St replacement from Energy up Autury	\$\$\$0,600	Aeglace	2,753	12 00	PVC	1930's	12	Acherton Comere	Latery and Reliability/Lovered	120	780		10
6374	Coastal Degrating Area	OCEAN CITY	Bay Are replacement from 6th Serves to 2nd Serves	\$440,000	Acoleca	2.200	8 00	PVC	1990'4	4	Cast Iron	Safety and Rebatethy/Structural	120	100		20
4275	Coastal Decrating Area	OCLAN CITY	1st St regiocomons from Doesn to Contribute	\$295,200	Reptace	1.476	8.00	PVC	1920'0	4	Cast Impa	Safety and Reflability/Structural	120	180		20
6276	Coastal Operating Area	DCEAN CITY	13th St replacement from Pleasure to Wort	\$145,600	Replace	1,220	8.00	PVC	25200	6	Cast tree	Sofety and Reliability/Structural	120	100		20
6227	Coestal Operators Area	OCLAN CITY	Dicean Rd replacement from Seabright to Bottersea	\$476,600	Beplace	2,303	8 00	eve	19904		Cast tree	Safety and Menaphity/Structural	120	T80		20
6218	Capital Coursting Area	DCIAN CITY	4th St replacement from Wesley to End	\$411,700	Roplece	2,034	1.00	eve	1920's		Cest tran	Sofety and Researcy/Scructures	130	TBO		30
44.0	casure con str-8 men	Octor City	Alloy of Aubury and West replacement from 50th to	9-11.100		2.000	****	***	25104	7	COST want	touted and master-cht sunctions.	100	160		20
6368	Coastal Operating Area	OCEAN CITY	29th (KIN Moon, The Customers to \$1)	\$136,500	Reptoce	610	4.00	PVC	2990's	3	Cest Iran	Safety and Belletill by/Siructurel	110	780		39
6949	Contai Operating Area	OCEAN CITY	2316 St replacement from Alloy of Aubury and Contrat to Control	\$33,800	Replace	114	8 00	PVC	1930's	1	Coveraged Steel	Safety and Renaudity/Structural	129	THO		90
6370	Countil Operating Area	OCEAN CITY	Along of Asbury and West replacement from \$556 to 36th (KIR Main, Tie Customers to 51)	\$133,330	Replace	635	000	PVC	1830%	2	Custon	Safety and Robobility/Structural	120	190		20
6371	Constal Deproting Area	OCEM CITY	27th St replacement from Central to Allay of Central and Wesley	\$31,200	Replace	110	6.00	PVC	1920°s		Galvanied Steet	Soloty and Relability/Structural	130	120		30
6372	Constal Operating Area	OCEAN CITY	14th 31 replacement from Pleasure to end Alloy of Aubury and West Replacement from 24th to	\$113,400	Replace	347	6 00	PVC	1920's	2	Golvanized Steel	Safety and Renobility/Structural	110	Cer		30
6373	Coastal Operating Area	OCEAH CITY	2 fird \$CM little, The Customers To 341 Alloy of Poven and West, replacement from 4th to	\$107,400	Betrace	337	8.00	PVC	1920-0	,	Cast won	Sofety and Reliability/Structural	120	TBO		20
4374	Casual Decreting Area	OCEAN CITY	end of ac	\$124,950	Replace	191	4 00	PVC	1940%	2	Courtree	Sofety and Rohability/Structural	310	THO		20
6375	Coursel Operating Area	OCEAN CITY	10th St replacement from and to Pales 13th St replacement from West to and	\$12,800	Regions	63	\$ 600	PVE	1920's		Galvanized Steel	Safety and Rehability/Structural	130	TEO		10
6374 6376	Countal Operating Area Countal Operating Area	OCEAN CITY	Alley of Haven and Wrest replacement from 7th sp	\$37,400	Replace	167	800	PVC	1930's	1	Getventred Steel	Safety and Reliability/Structural Safety and Rehability/Structural	120	76D 76D		10
****			Eth (EM Arom, The Cusamers to S1)				-		10101	•	2010-110 2011	20-013 4-4 -4-40-12-21-01-01-0		.40		.,
6301	Coastal Operating Area	OCEAN CITY	25th St replacement from Westery to House	\$346,700	Replace	1.370	6 00	PVC	3810.0	6	Asbertos Cornent	Safety and Mellehillty/Structural	110	101403		10
6302	Coestal Operating Area	OCEAN CITY	44th St replacement from West to Control	\$124,930	Replace	593	8 00	PVC	1920'6	2	Galvanaged Stool	Safety and Reliability/Structural	120	TBO		90
4383	Coestal Operating Area	CICE AM CITY	22nd 14 replacement from Aubury to Wesley	199,700	Applace	470	8 00	PVC	19306	2	Government Stool	Soloty and Robobility/Structural	330	180		30
6304	Coestal Operating Area	OCEAN CITY	Ji6th St reglacement from West to Control	\$1\$7,000	Replocu	793	8 00	eve	1950%	3	Cast Iren	Safety and Rabobility/Structural	330	T80		30
100000			\$3.56 St replacement from Allay of West and Haven to		1900000000					- 0						1000
6166	Coastal Operating Ares	OCEAN CITY	Control Alley of Aubury and West replacement from 19th be	\$157,500	Aeplece	710	8 00	PVC	1950'1	,	Galvanited Street	Safety and Relability/Structurel	120	180		19
6387	Coastal Operating Area	DCEAN CITY	Siltin (Kill Morn, Toe Contramers to St) Solve Albana Pt replacement from Westey by	\$154,350	Replace	733	6 00	PVC	393014	,	Cast tree	Safety and Bollopility/Structural	120	180		20
6300	Coestal Operating Area	OCEAN CITY	Boordwalk	\$17,400	Replace	187	0.00	PVC	194071	2	Cast from	Solarly and Refishibity/Structural	120	180		10
6309	Coastal Operating Area	OCEAN CITY	1 85h St regularment from Asbury to Boardwalk	\$745,700	Roptoca	1,170	8 00	eve	1970's		Caset from	Safety and RokesRity/Structural	130	180		30
4390	Contain Operating Ares	OCEAN CITY	2nd 34 reprocessors from Bay to Surpson	\$45,400	Applace	\$27	6 00	PVC	5930.1		Cast Iren	Safety and Rebability/Structural	130	190		20
6393	Caretal Operating Area	DCEWN CLLA	3th 14 replacement from West to Ocean	\$314,000	Regista	1,600	6 00	PVC	1930's	6	Cast Iren	Solety and Religibility/Structural	130	180		20
6393	Countal Operating Area	OCEAN CITY	Seh 36 replacement from Ocean to Booch	\$344,900	Replace	1,650	8 00	PVC	19300	6	Cost Iron	Safety and Reliability/Structural	110	180		20
6994	Coestal Operating Area	OCEAN CITY	Asbury Rd replacement from 1st to Botterios	\$273,000	Replace	1.300	8 00	PVC	19 10%	*	Cast trees	Sefety and Reliability/Structural	120	100		50

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New Jersey American Water Company, Inc. 2015 Foundational Fling

	September	Manicipality	Proposi Title	HLAW Funded (delient)	Project Type	Longth (feet)	Proposed Dis. [inches]	Proposed Pipo Motorial	Docado tomated	En. Dis- (Inches)	Easting Plan Motortal	Agrahurated Asset Investment Cotogory	Project Duration	Ertimeted in Service Forted	Provincely Syderetted for SPU Servess	Rounded Wedgeted Score
4795	Courter Operating Area	DCLAN CITY	Delencey Pl replacement from Atlantic to Constinue	\$219,000	Begrace	1.065	E (0)	PVC	1930's	4	Cost won	Selety and Belleathry/Structure!	120	700		20
4394	Constat Operating Area	DOEAN CITY	Park Pt repiscoment from Atlantic to Brock	\$294,000	Replace	1,400	9.00	PVC	Unknown	Unsnown	Cart from	Solety and Rehability/Structural	130	160		20
6397	Constal Operating Area	DCEAN OTY	Sout James Pf replacement from Allance to Brach	\$283,300	Replace	1,330	9 00	PVC	3910's	4	Unknows	Safety and Reliability/Structural	120	180		20
6390	Constal Operating Area	DCEAN CITY	West Ave replacement from 7th to 3rd	\$101,000	Replace	101	8.00	PVC	2910's		Cest tren	Selety and Rehability/Structural	130	TRO		20
6399	Coastal Operating Area	OCLAH DIT	17th 34 replacement from and he Wrosley	\$28,400	Replece	197	8.00	PVC	2940%	4	Asbenos Coment	Safety and Resolute/Structurel	320	180		20
0-000	Caestal Operating Area	OCLAH CTTY	15th St replacement from Simpson to Central	\$346,220	Replace	1.362	8.00	PVC	1910.0		Cost won	Safety and Retability/Structurel	130	TED		30
6414	Coorte Operating Area	OCEAN CITY	30th St replacement from and to Wester	343,000	Reptace	100	8 400	PVC	19401	6	Asbertos Cament	Sefety and Rote billey/Structural	110	190		20
6413	Constal Operating Area	OCEAN CITY	30th St replacement from West to Central	\$132,900	Replace	430	8 00	PVC	1910'e		Corrected Steel	Safety and Rehebility/Structural	120	180		30
4426	Coostal Operating Avea	OCEAN EITY	and St replacement from Atlantic to Cormenson	\$213,000	Regtace	1,045	# 63	PVC	1970 0		Cast Iron	Safety and Retability/Structure!	120	790		20
4417	Coestal Operating Area	OCEAN CITY	OC 6th St replacement from Pleasure to See backuding Pleasure Ave from 7th to 6th	\$180,600	Replace	960	8 00	PVC	19104	•	Card tran	Safety and Reliability/Structural	120	190		20
6418	County Operating Area	OCEAN CITY	OC Moonlyn for regiscoment from Ocean to End	\$740,450	Replace	1.145	8 00	PVC	19101	4	CRESTANDA	Safety and Resolute/Seructure/	120	180		10
6429	Constat Operating Area	DCEAR CITY	OC 23+d St replacement from Boy to Hoven	\$122,800	Replace	816	8.00	PYC	1940's		Asbestes Cement	Sefety and Rehability/Structural	120	780		10
6A20	Constal Coorsing Ares	OCEAN CITY	OC Asbury Ave replacement from 18th to 21st	\$967,500	Reptace	1.750	9.00	PVC	19101		Cast Iron	Salety and Ballability/Structural	120	THO		13
4433	Coastal Operating Area	OCEAN CITY	OC Sunset & Boyonne Pl replacement from and to Boy	\$190,100	Regisco	929	8 00	PVC	1940's		Carl MA	Salary and Rallshillty/Scructural	120	180		10
6472	Coestal Operating Area	OCEAN CITY	OC 19th St regiscommis from West to Hoven	\$79,800	Begiece	380	9.00	PVC	19500		Asbestos Compet	Seleny and Reliability/Structural	120	100		30
6434	Cooptal Operating Area	OCEAN CITY	OC - 20th St replacement from Wrest to Howen	\$54,200	Replace	271	8.00	PVC	19501	4	Asbettos Comont	Solety and Reliability/Structural	120	190		10
6415	County Operating Area	DCEAN CITY	OC 29th St replacement from Wesley to Haven.	\$2\$2,000	Replace	1,300	3 00	PVC	1950's		Ashemes Comens	Safety and Rehability/Structural	120	160		20
6416	Coeffel Operating Area	OCEAN CITY	OC 45th St replacement from Asbury to Control	\$98,200	Replace	381	\$ 00	evc	1950'1		Asheries Coment	Safety and Reliability/Structural	150	760		10
4437	Coortal Operating Area	OCEAN CITY	QC 47th St replacement from West to Asbury	\$47,400	Replace	237	9 00	PVC	1930'1		Asbestos Coment	Sefety and Relability/Structural	330	TEO		10
6438	Cookel Operating Area	DCEAN CITY	DC 48th St replacement from West to Control	\$122,050	Reptace	305	8 00	PVC	1950's		Asbestos Comens	Selety and Battathty/Structure!	730	CBT		19
6499	Cooker Operating Area	OCEAH CITY	OC 30th 34 reprocessing from West to Aubury	\$12,400	Restace	343	8 00	PVC	1990'9		Asbettos Cemens	Safety and Returbility/Structured	120	180		10
4440	Castlet Depreting Area	OCEAN CITY	OC 20th St reprocument from Westery to Control	\$41,600	heplace	908	8 00	PVC	1930's		Unknown Asbestos Coment	Safety and Renability/Structural Safety and Retability/Structural	120	780		10
4441	Cootte Operating Area	OCEAN CITY	OC - 34th St regiscement from Boy to Asbury	\$172.160	Replace	1,794	8 00 8 00	PVC	1950's		Albertos Comorc	Solety and Retablity/Structural	110	T80		10
6442	Coestal Operating Area	OCE WH CITY	OC 49th St replacement from Hones to Brest	333,600	Replace	356	8 00	PVC	1910's	2	Albertos Comon	Safety and Rehability/Structural	120	180		10
6443	Coestel Gaerating Area	OCEAN CITY	OC \$1st St replacement from West to Hoven OE \$7th St replacement from West to Control	\$104,000	Replace	230	8.00	PVC	1950's	- 2	Asbestos Coment	Sefery and Rolab Bry/Structural	120	180		10
5444	Coortal Operating Area	OCEAN CITY	OC 55th 31 replacement from Bay to West	\$920,250	Replace	1,525	13.00	PVC	1970's	- 2	Asbesses Coment	Safety and Aeliabelity/Structural	130	TBO		10
8447	Cooper Operating Area	YTI3 HASSO	OC - 16th St replacement from Bay to Singson	343,200	Replace	916	13.00	PVC	1910's		Cast was	Select and Remandity/Structural	120	180		10
6448	Coostal Operating Area Coostal Operating Area	OCEAN CITY	OC 18th St reptacement from Asbury to Hoven	\$129,800	Regions	649	17.00	PVC	1950's	12	Asbettes Cement	Soloty and Rohability/Structural	120	180		19
6442	Coastol Operating Area	OCEAN CITY	OC 21st St regiscement from Haven to See	\$131,000	Replace	635	12 90	PVC	1950's	12	Aubertee Comens	Spinty and Retablity/Structural	120	100		12
6543	Canadal Operating Area	OCEAN CITY	OC -Ferndale Orine between Service Road and Ancher Road	\$236,000	Replace	1,100	8 00	PVC	19501		Automos Coment	Soleny and Robability/Structural	120	180		20
6825	Countai Operating Sires	OCEAN CITY	Septem Place between Correlation Asserve and Boardwalls	540,000	Replace	370	6.00	PVC	1920'1	2	Columnized Stool	System Figure and Pressure	120	780		20
75%	Coastal Coursing Area	DOSAMPORT	Occomport Werak Place	\$107,500	Replace	1,210	800	PVC	1990 1	2	Golventred Steel	Safety and Reliability/Structural	130	TBO	Tes	10
1784	Coortel Operating Area	OCEANFORE	Replace 3" Clipipe on Occompant Avenue From Part Avenue for Part Avenue to Carciago Lone	\$130,000	Regisco	610	0 00	Ductes seen	1910'0	1.25	Cast Impa	Salety and Remobility	230	1015Q4		20
63.22	Control Depreting Aces	DEEANPORT	Shore Rd	\$260,000	Replace	1,500	6 00	PVC	1970'4		Ductile tran	Safety and Retrobility	120	180		20
7079	Coostal Devreus Area	TROWALDO	Trialty Place	\$75,000	Asplace	500	6.00	Ductille from	Unknown	Unknown	n Unknown	System Flores and Pressure	130	201603		10
395	Southwest Operating Area	DUDMANS	Osemans - settlereet, Creek to Redroad	\$160,800	Replace	1,091	12.00	Ductee tren	19101		Cost Iren	System Flours and Pressure	120	100	Yes	10
1306	Southwest Operating Area	DEDMENS	Ospinane - Key Place - Dennis Drive to End of Readury	\$35,250	Replace	165	4.00	Ductile Iren	1910's	1	PVC	Salety and Rehabitity/Structural	120	Tao		90
344	Storth Operetting Area	ONIOND	Polymen 13th Sweet West 2nd Street	\$105,000	Reptace	600	6 00	Ductile Iren	Unknown		Cost sryn	System Flows and Pressure	120	760	Ton	10
428	Southwest Operating Area	PALAFTIA	Delewere to Horace and West 2nd Street to West 3th Street	\$990,000	Reptace	2,000	9 00	Ductes tree	1930'6		Auberto Comen	System Flows and Pressure	110	180	Yes	30
479	Southwest Operating Area	PALMITA	Palmyra/Swerton - 746 Street - (ancels Aconve to Mats Street	\$420,000	Replace	2,200	8.00	Ductale tren	1930%		Concrete	System Flows and Pressure	120	191601	799	80
410	Seythwest Operating Area	PALNITRA	Palmyre Leconey Avenue & Leconey Circle—3th Street to Firth Lane	\$440,000	Replace	2.100	8 00	Durttle Iren	Pre-1900		Getroniped Steel	Salecy and Rehability/Sarvetural	120	780	705	30
499	Southwest Operating Area	PALMYRA	Palmyrs 4th Street Lecency Avenue to Herace Avenue	\$130,000	Replace	470	8 00	Ductine from	Pre 1900		Getranzed Steel	Salary and Annability/Structural	330	190	***	30
500	Southwest Operating Area	PALMYRA	Palmyra Berbley Avenue Temple Bled to West 4th Street	\$162,000	Replace	810	£00	Duckle sren.	Pre-1900	4	Carepland Steel	Sefery and Rehability/Structurel	130	180	Tes	10
501	Southwest Operating Area	PALAFFRA	Palmyra - West 3rd Street : Harace Avenue to Berkley Avenue	\$114,000	Reglace	600	8 00	Ductile Hen	Pre-1900		Galvermed Steel	Selety and Rawasillry/Structural	120	180	Tes	30
303	Southwest Operating Area	PALMYRA	Palmyre - West Sth Street - Auch Scient to Weart Blvd	\$218,500	Replace	L150	6 00	Ductile Iren	Pre-1900	*	Galvanised Steel	Safety and Reliability/Seructural	120	TED	Tes	10
509	Southwest Operating Aree	PALATRA	Palmyra Staw borsey Avenue South Brood Street to West Charles Street	\$220,000	Applace	1,110	0.60	Ductes Man	Pre-1900		Gottament Scool	totary and hanapathy/Structural	120	780	Yes	30

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New Jersey American Wroter Company, Inc. 2015 Foundational Piling

M	District	Mountain Day	Project Title	leskW funded (dellars)	Project Type	Proposed Longth (feet)	Proposed (No. [Nedwej]	Proposed Place Manarial	Decade Installed	Es. Dio. (Mahas)	Exercise Pipe Mesortal	Assolutated Asset Investment Category	Project Durotten		Proviously Submitted for BPU Bertes:	Reveded Weighted Score
ses.	Sauthwest Operating Area	PALMYRA	Palmyra - East 5th Street - Morgan Avenue to Elm Avenue	\$114,000	Replace	600	3 00	Ductile from	Pro 1900		Columnical Store	Salary and Releasing/Structural	120	TBD	Yes	10
316	Southwest Operating Area	PAGMINA	Palmyrs Magle Ivenue - East 5th Street to East Broad Street	\$103,000	Replace	310	8 00	Ductile Iron	Pre-1900	4	Colvensed Stool	Safety and Remobility/Structural	120	2016Q1	Yes	90
510	Southwest Operating Area	PALMYRA	Palmyre - Walnut Street - West Saring Gordon Street to Work Charles Street	\$300,000	Replace	1.050	9.00	DurttAt #en	1990*	4	Cost won	Safety and Retrobulcy/Structural	120	TRO	Tes	90
519	Southwest Operating Area	PALMINA	Palmyra Morgan Avenue - East Brand Street to West Saring Gordan Street	\$91,000	Replace	350	# 00	Ducting Iron	Pre 1900		Salryment Stool	Safety and Ratiobility/Servicional	130	101401	Yes	30
\$20	Southwest Operating Area	PARMIRA .	Palmyre Peer Street Walnut Street to Fillers Street	\$105,000	Replace	110	8 00	Ductile Iren	3930'e	4	Cart Iron	Safety and Reliability/Structurel	330	160	Yes	30
1910	Southwest Operating Area	PALMYRA	Palmyre - 6th Street - Arch Street to Decembre Ave	\$504,000	Replace	2,650	8.00	Ductile Iren	1900's	4	Coment	System Flows and Pressure	138	TRO		80
3311	Southwest Operating Area	PALMYRA	Palmyra - Parry Ave- Cuthambiann Ave to-Charles Street	\$342,000	Reptace	1.900	8 00	Ducklie Iron	1900'9	4	Carriery	System filmus and Pressure	110	79.0		50
3823	Southwest Operating Area	PALMYRA	Pairryra Legion Ave Broad Street to W 3rd Street	\$190,000	Replace	1,000	8.00	Ductes Iren	1920's		Cast tree	Safety and Reliab-Lts/Structural	120	Cer		39
1874	Southwest Operating Area	PALBEYRA	Palmyra Tempta Blid sefferson and to Berstey and	\$330,000	Replace	1,900	6.00	Ductile from	19501		Asbestes Comens	Sofery and Rehability/Structural	130	301401		30
5037	Southwest Operating Area	PALMITAA	Palmyra - Highland Ave - Brood Street to 7th Street	\$260,000	Roplece	1,900	8.00	Ductile tren	1900's		Coment	Salety and Reliability/Structurel	120	TBO		20
5928	Southwest Operating Area	PALMIRA	Palmyra - Emcata Avenue - East Broad Street to 7th	\$323,000	Aeglaca	1,700	8.00	Ductifie iron	Pro 1900		Compan	System Floor and Pressure	130	2016Q1		30
****	Sectional Control of Section 2	7.000000	Street Paimyre: Who Street - West 5th Swort to West Broad	****		2,00	***	DEC-1-1-1	*10 1100			7,000,000,000		10100		~
6726	Sauthwest Operating Area	PALMTRA	Street	\$104,500	Reproce	110	8.00	Ductile Iren	Pre 1900	4	Comens	Safety and Relability/Structural	120	180		30
6727	Southwest Operating Area	PALMYRA	Palmyra West Sth Street and Weart Blvd Arch Street to Delaware Avenue to West Sth Street	\$333,500	Replace	1.810	8 00	Ductile Iren	Pre-1900	4	Comont	Safety and Resolutiny/Structures	120	TRO		30
6728	Southwest Operating Area	PALBAYRA	Pálmyra Race Stroot - West 6th Stroot to West 6mod Stroot	\$147,250	Replaca	37%	8.00	Durthe won	Pre-1900	4	Concrete	Safety and Reliability/Structural	120	TBO		30
7104	Saythwest Operatory Area	PALMYRA	Palmyra Colamoro Avenue West Broad Street to Charles Street (Include 2nd Street and 5th Street)	\$13,500	Augusce	1.100	4 00	Duptile iron	Unknown	Unkesod	therewa	Safety and Rahability/Structural	120	tap		80
6849	North Operating Area	PEAPACE GLADSTONE	PEAPACE GLADSTORE Greet Dr From Eul De Sac to	\$440,000	Replace	2,200	600	Ductile Iron	Unknown		Ductile tron	Salety and Behalidhy/Structural	120	780		10
6850	Month Operating Area	PEAPACE GLADSTONE BOROUGH	gradient line PEAPACE GLADITONE: Main it from Mondhem Ad to gradient line	3440,000	Replace	1.300	4.00	Ductile input	Unbeged		Cart Iron	Safety and Reliability/Structural	120	teo		30
6431	Herth Operating Area	PEAPACE GLADSTONE BOROUGH	PEAPACE GLADSTONE - Petterprelle Ré from Moun Se to RT 206	\$640,000	Reptace	8.300	8 00	Ductile Iron	Untrann	4	Cast Iran	Safety and Rekability/Structural	120	Tho:		20
6452	transh Operating Area	PEAPACE GLADSTONE BORQUEH	PEAPACE GLADSTONE - Ridge Rd from Breek troilers	\$300,000	Beplace	L300	0 00	Ductine wen	Unknown		Cart Irea	Safety and Russamy/Structural	120	780		10
7110	North Operating Area	PEAPACE GLADSTONE BORDUGH	Holland Rood gewore mein	\$330,000	Replace	1,100	6 00	Ductife tren	Unbnown	Quanow	Unançum	Safety and Rehability/Structural	120	160		10
7191	Herth Operating Area	PEAPACE GLADSTONE	Holland Reed prints mark	\$220,000	Replace	1,100	4 00	Ductile tron	1930%	1	Golverered Sterel	Solony and Rehabdoy/Structural	120	780		20
348	Southwest Operating Area	PENNS GROVE	Penns Greec Macy Street and Jehn Street - South Broad Street to Moon Street	\$316,000	Replace	L200	13.00	Ductile Iron	1997a		Cart tree	System Flows and Pressure	120	780	Yes	80
891	Southwest Gaereting Area	PENNS GROVE	Penns Grave Turner Avenue West Pitmen Street to West Line Street	\$152,000	Replace	800	8.00	Ductile Iran	1990's	1	Cast Wan	Safety and Retabling/Structural	120	780	766	10
100	Southwest Operating Area	PENNS GROVE	Penns Grove South Smith Avenue - Walnut Street to Diver Avenue	\$165,400	Regisco	860	4.00	Ductile tren	1936's	1.35	PVC	Safety and Rehabbley/Structural	120	160	Tes	30
\$11	Southwest Operating Area	PENNIS GROVE	Penns Grove - Delawere Drive - Church Street to Cave Road	\$113,000	Replace	700	é 00	Ductife (FSI).	19504		Cost from	System Flows and Pressure	120	780	Yes	30
334	Southwest Operating Area	PENNS GADVE	Penny Grove: Railrood Avenue and Still Street Naylor Avenue to Dood End to HPG-65	\$218,500	Replace	113	12 00	Ducted tren	1950's		Cast Iren	System Flows and Pressure	120	180	Yes	30
335	Southwest Operating Area	PENNS GROVE	Penns Grave Instituting Avenue Delausire Avenue to Marth Broad Screet	000,0002	Replace	2,000	8.00	Ductile Iron	3930's	4	Cast Iron	System Flows and Pressure	110	180	Tes	10
5353	Southwest Operating Area	PENNS GROYE	Penns Grove West tracmeny Avenue - Deleviero Avenue to toorth Broad Street	\$473,000	Replace	2,500	12.00	Ductile tron	1900's		Cestiman	System Flower and Prossure	120	391603		30
5395	Southwest Operating Area	PENNS GROVE	Penne Grove State Street West Maple Avolue to West Main Street	\$414,500	Replace	1.310	8 00	Ductile Iron	19104		Cart Iron	System Flows and Prospure	120	180		80
5744	Southwest Operating Area	PENRS GROVE	Penna Grave - Derrong Avenue - Walnut Street to With Avenue	\$95,000	Replace	\$00	6 00	Ductile Iren	1910'0	3	Cast Iren	Safety and Rehability	120	T9.0		30
6015	Southwest Operating Area	PENNS GROVE	Penns Grove : Swelens Place - Refreed Avenue to Dead End	\$36,100	Replace	190	8.00	Ductalle trees	1300.9	13	PK	System Flows and Pressure	8.20	TRO		30
6016	Southwest Operating Area	PEHNS GROVE	Penny Grave : Airy Avenue : Radiose Avenue to Dead End	\$19,000	Replace	100	0 00	Ductile iron	1900's	4	Castings	System Flows and Pressure	130	180		30
6017	Southwest Operating Area	PENNS GROVE	Pering Grave Worth Gread Street - East Line Street to	\$368,600	Replace	3,940	8.00	Ductile from	1900.4	6	Cast Iron	System Flows and Pressure	120	780		20

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New Jersey American Water Company, Inc 2013 Foundational Filling Appendix C - April of \$113/7015

w	Chateles	Municipality	Project Title	MIAW Funged (daffers)	Project Type	Proposed Length (feat)	Proposed Dio. (Inches)	Proposed Pipe Material	Docade Installed	Es. Dis. (thches)	Existing Plan Motortal	Accelerated Asset Investment Consoury	Propert Durotion		Provincely Submitted for OPU Review	Reprided Weighted Store
6018	Southwest Operating Area	PENNIS GROVE	Penns Grove - South Shood Street - East Might Street to Dood End	\$750,500	Repuce	3.950	6 80	Ductife from	\$900°a		Cost tren	System Flores and Prospers	120	190		30
6019	Southwest Operating Area	PENNS GROVE	Penne Grave - Summertil Avenue : Garnet Street Se Dead End	\$72,200	Regrace	390	8.00	Ductile Iron	191070		Cast Iron	System Flows and Pressure	120	TEO		30
4420	Southwest Operating Area	PENNIS GROVE	Penns Grave - Church Street - South Breed Street to Columns Drive	\$764,000	Replace	1,400	8 00	Ductile Iren	1930's		Cast Iree	System Flows and Pressure	170	tso		20
6031	Southwest Operating Area	PENKS GROVE	Penns Grove Comberland Avenue Other Avenue to Walnut Street	\$163,400	Replace	840	8 00	Durtile man	1990's	4	Cast Iren	System Flows and Pressure	120	180		30
4033	Southwest Operating Area	PENNS GROVE	Penns Grave - Denny Avenue and New New Street Penns Street to Franchis Street to Doed End	\$336,000	Replace	1,200	6.00	Ductile Non	3900'9		Cast Iron	System Flows and Prosture	120	180		10
6024	Southwest Operating Area	PENNS GROVE	Penny Grave Feathers: Avenue Marydon Avenue to Haward Street	\$132,300	Reptace	\$90	8.00	Dwctife Iren	1940's	125	PVC	System Fanos and Pressure	120	TBO		30
6033	Savthwest Operating Area	PENNS GROVE	Penns Grove Wright Street and Popler Street Lanning Avenue to Dead End	\$197,600	Replace	1,040	0.00	Ductile trea	Unknews		Cast Iron	System Flows and Pressure	120	TED		90
4024	Southwest Operating Area	PETHIS GROVE	Pende Grove East Union Street Joseph Broad Street to Berber Avenue	\$159,600	Aeptoce	840	£ 00	Ductile wen	Unhouse	2	Cost from	Sustained Economic Growth	130	180		30
6027	Southwest Operating Area	PENNS GROVE	Panns Grove Clab Street West Main Street to Dead End	\$47,500	Reptees	210	4.00	Durithy Iron	1900%		Cast Iron	System Flows one Prossure	120	180		30
6029	Southwest Operating Area	PENNS GROVE	Penna Grave East Main Street: Virginia Avenue se South Bread Street	\$340,100	Registe	1,790	8 00	Ductile iron	1900/#		Cost Iron	System Flows and Pressure	120	180		10
6030	Southwest Correting Area	PENNS GROVE	Penns Grove : West Main Strees - Horth Brood Street to Delaware Avenue	\$4\$7,900	Reprece	2,410	6 000	Ductile Iran	1900's	4	Cost tren	System Flows and Prossure	120	180		20
60\$1	Southwest Operating Area	PENNS GROVE	Penne Grave - Howard Street - Prantit Virginia Avenue - se Festiverer Avenue -	\$76,00m	Replace	400	8 00	Dugitle Iren	Unbegun	1.25	PVC	Safety and Reliability/Structural	130	COF		30
6033	Southwest Operating Area	PENNS GROVE	Penns Grove West Union Street - North Bread Sweet to Dood End	\$47,500	Replace	130	8 60	Ductile from	Pre-1900	2	Cart Iran	Sustained Economic Growth	120	190		30
6033	Southwest Operating Area	PENNS GROVE	Penns Grove - Battracid Avenue - Haylat Avenue to Ally Avenua	\$171.000	Reptace	909	6 00	Ductire from	1900's	4	Cost Irea	System Flows and Processes	120	TBD		10
6013	Southwest Operating Area	PENNS GROVE	Penns Grave - Datwood Avenue - McLary Avenue to Procused Avenue	\$195,000	Replace	700	a (10	Ductes Iron	1950%	4	Aske thee Comment	System Flows and Pressure	120	160		20
6036	Southwest Operating Area	PENNS GROVE	Penns Group - Maplewood Avenue - Mallyweed - Avenue to Dakwood Avenue	\$371,000	Replace	900	6.00	Ducide wen	19504		Cost Iron	System Flows and Prossure	120	Teo		29
364	Southwest Operating Area	PE HHEALPECTO	Pennsylvan Route 130 Marken Pike to Homesteed Average	\$494,000	Reproce	2,600	0.00	Ductifie trem	1930's		COH NON	Selety and Rehability/Structural	£20	TBD	Ton	10
5079	Southwest Operating Area	PENNSAUSEN	Penasoulas - Rudgerow Avenue - Room 166th Street to Dood End	\$95,000	Replect	\$400	8.00	Ductile iren	3930 4	4	Casa tren	System Hours and Pressure	330	180		10
5904	Sauthwest Operating Area	PENNSAUREN	Pennsysten: Airport Industrial Fack: Kaghins Avenue spillerth Pack Drive	\$1,797,000	Poplace	6,800	11 00	Ducille Iron	1940's		Cost tron	System Flows and Pressure	120	T80		30
\$949	Southwest Operating Area	PENNSAUREN	Pennsauben Clork Anomyo - Marken Pée ta Marki Avenge	\$152,000	Regisco	800	9 00	Ductine stem	1950's	6	Cost Wen	System Flows and Pressure	120	TBD		20
3930	Southwest Operating Area	PENNSAUEEN	Pennesuken Rossevelt Avenue - Eing Are to Gorfield Avenue	\$133,000	#40rec4	970	8.00	Ductile Irea	1930'1	6	Cost tree	System News and Procesure	130	100		20
3931	Sauthwest Operating Area	PERMIAURER	Pennsaukan Sardan Avenue Resourch Ave to resourced Avenue	\$100,000	Replace	510	å (IO	Ducting was	3940's	2.23	Cost tree	System Flows and Prossure	120	180		90
1952	Saythwest Operating Area	PENNSAUERN	Pennseubeo Beacon Ave tryhland Ave to Rt 130 and Rapsovoll Ave to Hamasd Ave	\$305,000	Replace	1.500	9.00	Durille Pon	282074	4	Cast tren	System Flows and Pressure	120	100		20
5953	Southwest Operating Area	PENMSAUEEN	Fennsylvan Eing Arenve Bescevelt Jue to Dead End	\$\$0,000	Reptace	260	8.00	Ductile Iren	1990)	4	Asbeetes Comons	System Flows and Pressure	120	100		30
6497	Southwest Operating Area	PENNSALIEEN	Pennseuken - Elimbiate main under Route 130 Jersty- barrier	12,750,000	Replace	9.330		Ductile Han	1990's		Cast fron	Solety and Ballobilly	130	100		30
6418 284	Southwest Operating Area Control Operating Area	PENRSAUEEN PESCATAWAY TWP	Pontantion - Willgoos Ave - Morris on Earl Pracetower - Carbon Ave	\$165,000	Regisca	910 4,300	8.00	Ductile Iron Ductile tree	Urbaneum 1940's	UMENOW!	Seet from	Selety and Releasing/Structural Selety and Reneastry/Structural	120	780 780	200	10
653			Plecatemay Storer Road - 15" main						10000000					10000	106	170
388	Central Correting Area	PISCATAWAY TWP	From Haymond 10 Winneped and from Maplahuret to Barbar Placataway - South Ann Bridge :	\$800,000	Replace	4,009	16 00	Ductine sre-s	Unknown	16	Cast from	Estacation/Opportunity	110	180	Yes	Į3
452	Central Operating Area	PISCATAWAY TWP	Middlesex/Pleastaway	\$84,000	Replace	100	6.00	Ductile Iron	Unbapum		Cast Iron	Relocation/Opportunity	\$30	TBO	Yes	30
5784	Control Operating Area	PESCATAWAT TWP	1st Ava Bridge Replacement	\$100,000	Regisco	120	0.00		Uninous	Unknow	n tintnews	Beforemen/Opperhanity	130	180		10
6490	Central Operating Area	PISCATAWAY TWP	Papter Reed mem Replacement	\$379,000	Regroce	1.365		177222	1930.9	4	Cast from	Percetten/Opportunity	130	TED		30
6459	Control Operating Avea	PISCATAWAT TWP	Easement (William St to Right of Way)	\$88,650	Replace	394	12.00	HOPE	1960%	12	Stool	Safety and Retability	120	160		20
3574 3375	Control Operating Area Control Operating Area	PLANTIELD CITY PLANWIELD CITY	George St. (Labord to Torritt) Elaine Ct.	\$576,000	Replace	2,869	6 00	Ductile Hon	1910's	4	Cast tree	System Flows and Proceum System Flows and Proceums	110	2014Q3 2014Q3		29
6463		PLANNIELD CITY	South Annue from A-chmend St to Berlunan St.	\$962,500	Replace	1,410		Duttile Iron	3930.e					180		
4443	Control Operating Area Control Operating Area	PLANSIELD COTT	South Avenue from Berchmen St to behand Ave	\$800,000	Reblece	3,100		Creetile iron	3910 0	÷	Cost from	System Flows and Pressure System Flows and Pressure	130	780		30
-444	The state of lands					8,100	-200					***************************************	130			

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How Jersey America: Water Company, Inc. 2013 Feyndational Filing Appendix C Aerood 8/13/3015

Proposed Length (foot) Deboran Ct. (@ both cui de eaca) Plainsamo Jeffers/PassureSignal 23/fluishing/loss Control Operating Area PLANWISCO CITY \$31,500 19701 System Clean and Pressure TBO 20 20 PLANSBORO TWP \$161,400 8 00 1950's Cest Iran 180 78 1.090 120 Control Operating Area Water Quality 194 water
Pirsampile Daughty Road Sveween US Route 40 &
Washington Arease (or bore)
Washington Avenue between New Road and State 120 PLEASANTVALLE 1,700 8.00 1930's COM MA 120 100 10 1440 Coostal Operating Asso PLEASANTVILLE \$349.000 2.050 13 00 Pre-1900 6 Cambrer Safety and Rakabitty/Scructural 180 80 Street Washinton Avenue between blain Street and Franklin N 3rd Street between W Adets Ave and Hendrichs 5996 PLEASANTVILLE 144,000 425 8.00 Sestem Floors and Pressure 100 3987 Casetal Operating Area PLEASAMIVALE \$122400 760 0 00 System Flows and Pressura 120 180 Aud M. 6th Screet between Washington Ave and Martin Luther Ring is Ave 4th Street between Washington Avenue and West \$100 PLEASANTVILLE \$10,000 60 4 00 120 180 PLEASANTVILLE \$73.600 460 8.00 100 3990 Coastal Devresing Area Ductile hen Sestem Steurs and Pressure 170 PLEASANTVILLE 1992 Courte Operating Area PLEASANTYILLE \$ 125,000 250 8 00 Ductide Iren System Flows and Pressura 120 TEO 6401 PLEASANTVILLE \$166,900 133 6 00 1 Cost from 120 Coortel Operating Area Ductile Iren 440] PLEASANTVILLE \$72,000 400 12 00 1940's Safety and Rehability/Structural 120 TSO Frankla Blug
FV: BACConnell Drive between E. Lendy Ave and
Codecrest Ave
FV: Magnetis Place between ficer, Serest and
Ant Connell Drive;
FV: Laurel Drive between Magnetic Place and of Drive between E. Leogs Ave and PLEASANTVILLE \$193,500 Aeglece 1.075 8.00 6 Asbestos Coment 180 Coestal Goorstong Area 19501 120 PLEASANTVILLE \$149,600 5406 PLEASANTVILLE 450 8 00 180 Courtal Operating Area \$117,000 Ductile tree 1950's 6 Asbettes Coment Safety and Rehability/Structural 124 Courted Operating Area PLEASANTVILLE \$629,500 2.900 17 00 Street EV - Eliten Avanue from W. Louds Avenue EV - Kline Avenue between W. Louds Avenue and end Loloty and Belieplity/Scruttural PLEASANTVILLE \$40,000 CALL STOR 6409 Casetal Operating Area PLEASANTYRAE \$162,000 900 0 00 Our Use tree 1940's Asbesses Com Safety and Resability/Structural 120 190 of rood PV - Sunset Court between How Rood and Kino \$47,350 Coostel Operating Area 4411 PLEASANTVILLE \$164,700 913 \$.00 1940'4 Cast Irea 100 PLEASANTVILLE 880 8 503 180 6419 \$142,600 Replace 1940's Galvanized Steed Safety and Resolutely/Structures 120 Caestal Deersting Area Ductile from 6421 PLEASANTVILLE \$191,000 6411 Coestal Devretting Area PLEASANTVILLE \$65,500 Regiece 473 6.00 Ductile Iren 19404 Cost from Safety and Polebility/Seructural 138 180 \$126,000 6433 Ductile Irea Courtel Operating Area Bind
PV - Chatham Income between State Sarect and
Clearwave Avenue
PV - Walnut Avenue between Main Screet and
Anathan Screet and 6450 PLEASANTVELE 1770.000 1,500 8.00 1950'0 Case tren 6453 PLEASANTVILLE \$126,000 700 8 00 120 180 1930'4 CON HOS Safety and Retrobitry/Structural Coartel Operating Acco Ducthe from Frankin Blvd

PV - Ersekkin Blvd between Morien Avenue and
Charles Avenue

PV - E. Menen Avenue between Main Street and cask 6493 PLEASANTVILLE 6434 Coastal Dooreting Area PLEASANTVILLE \$253,600 1,420 8.00 Owrthe Iron 1930% Safety and Retability/Structural TBO and of road PV - Callins Avenue between their Street and Eranitin 6455 County! Operating Area \$122,400 Blvd PV Callins avanue between Franklin dwa and east and of road PV E. Adams five between Main Street and east and 1436 PLEASANTVILLE \$146 700 015 8.00 PLEASANTVILLE \$173,400 1,330 8.00 120 TBD 6457 Coastal Operating Asses Replace Ductife Iron 1930% Sefety and Rehability/Structural

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New serbay American Wreen Company, Inc 2015 Foundational Filling

м	Disprior	Minute landing	Proport 1780	MIAW Funded (dollars)	Project Type	Proposed Langth (Soot)	Proposed Die. (Inches)	Progressed Phys Material	Docado Installed	Ex. Dio.		Accolorated Assot time timent Estagony	Project Durasten	Estimated in Contac Parted	Previously Submitted for BPU Service	Rounded Welphard Score
6459	Constal Operating Area	PERSONTVILLE	PV - Frenkin God between Old Tyropise and Wrashington Ave	\$112,600	Replace	630	9 000	Ductile won	1930'4	6	Cast men	Solety and Retobility/Structure!	120	Teo		20
6575	Coastal Operating Area	PLEASANTVILLE	PV - Main Street between Delphin five and Park Ave	\$706,250	Replace	2.823	16 00	Dyrttle Iron	1910'e		Cast from	Safety and Rehability/Structural	120	TBO		20
6376	Courtal Operating Area	PLEASANTVILLE	PV - Mass Street between Park Ave and Decetur Ave	\$415,000	Replace	2,500	16.00	Ductile Iran	1910's		Cast trees	Safety and Ratiobility/Structural	130	780		10
6404	County Operating Area	PLEASANTVILLE	6 Deliteh Rood between titlam Scroot and Franklin Soud	5112,000	Replace	\$60	8 00	Ductor Iran	1910's	1	Cast Iron	Salety and Reliability/Servictures	120	100		30
6603	Coastal Operating Area	PLEASANTVALET	Lindon avenue between Devlati Rd and Wingsor Ave	263,000	Replace	113	8 00	Ductile Iren	19101	4	Cost Iron	Safety and Recognity/Structural	120	TEO		20
6606	Coastal Operating Area	PERASANTVALE	Wandser Avenue between Linden Avenue and Main Screet	\$104,000	Appleto	510	8 00	Ductille Iren	Untrans	Unknow	n Untnews	Safety and Rehability/Structural	120	160		10
6921	Casetal Operating Area	PLEASANTVILLE	Clematic Aversus between Ryan Ave and Glandale Ave	\$152,000	Replace	760	16.00	Ductes tres	1930's		Aubessos Coment	Salety and Recopility/Structural	120	180		38
4939	Counted Operating Area	PLEASANTVILLE	E Park Are between Main 3s and east and of Park Are	\$300,000	Replace	1440	16 00	Ducter iron	1940/4	4	Asbestos Cement	Safety and Reliability/Structural	130	180		10
6932	Constal Governing Area	PLEASANTVILLE	Byon Avenue between Mein Staget and Mercanus Ave	\$375,000	Replace	8,300	8 00	Durtile Iren	1940's		Asbertos Comons	Solety and Reliability/Structural	230	180		10
7209	Conttol Operating Area	PLEASANTVILLE	PV-dage-wood & Ashland	\$200,000	Replace	1.800	8.00	Ducte from	Unknown	Unknow	n Untrook	Safety and Roses My/Servetural	130	MILES		10
79	Castrol Operating Area	PRINCETON BOXDUGH	Françaton Bara - Elm ReadModge to 206hfom Breaks	\$432,000	Pepiece	2,400	0.00	Crecible Man.	1990's		Cast tren	Safety and Religibility/Structural	120	180	Yes	26
81	Control Operating Area	PRINCETON BOROUGH	Princeton Bars: Camabolton Rood & Circle/ Allicon	\$826,000	Replace	8,600	6.00	Ductile Iren	1930's		Cast Iron	Water Quality	120	TBO	Tes	19
\$436	Control Operating Area	PRINCETON BOROUGH	Dictionson St between elevander \$2 and University PI	\$100,000	Replace	410	8 00	Ductile Irea	19074		Cost tree	Sofety and Reliability/Structural	120	3016D4		40
6871	Central Operating Area	PRINCETON BORGUGH	Bana Street Main Replacement	\$3,000,000	Aeplace	960	8 00	Duritle Irea	19200		n Cast from	Salety and Rehability/Structural	130	203603		30
	Control Coording Area	PRINCE FON TWP	Princeton Hessau Street from Hermoson to	\$1,500,000	Regisco	3,100	12.00	Durite tree	Pre 1900	4	Cast tree	Salety and Rehability/Structural				
19	County Constant Inch	PRINCETON THE	Washington	\$1,300,000	Meghanic 8	2.100	11.00	December Irres	1300		CEST PROPERTY.	Phone and members his her faces	120	180	T94	40
03	Central Operating Area	PRINCÉTON TWO	Princeton Township - Ridge/New ReadGreet Road to Cherry HS Road Princeton Township - Studit Road Greet Road to	\$1,604,000	Replace	1.700	12 60	Owestie Iran	Unbegum	13	Ductile lease	Solecy and Reliability/Structural	120	TBD	Tes	30
84	Central Operating Area	PRINCETON TWP	Cherry Hill Reed	\$103,600	Reptoce	\$,010	11 00	Ductile way	19300		Cost from	System Flows and Pressure	120	TBO	Y44	20
25	Central Operating Area	PRINCÉTQN TWP	Princeton Township-Harris Road	\$34,000	Beptece	\$00	8 00	Dys(15e Arpe)	Unknown		Cast from	Safety and Releasing/Structural	110	100	Yes	10
891	Control Operating Area	PRINCETON TWP	Princeton . Valley Road from Walnut La to Harrison St	\$240,000	Replace	1,300	9 00	Ductile Iran	19501	4	Cost Wyn	Saloty and Resembly/Seructural	120	2015Q4	Ter	300
1658	Control Operating Area	PRINCETON TWP	Red HIR rd 6" Stein replacement	\$600,000	Asplace	1.300	6.00	Dwettle Iron	1950's		Cast Hen	Safety and Rettability/Scrueoural	120	301604		30
7204	Central Operating Area	PRINCETON TWP	rellisade Avenue State Replacement	\$150,000	Replace	380	9.00	Dugtile Iren	19500	3	Quality regions	Sefety and Reliability/Structural	120	201403		30
1190	Control Operating Area	RAMEAN BOROUGH	Therepson & Marn Replacement	\$250,000	Regisce	1,100	8.00	Ductile Iren	1920%		Cast Man	Safety and Reliability/Structural	120	301604		30
\$780	Central Operating Area	RARITAN SOROUGH	Remor Street Main Replacement	\$110,000	peheca	1900	6.00	Ductile man	1920'4		Cart Irea	Soleny and Ruhability/Structural	320	2016Q4		30
5782 5788	Control Operating Area Control Operating Area	RARITAN BORGUGH	Frest Jupous Moin Resiscement Fresterick 14 Main Resiscement	\$100,000	Reptore	1000	8 00	Ductile Irea Ouctile Irea	1920's	:	Cost wan	Solony and Rehability/Structural Solony and Rehability/Structural	120	3016Q4 3016Q4		90
6730	Central Operating Area	RARTAN BOROUGH	First Antique Mate Replacement	\$400,000	Replace	1.400	8 00	Ductine Iran	1930'4	i	Cast Iren	Safety and Rehablity/Structural	120	183		90 30
9724	Central operating rese	MANUFACE BUNDAGE	Burridge Housings Avenue New Jersey Avenue to	\$400,000	valvant	1.40	500	Crectory Irran	123m 8	•	Cate men	Model A dr. B. anderson-e s.A.). Sou. REction de	120	165		30
1022	Southwest Operating Area	AIVEASIDE	Washington Street	\$494,000	Replace	3,600	8.00	Ductile Hen	19 90"0		Coot won	Antesia GreeniA	120	101403		30
344	Southwest Operating Area	MOTREM	Burgitan : Bank Avenue - Lippancert Avenue to Howard Street	\$\$28,000	Replace	1,700	12.00	Durtille man	19104		Steef	Sefety and Reliability/Structural	130	101001	Tes	20
491	Southwest Operator Area	RIVERTOR	Altertal - Under Avenue - South Broad Street to 7th Sarest	\$330,000	Replace	1,200	6.00	Ductle Irea	19201	4	Concrete	System Flows and Pressure	110	1016GF	Yes	90
492	Southwest Operating Area	ATVERTON	Revertion - Thomas Avenue - Brood Street to Park. Avenue	\$341,000	Replace	1.800	8 00	Ductile Irpn	1930'9	4	Contryle	System Flores and Prossure	630	201601	Yes	30
495	Southwest Operating Area	ROW STOW	Rhierton - Lindon Avenue - Midway Avenue to Park Avenue	\$95,000	Replace	500	8 00	Duttle from	1920's		Comprete	System flews and Pressure	120	2016Q1	Tes	30
414	Southwest Operating Area	RIVERTON	Rivertion - 8th Street - Main Street to Thomas Avenue	\$371,000	Replace	900	8 00	Ductile Iron	1920's		Concrete	System Flows and Pressure	120	160	Yes	30
437	Southwest Operating Area	NOTESTON	Revertor - Maguey Avenue - Mant Street to Elim Terrace	\$904,000	Replace	1,600	8 00	Ductile Iron	19200	4	Cancrete	System Flores and Pressure	120	180	Yes	30
442	Southwest Operating Area	ATVERTON	Aborton Brd Street Penn Street to Church Lone	\$61,700	Perphase	900	4.00	Ducthe Iren	1920%	6	Concrete	System Flows and Proceurs	130	2016Q3	700	30
524	Southwest Operating Area	RIVERTON	Riverton Main Strant Broad Strant to 8th Strant	\$114,000	Replace	600	13.00	Ductes Inge	Pre-1900		Galvantord Steel	Safety and Retobility/Structural	320	780	709	10
3929	Southwest Operating Area	RIVERTON	Register - 7th Street - Coder Street to Lanceto Avenue	\$\$70,000	Replace	9,000	9 00	Ducthe tree	Pre 1900	4	Concreto	Water Quality	120	3016Q1		30
7112	Southwest Operating Area	RIVERION	Revertan - Codar Street, 9th Street and 10th Street reftr-47 he Woodside Lane	\$5,719,000	Replace	1,010	8 00	Ductrie Iron	Per-1900	4	Coment	Safety and Resolution/Structural	120	2016Q1		90
5349	Control Operating Area	ROSELLE BORQUEM	6th Ave. From Eaglen St. to Dead End	\$262,600	Replace	1.300	8 00	Durtle Iron	19100		Cost them	Safety and Rehability/Structural	120	301601	Tes	30
96	Control Operating Asea	ROSELLE PARK BOROUCH	Receils Forb. Recovered Place Poved 3007 - 5 ye	\$100,000	Regtore	600	0.00	Durthe Hen	Unknown		Cast Iron	Safety and Ronability/Structural	130	180	Ten	30

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1015 Foundation Water Company, Inc. 2015 Foundational Filing

M	Statutes	Manual Spalley	Project Title	ISSAM Funded (dellars)	Project Type	fragesed tength (feet)	Preposed Dis- (Instrus)	Proposed Pips Meterial	Docade Installed	Es. Dep. (brichan)	Estating Pipe Motostal	Aggelerated Agent Investment Cotogony	Project Duration		Previously Submitted for BPU Review	Rounded Weighted Scorp
853	Control Operating Area	ROSELLE PARK BOROUGH	Baselle Park E. Grant Ave. from Pershing Ave. 10 Channel St.	\$250,000	Replace	2.100	8.00	Ducthe Iron	1910'4	6	Cast tren	Soleciden/Opportunity	120	TBD	Tes	20
5646	Central Operating Area	ROSELLE PARE BOROUGH	Colonial Rd. (Sonder to Ragional)	\$107,600	Beplece	513	9 60	Durtille tree	37603	4	Cast from	System Flows and Prossure	120	780		20
7026	Central Operating Area	4036LLE PARK BOROVCH	Ashward Ave. [W. Calles to Amsterdam]	\$177,000	Beefree	385	8 00	Duritie tree	1940's	- 2	Cast Iron	System flows and Prospure	120	TBO		20
7029	Control Operating Area	ACISTUS PARK BOROUGH	Bender Ave E Imcelle to E. Grant)	\$171,400	Beglace	857	8 00	Ductile Iran	1990's		Cast Iron	System Flows and Prospure	330	180		39
7096	Control Operating Area	POSEULS PARK BOROLIGH	W. Collas Ana (Lourette Chestout)	\$343,600	Replace	2,719	8.00	Dyctile Iran	1920's		Cast tree	System Flows and Prospure	230	THO		30
7031	Comrad Operating Area	SOSELLE PARK BOROUGH	W. Liscoln Arre. [extends to Lours!)	\$262,600	Replace	1,310	8.00	Ductile Irea	1920'0	4	Cost hes	System Flows and Prossure	130	180		20
7032	Central Operating Area	ADSELLE PARK BOROUGH	W. Webster Ave [heyrtle to lourel]	\$205,400	Replace	L017	6.00	Ductile was	1910 4	6	Cost from	System Florers and Prossure	120	TBO		20
5806	Countai Operating Area	RUMSON	Tennes Court &a Mein Replacement	\$163,000	Replace	1.100	8 00	Ductifie area	1940'1	2	Cost work	Safety and Religaday	120	101604		20
6499	Cartel Goroting Area	MUNISON	Center Street Main Replacement	\$135,000	Roptoco	925	0.00	PVC	1920'4	2	Golvenized Steel	Latery and Remobility	110	180		90
5905	Southwest Operating Area	AUMMENTOF	Runnemode Intoh Hill Road and High Street East Clements Bridge Road to Deed End	\$851,300	Replace	1,010	12 00	Ductile Iren	1960's	6	Cost Iron	System Floure and Pressure	120	180		30
5971	Southwest Operating Area	RUNNESMEDE	Rusnamede West 1st Avenue North Back Horse Pile to VIIU-13886	170,500	Replace	\$70	00 0	Ductile Iren	1950's		Cost Iron	System flows and Processes	120	180		30
310	Correct Operating Area	SCOTCH PLANS TWP	Scotch Please Bonah	\$2,323,000	Retub	\$1,000	6.00	Other	1920's		Cast tren	System Flows one Pressure	120	180	705	10
6619	Central Operating Area	SCOTCH PLANS TWP	Park Ave. (Raute 23 to Portland)	3841,375	Replace	2,739	13.00	Ductile Iron	1900'e	Unhaum	Cost Iren	System Flaws and Proceure	110	TBO		80
7061	Central Operating Area	SCOTCH PLAINS TWP	Farmey Ct. (Lake Ave. to Cull Do Sac)	\$207,000	Replace	1.031	8 00	Durtle won	1960°e	6	Cast tren	System Floors and Prossure	120	TEO		20
5348	Could Operating Area	SEA SAIGHT	See Bright - Concer St. : From Ocean to Terromus	\$90,000	Regiore	600	4.00	Ductile Iron	1930's		Cast wen	Safety and Hatlability/Structural	110	180	Yes	20
1009	Coostal Operating Area	SEA BARGAST	Diversibury Way Main Replacement	\$40,000	Assista	400	9.00	BUTTON MON	19304	2	Cast tress	Safory and Relability	379	tap		20
5810	Constal Operating Area	SEA BRIGHT	Conser Street Main Repoltement	177,210	Reprace	222	6.00	Durthy Iron	1850.1	3	Cast Iron	Safety and Rehability	120	2014Q4		30
9911	Courtal Operating Area	SÉA BAIGHT	Ocean Ave (Rt Sé) blann Replacement South	\$1,000,000	Anglica	2,300	16 00	Dettile tren	19201		Cast from	Safety and Retsolity/Structural	120	190		20
\$974	Coestal Operating Area	SEA BRIGHT	install Structural Ener for 16 PCCF underwater crossing	\$1,000,000	Reptoco	700	16.00	Other	19500	16	PCCP	Safety and Reliability/Structural	110	2016QA		30
7044	County Operating Area	SHREWINDURY	Replace 9" Main on Shadow Brook Road	\$131,000	Replace	972	4.00	Ductile new	1920%		Gabrahued Steel	Safety and Rehability/Structural	130	2016Q4		30
140	Southwest Operating area	SOMEROALE	Semerdate Somerdate Read Unger retread crossing	\$49,000	Replace	300	8 00	Ductile Iren	1950%		Cast wen	Safety and Rehobility	130	180	Yes	20
1343	Southwest Operating Area	SOMEROACE	Sementale: Cypress Avenue: Glaucestor Avenue to Dead End	\$49,400	Repuse	260	4 00	Ducte Iron	1950'4	2.23	Cast tree	System Flours and Pressure	120	160		10
1947	Southwest Operating Area	SOMERDALE	Samerdale - Arismby Svorme - North Worsech Road to Doad End	\$110,700	Reproce	180	9 00	Ductre stee	1950%	6	Asbertes Cement	System Flows and Pressure	170	180		20
5940	Southwest Operating Area	SACREMOR	Semendale - Codar Avenue - Herth White Herse Pille to Deed End	\$318.200	Replace	1,780	8 00	Ductive iron	1850%	6	Aubertos Cement	System Flows and Prossure	120	120		30
7734	Southwest Operating Area	SOMERDALE	Semerasia - Weresto Read (CR-66% & Attentio Avenue (CR-737) - Relined Cressing	\$500,000	Registe	700	9.00	Ductile from	\$430.1		Asbertos Coment	Safety and Rekability/Structural	120	160		30
161	Coastel Operating Area	THICH ENTANDS	Semera Panne Shore Read Between Connecticut Avenue & Betzet Read (AC-8-40) (Mort anded 2010)	\$110,000	Reptoca	440	12 00	Ductile Irea	1940'4	4	Ductile Iren	System Flows and Pressure	120	Teo	701	0
182	Constal Operating Area	SOMERS POINT	Seniors Fernt Share Read Between Bestel Road & Maryland Avenue (AC-8-40)	\$302,500	Replace	1,710	17.00	Duttle Iron	1920%		Azbestes Cernent	System flows and Pressure	830	TEO	Teş	10
100	Courtal Operating Area	SOMERS POWT	Somers Paint Maryland Avenue: Detween Shore Road & Sunset Avenue (AC-8-40)	\$72,900	Begiaco	290	12 00	Ductile srew	1970's		Cart box	System Flows and Pressure	120	180	Tes	10
184	Coastal Operators Area	SOMERS POINT	Semerc Point - interpland Avenue - Services Susset - Avenue & Bay Avenue (AC 8-00)	\$207,500	Replace	930	55 00	Durille won	1970'0		Ductile tron	System Flows and Pressure	170	180	Yes	0
185	Coestal Operating Area	SOMERS POINT	Jamers Pant Maryland Avenue - Between Bey Avenue & Lourch Avenue (AC-8-40)	\$167,500	Reprose	670	12:00	Ductifie Iron	1970's		Cast Iron	System News and Prospure	170	100	Tes	10
304	Constal Operating Area	SOMERS PORET	Somers Poinc - Share Road - Between Maryland Avenue & Graveland Avenue	582,500	Replace	330	13 00	Ductile Iron	19201		Asbettos Coment	System Flows and Pressure	120	180	Tes	10
209	Constal Operating Area	SOMERS POINT	Samers Peint: Shore Reed: Between Groveland Avenue & Ocean Hotphto Avenue Sunny Avenue between Graveland Avenue and	\$805,000	Replace	1.220	12.00	Ductile tren	1920.9		Cost from	System Flows and Pressure	120	TRO	Tes	10
\$641	Courtal Operating Area	SOMERS POINT	Presson Avenue From Sunny Avenue to 230' feet east	\$145,800	gistrace	1,040	8.00	Ductile Iran	1940'e	*	Cast Pres	System Flows and Pressure	120	301401		10
5442	Constal Operating Area	SOMERS POINT	of Survey Automos	\$33,300	Seplace	230	6 00	Quettle man	1940€	2	Cost Iron	Safety and Renatively/Sinuctural	120	201604		20
6351	Coastal Operating Area	SOMERS POINT	SP - 10th from Loures to New York	\$157,600	Baptace	768	8 00	Dustile from	1950's		Asbertos Comune	Salacy and Bull-pathty/Structural	330	160		30
6333	Coostal Operating Area	SOMERS POWER	SP Ess Street regiscement from Connecticut se Rhope Island	\$80,000	Replace	400	9.00	Ductile trees	1980'6	3	Cost from	Safety and Reliability/Structurel	110	TRO		20
6293	Coastal Operating Area	SOMERS POINT	SP - 1st Street replacement from Johnson to Bowers	\$169,200	Replace	946	8.00	Ductre Iron	1960'0		Carriera	Safety and Reliebility/Seructural	170	100		20
			3P 3rd Street regulacement from Rhade bland to							-	Cost tros					20
6295	Countal Operating Area	SOMERS POINT	Connecticut SP 4th Street reptacement from Dabbs to W. New	\$89,600	Replace	410	a 00	Ductile son	1940.5	2	Cast Iren	Safety and Rehability/Structural	120	790		10
4237	Coastal Operating Area	SOMERS POINT	Jersey Avenue SP Ath Server replacement from Rhade Island to	\$63,600	Replace	313	9.00	Duetne tron	1950'1	6	Cast tree	Sofety and Rehabitry/Structural	330	180		80
6238	Control Operating Area	SOMEAS POINT	Tuebor	\$15,600	Represe	278	8 00	Ductile trem	3950's	3	Cast Irea	Sofety and Reliability/Structural	120	TRD		39

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BPU Docket WR 15060724 Stipulation - Exhibit A

710 120 180 4th Serest replacement from from York to Messochusetts and SP Village Drive between Lastern Lone and US Reute 1,300 3 00 1940's 6341 SOMERS POWER \$140,000 6313 100 490 12.00 Cast Ree 180 6313 SOMERS POINT 8.425 12 00 TBO L753 681F SOMERS POINT 1200 1.000 tso 6463 TRO 1,310 14.00 1910% Cast from 120 \$347,500 1.110 TBO \$322,000 4519 Tep 4530 585,000 110 13 00 Cast Irea 600 \$130,000 12.00 4534 SP : US Rt 9 between Village Drive and 5 Village Drive 160 6327 2,900 8.00 130 SP 1. Village Or between Holly Halls Dr and Degerood 8.00 \$340,000 1.400 1950's 6330 SOMERS POWT 700 180 4531 SOMERS POWE \$133,500 Coostal Operating Area 411 170 180 6582 SOMERS PORT 175,000 400 1950's 59 - S. Leviel D' between Voirei Lane and Brot Share Bade between New Jersey nee and Canier Control of the State Bade Service of the State Bade Service Caseau Anna Marin Replacement Park Bade Service Caseau Anna Marin Replacement Park Bade Bade Bade Service Serv Replace Replac 1,400 6940 Coastel Operating Area SOMERS PORT \$250,000 \$250,000 \$250,000 \$223,000 \$440,000 \$130,000 \$180,000 1930's 1930's 1930's 1930's 1930's Cost Iron
Cost Iron 3016Q4 3016Q2 3016Q4 3016Q4 3016Q4 900 800 600 900 2,100 2,620 1,100 440 120 120 120 120 120 120 120 \$423 \$434 \$499 \$700 \$794 \$793 \$798 201401 \$70,000 Ductire from Safety and Reli 6625 SOMERVILLE BOROUGH SOMERVILLE BONGUIGH SOUTH BRUNSWICK TWP SOUTH BRUNSWICE TWP SOUTH BRUNSWICE TWP SOUTH BRUNSWICE TWP L160 700 800 400 400 6719 5681 5682 5684 5685 6655 180 180 309 M PCCP 120 294 MO \$378,600 7167 Central Operating Area \$114,000 180 6336 \$900,000 3,800 4 00 Ductile Iron 6 Cort tree Safety and Ashessity/Surveyore 190 4874 SPRINGHELD 0.00 6438 Horth Operating Area SPRINGFIELD 1,200 8 00 6 Cost from TRO 10 6439 Morth Operating Area SPRANGFIELD - Reversinge Dr Freim Cann St to Bartlefillit SPRINGFIELD

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Now sersey American Water Corresony, Inc 3015 Foundational Filing Appendix C. Abrusel 8/13/2015

Proposed Langth (Seet) 4,200 NGFFLD Shylark Rd from Tree Top Dr to Green 1,500 6443 North Operating Area SPRINGIELD \$1,100,000 8 00 Ductile Ires Cart Iren Sofety and Rekotemy/Structure 120 780 35 SPRINGINE LD SPENGFELD Coronel Rd from Evergreen Rd find Ave SPANGFIELD Route 32 aast 4nd west SPANGFIELD Deathern Rd Brown Denne Rd to \$280,000 1.400 18.500 1.100 6977 Morth Operating Area SPRINGS IELO \$2 000 000 8.00 Ductile Irea Cast Iron Selety and Reliability 120 SPRINGFIELD 8934 6.00 Ductine Iron 19400 Cast Irea Herth Geersting Area Morrison fild SPRINGFIELD Golf Ovel from Mesunitalm Ave SPRINGFIELD Sharom fild from Highland Ave to Summit fill SPRINGFIELD Elmorsod Ave J Cottler due from Milliann fild. \$310,000 Solety and Reliability/Structure 120 180 4135 1,900 DucUle Iron 1870'4 120 6939 PRINGFILLD \$140,000 700 000 1940's Safety and Reliability/Strecture 6939 SPRINGPALD \$100,000 1,500 8 00 120 180 borth Operating Area Rephics Ductile sen 3960's Cart tren Solety and Bonability/Structur Safety and Reliability 6944 SPRINGHELD \$270,000 L350 8 00 39400 Cest tree 120 TBD SPRINGFIELD - Severne Ave from Denham to Ehert Replace Replace Anglace 6945 6945 6947 6949 6910 6931 SPANICHEUD North Operating Area \$370,000 1,310 8 00 Ductile new 1940's Cost Irea 130 180 SPRINGFIELD SPRINGFIELD 309 600 Cast Irea Cast Irea \$100,000 1940's 1920's 182 180 March Operating Area PRINCEIELD Schmidti,D. Green Hall hig from Tree Top to teighland. Shertic/Ti(D. Essen from Bitcher to Springfleid Schrittiff(I.D. Bester from Lisch to seem at Davis Schriftiff(I.D. Store from Springfleid to Commercy Striffers' Cannoll Avenue, hearth stitute to commerce Hearth Milliac Horse Piles. \$440,000 Bapiere 2,200 8 00 Ductile Iren 1960's Cast tren 120 180 SPRINGINED SPRINGINED \$140,000 \$200,000 \$220,000 8 00 8 00 8 00 1,000 1,000 1,100 Cost Iren Cost Iren Cost Iren 130 110 130 TRO TRO 1244 Southwest Operating Area STRATIONS \$494,000 Asplace 2.1400 8 00 Duttile Irea 195074 Steel 120 180 north White blorce Pills Startford: Wheeling Way hood - WEST: Ninhale head to Driver Creah Road Firstford: Winding Way Road - EAST: Timber Creah Road to Engineed Dimini Summa: Addhash Mil Summa: Addhash Mil 7175 STRATFORD \$722,000 3,800 0 00 180 Theret Operating Area 120 10 2126 STRATFORD \$443,000 1,300 4.00 41 Morth Operating Area North Operating Area SUMMET SUMMETS \$180,000 Replace Septace 1,900 8 00 8 00 Ductée irea Ductée irea Unknown 1920's Cost tren Safety and Rehability/Scruttural System Flaus and Pressure 120 180 Summa - Physioth, Dovon & \$15,000 1990's Hery and Reliability/Skructu 120 10 SUMMART SUMMARY Summit Cottage (Correge)
SUMMIT Code-ell Are from Clork St to Saringheld 349,750 250 6.00 1930'0 System Flows and Prosours 6712 North Operating fires \$160,000 Regisere 800 8.00 Ductile Iron 1950's 125 Cost Irea Safety and Retability 120 TBO Ave SUNAMIT - Constantine OI from Pessale due to Springflied Ave SUMMIT - Druid and Rd from Silver Lake Dr to Surrer 6866 6847 SUMMET \$420,000 Aeplees 2,100 8 00 Cast tren Sefety and Rehability/Structural 120 180 SUMMER 900 Solety and Rekability/Structural 5040 North Operating Aree \$190,000 Replace 8 00 Durtile wen Cost Iron 120 180 4469 \$940,000 1,700 1 00 Cast Iron 110 SURMANT Receives in [Createst thre] SURMANT Surpophie file from Reneword St to Yolo St SURMANT Weedland Jeve from River fild to Conse Gregot Plany SURMANT Ret Jeve/Bevich Seeing Dr lange from 199 1,500 6870 Morth-Operating Area \$300,000 Repises 8 60 Ductife Irea Unknown Cast from Sefety and Rehability/Structural 120 180 North Operating Area 6071 1.000 Cast from Safety and Reliability/Saructural 6 00 120 \$170,000 850 Cost tren 6673 sorth Operating Area SUMMATT \$340,000 1,700 8 60 Ductile Iren Unknown Cast Iron Safety and Bakebilly/Streeture 120 130 6004 erth Operating Area 8,500 0 00 Cast Iron 110 6890 rth Deersting Area \$340,000 2,800 8 00 Cast Iron 120 Mail LIMANT - Division Ave Born Knob hill to Yalley Viso 6891 \$920.000 1,600 \$ 00 Cast Irea 110 780 North Operating Area Ductile Iron - Uninquin Safety and Rebability/Scruetural 20 Are TEWESBURY inablew Brank Rid from transcessed Rid to dead and of main. TEWESBURY RACCORDS MAIR Rid from Fairmoyne Rid to Reast Rid. 6892 TEWESBURY TWP \$1,100,000 TEWESBURY TWP \$160,000 6811 9 00 120

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New Jersey American Water Company, Inc. 2013 Foundational Piling Assessed & Assessed B/19/2015

M	Dietrict	Municipality	Project Title	REATH Funded (dollars)	Project Type	Proposed Longon (feet)	Proposed Dis- (Inches)	Proposed Pipe Material	Decade Installed	En. Dio. (Inches)	Exteting Place Material	Accelerated Asset Investment Estagory	Project Durotlen		Provingity Submitted for BPS Seview	Reended Weighted Leavy
189	Constal Operating Avec	THITON FALLS	Sinces Falls Sylven Dr. From Claramend to Sinceredge	\$47,500	Replace	450	9 00	Ductile tress	195079	2	Cost InpA	Safety and Relabbility/Structural	820	T80	T44	30
124	Constat Operating Area	TOMS RIVER	Tomo filvor Turp - Monterey - Haddonfield Ave from Pt \$\$ to to communa (boardinah).	\$309,000	Replace	730	8.00	Ouctile tren	3950%		Cost Iron	Salety and Reliability/Salectural	120	TRO	Yes	10
125	Courtel Operating Area	TOWIS HIVER	Tome Rever Turp: Memorry: Bryss Mour Ave from Rt. 35 S to terminus (beenfleets).	\$196,500	Registe	L310	\$ 00	Ductile men	1850'a	4	Continue	Safety and Rehability/Structural	120	180	T45	20
136	Courtal Operating Area	FOMS RIVER	Toms fiver Tury Makerry Starting Ave from Bryn Mewr Ave to terminus. Toms Siver Tury Monterry Serveget Way From St	\$94,000	Replace	470	6 00	Gurde Irea	1950'0	2	Cost wee	Safety and Rehebility/Structural	126	180	Tes	10
127	Constal Operating Area	TOWS RIVER	83 % to Ocean Rd, along Ocean Rd to Share Wey, along Share Way to Terminus.	\$\$ 80,000	Replaca	2,610	6 00	Ductife from	1950'1	3	Cost Iron	Safety and Renobility/Structural	110	201603	700	30
128	Caustel Operating Area	TOMS AWER	Tome Near Euro. Menterny: E. Bay Way from 4°-2" reducer just sect of Rt 35 5 to Ocean Rd	1216,009	Replace	L180	6.00	Ductile wen	1950'1	2	Cost tree	Selety and Rehability/Structural	120	TOSTOR	Yes	10
477	Constal Operating Area	TORKS RAVER	Orthry Sch Ave (from Bay Stud to Belomore Ave)	\$193,000	Replace	100	8 00	Ductile Irea	1940'4	4	Cost tree	System Flows and Pressure	120	2016Q4	Tes	20
399	Course Operating Area	TOMS RIVER	Spric River Bayshers Drive (fram to)	\$74,000	Soplete	370	6.00	Ductile irea	2930's	2	Gatemased Steel	Water Quelty	120	2016Q4	744	10
601	Coestal Operating Area	TOMS RIVER	Terrace)	\$47,500	Reprorq	360	6 00	Dersie inge	\$950°s	1	Garvanized Steed	Water Quality	120	201604	Tes	10
40A	Coastal Operating Area	TOMS RIVER	Tome River - Inter Road	\$30,000	Replace	250	6 00	Ductee wen	1950's	1	Galvenneed Stool	Water Quetry	120	101604	Tog	10
608	Coastal Operating Area	TONES MAYER	Tems River: Ocean Read (from Barnegst Way to Beach Way)	\$72,000	Replace	940	6.00	Ducting Iron	1950's	2	Government Steel	Weter Quality	170	301604	Tes	10
589	Contal Operating Area	TOWS BYER	Toms River Turp Manterey Westmans Live from 61 25 N to terminus [beardwells].	\$109.500	Regrace	730	8 000	Decta wee	193000	4	Cost wen	Safety and Beliebility/Structures	130	100	701	10
490	Constal Operating Avea	FOMS RIVER	Toms River Two - Menterny - E & W Beach Way from Ocean 8d to serhinus	\$270.000	Replace	1.350	6.00	Durthe won	1950's	1	Cast tren	Safety and Rehability/Structural	120	160	746	10
692	Coastal Operating Area	TONIS RIVER	Jama Roor Torp Manterey Sprey Way from Ocean . Ad to terminal.	\$194,000	Replace	670	400	Ductale iron	1930'1	3	Cost Iron	Safety and Relability/Structural	110	780	101	10
694	Coestal Operating Area	TOMS KNER	Tame Borer Tomp Monteray Rytherland (n Irom At 35 5 to Rt 35 N.	\$74,400	Replace	630	6 60	Ductile Iron	1950'e	1	Cast Irgo	Safety and Renability/Structural	120	180	You	10
700	Coastel Decrating Area	TOMS MHER	Temp Store Tive: Idamonray - Las Vegas Ra from Rt 35 Rt to 6"-2" reducer: Dir retire 3" CR, and metall 6" Dt from Las Vegas Rd north to Catalina Dr. Tama Store Tive: Manterey: Dat Star Dr From	\$48,000	Replace	400	6.00	Ductile Iron	1930'e	2	Cast Iron	Sofety and Robublity/Structural	130	100	Yes	10
701	Contai Operating Area	TOMS SIVER	Catalina Dr to Mathy R4, slong Mallow Rd to Ocean Dr, slong Ocean Dr to 6": 2" reducer.	\$93,600	Replace	780	6.00	Ductily Iren	3950'1	1	Cast how	Solety and Relubility/Stractural	110	160	100	10
702	Constal Operating Area	TONES RIVER	Tems River Euro Monterey Coronado Rd from Del Mar Drito Ocean Rd	\$40,000	Bopteca	300	8 00	Ourtille trees	1950's	2	Cast from	Salety and Rehability/Structural	120	TEO	Tes	10
708	Cosstal Decreeng Area	TOMS BIVES	Some River Turp Menterby - Merber Dr from Rt 35.5 so terminus (Bey)	\$238,000	Replace	1,190	8.00	Decide won	1950'4	3	Cost Iron	Sefery and Bellebility/Structural	130	100	706	10
hes	Coertal Operating Area	TOMS RIVER	Toms River Torp: Mantertry: Gell to Srem Rt \$5.3 to emend to Sneel 3d, connect to Herber Dr.	\$176,009	Replace	890	9.00	Ductile Iron	1950's	1	Cast Iron	Sefery and Rebellity/Structural	130	180	T04	10
710	Constal Operating Area	TOMS RIVER	Tems fiver Tug. Memorsy: Boocon Rd from Horber. Or to terminus.	\$12,000	Regisco	60	+80	Ductile Iren	1910's	3	Cost Iron	Safety and Reliability/Structural	120	180	***	10
731	Coastal Operating Area	TOMS RIVER	Tame floor Turp - Monterey - Sper Rd from Harbor Dr to terminus.	\$14,000	Replace	70	4 00	Ductile tree	1930's	1	Cost from	Solety and hanobility/Structural	120	180	Tes	10
712	Coestal Operating Area	TOMS BIVER	Toms River Two - Monterey - Helm Rd have iterbar Dr to terrainus	\$22,000	Replace	110	4.00	Ductile tren	1990's	2	COST WAS	Safety and Releasibly/Structural	120	780	Tes	10
713	Coassal Opersong Area	TOMS NIVER	Toms River Tup - Monterey -Dory Rd Born Gull To Terminus	\$12,000	Replace	260	8.60	Ductile Iron	1950'e	3	Cost trea	Selety and Reneality/Structural	110	TRO	Yes	10
714	Constal Operating Area	TOMS RIVER	Tests River Turp: Menterey: Ancher Rd from Herber Dr to terminus.	\$26,000	Replace	130	4 00	Durine was	1950's	1	Cost tren	Solety and Rolubdity/Structural	130	180	Yes	10
715	Courtal Operating Area	TOACS RIVER	Terms Revor Turp: Mareterpy - Marship Rid fram Harbor Dr to terminus.	\$36,000	gebreca	130	4.00	Ductally trees	1950%	2	Cost Iron	Solety and Rehability/Structural	130	160	Yes	10
716	Coastal Operators Area	TOMS RIVER	Tamis River Turp - Monterity : MILET Rd from Herbor Rd to terminus	\$26,000	Replace	110	4 00	Ductile Iron	1950's	2	Cast Non	Safety and Belobility/Structural	120	180	700	10
737	Countal Operating Area	TOWS RIVER	Toms Near Tup: Managray - Gave Way from Rt 35.5 : to 6".2" radices to Helber Dr/Ketth Ln Intersection	\$76,800	Replace	640	6 00	Durtile iron	1950'0	3	Cost man	Safety and Renability/Structures	120	160	Yes	80
719	Coastal Operating Area	TOMS BYER	Terro Alver Evip - Monterpy - Tuna Way from th 33 M to Gae Way	\$124,000	Replace	120	6.00	Durate was	1910's	2	Cast Iron	Safety and Reliability/Structural	120	180	Tes	10
730	Coastal Operating Area	TOMS RIVER	Tems River Tug - Monterey - Osprey Ln from Rt \$5 N to Gos Wey.	\$124,000	Replace	620	6.00	Ductile Iren	1990's	3	Cost Iron	Solety and Renobility/Structural	120	TBO	Yes	10
771	Coastel Operating Area	TOMS AWER	Terris Bries Eug : Moneoray : Bas Way from W Tuns to W Ambarjoch Way.	\$90,000	Replace	450	6 000	Ductile wen	3950%	1	Cost Iron	Salmy and Relability/Structural	120	180	765	89

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new Jersey American Wroter Company, Inc. 2013 Foundational Filing

м	District	Municipality	Projects Title	Itskill funded (dellers)	Project Type	Proposed Langth (feet)	Proposed (No. (Indies)	Proposed Pipe Manerial	Decade Installed	(In Dis. (Inches)	Esseting Plans Menorial	Azzalocated Asset Investment Epispory	Project Durotion	Entimoted in Service Period	Previously Submitted for BPU Berdess	Rounded Wroghed Score
122	Coestal Operating Area	TOMS AVER	Tomo Rhyer Tury - Adenterry - Albacore Way from Gas Way to Sas Varw Rd	\$352,000	Regists	1.760	6.00	Duritle Iran	1954**	3	Cost Irgn	Soloty and Remob.Jity/Structurel	120	teo	Tet	ţ0
729	Coostal Devrsting Area	TOMS RIVER	Tone fiver Eup - Menterny - Player Way from Goa Way to M 35 N	\$130,000	Replace	850	6.00	Ductrie wen	1950's	1	Cost tren	Safety and Behandiny/Structural	110	160	Tot	10
224	Coestal Operating Area	TOMS RIVER	Tome Siver Turp Monterey Ambertack Way/BeschWay from See View Rd to Dawn Ls, along Deem Lin to Laffoh Way	\$360,000	Reptace	1,900	6 00	Ductile tree	1950's	1	Cost Iron	Safety and Relicativy/Structural	120	160	Yes	10
726	Coestal Operating Area	TOMS RIVER	Toms River Fug. Monterey: Quality Way from At BS S to See Varu Rd.	\$280,000	Replace	1.400	6 00	Ducine won	1950's	1	Cost tree	Safety and Reliability/Suructurel	120	teo	Yes	10
727	Coastal Operating Area	TOMS NIVER	Toms River Tug - Mentersy: Crane Way from Rt 35.5. to See View Rd.	\$380,000	Acplace	1,400	\$ 00	Ductile Iron	1950'0	2	Cost Won	Safety and Rehability/Scruetural	110	TBD	764	to
734	Causad Operating Area	TOMS RIVER	Tema flow Ting - Menterry - Tarpen Way from Rt 35 S to See West Rd.	\$274,000	Reptace	1.300	6.00	Durthe Iren	1950's	1	Case Iran	Safety and Bakability/Structural	130	160	Tes	10
717	Coastal Operating Area	TOMS NOVER	Tomo River Torp . W Boy View Drive (RCSSS to RCSSN)	\$194,000	Regiocs	680	6 00	Ductile Irea.	19501	3	Casa tren	Salaty and Reliability/Structural	120	180	701	10
73B	Counted Operating Area	TOMS MIVER	Tors filter Turp: Menterry: Heren I.n From Bay View Br to terminus	\$31,600	Replace	430	6 00	Ductire Iron	1950'e	2	Courses	Selety and Reteasony/Structurel	120	180	Yes	10
799	Coastal Operating Area	PONS RIVER	Egms River Two - Menterpy - Subset Ln from Bay View Dr to terminus.	\$17,600	Replace	480	6.00	Durctife from	1950's	2	Coorwon	Salety and Religibility/Structural	120	TRO	Tes	10
240	Constal Operatory Area	TOMS RIVER	Toms liver Two: Monterey - Test Unition Bay View Or to territings.	\$38,800	Asplace	410	600	Ducide Ires	19301	2	Cast won	Safety and Resolutey/Structural	120	160	Yes	10
741	Caestal Operating Area	TOWS RIVER	Tame filter Trup - Monterey - Meanthe Le from Bay View Dr to temmys, retire 2" Cit, along Bay View Dr.	\$7\$,600	Replace	690	6.00	Ductile Iron	1950's	3	Coul tran	Safety and Religibility/Structures	120	180	Yes	10
742	Coastal Operating Area	TOMS RIVER	Toms Repr Twp. Monterey: Eargbener Way from Rt. 25 S to 8t 35 fr could extend to 8t 35 St.	\$148,000	Replace	740	6.00	Ducille wen	1950's	2	Cast Iren	Servey and Reliability/Structural	120	790	Tes	10
746	Coestal Operating Area	TOMS RIVER	Toma River Timp Anamorey Strickland Brid from Rt. 85 Ht to 8"-6" reducer (bay)	\$304,000	Replace	1,360	6.00	Ductile Impa	1950'0		Asbestes Coment	Safety and Reliability/Seructural	130	190	700	10
242	Coestel Goorstong Area	TOMS RIVER	Tours River Euro Monterey they Shore Dr from Strickland Bird to terminus	\$19,600	Replace	990	6 00	Ductalle lines	3820.4	1	Cost tree	Salaty and Ratio bility/Seructoral	120	TED	Yes	\$0
748	Countyl Operating Area	TOMS RIVER	Toms Near Turp Manterby Fort Mayors Ct and to	\$60,400	Replace	170	8.00	Ductes won	1950's	2	Cost from	Selety and Rehability/Structural	120	100	T06	10
749	Coastal Operating Area	TONS AIVER	Tame River Turp Menterey Integres Ct and to and. Tame River Turp Menterey Baymon Ct from Miland	\$35,200	Replace	310	600	Ductile Iren	1950'1	2	Cert Iten	Safety and Reliability/Structural	120	190	Yes	10
730	Coortel Doorsting Area	TOMS RIVER	Dr to terminus (connect hitems Dr between Carel Gables Dr and Daytons Dr).	\$20,400	Replace	170	6.00	Ductile Iron	1930's	3	Case Non	Saleny and Reseasing/Structures	130	TBD	746	10
733	Coastal Operating Area	TOMS RIVER	Tams River Turp - Mightenry - Delizy Dr and to and	\$84,000	Replace	700	6.60	Decide Iran	3930'4	2	Cost Iron	Safety and Reliability/Structural	130	780	Yes	10
753	Constal Operating Area	TOWS NIVER	Tome flow Two decemberry James on did from \$1.35.3 to Lerminus (bay).	\$73,000	Soplace	800	6.00	Quictile Iren	3950%	2	Cast trees	Safety and Rehability/Scrathyral	130	100	Yes	19
754	Consul Operating Area	EQNIS RIVER	Toms River Two Monterpy Serf Way from Rt 33 H to Ocean Rd	\$79,600	Replace	630	6 00	Dwctile wen	1990's	2	Cost Iron	Safety and Rel-ability/Structural	120	180	Yes	10
764	Constal Operating Area	TOMS RIVER	Terms floor Yung - Menterey - 2nd Ave from Rt 35 ft to 8"-2" reducer.	\$47,500	Replace	450	8.00	Ductes was	185074	1	Cast Hen	Entery and Reliability/Structural	120	TBO	Tes	10
7100	Coastal Operating Area	TOMS RIVER	E B W Share Way	\$185,000	Aspiscs	975	6.00	Durillo from	1930'0	3	Case tree	Safety and Reliability	110	201603		30
7143	Exectal Operating Area	TOMS RIVER	Metody Lane (Relinated to Terromous)	\$220,000	Replace	1,100	8 00	Ductile New	Unbayen	Unknown	n Aubreton Coment	Solvey and Ballabiley	130	2016Q3		20
7146	Courtal Operating Area	TOMS RIVER	Refreed (from Iterbor to Gull)	\$10,000	Replace	150	8 00	Ducine Work	1950%	3	Cost tree	Solony and Reliability	130	101101		10
7148	Countal Diperating Area	TOMS RIVER	W Tarpen Vray (RL33\$ to RL33H)	\$134,000	Replace	670	8.00	Duchite Iron	1950's	2	Cast tree	Safety and Reliability	120	2016Q1		30
7148	Coastal Degrating Area	TOMS ANTER	W Bay View Drive (RGSSS to Rt2534)	\$334,000	Peplace	680	8.00	Dructile Aren	1950'1	6	Auberten Coment	Safety and Reholibry	128	3318Q1		30
71.00	Coastal Operating Area	TOMS BYER	W Pongum Way (Rt395 to Rt35H)	\$140,000	Replace	700	6.00	Ductile from	1950"	6	Asbestee Coment	Splety and Bultability	120	3014Q1		20
7130	Coastal Operating Area	TOMS RIVER	E Sandptper Way (Rt35N to Sea View)	\$120,000	Replace	400	8 00	Ductile trea	1950's		Asbertos Coment	Safety and Bekebiling	120	201401		20
7151	Coestal Operating Area	TOMS RIVER	E Pengum (RtSSH to See View)	\$120,000	Replace	400	9.00	Ductes from	2950'4	4	Asbertos Comem	Safety and Reliability	120	201601		20
7152	Coestal Operating Area	TOMS RIVER	E Player (IN) SN to Sea Views	\$120,000	Replace	600	8 00	Ductile tree	19504		Asbestos Coment	Safety and Reliability	320	201603		20
7153	Casstel Operating Area	TOMS RIVER	Sea View (E Tuna to E Sandpiper)	\$210,000	Replace	1.050	6 007	Ductile Iren	1990's	6	Aphennes Coment	Safety and Reheastry	130	3010Q3		20
			Dock Street -Replace 1950' of 6' cast iron main from				1000			- 8						
6711	Caustal Operating Area	UNION STACK	Florence Avenue to Front Street Valley St. (Maple to Crastverw to Springfield Ave.)	\$392,500	Replace	1,910	8 00 8 00	PVC Dectile Iran	1940's	6	Cast from	Sefety and Rehability/Structural System Flows and Pressure	170	2016Q4 2014Q1		30
5576	Control Operating Aves						8 00	Ductile inten		- 1	Cast Iron			101401		39
3380	Control Operating Area	UMION TWP	Raymond Tark. Valley St. (Maple Ave. to Samrefletd Ave.)	\$517,080	Asplace	218 2,502	8 600	Ductile man	19201	- 1	Cast Iron Cast Iron	System Hows and Procesure	120	2016Q1		19 30
\$585	Control Degrating Area	UNION TWP			Asplace							System Flows and Prossure				
4610	Control Operating Area	UNION TWP	Bennel Ct. (Johnson to End)	\$70,400	Replace	953	8.00	Dractile tress	19204		Cast Iren	System Flows and Prossure	130	780 180		20
4807	Central Operating Area	UNION TWP	Kawameen La. (Easemeen to Dead End)	\$26,250	Replace	110	6 00	Ductile Iron	39400	15	Capt tren	Wrater Quelity	130			20
6808	Control Operating Area	LINON TWP	Charles Ave (Grandwaw to Coolidge)	\$117,800	Replace	699	6 00	Ducate tree	1930.		Cast trees	System Flows and Prossure	230	780		20
6610	Central Operating Area	UNION TWP	Springhest Ave. I Velley to Voushall Rd. 3	\$449,000	Replace	2,313	6 00	Ducille Iron	1830's	4	Cert tres	System Flows and Pressure	120	120		30
6833	Control Descripting Area	UMION TWP	At-lier St. (Springfield to Deed End)	\$71,925	Replace	411	6.00	Durcton Iron	1920's		Cast tren	Weter Quality	170	180		30
6813	Control Operating Area	UNION TWP	Sches St. (Springfield to Hilliam)	\$213.800	Replace	1.044	4 00	Ductile inter	192071		Cast tren	System Flaves and Pressure	120	180		20

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New Jersey American Weter Company, Inc. 2013 Faundacional Filling Appendix C. Revised 8/13/2015

Longth (feet) Tower St. (Sattinghold to Hallon)
Smith St. (Younhall to Valley)
Smith St. (Vounhall to Valley)
Smith St. (Valley) St. Vounhall Bd.)
Upger Townstein Commonwealth Avenue Benov
Vincent Avenue & William Avenue (ST-8-5)
Weepster Avenue Replacement of Brich Cast from
Inom Commonwealth Avenue to end 1920's 1920's 1820's 6825 6824 7035 \$199,400 \$112,800 \$114,600 UNION TWP UNION TWP UNION TWP 981 364 378 6 000 6 000 8 000 Cost Iron Cost Iron Cost Iron 120 110 110 180 180 180 20 20 20 278 UPPER TWP \$137,500 930 11 00 1950% Cast from 130 180 10 Constal Operating Area 6132 494 0.00 1950% Cost Iron 120 180 6127 UPPER TWP \$111,000 111 8 00 1950'1 Cast Wen 120 6148 UPPER TWO 1950'e 6149 UPPER TWP 500 9.00 19500 120 100 6130 810 9 00 1950'6 120 780 UPPER TWP \$170,000 Cast Iron 8.00 6509 UPPERTOP \$100,000 500 \$ 00 PVC 1830°e 110 180 UPPER TWO \$98,000 6371 6513 UPPER TWP \$100,000 500 6.00 PVC 1940'1 120 TRO 6 00 120 100 6519 UPPER TWP \$98,000 PVC 1940's UT . W. Whitter Annual between Bayesers for and Commenses 8th Aug. UT . E. Leaner Annual between Commenses 8th Aug. UT . E. Leaner Annual between Commenses 8th Aug. UT . E. Barriera Annual between A Commenses 4th Aug. and the beach. Vessilves Gall Hallow Calest Off of Hallow Drive Vessilves Gall Hallow Calest Off of Hallow Drive Vessilves Gall Hallow Line Total Fill Sci. R O W. Parchees Fill Sci. R O W. 6513 UPPER TWO \$64,000 290 0.00 MC 1940'6 120 180 190,000 450 6.00 Galvanized Steel 120 180 6516 UPPER TWP Ductile Hee 1940's \$79,000 372 VOORHEIS \$76,000 400 2 00 HOPE 1970'0 HOPE Sofery and Reliability/Structure 120 J01601 1347 west Operating Area VODRNES \$157,500 700 entern Flows and Pressure 120 Tep \$253,000 1.330 Cast tree em Flows and Prossure 3955 \$10,000 16 treet 1900'1 stool 120 190 Cast Irea 44 Morth Operating Area NGTON BGROUGH \$300,000 1,600 12.00 Decille Iron 120 TRO Yes 109 \$157,500 140 WASHINGTON BOROLIGH \$200,000 1,000 8 60 Duritle Irea 294Ce Cast tren System Closes and Prospers 120 Tap Yes 13 L100 6 00 120 180 141 North Doersting Area \$330,000 1940's Cast Iren 141 1.100 8 00 1940) Cast tren 110 180 3796 worth Operating Area WASHINGTON BOROUGH \$124,000 Replace Replace Replace Replace Replace Replace 630 8 00 Pre-1900 Capt from System Flows and Pressure 330 180 \$208,000 \$318,000 \$341,000 \$380,000 1,040 590 1,705 1,900 8.00 e 00 e 00 e 00 e 00 Pre-1900 Pre-1900 1960's 1800's 5739 5739 5740 3741 5742 QST CST QST QST 120 120 120 120 120 5,165 12.00 19601 Cast wen Sofery and Rehability/Estucia 3016Q3 \$7\$7,125 Hostin Operating Aree HIGHOR HORDUCH \$745 \$113,000 1,545 Cast Irea 3746 WASHINGTON BOROUGH 1141 000 1.815 13.00 Cast tran System Flows and Populate 120 180 1940'4 Safety and Bellebility/Isructi \$747 Harth Operating Area HETON BOROUGH \$221,000 1,105 8 00 COM WOR Cast Iren 120 180 1,165 Docado Iran 19601 Cast Iron 3740 \$213,000 Herth Operating Ares

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term peryoy American Wrater Campany, Inc. 2015 Foundational Pling

M	District	Manicipality	Project True	PLIRW Funded (dulters)	Project Type	Proposed Longth (foot)	Proposed Dis-	Proposed Pipe Meterial	Decods Installed	Ez Dio.	Expelling Physics Adopterial	Accelerated Asset Projetment Category	Project Duretien		Proviously Submitted for BPU Royles	Rounded Weighted Sears
\$750	North Operating Area	WASHINGTON BORDUCK	AUCDameld Street From Women St to and at 16" main	\$260,700	Replace	1.103	12 00	Ductile tree	19101	6	Cast train	System Flours and Prosours	230	100		20
5753	Inurth Operating Area	WASHINGTON BOROUGH		\$149,000	Popleca	743	8.00	Ductile Iron	1966		Asbestes Coment	System Flows and Pressure	130	T80		20
3716	Sorth Operating Area	WASHINGTON BORDUGH	Wysming Aug-from 6" (It main to hydront HSW-40 co at McDeneld St	\$218,750	Replace	1.230	8 00	Ducthe won	Pre-1900		Castiren	System Flows and Processes	120	180		20
9757	Worth Operating Area	WASHINGTON BORDUCH		\$80,500	Regiace	840	0.00	Ductile Iron	1910:		Achertes Coment	Section Flows and Pressure	120	100		29
6187	Merth Operating Area	WASHINGTON BOROUGH		580,000	Replace	400	9 00	Ductile Iren	1950's		Appertos Comuns	System Flows and Pressure	120	CBS		10
6218	North Operating Area	WASHINGTON BOROUGH	CHARSTONE	\$90,000	Reptace	490	9 80	Ductile wee	1940's	4	Алботов Сетом	Salery and Rehability	120	180		19
130	North Operating Area	Walmington Two	Washington - Washburn Road Changwater to \$ Lincoln	\$945,000	Reptoco	4,200	12.00	Ductille Iran	1950's	6	Ashertos Coment	System Flows and Pressure	120	100	702	10
\$743	North Operating Area	WASHINGTON TWP	Fisher Ave from Ralleand Ave to Weshburn Ave	\$275,000	Replace	1,375	8 00	Ductile Irpo	1990's	4	Cast myn	Water Guality	130	TRO		20
1760	Morth Operating Area	Washington Twp	Washington Ava From Brass Costle Rd to Mill Pond Road	\$725,000	Replace	1.900	16 00	Ductile Iren	19504		Cost Iron	System Flows and Pressure	120	160		20
5761	North Operating Ares	МАЗНИЦТОН ТИР	France HSE Road from Partnego Run to Evenemian Ave	\$161,000	Replace	905	8 00	Dusting was	1940's		Cost Iron	System Flows and Prossure	120	TED		20
\$342	Month Operating Area	WASHINGTON TWP	Jackson Valley hid from bline Hill Road and of main Bast Jackson Parkway	\$837,000	Aspleta	1,770	13 00	Ductile Iran	1960%	6	Asbentes Comunt	System Flows and Pressure	130	180		10
5764	Herth Operating Area	WASHINGTON TWP	Valley View Ad Irom End to Pohescong Ava	\$188,000	Beptace	690	8 00	Asbettos Coment	19601		Asbestos Coment	System Flows and Pressure	120	750		20
1761	North Operating Area	WASHINGTON THP	Pohatteng Are from Valley View Rd to Pohettang Dr	\$110,000	Replete	615	0.00	Dugtile Iron	1960's	- 6	Asbettes Coment	System Flows and Pressure	120	TBD		20
3767	Fronth Operating Area	WASHINGTON TWP	Pehatceng Dr from Pohatceng Ave to end	1307,000	Anglese	L515	£ 00	Durille won	1940's	4	Asbectos Comens	System Planes and Prospure	120	780		20
\$768	Month Operating Area	WASHINGTON TWP	Jackson Forkway from Pohescong Dr to Jackson Volley	\$101,750	Replace	450	8.00	Ductile from	1960'6		America Coment	System Flows and Pressure	120	Teo		30
6104	North Operating Area	WASHINGTON TWP	OLD SCHOOL HOUSE RO	\$194,000	Replace	679	0.00	Quette trea	1990's	1	Golventred Stool	System Flows and Prossure	120	TRO		10
6165	North Operating Area	WASHINGTON THIP	DOGWOOD LANS	\$192,000	Replace	160	9.00	Outte iren	1930'1	1	Galvanized Stool	System Reas and Pressure	130	FBQ		20
5937	Constal Operating Area	WEST LONG BRANCH	World Long Branch Woolley Place from Menmouth Read to Galler Dired	\$105,000	Restoce	700	6 00	Ductile wen	1950's		Cast tron	System Flows and Procure	120	180		20
5929	Constal Operating Area	WEST LONG BRANCH	West Long Branch - Belief Drive from Woodley Place and Hendrickson Place	\$105,000	Replace	700	8.00	Ducting srees	1950'#	2	Cast Iron	System Flows and Prospure	120	160		20
6069	Constal Operating Area	WEST LONG BANNICH	West Long Branch - Maple Avenue on either side on Financial Avenue	\$44,250	Replace	493	6-00	Ductife Iren	1950%	2	Cost tree	System flows and Presoure	350	183		20
4971	Control Courseling Area	MEST FOME BYTTHE	West Long Branch - Eliminand Avenue from Wall Street to north of Hellywood Avenue	\$78,000	Aeptace	\$70	6.00	Очетию мол	1950's	3	Cost Iron	System Plans and Pressure	120	180		20
4073	Courtal Operating Area	WEST LONG BRANCH	West Long Branch - Pine Avenue between Chestnut Flats and Walnet Place	\$79,500	Applece	490	6 00	Ductes Iran	1930'e	5	Cast tren	System Floury and Pressure	120	180		30
6146	Coastal Quoreting Area	WEST LONG BRANCH	West Long Branch - Woodland Drive	\$118,500	Replete	790	8 00	Ductile trea	1950%	6	Asbestos Comuns	System Flows and Prospure	120	301604		20
8189	Coastal Georgiang Area	WEST LONG BRANCH	West Long Branch : Popular Avenue	140,000	Replace	400	4 00	Ductile tres	19501	1	Cost wen	Safety and Reliability	120	180		79
4190	Coastal Danisting Area	WEST LONG BRANCH	Wrest Long Branch Hold Avenue	\$99,000	Replace	640	6.00	Dincapt new	1950's	3	Cast from	Safety and Rehability	120	2014Q4		30
6191	Coastal Operating Area	ME21 FOME BUTHICH	West Long Granch Golf Street	\$34,500	Replace	230	4.00	Dectile Iron	1950'1	1	Cast Iron	System Flours and Pressure	150	2016Q4	1421	10
11	North Downling Area teeth Operating Area	WEST DRANGE WEST DRANGE	West Drange - Mitchell St (bet Calony & Rollinson) West Orange - Undertained Rd Retrieven Blackstock	\$330,000	Replace	1,540	8 00	Ductile Iren	1910's		Cast Iran Cast Iran	Safety and Rehability/Structural Safety and Rehability/Structural	120	780 2018Q1	Yes	20 10
154	North Operating Area	WEST GRANGE	and Torongy) Wrest Orange Sahob. Phase 6	\$3,382,500	Reham	22,550	14.00	Other	19304	14	Cast Iron	System Flores and Prossure	120	Teb		20
157	Marth Operating Area	WEST GRANGE	West Orange Betisle Phase 3 Replace	\$407,500	Broken	1,700	17.00	Ductile tree	1930'4	4	Cast leas	System Flows and Pressure	330	Tex	Ton	20
133	North Operating Area	WEST ORANGE	West Grange Rehalt - Phone 3 Replace	3247,300	Replace	1,100	8 00	Ductile tron	1990'4		Cost tree	System Flows and Prossure	120	180	Tes	29
154	North Operating Area	WEST CRANGE	West Grange Beneb - Phose & Reproce	\$47,500	Replace	900	8.00	Ductile tren	19101		Cast Iren	System Flours and Prossure	320	180	For	10
193	Hersh Operating Area	WEST DRANGE	West Orango Rehab: Phase 5 Replace	\$326,250	Asplace	1,430	9.00	Ductile Iron	1990'1		Cast tres	System Flows and Pressure	110	180	705	20
3432	North Operating Area	WEST DRANGE	Gregory Place	\$170,000	Replace	810	0 00	Ductile Iron	1930'9	6	Cost Iron	Safety and Rehability/Structural	120	180		20
6202	borth Decreting Ares	WEST DRANGE	St. Cloud Avenue from Old Indian Road to Arverse Rd	\$440,000	Replace	2.100	6 000	Ductale Index	1950'e	٠	Cost wen	Safety and Relability/Seructural	120	180		20
6203	North Operating Area North Operating Area	WEST GRANGE WEST DRANGE	Fatryow Ave Trom Strokwood Ave to Chestrus Rd Arverne 6d from 31 Cloud Ave to Pighland Bivd	\$345,000	Replace	2,300	4 00	Ductile iron	1930'4	:	Cast Man	Safety and Retablisty/Structural Safety and Reliablisty/Structural	110	TED		10
		WEST DRANGE	Edit owned Ave from Arverne Rd to Ond Salery Rd	\$367,000	Replace	1.035	6 00	Ductile Iron	19301	- 1	Cast tree		120	Tap		
4203	Month Operating Area		St. Cloud Avenue, Chemnyt Rd, Redmon Place,					ndrad = 00				Selety and Relability/Structural		100		39
6306	trents Operating Area	WEST DAMISE	Shorldan Avg and Lemox Torrocq	\$1,807,500	Retrop	7,290	6.00		19500	Untres	n Cost trea	Water Quelity	350	780		30
6217	Nurth Operators Area	WEST ORANGE	Rect Spring Avenue from Horthfield Ave to Chestout Reed	\$402,000	Replace	3,010	6 00	Ductile tree	1950°e		Durate tren	Safety and Reliability/Structural	120	TBO		10
6319	North Operating Area	WEST ORANGE	Lessing Road from \$1. Cloud to Birty horsing Ave	1316,000	Replace	1,580	8.00	Ductile trea	195074	6	Duttile hee	Safety and Rehability/Seructural	120	790		10
8230	Morth Operating Area	WEST DRANGE	Devenience Tempce from Mt, Placeans Ave to end cop- past Holtingham Rd	\$197,000	Reglece	985	8.00	Dw/Me Iron	195074	6	Cast from	Sefety and Rehability/Structural	110	Teo		10
6711	North Operating Area	WEST DRANGE	Woodland Avenue from Forest Avenue to Prospect Avenue	\$413,000	Replace	2,043	0.00	Durise Hon	Unbnown	6	Cartiron	Salety and Rehability/Structural	370	180		30
6224	North Operating Area	WEST ORANGE	Eagle Rack Ave Ireto connection with 8" (I west of VWO-1433 to Lowel Rd	1204,000	Replace	1,010	8 00	Ductile Irea	Unkapun		Cast Irea	System Flows and Pressure	120	180		20

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New Jersey American Water Campany, Inc. 3013 Foundational Filing

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N	District	Bd webspelling	Project Title	PLIAW Funded (dollars)	Project Type	troposed troggth (foot)	Proposed Dia. (Inshee)	Proposed Ples Meterial	Docada Installed	En. Dio. (Inches)		Accelerated Asset Investment Category	Project Duration	Estimated In Service Period	Provingely Submitted for BPU Review	Rounded Weighted Score
4333	Morth Operating Area	WEST ORANGE	CBL Ragio Rock, Borron Dr. Lawrel, Ave., and Alvern	1932,000	Renata	1.555	6.00		Uningers	Unkapu	n Unknows	System Figure and Procesure	320	3016Q4		20
4226	Herth Operating Area	WEST DRANGE	Surveyside Rd from Pleasant Valley Way to end	\$511,000	Replace	3.555	0.00	Ductes wan	1950's		Aubentas Coment	Salety and Reliability/Structural	120	180		19
6327	North Operating Area	WYST DRAWGE	Hover Ava from Pleasant Valley Way to and just past	\$190,000	Restace	930	8 00	Ductile Irea	1930'e	4	Cost from	Sofety and kenshitty/Structural	120	180		10
6228	Morth Deersting Area	WEST ORANGE	Reading Torrace from Mt. Pleasent to Gregory Avo	\$134,000	Replace	690	8.00	Cost Iron	1950's		Cartiron	Safety and Reliability/Structural	170	100		10
6229	North Decreting Area	WEST DRAMGE	CAL vegets are, Grant Forrace, Wardesdi St. Has St.,	5889,400	Benati	4,447				testeren	a Unbrows	Water Quality	110	2016Q4		10
6230	North Geersting Area	WEST DANNE	Misple St. and Elm Street. Old Indian Rd From Pressort Valley Road to St. Cloud.	\$197,000	Replace	105	9 00	Ductile Iron	1950's		Colt tran	Sofoty and Rollaborry/Structural	130	180		19
****		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Are WEST ORANGE - Wandland Are between Forest and	217-,004			***	Service new	29708			34-17 0-10-10-10-10-10-10-10-10-10-10-10-10-10	***			14
6714	Morth Operating Area	WEST CRANGE	Prospect	\$483,750	Reproce	1,110	12 00	Ductile Iren	1950'0	.6	Ashertos Coment	Safety and Reliability	120	Teo		20
6717	North Operating Area	MALEL DUYNICE	WEST ORANGE - Did Indian Rd from Pt Yalley Wey to Weddington	\$260,000	Replace	1.100	8 00	Dwcthe wen	1950%		CHI HOM	Sefery and Rehability/Structural	830	180		10
6718	South Operating Area	MEST COUNCE	WEST CRANGE Old Indian Rd between Prospect and HWO-233	\$300,000	Replace	1,000	8 00	Ductile from	Pre-1908	6	East Iron	Salaty and Balababy	330	780		10
4905	North Operating Area	WEST GRANGE	WEST CRANGE - Bulgrade for from Brogland Ave to - Club Blvd	\$300,000	Replace	1,300	8 00	Ductile Irea	Unknown	4	Carl from	Solety and Rekopility/Survival	120	160		10
6907	Month Operating Area	WEST CRANGE	WEST CAMPGE - Delle Tome Ad Inpm Pleasant Volley Way to Cookings Ave	1240,000	Replace	L300	0.00	Galventack Steel	Uningun		Cost from	Sefety and Rallability/Structural	120	160		20
4908	Morth Operating Area	WEST DRANGE	WEST CRANGE - Brookside Ad from Fairway Dr to Gregory Ave	\$360,000	Reprace	1,900	9 00	Ductrie Iron	Unknown		East from	Salaty and Retability/Structural	130	780		80
6909	North Operating Area	WEST DRAWGE	WEST DRANGE - Forest HIB he from Gregory has to Collemons	1500,000	Deptace	1,500	8 00	Ductile Hee	Unknown		Cost Iron	Safety and Rehability/Structural	130	190		10
4910	Harth Operating Area	WEST CANNES	WEST CRANGE - Humandon hallow Warren hallo short lin Jup	\$300,000	Regioca	2,500	0.00	Ductile Iren	Unknown	6	Castiron	Safety and Respositly/Structurel	120	780		10
6911	North Operating Area	WEST DRAWGE	WEST GRANGE - Kernel CV + CI from horshilele Ave	\$360,000	Beplace	1,900	0.00	Ductile Irps	Unbrown		Cast Non	Safety and Rebookity/Structural	120	760		10
6912	Horth Geersting Area	WEST GRANGE	WEST CRANGE - Luddington Ad from Gregory ave to	\$240,000	Reproce	1,000	8 00	Ductite tran	Untrawn		Card Iron	Solety and Rehablety/Structural	110	tap		10
6913	Morth Operating Area	WEST DRANGE	WEST CRAINGE : Mortsviold Ave from Wromer Rd to Make \$4	\$1,000,000	Reproce	10,000	6 00	Ductile Iren	Unknown	4	Cost Iron	Safety and Reveal-May/Structural	120	303604		60
6914	Isorth Operating Area	WEST DAAMSE	WEST ORANGE - Pressent Valley Way from Esglo Rock. Ave to 1 200	\$1,000,000	Replace	3,000	0.00	Ductile Iron	Unbergun		Cort tran	Sofery and Retability/Securivial	820	201604		10
6920	Morth Operating Area	WEST CANNES	WEST CRANGE Randolph PI from Mt Pleasant Ave to Eangydrus St	\$100,000	Replace	1,300	8 00	Ducade tran	Unknows		Cast trem	Salety and Polish Thy/Structural	310	Teo		20
6922	Morth Operating Area	WEST GRANGE	WEST DRANGE - Seeman Rd + Deerfield Or from	\$1,000,000	Reptace	5.000	8 00	Ductile Irea	Unquawn		Alberton Comerc	Safety and Bahability/Structural	130	710		30
6929	Horsh Operating Area	WEST GRANGE	Woodland Ave WEST ORANGE - St. Claud Ave from Old Indian Rd to	\$460,000	Registe	2,309	6 00	Ouctile lion	Unangura	6	Cort Iren	Safety and Renebaty/Structural	120	160		20
			Amerine Rd WEST ORANGE - Same Dr from Brockstock fluite													
8935	Worth Operating Area	WEST DANNEE	Weber Rd	\$460,000	Replace	2,900	8 00	Oweste sree	Unknown	•	Cart Hop	Safety and Rehability/Structural	130	180		10
6927	North Operating Area	WEST DRAWGE	WEST GRANGE - Sunmyside Rd from Pleasant Valley Way	\$800,000	Replace	1,500	8 00	Ductille trans	Unknown		Cast tron	Salaty and Reliability/Structural	120	TBO		10
4926	Horth Operating Area	WEST DRANGS	WEST CRANGE—Undershift for from Forest MIR Rd to Bradford Ave	\$360,000	Replace	L100	0.00	Guctile sren	Unknown	4	Cart tren	Safety and Reliability/Servetural	120	190		10
6930	Morth Operating Area	WEST DRANGE	WEST ORANGE - Walter Ad from Surrest Terr to Underciff Tors	\$300,000	Reptace	1,500	8 00	Ductile Iren	Unknown	6	Cost Iron	Safety and Revelotity/Structurel	120	TEO		10
6931	North Operating Area	WEST DRAWGE	WEST GRANGE - Wellington Are from Gregory Are to Velley Rd	\$400,000	Replace	2.000	8 00	Ductile Iren	Untopum	4	Cast Iron	Soleny and Roses-Why/Scruetures	120	TBO		10
6943	Martin Operating Area	WEST CRANGE	WEST ORANGE: Bagle Rock Ave from Massessept to Smith Manor Blief	\$460,000	Replace	9,400	00 9	Ductile Irga	Unknown	4	Cast fron	Sefety and Rehability	120	180		20
6943	Searth Operating Area	WEST DAMME	WEST ORANGE - Eagle Rock Ave from 700' eact of Prospect to Lourel	\$2,092,500	Peplace	9,300	13.00	Bucille Won	Unkapwn	6	Cartiron	Safety and Redobility	120	TRO		30
7214	North Operating Area	WEST DRAMGE	Removalt Ave 6" replacement	\$200,000	Replace	1,000	9.00	Ductile Iren	1850'e		Case tran	Zafety and Rebotatry	120	190		30
7221	North Operating Area	WEST DRAWGE	West Orange Rehab - Phose Sa West Windoor - Alexander Road @	\$130,000	Reheb	1.300	6 00	Cast Iron	1970'0	4	Cost Iren	Wreter Quelly	120	2014Q2		30
1	Control Operating Area	WEST WINDSOR TWP	Wallacantersection of N Port to Narris Avellager resteration each time over 10,000 00	\$130,000	Aeplace	1,440	32 00	Ductile Irea	1960's	10	Cast Iron	Sefery and Reliability/Structural	330	180	Tes	10
	Control Operating Area	WEST WANDSON TWP	West Windler Fahre Ave	\$90,400	Replace	820	0.00	Durtile Iren	1930'1	4	Asbestas Coment	Safety and Reliability/Structural	120	TED	Yes	10
	Control Operating Area	WEST WHOSOE PWP	West Windson: Weshington Roadhoute 1 to Ferview	\$297,000	Replace	1,630	12.00	Ductile Iren	18500	10	Cast Iven	Zafety and Rotobility/Structural	130	TRO	Yes	20
	Central Operating Area	WEST WINDSON TWP	12" main Wast Windoor - Wheeler Way	\$230,500	Replace	1323	8 00	Ductile tran	Untopun		Cast Iron	Safety and Renability/Structural	120	TBO	Tes	10

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from Jorsey American Visitor Company, Inc. 3815 Foundational Filing Appropria C -Revised 8/13/2015

w	Blentes	Municipality	Project Time	histor funded (dellers)	Project Type	frapesed longth (feet)	Proposed Dis. (Inches)	Proposed Pipe Manarid	Decade Installed	Es. Dis. (Inches)	Existing Pipe Meterial	Accelerated Americanson Category	Project Duration	Estimated to Service Period	Previously Submitted for BPU Review	Rounded Weighted Score
409	Southwell Operating Area	WESTAMPTON TWP	Westampton Pennington Avenue WESE Bioproheid Drive to Bloomheid Drive	\$505,400	Replace	1,640	0.00	Ductile Iron	1970'1	4	Achiettas Comons	Safety and Reliability/Structural	120	Teo	Tes	30
430	Southwest Operating dise	WESTAMPSON TWP	Westampton Inch Reed Weedlane Read to Rencotes Reed	\$494,000	Regisco	2,600	16 00	Dattle pau	1960'6		Actions Comunity	Safety and Boughtery/Neurius	120	160	Yes	19
411	Southwest Operading Area	WESTAMPTON PAP	Westington Ironyn Lyne Woodlane Band to Burington Mount Holly Road	\$114,000	Replace	600	33 00	Ductile Irea	1960's	10	Asbestos Carrent	Safety and Resolutily/Structural	120	100	Yes	10
411	Southwest Operating Area	WESTAMPTON TWP	Westergean Hally Lane Blacomfield Drive to Rencocos Reed	\$190,000	Replace	1,600	8 00	Durithe Iron	1980's	4	Aubressos Coment	Actors/Opportunity	120	TRO	704	10
418	Saydhwest Operating Area	WESTAMPTON TWO	Ventampton Rancocas Rood - Lambert Drive to Hody Lame	\$152,000	Replace	800	12 00	Suttle Irpa	1960,0		Aubestes Coment	Safety and Beisperry/Structural	120	190	701	10
1105	Southwest Operating Area	WESTAMPTON TWP	Westempton Rancocasi Bood from Irick Road to Implant IrixEx-76	\$4\$0,000	Regrace	2,000	16 00	Ductile wee	1970'4		Ductile Iren	System Flows and Pressure	130	TRD		10
3377	Southwest Operating Area	WESTAMPTON TWP	Westempton - Permitsgron avenue (AS) - Broanderd Drive to Housell Drive	117,300	Arplete	1,700	8 00	Ductile tren	Unknows	Untropur	Unknown	Safety and Relieb Http://Structural	120	180		10
63-80	Control Demottes Area	WISTIGLD	Boulevard (Claver to Aylella)	\$384,400	Replace	3,472	6.00	Ductile Iran	1930's		Cost Iron	Weter Quality	110	201603		20
6582	Control Operating Area	WESTFIELD	Wysig Ave. (Shocksmouth Dr. to Englished Forr.)	\$343,400	Replace	1,617	a 00	Ductile Iren	1926's		Cast Iren	System Pipers and Pressure	120	201601		30
8584	Central Operating Area	WESTFIELD	Amy Dr. (Retriesy to Deed End)	\$89,909	Replace	100	6.00	Ductile iron	1960'0	3	Cast tren	Water Quelty	120	3016Q1		20
6811	Central Operating Area	WESTFIELD	Army Dr (Army @ Dood End)	\$16,410	Replace	84	6.00	Ductile from	1960'4	3	Cost from	System Flows and Presoure	120	TOD		10
4841	Comtrol Courseting Area	MESTER FD	Essement - Echa Lake CC (Woodland to Springfield)	\$1,018,500	Replace	4,074	16.00	Ductile Iron	1960's	14	Asbestos Coment	Water Quality	130	180		10
6843	Control Operating Area	WESTFELD	marth Ave. [W. Dudley to 4th Ave)	\$1,846,800	Renes	8,208	12 00	Cost Irpa	1810's	Unbnows	Cost Iron	System Flows and Pressure	110	180		90
7210	Control Degrating Area	WESTINELD	Cleaning and Lining	\$1,000,000	Rehele	30,000	4 00	Cost from	1930%		Combon	System Flows and Pressure	120	301604		30
644	thanth Operating Area	WOODLAND PARK	Clean & time oil unifined Cl mains in Woodland Park due to fire flows and DW.	\$4,012,000	Renab	40,130	6 00	Other	Untraven	4	Cast Iron	System Flows and Pressure	120	180	Tes	30
1460	North Operating Area	WOODSLAND PARK	McBride Av north and	1340,000	Replace	1.900	8.00	Ductile Iran	1910.1		Cast Pon	System Flows and Pressure	110	180		10
Physic	Ad	48	Consequent large Disposes pape formers	\$30,000,000	6/8	0/0	40	n/e	n/a	0/0	n/a	Safety and Retablity/Structural	4/8	TWO		4/9
Hylt	AA.	All	Unachaduled municipal main replacements	\$10,000,000	No	4/4	4/4	n/a	n/o	0/0	n/a	Safety and Kotabbity/Swortural	Ne	TBO		1/5

Proviously BPU Approved - not Continued \$ 89,412,494.00 New Additions \$ 448,406,725.0

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Page 40-ship

PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17105-3265

Public Meeting held July 11, 2007

Commissioners Present:

Wendell F. Holland, Chairman James H. Cawley, Vice Chairman Terrance J. Fitzpatrick, Concurring Statement attached Tyrone J. Christy Kim Pizzingrilli, Statement attached

Petition Of Pennsylvania-American Water : P-00062241

Company For Approval To Implement A Tariff:

Supplement To Tariff Water-PA P.U.C. : No. 4 Revising The Distribution System :

Improvement Charge

Irwin A. Popowsky, Consumer Advocate : P-00062241C0001

Pennsylvania-American Water Company :

Marlane A. Pizzi : P-00062241C0002

v. :

Pennsylvania-American Water Company

Jamin Benson : P-00062241C0003

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Pennsylvania-American Water Company

Frank J. Paris : P-00062241C0004

v. :

Pennsylvania-American Water Company :

Richard O. Adams : P-00062241C0005

V.

Pennsylvania-American Water Company :

D. Wintermeyer : P-00062241C0006

Pennsylvania-American Water Company

OPINION AND ORDER

BY THE COMMISSION:

Before the Commission for consideration and disposition are the Exceptions of Pennsylvania-American Water Company (Petitioner), filed on June 5, 2007, to the Recommended Decision of Administrative Law Judge (ALJ) Wayne L. Weismandel, which was issued on May 16, 2007. Reply Exceptions were filed on June 15, 2007, by the Office of Trial Staff (OTS), the Office of Consumer Advocate (OCA), the Office of Small Business Advocate (OSBA) and the Pennsylvania-American Water Large Users Group (PAWLUG).

History of Proceeding

The following is an abbreviated history of the proceeding, most of which has been obtained from pages 2-6 of the ALJ's Recommended Decision.

On October 17, 2006, the Petitioner filed, at the above-captioned docket, a Petition For Approval To Implement A Tariff Supplement To Tariff—Water Pa. P.U.C. No. 4 Revising The Distribution System Improvement Charge (Petition), seeking authority from the Commission to increase its maximum allowable Distribution System Improvement Charge (DSIC) from 5% of billed revenues to 7.5% of billed revenues.

Formal Complaints were filed by the Office of Consumer Advocate (OCA) at Docket No. P-00062241C0001, and by various individuals, at Docket Nos. P-00062241C0002-C006. The Office of Small Business Advocate (OSBA) filed a Complaint in the Form of an Answer to the Petition. The Office of Trial Staff and the Pennsylvania-American Water Large Users Group (PAWLUG) participated as Intervenors.

Notice of the filing of the Petition was published in the *Pennsylvania Bulletin* on December 2, 2006, with protests or petitions to intervene due on or before December 18, 2006. On December 18, 2006, the OSBA and the OCA each filed a Protest to the Petition.

An Initial Prehearing Conference was held on December 20, 2006.

Representatives on behalf of the Petitioner, the OTS, the OSBA, and the OCA attended.

A transcript of the proceeding containing sixteen pages was produced. By Order Granting Petition to Intervene dated December 20, 2006, the ALJ granted PAWLUG intervenor status.

On January 10, 2007, the Petitioner filed Answers to the Formal Complaints of Marlane A. Pizzi, Jamin Benson, and Frank J. Paris. On January 17, 2007, the Petitioner filed an Answer to the Formal Complaint of Richard O. Adams. On January 24, 2007, the Petitioner filed an Answer to the Formal Complaint of D. Wintermeyer.

The names of the Complainants, the date filed and the associated docket numbers are as follows: Marlane A. Pizzi, filed December 13, 2006, at Docket No. P-00062241C0002; Jamin Benson, filed December 7, 2006, at Docket No. P-00062241C0003; Frank J. Paris, filed December 1, 2006, at Docket No. P-00062241C0004; Richard O. Adams, filed December 18, 2006, at Docket No. P-00062241C0005; and D. Wintermeyer, filed December 2, 2006, at Docket No. P-00062241C0006.

An Initial Hearing was held on March 14, 2007. The Petitioner, OCA, OSBA, OTS, and PAWLUG participated. The Petitioner presented two witnesses, OCA presented one witness, OSBA presented one witness, and OTS presented one witness.² A transcript of the proceeding containing 138 pages was produced.

The Petitioner, OCA, OSBA, OTS, and PAWLUG each filed both Main and Reply Briefs. In accordance with the provisions of Section 5.502(d) of the Commission's Rules of Practice and Procedure, 52 Pa. Code § 5.502(d), Aqua Pennsylvania, Inc. (Aqua) filed an Amicus Curiae Brief. The record closed on April 26, 2007. As noted above, ALJ Weismandel's Recommended Decision was issued on May 16, 2007. The ALJ determined that the Petitioner had not met its burden of proving, by a preponderance of the evidence, that the proposed DSIC increase is in the public interest and that it would be just and reasonable. The ALJ, therefore, recommended that the Petition be denied. Exceptions and Replies were then filed as noted above.

Background

As stated earlier, the Petition filed by the PAWC is a request to raise the surcharge cap from 5% of billed revenues to 7.5% on DSIC-eligible infrastructure. ALJ Weismandel issued a Recommended Decision which denied the Petition. We disagree with the Recommended Decision and instead will grant PAWC's Exceptions which succinctly clarify the Petition's consistency with the purpose of DSIC, along with

The Parties introduced into evidence PAWC Statements 1 (with accompanying Exhibits SLK1 through SLK3), 2 (with accompanying Exhibits DRK-1 through DRK-4), 1R, and 2R; OCA Statement 1 and cross-examination Exhibits 1-5, and 7-9; OSBA Statements 1 and 2; and, OTS Statements 1 and 1-SR, Exhibit 1, and cross-examination Exhibits 1 and 2.

providing ample support as to the benefits expected to accrue to ratepayers with a 7.5% DSIC cap.

The DSIC is a regulatory tool created in Pennsylvania that has since been adopted, in similar versions, in seven states.³ The purpose of the DSIC is to provide the Company with the resources to accelerate the rate of aging water distribution system infrastructure replacement in a timely, cost-effective manner. Water utilities with an approved DSIC tariff may charge a sliding scale of rates collected through a quarterly surcharge that enables the recovery of the fixed costs (depreciation and pre-tax return) of certain non-revenue producing, non-expense reducing distribution system improvement projects completed and placed in service between base rate cases. DSIC approved projects include main and valve replacement, main cleaning and relining, fire hydrant replacement, main extensions to eliminate dead ends, solutions to regionalization projects and meter change outs. Customer safeguards include an auditing process, an annual reconciliation of over or under collections, with over collections being refunded with interest, and resetting the charge to zero at the time of new base rates or if the company is over earning, and customer notice of rate changes. A cap of 5% of a customer's total billed revenue for the month has also been one of the safeguards.

Prior to the implementation of the DSIC in 1997, the total rehabilitation of PAWC's distribution system would have taken approximately 225 years to complete.⁴ Since the DSIC tariff has been utilized, at a maximum of the 5% cap of a customer's total bill for the month, the Company has reduced the timeframe to 170 years.⁵ Since increasing its investment in DSIC in 2006 (the most recent quarterly filing of January 1, 2007 showed a level of 6.36%, although recovery has been limited to 5%),⁶ PAWC

Indiana, Illinois, Ohio, Delaware, Missouri, New York, and Connecticut.

⁴ (PAWC M.B. at 8).

⁵ (*Id.*).

⁶ (PAWC Quarterly DSIC filing).

estimates that an increased cap of 7.5% of a customer's total bill for the month will enable it to reduce the timeframe from approximately 170 years to 112 years, thus enabling improvements to aging infrastructure at a pace more reflective of actual service lives. PAWC asserts that its request to increase the maximum 5% cap to 7.5% of a customer's total bill for the month will further achieve the intent of the DSIC. PAWC stated that the public interest benefits to accrue when infrastructure upgrades are made include improved water quality, pressure and fire protection; fewer main breaks and service interruptions; lower levels of unaccounted-for water; and greater rate stability. We agree.

We will now consider the Exceptions filed to the Recommended Decision.

Discussion

Section 332(a) of the Public Utility Code (Code), 66 Pa. C.S. § 332(a), provides that the party seeking a rule or order from the Commission has the burden of proof in that proceeding. It is axiomatic that "[a] litigant's burden of proof before administrative tribunals as well as before most civil proceedings is satisfied by establishing a preponderance of evidence which is substantial and legally credible." *Samuel J. Lansberry, Inc. v. Pa. PUC*, 578 A.2d 600, 602 (Pa. Cmwlth. 1990).

We note that any Exception, which we do not specifically address herein, has been duly considered and will be denied without further discussion. It is well settled that we are not required to consider expressly or at length each contention or argument raised by the parties. *Consolidated Rail Corp. v. Pa. PUC*, 625 A.2d 741 (Pa. Cmwlth.

⁷ (*Id.* at 9-10).

^{8 (}*Id.* at 10, 12-13).

⁹ (*Id.* at 1).

1993); also see, generally, Univ. of Pennsylvania v. Pa. PUC, 485 A.2d 1217 (Pa. Cmwlth. 1984).

The ALJ made forty-two Findings of Fact and reached twelve Conclusions of Law. The Findings of Fact and Conclusions of Law are incorporated herein by reference and are adopted without comment unless they are either expressly or by necessary implication rejected or modified by this Opinion and Order.

A. Broad Policy Issue

The Petitioner excepts to the ALJ's characterization of the Petition. The Petitioner believes that the ALJ misidentified the question presented in this case as a "policy determination." (Exc. at 2, R.D. at 13). The Petitioner states that it has not requested an increase to its DSIC cap as a matter of policy (which infers that an increase in the cap should apply to all jurisdictional water companies). Rather, it wishes the Commission to determine whether or not it has demonstrated, by a preponderance of the evidence, that an increase in its DSIC cap is justified given the Commission's statutory and the Commission's existing DSIC policy. (Exc. at 2).

The OSBA states that the ALJ based his recommendation on whether or not the Petitioner's DSIC cap should be raised from 5% to 7.5%, and not on whether *all* water company DSIC caps should be raised from 5% to 7.5%, as the Petitioner claims. (OSBA R.Exc. at 3). The OSBA notes that the ALJ specifically stated, "[w]hile the question in this case is a policy determination (whether or not *petitioner's DSIC cap* should be raised from 5% to 7.5%), petitioner has the burden of proving that the policy position it advocates should be adopted by the Commission." (R.D. at 13, emphasis added). The OSBA submits that the ALJ made no mention that the instant Petition should be denied because the Petitioner failed to prove that other water company DSIC caps should also be raised from 5% to 7.5%. (OSBA R.Exc. at 3).

The OTS contends that the Petitioner's first Exception misinterprets the entirety of the ALJ's Recommended Decision and that the relief requested in the Petitioner's filing is inconsistent with the Commission's prior policy. Noting that the cap has been set at 5% ever since the establishment of the DSIC, the OTS posits that raising the DSIC cap would indeed be a deviation from a well-established Commission policy that has been followed for over a decade. Moreover, the OTS believes that it is abundantly clear that the ALJ ruled on the merits of the case presented by the Petitioner and did not simply deny the Petitioner's requested relief based on general policy grounds. Finally, the OTS opines that the ALJ specifically, and correctly, cited the Petitioner's failure to satisfy its burden of proof based on the record evidence that was presented. Accordingly, the OTS believes that the Petitioner's Exception must be denied. (OTS R.Exc. at 2 – 3).

As determined by ALJ Weismandel, any change to the DSIC mechanism cap is policy related. However, the Petitioner's request to raise its DSIC collection so that it may accelerate the replacement of aged mains in its service territory must be considered based on the evidence presented in **this** proceeding and not simply as a broad policy. The Petition at hand seeks approval of a tariff supplement revising the DSIC for PAWC only, not all jurisdictional water utilities. The Petitioner has convinced us that the 5% limitation, as applied to PAWC, should be revisited. We reach this conclusion not only on a policy basis, but more importantly, based on the facts specific to this proceeding. As such, the Exception on this issue is granted.

B. Burden of Proof

In the Recommended Decision the ALJ found that the burden of proof to establish the justness and reasonableness of every element of Petitioner's requested DSIC increase rests solely upon the Petitioner. Additionally, the ALJ found that the Petitioner has not met its burden of proving, by a preponderance of the evidence, that its proposed DSIC

increase is in the public interest and that it would be just and reasonable. (Conclusions of Law No. 8 and 12).

In its Exceptions, the Petitioner states that the ALJ's Conclusions of Law No. 4, 5, and 6 cumulatively establish that the Petitioner's burden of proof is simply to demonstrate, through evidence, that increasing the DSIC cap will result in an "appropriately funded DSIC [that] provides the Petitioner with the resources to address the problems presented by its aging water distribution system in an orderly and comprehensive manner." (Exc. at 6). These Conclusions of Law state:

- 4. An appropriately funded DSIC provides petitioner with resources to address the problems presented by its aging water distribution system in an orderly and comprehensive manner.
- 5. The Commission has statutory authority to permit a sliding scale of rates or other automatic adjustment method for water utilities to recover the cost of distribution system improvement projects completed and placed in service between base rate proceedings.
- 6. The Commission has the legal authority to approve a DSIC with a cap that exceeds 5% of billed revenues.

(R.D. at 18). As such, the Petitioner asserts that it is within the Commission's discretion to grant the Petition if it is determined that the Petitioner has established, by a preponderance of the evidence, that increasing its DSIC cap to 7.5% would provide sufficient funding to address the problems with the Petitioner's aging water distribution system. (Exc. at 5).

PAWLUG rejects the Petitioner's argument that its burden is only to demonstrate that increasing the maximum percentage cap will appropriately fund the DSIC. (PAWLUG R.Exc. at 3).

The OCA rejoins that, contrary to the Petitioner's assertion, Conclusions of Law 4, 5, and 6 do not, by any reading, establish the Petitioner's burden of proof.

According to the OCA, these Conclusions of Law deal with the purpose of the DSIC itself and the authority of the Commission. Accordingly, the OCA asserts that the Petitioner's argument on this issue is without merit. (OCA R.Exc. at 5).

The OTS asserts that the Petitioner's interpretation of its burden of proof in this proceeding violates basic ratemaking tenants. Under the argument presented by the Petitioner, it is only necessary to demonstrate that an increase to the DSIC cap will result in an appropriately funded DSIC. However, OTS submits that the Petitioner fails to recognize that the law also requires all rates must be just and reasonable. The OTS opines that base rate review is necessary because solely focusing on the DSIC cap increase, without the opportunity to put it in context of all the components that comprise the Petitioner's revenue requirement, fails to produce an accurate picture of the Petitioner's operations. (OTS R.Exc. at 4-5).

We agree with the OCA that Conclusions of Law 4, 5, and 6 do not establish the Petitioner's burden of proof. These Conclusions of Law deal with the purpose of the DSIC itself and the authority of the Commission. A more appropriate question is whether or not PAWC has proved that its DSIC cap should be raised from 5% to 7.5%. As stated above, a litigant before this Commission must prove its case with a preponderance of evidence which is substantial and legally credible. *Samuel J. Lansberry, Inc. v. Pa. PUC, supra.* The ALJ correctly determined that the Petitioner bears the burden of proving by a preponderance of the evidence that the position it advocates should be adopted by the Commission. (R.D. at 13). That being said, while the ALJ did not misstate the burden of proof applicable to this proceeding, as discussed *infra*, the ALJ erred in finding that the Petitioner did not meet that burden. Accordingly, the Petitioner's Exception on this issue is granted consistent with this discussion.

C. Ratepayer Safeguards

The Petitioner also argues that the Commission addressed the ALJ's concerns regarding ratepayer protection when it stated, "[t]he earnings disclosure reports mandated by the final regulations adopted herein will improve substantially the Commission's ability to monitor the financial performance of Pennsylvania's public utilities and, further, will assist greatly in assuring that the rates charged to customers are just and reasonable." Thus, the Petitioner opines that the earnings test safeguard and other DSIC safeguards are included in the recurring DSIC audits and provide ratepayers with adequate protection under the DSIC. (Exc. at 5).

The OSBA objects to the Petitioner's contention that the ALJ erred by considering that, "reduced costs and unrecognized revenue between rate cases may produce earnings above a company's authorized rate of return." According to the OSBA, the ALJ was not mistaken to take these factors into consideration because the safeguards previously established by the Commission to protect ratepayers from single-issue ratemaking would otherwise be weakened if the Petitioner's request were granted. (OSBA R.Exc. at 6).

PAWLUG asserts that the ALJ appropriately noted that, "[o]ne of the keystone protections of consumers' interests cited by the Commission in developing the DSIC was that 'the DSIC will be capped at a relatively low level to prevent any long-term evasion of a base rate review of these plant costs." (R.D. at 14). In other words, the Commission viewed the 5% level as the appropriate safeguard for ensuring that the Commission would have the opportunity to review these costs via a base rate proceeding. (PAWLUG R.Exc. at 3). PAWLUG believes that the 5% cap is arguably the most

^{10 (}Docket No. L-910061, PAWC Supplement No. 22 to Tariff Water PA P.U.C. No. 4 at Rev. 12B3).
(Exc. at 5).

important safeguard implemented by the Commission to protect customers from the dangers of single-issue ratemaking. (*Id.*).

Additionally, the OTS states that the Commission adopted the 5% maximum rate based upon the Petitioner's recommendation. In its 1996 Petition, the Petitioner represented that, "[t]he DSIC will be capped at 5% of the amount billed to customers under otherwise applicable rates and charges. If the cap were reached, no further increases in the DSIC would be permitted." (1996 DSIC Petition at 4). Despite the Petitioner's express language and assurance to the contrary, OTS claims it is now requesting a significant DSIC cap increase. As such, the OTS argues that the ALJ properly rejected this requested increase because the Petitioner failed in its burden of showing that the requested increase is just and reasonable. (OTS R.Exc. at 6).

The Code, 66 Pa. C.S. § 101 *et seq.*, grants the Commission the legal authority and power to establish the Petitioner's DSIC rate cap at either 5% or 7.5% or, conceivably, at a higher percentage. (R.D. at 13). Subsection 1307(g) of the Code provides, in relevant part:

Recovery of costs related to distribution system improvement projects designed to enhance water quality fire protection reliability and long-term system viability.—Water utilities may file tariffs establishing a sliding scale of rates or other method for the automatic adjustment of the rates of the water utility as shall provide for recovery of the fixed costs (depreciation and pretax return) of certain distribution system improvement projects, as approved by the commission, that are completed and placed in service between base rate proceedings. The commission, by regulation or order, shall prescribe the specific procedures to be followed in establishing the sliding scale or other automatic adjustment method.

66 Pa. C.S. § 1307(g).

ALJ Weismandel aptly described the standard this Commission must employ in our review of the instant Petition to revise PAWC's DSIC:

The parameters of petitioner's DSIC and the procedure for its implementation and review established by the Commission in the PAWC DSIC Order are an "other method for the automatic adjustment of the rates of" petitioner as provided for in the Statute. The Legislature granted the Commission both the authority and the power to exercise discretion in determining the specifics of a distribution system improvement cost recovery program and did **not** establish a numerical percentage rate cap. However, the Commission remains bound by the provisions of the Public Utility Code that require that all rates "shall be just and reasonable" and non-discriminatory, 66 Pa.C.S. §§1301, 1304.

(R.D. at 13 (emphasis added)).

Prior to DSIC's implementation in 1997, PAWC's timeframe to upgrade its existing, aging infrastructure was 225 years. ¹² Following DSIC's implementation, the timeframe was reduced by nearly 25% to 170 years. A critical factor is that, with its current increased investments in DSIC-eligible projects over the 5% cap (the most recent ¹³ quarterly filing reached 6.36%), the Company estimates a 33% reduction to 112 years, which more realistically reflects actual service lives. (PAWC M.B. at 9). Matching replacement with service life substantially improves service reliability. Infrastructure remediation and improved service and service reliability directly benefits customers. Upgrades of deteriorated mains are essential to reduce main breaks, service interruptions and unaccounted for water and improve water quality, improve pressure, enhance fire protection, and achieve rate stability. Additional ratepayer benefits include the achievement of these essential goals:

¹³ As of January 1, 2007.

Other jurisdictional water companies faced similar or worse timeframes.

Promoted the acquisition of small and non-viable water systems, consistent with Commission policy (see 52 Pa. Code §§ 69.711 (relating to small and nonviable systems));

Promoted the regionalization of water systems, consistent with Commission policy; see 52 Pa. Code § 69.721 (relating to acquisitions);

Reduced rate case expense by decreasing the frequency of base rate case filings;

Allowed water utilities to afford remediation projects that would have otherwise been cost-prohibitive; and

Decreased main breaks, service interruptions, low pressure problems, and discolored water.

(Aqua Correction to Amicus Curiae Brief at 4).

When DSIC's implementation was approved by the Commission, several critical safeguards were established, including a cap of 5% of billed revenues. ¹⁴ Additional safeguards include: resetting the DSIC to zero at the time of the next base rate case or if the utility is over-earning; providing notice to customers of any change in the DSIC rate; audits are conducted as needed and an annual reconciliation audit is conducted to ascertain any over or under-collections, with any over-collections being refunded with interest at the time of the next DSIC calculation. All mains or other DSIC-eligible projects have been placed into service prior to DSIC charges being issued to customers and meet used and useful parameters, which are among the foundations of utility ratemaking principles.

Petition of Pennsylvania-American Water Company for Approval to Implement a Tariff Supplement Establishing a Distribution System Improvement Charge, Docket No. P-00961031 (August 16, 1996), see Attachment A, "Sample Tariff Language," p. 4.

The Company's argument that these safeguards remain in place and effective even with a higher cap is correct. Therefore, we will grant PAWC's Exception on this issue.

D. Recent Infrastructure Study

The ALJ noted that the Petitioner has not done an infrastructure study in the last three years. The ALJ stated that the Petitioner's current accelerated replacement might or might not be sufficient or that the previous replacement and improvement rate might even be enough to discharge the Petitioner's responsibility to render adequate, efficient, safe, and reasonable service. The ALJ reasoned that, without a recent infrastructure study having been presented by the Petitioner, the adequacy of any of these replacement rates is speculative. Accordingly, the ALJ concluded that that increasing the Petitioner's DSIC cap is not permissible. (R.D. at 17).

The Company points out that under the ALJ's criteria, there would not be a need for a DSIC at all, so long as a minimal level of adequate service was being rendered. The General Assembly had a broader vision and has provided the Commission with the tools to replace aging infrastructure in the Commonwealth. PAWC simply requests that the Commission use this tool and permit the Company to increase its DSIC percentage so that the purpose of the law can be realized. (PAWC Exc. at 11).

The Petitioner objects to the ALJ's conclusion on this matter and argues that the need for an infrastructure study is illusory. The Petitioner contends that requiring such a study would elevate form over substance. (Exc. at 7). The Petitioner argues in detail that the findings refute the ALJ's observation that a study is necessary to justify acceleration in the rate of replacement of aging infrastructure. (Exc. at 8-10). Furthermore, the Petitioner argues that the requirement of an infrastructure study is not required by the DSIC Regulations and is not a requirement of generally accepted utility practices. (Exc. at 10).

The Petitioner recognized that its ideal spending level for infrastructure remediation "should be adequate to keep pace with the anticipated remaining useful life of the distribution system infrastructure." (PAWC M.B. at 9). The Company explained that, in 2006, it accelerated its infrastructure upgrade program by over 50% and replaced 82 miles of mains. This can be compared with the pre-DSIC figure of replacing 25 miles per year. From DSIC's inception in 1997, until 2005, the Company replaced 47 miles of main, or 0.56%. The 2006 increased rate of 0.90% has been maintained in 2007 at a DSIC level of 6.36% for all of 2007. As previously stated, the current accelerated rate should enable the Company to significantly reduce, by 34%, the amount of time it would take to make all of the needed improvements, from approximately 170 years to 112 years. (PAWC M.B. at 8-9).

The Petitioner also noted its current focus on replacing smaller diameter mains due to its discovery that they were found to be a more frequent source of main breaks than larger diameter mains. (PAWC M.B. at 11). The Company states that an increased DSIC cap to 7.5% will support its efforts to accelerate the systematic replacement of its older small-diameter mains. The Petitioner estimates it can reduce by about 20 years, the time in which it will be able to make the needed improvements to this segment of its distribution system. The Company points out that, in comparison, "an under-funded DSIC is more likely to result in more significant costs associated with unplanned or more extensive system repairs in the future (*e.g.*, more main breaks and service interruptions, higher levels of unaccounted for water, etc.)." (PAWC M.B. at 12). The Petitioner has determined that a higher investment level is essential for it to keep pace with the anticipated remaining useful life of the distribution system infrastructure. (PAWC M.B. at 9).

The OCA replies that the absence of an infrastructure study reflecting the appropriateness of the Petitioner's main replacement rate is not the only troubling omission from the Petition. The OCA notes that the Petitioner has no system-wide

method for consistent prioritization and assessment of the need for infrastructure replacement and rehabilitation. (OCA M.B. at 19-22). Furthermore, the OCA submits that the Petitioner's current prioritization tool is being used only on a trial basis, and as acknowledged by the Petitioner, no studies have been conducted between 1990 to 2006 to address the reasonable and prudent process or procedure for replacing distribution mains. (OCA R.Exc. at 6).

The OSBA also agrees with the ALJ on this issue. The OSBA replies that the Petitioner is seeking to increase the DSIC cap without providing evidence of why the main replacement acceleration is necessary and why the current DSIC mechanism is inadequate. Additionally, the OSBA noted that the Petitioner does not have a system-wide method for consistent prioritization and assessment of the need for infrastructure replacement and rehabilitation. (OSBA R.Exc. at 10). The OSBA opines a conclusion cannot be made that the Petitioner needs a DSIC cap increase and that the DSIC dollars currently being collected from ratepayers are being used in the most efficient manner as possible. (OSBA R.Exc. at 12).

The OTS states that the requested DISC increase represents a 50% increase over the current maximum DSIC rate. The OTS argues that to support the requested increase, the Petitioner should have performed an analysis showing: (1) the overall condition of the plant; (2) plant that should be rehabilitated or replaced; (3) cost estimates; and, (4) a prioritization of DSIC projects and locations. According to the OTS, the Petitioner simply failed to do so and instead argued that its presentation of service lives and the problematic nature of small diameter pipe satisfied its burden of proving that the proposed DSIC increase is warranted. (OTS R.Exc. at 7).

¹⁵ (M.B. at 20-21).

As stated by PAWC, the legislature has provided the Commission with the tools to replace aging infrastructure in the Commonwealth. PAWC simply requests that the Commission use this tool and permit the Company to increase its DSIC percentage so that the purpose of the law can be realized. Our review of the record persuades us that currently, a higher DSIC rate for PAWC is consistent with the legislative intent to economically accelerate infrastructure remediation:

The DSIC more accurately reflects the ongoing investments and improvements that are made in the water distribution system versus the less frequent but larger step increases that would result from base rate increases without an appropriately funded DSIC. The timely recovery of the fixed costs of infrastructure replacement through the DSIC provides an incentive for increased and continued levels of capital infusion. This results in a stronger and more reliable water distribution system for both current and future customers.

(PAWC M.B. at 13). In our view, the Petitioner has presented sufficient evidence to support the requested increase of the DSIC rate. We note that PAWC's customers' rates at the 5% DSIC rate average \$1.75 a month. With a 7.5% DSIC, that rate will increase by an average of \$1.00 a month. It should be kept in mind that this rate will be reset to zero following the next base rate case (or at any time that the Company is over-earning) and it takes a number of billing cycles of progressive increases over a few years to rise to the allowed level of the cap. Most importantly, DSIC represents a dollar-for-dollar recovery of prudent expenses incurred for improving reliability to customers. Accordingly, we shall grant the Petitioner's third Exception.

E. Frequency of Base Rate Filings / Necessity of DSIC Increase

The ALJ determined that Petitioner failed to provide evidence in support of its assertions: (1) that an increase of 50% in its DSIC cap is required to maintain its accelerated water main replacement program; and (2) that a higher DSIC cap would

potentially lengthen the period between its filing of general rate increase cases, thereby delaying the large costs involved. (R.D. at 15).

The Petitioner claims that the ALJ erred in finding that it must prove that increasing the DSIC is necessary to maintain its accelerated improvement program or to lengthen the time between base rate case filings. (Exc. at 11). It argues that it has not maintained, and it is not the Company's burden to prove that increasing the DSIC cap is necessary to maintain its accelerated improvement program or to lengthen the time between the filing of base rate cases. Rather, the Petitioner asserts that it simply must prove that increasing the DSIC cap to 7.5% will provide the Company with adequate resources to achieve the Commission's objective to accelerate the replacement of its aging infrastructure, and that the "modest requested increase to PAWC's DSIC cap accomplishes this goal." (Exc. at 12).

The Petitioner also submits that the fact that it filed a base rate case is irrelevant to whether the Commission should exercise its discretion to increase the DSIC percentage. The Petitioner notes the necessity for sufficient resources to achieve the Commission's long term objective of accelerating the replacement of its aging infrastructure while encouraging the Company to make less frequent base rate case filings. (Exc. at 12).

The OCA replies that the DSIC was not capped at 5% to deter companies from making infrastructure improvements as those costs can still be recovered in a base rate proceeding. Instead, the cap was instituted to protect ratepayers from the potential pitfalls of the surcharge mechanism. The OCA posits that it is the responsibility of the Petitioner to manage its operations, and it should not expect to recover returns above those authorized by the Commission simply because it chooses to spend more than it could recover via the surcharge mechanism. (OCA R.Exc. at 7).

Regarding the frequency of base rate case filings and an increase in the DSIC cap, the Petitioner stated that the requested 50% increase in the DSIC cap would not guarantee that the Petitioner will not file another base rate case within two years. ¹⁶ The OSBA points out that with the 5% DSIC cap, the Petitioner has been able to avoid a base rate increase for more than three years, and at the same time, accelerate its DSIC-eligible spending. (OSBA R.Exc. at 14; PAWLUG R.Exc. at 6 -7). Therefore, the evidence supports that the Petitioner does not need an increase in its DSIC cap in order to move to a three-year base rate case filing cycle. (OSBA R.Exc. at 15).

PAWLUG states that while the Petitioner asserts the claimed increase in its DSIC cap is modest (from 5% to 7.5%) and an approval of that 50% increase will support a three-year or longer base rate case filing cycle, the ALJ found that the requested increase is not in the public interest. (PAWLUG R.Exc. at 6, 7). PAWLUG noted that the increase in DSIC cap were to be granted, the monthly billing for one of the Petitioner's largest customers would increase by approximately \$3,000 while the average residential customer would pay approximately \$12.00 more annually. (R.D. at 11, 12). PAWLUG also points to the fact that the Petitioner could not affirm a greater time span between the filing of base rate cases if its increase in the DSIC were permitted. (PAWLUG R. Exc. at 7).

The OTS contends that instead of recognizing that the current 5% DSIC cap helps the Petitioner complete infrastructure projects between base rate case filings, the Petitioner is treating the DSIC as a funding source to achieve infrastructure goals set by management rather than as a regulatory tool that has accomplished exactly what it is supposed to accomplish. (OTS R.Exc. at 11).

On April 27, 2007, the Petitioner filed a base rate case with the Commission, which upon completion will reset the DSIC to zero. The base rates established in this most recent base rate case will become effective on or before January 28, 2008. (R.D. at 16).

We agree with the Petitioner that the evidence presented in the instant case reveals a choice between:

(1) providing the Company with adequate resources (a 7.5% DSIC cap) to support a three-year or more base rate case filing cycle, or (2) providing the Company with more limited resources (a 5% DSIC cap) that would encourage a more frequent base rate case cycle – every year or two.

(PAWC Exc. at 12; Tr. at 98-100). The current DSIC cap of 5% will not provide the Company with resources adequate to achieve this Commission's long term objective, accelerating the replacement of aged water distribution systems throughout the Commonwealth. Increasing the DSIC cap to 7.5% would achieve a reasonable balance between supporting the Company's efforts to improve its distribution system while encouraging it to make reasonably frequent base rate filings. PAWC has used the funds available to it under the current 5% cap consistent with the legislative intent. We believe that the incremental increase in the cap to 7.5% will permit the Company to accelerate its replacement of this critical distribution infrastructure.

In addition, a response is necessary to the argument put forth by the OCA that simple presentation of expenses virtually guarantees recovery without the oversight of a base rate case proceeding. (OCA M.B. at 12). Expense recovery is granted only for those DSIC-eligible projects that are prudently incurred, in service, and used and useful. In raising the level of DSIC expense recovery, we clearly intend to continue its cautious use. Contrary to the OCA's reference to the reasoning of the Commonwealth Court in the recent Collection System Improvement Charge Appeal, the DSIC review and audit process includes a determination of compliance and prudence. Hence, the OCA's reference to the recovery of projects being relatively automatic (using the example of a solid gold manhole cover being allowed, provided the expense was made and submitted)

¹⁷ *Popowsky v. Pa. PUC*, 869 A.2d 1144, 1156 (Pa. Cmwlth. 2005).

is simply not accurate nor reflective of the extensive and thorough DSIC review process. Accordingly, we will grant the Petitioner's Exception on this issue.

Conclusion

Based upon the foregoing discussion, we shall grant the Petitioner's Exceptions and reverse the ALJ's Recommended Decision; **THEREFORE**,

IT IS ORDERED:

- 1. That the Exceptions filed by Pennsylvania-American Water Company on June 5, 2007, are granted, consistent with this Opinion and Order.
- 2. That the Recommended Decision of Administrative Law Judge Wayne L. Weismandel is reversed, consistent with this Opinion and Order.
- 3. That the Petition of Pennsylvania-American Water Company for Approval to Implement a Tariff Supplement to Water Tariff Water-PA P.U.C. No. 4 Revising the Distribution System Improvement Charge filed October 17, 2006, is granted.
- 4. That Pennsylvania-American Water Company shall place into effect Supplement No. 23 to Tariff Water-PA P.U.C. No. 4 First Revised Page 12B3, on one days notice, the same having been found to be just, reasonable, and in the public interest.
- 5. That the formal Complaint filed by Irwin A. Popowsky, Consumer Advocate, at Docket Number P-00062241C0001 is dismissed.
- 6. That the Protests filed December 18, 2006, by the Office of Consumer Advocate and by the Office of Small Business Advocate are dismissed.

7. That the formal Complaints filed by Marlane A. Pizzi at Docket Number P-00062241C0002, Jamin Benson at Docket Number P-00062241C0003, Frank J. Paris at Docket Number P-00062241C0004, Richard O. Adams at Docket Number P-00062241C0005, and D. Wintermeyer at Docket Number P-00062241C0006 are dismissed for lack of prosecution and the records marked closed.

8. That the record in this case be marked closed.

BY THE COMMISSION,

James J. McNulty Secretary

(SEAL)

ORDER ADOPTED: July 11, 2007

ORDER ENTERED: August 14, 2007

PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, PA 17105-3265

Public Meeting held December 4, 2014

Commissioners Present:

Robert F. Powelson, Chairman John F. Coleman, Jr., Vice Chairman James H. Cawley Pamela A. Witmer Gladys M. Brown

Petition of Pennsylvania-American Water Company Wastewater Operations for Approval of its Long-Term Infrastructure Improvement Plan	P-2014-2431005
Petition of Pennsylvania-American Water Company Wastewater Operations for Approval of a Distribution System Improvement Charge	P-2014-2431005
Office of Consumer Advocate v. Pennsylvania- American Water Company Wastewater Operations	C-2014-2433700

OPINION AND ORDER

BY THE COMMISSION:

Before the Commission for consideration is the Petition for approval of the Long-Term Infrastructure Improvement Plan (LTIIP) and the Distribution System

Improvement Charge (DSIC) of Pennsylvania-American Water Company Wastewater Operations (PAWC or Company).

HISTORY OF THE PROCEEDING

Pennsylvania-American Water Company – a wholly owned subsidiary of American Water Works Company, Inc. – is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. Pennsylvania-American Water Company is in the business of furnishing water and sewer service to retail customers within the Commonwealth, and is therefore a "public utility" within the meaning of Section 102 of the Public Utility Code, 66 Pa. C.S. §§ 102, subject to the regulatory jurisdiction of the Commission. PAWC provides wastewater service to approximately 16,800 customers through its nine wastewater collection systems located in seven counties across the state. PAWC provides this wastewater service through approximately 267 miles of mains, 3,814 manholes, and 47 lift stations that it owns, operates and maintains.

PAWC's LTIIP was filed on July 3, 2014, with copies being served upon the statutory advocates in accordance with *Implementation of Act 11 of 2012*, Docket No. M-2012-2293611 (August 2, 2012) (Final Implementation Order). The DSIC was also filed on July 3, 2014. PAWC's DSIC Petition includes Supplement No. 4 to Tariff Wastewater – Pa. P.U.C. No. 15 to introduce the DSIC Rider into the Company's tariff with an effective date of January 1, 2015. The filing was made pursuant to 66 Pa. C.S. § 1353 and the Final Implementation Order.

The Office of Consumer Advocate (OCA) filed comments pertaining to the LTIIP on July 23, 2014, but did not initially request hearings. On July 23, 2014 the OCA filed a Public Statement, a Formal Complaint (Docket No. C-2014-2433700), and an

Answer to PAWC's DSIC Petition, in which the OCA states that the Commission should deny PAWC's Petition as filed, suspend the proposed Supplement No. 4 to Tariff Wastewater – Pa. P.U.C. No. 15, and refer the matter to the Commission's Office of Administrative Law Judge (OALJ) for a full hearing and investigation pursuant to the OCA's complaint.

On July 23, 2014 the Office of Small Business Advocate (OSBA) filed a Notice of Intervention, Public Statement, and Notice of Appearance to PAWC's LTIIP/DSIC Petition. The OSBA requested hearings and such relief as may be necessary or appropriate, but did not allege that any particular provision or relief requested by PAWC should be denied.

On July 11, 2014 a comment on the PAWC DSIC was received from one individual customer, who argued against implementation of a DSIC.

No objections or comments were received from federal, state or local governmental agencies.

BACKGROUND

On February 14, 2012, Governor Corbett signed into law Act 11 of 2012, (Act 11), which amends Chapters 3, 13 and 33 of Title 66. Act 11, *inter alia*, provides jurisdictional water and wastewater utilities, electric distribution companies (EDCs), and natural gas distribution companies (NGDCs) or a city natural gas distribution operation with the ability to implement a DSIC to recover reasonable and prudent costs incurred to repair, improve or replace certain eligible distribution property that is part of the utility's distribution system. The eligible property for the utilities is defined in 66 Pa. C.S. §1351.

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¹ http://www.legis.state.pa.us/WU01/LI/LI/US/HTM/2012/0/0011..HTM.

Act 11 states that as a precondition to the implementation of a DSIC, a utility must file a LTIIP with the Commission that is consistent with 66 Pa. C.S. §1352.

On April 5, 2012, the Commission held a working group meeting for discussion and feedback from stakeholders regarding its implementation of Act 11. On May 10, 2012, the Commission issued a Tentative Implementation Order addressing and incorporating input from the stakeholder meeting. Stakeholders filed comments to the Tentative Implementation Order on June 6, 2012. On August 2, 2012, the Commission issued the Final Implementation Order, at Docket No. M-2012-2293611, establishing procedures and guidelines necessary to implement Act 11.

The Final Implementation Order adopts the requirements established in 66 Pa. C.S. § 1352, provides additional standards that each LTIIP must meet, and gives guidance to utilities for meeting the Commission's standards. The Final Implementation Order of Act 11 requires the inclusion of seven elements in the LTIIP.

PAWC's LTIIP PETITION

PAWC's Petition

Before the Commission for consideration is the Petition for approval of PAWC's LTIIP, filed on July 3, 2014. Act 11 states that as a precondition to the implementation of a DSIC, a utility must file a LTIIP with the Commission that is consistent with 66 Pa. C.S. §1352.

PAWC's LTIIP is a five year plan, over which the Company plans to replace approximately 94,000 linear feet (LF) of pipeline, 1,200 laterals, 400 manholes, and one lift station. PAWC's projected annual investments in wastewater infrastructure replacement over the course of the plan will be approximately \$5.14 million.

As of February 28, 2014, PAWC provided service to 16,803 wastewater customers, including five bulk municipal customers, in several counties in Pennsylvania. The condition of PAWC's collection systems vary depending upon age, materials, soil conditions, and construction methods and design. Some collection systems require significant capital investment to maintain safe and reliable service as a result of aging infrastructure and to reduce infiltration and in-flow (I & I) resulting from rainwater and groundwater.

PAWC wastewater systems include Blue Mountain Lake, Lehman-Pike (Saw Creek Estates), Pocono Country Place, Claysville, Coatesville, Clarion, Franklin (Cashtown/McKnightstown Sewage Treatment Plant), Koppel and Marcel Lake (Clean Treatment). The Company states that since acquiring the wastewater systems, it has made improvements based upon studies and investigations that have identified the need for refurbishment of deteriorated and failed piping and manholes. PAWC has utilized Geographic Information System (GIS) to identify and prioritize specific wastewater collection components for replacement and rehabilitation considering material type, diameter, age, and I & I findings. PAWC used maps, consulting services, and other sources of data to supplement missing GIS data.

The Company also states that there is a need for continued rehabilitation, improvement, and replacement of the collection systems in order to maintain efficient, safe, reliable and reasonable service, and to allow continued compliance with existing and evolving regulatory standards imposed by state and federal agencies.

Of particular importance is the need to reduce I & I. I & I increases the volume of wastewater that must be treated, thus increasing pumping and chemical expense, and may require additional capital investment to expand treatment, pumping and sludge disposal facilities. Accordingly, PAWC states that it is committed to making on-

going capital investments in its wastewater collection systems currently and for the foreseeable future to reduce I & I.

PAWC's planning process for replacement of aging collection system infrastructure was based on a macro-level overview of each wastewater system. GIS data assisted with identifying and prioritizing likely wastewater problems.

PAWC has also filed a petition at P-2014-2431005 for approval of a DSIC. DSIC is a ratemaking mechanism that allows for the recovery of prudently incurred costs related to the repair, improvement and replacement of utility infrastructure through a surcharge on a timelier basis, subject to reconciliation, audit and other consumer protections.

On March 14, 2013, the Commission issued a proposed rulemaking on the LTIIP at L-2012-2317274. The proposed rulemaking acknowledged the Commission's decision against establishing a separate Pipeline Replacement and Performance Plan filing process at Docket No. M-2011-2271982, because it would be duplicative of the Act 11 DSIC regulatory process, specifically, the filing of LTIIPs. The Commission, nevertheless, determined that it would rather order additional actions from NGDCs if necessary, in order to safeguard the public. The Commission also acknowledged that the implementation of a DSIC mechanism may lead to numerous construction projects by the utilities. The Commission is aware that these construction projects could lead to significant disruptions as utilities perform work in the right of ways of the roadways and streets across the Commonwealth in order to repair or replace their infrastructure. Therefore, the Commission has directed, by way of the proposed rulemaking, that a utility, as part of its LTIIP, should provide a description of its outreach and coordination activities with other utilities, Pennsylvania Department of Transportation (PennDOT), and local governments regarding their planned maintenance/construction projects and roadways that may be impacted by the plan.

As a result, the proposed rulemaking added an additional element, thereby increasing the original seven elements in the LTIIP to eight as shown below:

- (1) Types and age of eligible property;
- (2) Schedule for its planned repair and replacement;
- (3) Location of the eligible property;
- (4) Reasonable estimates of the quantity of property to be improved;
- (5) Projected annual expenditures and measures to ensure that the plan is cost effective;
- (6) Manner in which replacement of aging infrastructure will be accelerated and how repair, improvement or replacement will maintain safe and reliable service;
- (7) A workforce management and training program; and
- (8) A description of a utility's outreach and coordination activities with other utilities, PennDOT and local governments on planned maintenance/construction projects.

PAWC's LTIIP addressed these eight elements as required in the Final Implementation Order of Act 11 and the proposed rulemaking of March 14, 2013, as outlined below.

(1) TYPES AND AGE OF ELIGIBLE PROPERTY

PAWC's Petition

PAWC stated that it owns the following types of sewer collection systems:

<u>Gravity System</u> – PAWC owns approximately 847,282 LF of gravity main and 3,814 manholes including a portion of the customer service lateral from the main to the edge of the right-of-way or property line. The material used generally depends on the year of installation, with newer mains comprised of polyvinyl chloride (PVC) and older mains comprised of vitrified clay pipe. Newer manholes are comprised of pre-cast or cast in place concrete whereas, older manholes are brick.

<u>Force Mains</u> – PAWC owns approximately 103,973 LF of force main and 47 lift stations. Generally, older force main material is comprised of ductile iron with newer mains consisting of PVC.

<u>Low Pressure</u> – In a low-pressure collection system, individual customer sewage collects in a grinder pump and pit installation. Sewage is pumped from the pit through a customer service lateral and the low pressure force main. PAWC owns approximately 456,574 LF of low pressure main.

The ages of the wastewater collection systems when initially constructed, range from the 1920's for the Koppel system to 1990 for Blue Mountain Lake, with the largest system being Coatesville, dating to the 1930's. A summary of the wastewater systems by feet of main, manholes, lift stations, and system ages of eligible property is summarized in Table No. 1 below.

TABLE No. 1 - TYPES AND AGE OF ELIGIBLE PROPERTY

	Gravity	Force	Low Pressure		Lift	System
Wastewater System	Main (LF)	Main (LF)	Main (LF)	Manholes	Stations	Age
Blue Mountain Lake	0	0	67,825	0	0	>1990
Lehman-Pike	0	0	268,484	0	13	>1980
Pocono Country Place	150,591	5,407	94,265	657	2	>1975
Claysville	62,126	1,100	0	343	1	>1983
Coatesville	331,017	85,826	0	1,564	16	>1930s
Clarion	200,901	11,640	0	903	5	>1930s
Franklin*	47,906	0	0	165	0	2004
Koppel	24,041	0	0	85	0	>1920s
Marcel Lake	30,700	0	26,000	97	10	>1960
TOTAL	847,282	103,973	456,574	3,814	47	

^{*}Does not include eligible property from Hamiltonban System, which is expected to be interconnected to the Franklin System in 2015.

Comments

The OCA submits that additional background information may be needed to assist the Commission in determining that the LTIIP will accelerate the infrastructure repair and replacement in a cost effective manner. Specifically, the OCA recommended that the Company provide the following information pertaining to the LTIIP:

A breakdown of historic annual replacement and retirement by category of plant.

A breakdown of historic annual replacement and retirement by individual system.

Resolution

In response to the OCA's concerns, PAWC provided specific information on each item listed below. The Commission will address each of these concerns and make appropriate resolutions.

Breakdown of Historic Annual Replacement and Retirement by Category of Plant

PAWC's Petition states that, overall, the Company spent an average of \$3.79 million annually from 2009 through 2013, or approximately \$239 annually per customer, and that it proposes to increase the wastewater DSIC eligible spending to \$5.14 million annually, representing a 35.6 percent increase or approximately \$305 per customer, in order to continue making the necessary improvements at an accelerated pace. The historic annual expenditures for the years 2009 through 2013 are shown on Figure 2, p. 25 of PAWC's LTIIP.

The categories of repairs and rehabilitation include aggressive abatement of I & I of gravity main, rehabilitation of laterals and manholes, construction of a wet weather storage tank, and upgrades to lift stations.

Following these upgrades, additional capital spending may be warranted to rehabilitate, improve and replace aging elements of the collection system in order to maintain adequate, efficient, safe, reliable and reasonable service, and to comply with regulatory standards. This type of historic spending investment profile will be cyclical in nature as the Company moves from system to system to address wastewater infrastructure needs.

Breakdown of Historic Annual Replacement and Retirement by Individual System

Marcel Lakes, Franklin, and Koppel were acquired in 2013 and have low historical spending levels. Infrastructure replacement in newly acquired troubled wastewater systems will initially be minimal because the systems are undergoing condition and performance assessment, planning, design and permitting. These actions can typically be followed by a multi-year period of significant infrastructure investment to correct deficiencies.

The work on individual systems includes the following:

- PAWC stated that an aggressive I & I abatement program was implemented in the Pocono Country Place system that resulted in rehabilitation of 2,200 LF of gravity main and 130 manholes.
- Improvements to the Claysville system consisted of construction of a wet storage tank to minimize sanitary sewer overflows.
- For the Coatesville system, an aggressive I & I abatement program was implemented. Portions of the collection system were rehabilitated using trenchless technologies to allow the rehabilitation to be completed in a cost-effective, safe and reliable manner.
- Work in the Clarion system included main line, manhole, and lateral rehabilitations, as well as upgrades to lift stations. The work consisted of replacement of 7,728 LF of undersized segments of main, abandonment of parallel sewers, and improvements to the Liberty Lift Station.

Figure 2 – Projected and Historic Wastewater DSIC Eligible Capital Expenditures, shown on p. 25 of PAWC's LTIIP filing, demonstrates historical and projected annual expenditures.

Upon review of PAWC's LTIIP and all supplemental information and explanations filed, the Commission finds that the requirements of element one of the Final Implementation Order of Act 11, types and age of eligible property, have been fulfilled.

(2) SCHEDULE FOR PLANNED REPAIR AND REPLACEMENT OF ELIGIBLE PROPERTY

PAWC's Petition

PAWC recognizes the need for continual renewal of the collection and conveyance system to maintain quality and reliable service to its customers. The Company has been rehabilitating and repairing system components since acquiring its various wastewater systems. For the future, PAWC proposed expenditures that will prioritize remediation of I & I, applying a macro and micro level of analysis and investigation.

The macro level identifies general categories based on systems having significant I & I issues. I & I flows have been developed for each system from sewer system investigation studies and reports that included flow measurement, smoke testing, CCTV inspection, system modeling, and inspections of manholes and pump station. A corrective action plan was developed based on the studies and analysis. The Company indicated that the focus for project expenditures was tied to reducing I & I.

The micro level main replacement planning involves addressing specific

pipes and manholes within the broader categories. Specifically, performance characteristics such as cracks in mains and other criteria that impede performance are targeted. The findings of I & I investigations and video inspections will be used to target specific pipe segments and laterals that require rehabilitation. Selection of projects for repair or replacement is prioritized based on environmental impact, public health, and capacity required in a specific area.

Pipe replacement is warranted when structural integrity has been compromised or the pipe has inadequate size, grade, or is misaligned. Trenchless technologies that eliminate the need to excavate a continuous trench, such as cured-in-place liners or slip lining, are utilized when replacement of the pipe is not used, and represent a cost-effective method for pipe rehabilitation. PAWC submitted a schedule of planned replacement/rehabilitation in response to Data Request A-1.

Comments

The OCA submitted that the following additional information may be needed by the Commission and its staff in their review of PAWC's LTIIP:

A table showing the projected annual expenditures by eligible plant categories and by system and an explanation of the basis for the proposed expenditures.

The OCA commented that the information provided in the filing did not tie the projected annual expenditures to individual systems or to the priorities identified in the overview of each system.

Resolution

In response to TUS data requests, PAWC provided a detailed table showing

a breakdown of expenditures of eligible property for each type of property by year and by wastewater system. The table listed the year, capital budget, unit cost, length, depth and size of main, and other eligible components of the collection system. Mains were classified as gravity pipe, low pressure main, or force mains. An explanation for the proposed expenditures is provided in the above paragraphs.

Wastewater DSIC projects are prioritized in the following manner. Repair vs. replacement decisions are based on a determination of the main's hydraulic capacity under both existing and projected flow conditions and the main's physical characteristics. Line segments are cleaned and televised to permit this physical examination. Individual line segments are rated to the NASSCO rating system utilizing the PACP Structural Grade and PACP Maintenance Grade. Individual line segments are categorized to determine the appropriate action plan, as Replacement, Full Lining, Point Repairs, or No Current Action Needed.

The projects are scored in a prioritization model to compare and evaluate with different capital projects. Scoring is based on evaluation criteria of: Provides Reliable Service, Provides Adequate Capacity/Supports Growth, Improve Customer Satisfaction, Meets Regulatory Compliance, and Enhances Safety.

Upon review of PAWC's LTIIP and all supplemental information and explanations filed, the Commission finds that the requirements of element two of the Final Implementation Order, schedule for planned repair and replacement of eligible property, have been fulfilled.

(3) LOCATION OF ELIGIBLE PROPERTY

PAWC's Petition

PAWC wastewater systems include: Blue Mountain Lake, Lehman-Pike (Saw Creek Estates), Pocono Country Place, Claysville, Coatesville, Clarion, Franklin (Cashtown/McKnightstown Sewage Treatment Plant), Koppel and Marcel Lake (Clean Treatment). The Company states that since acquiring the wastewater systems it has made improvements based upon studies and investigations that have identified the need for refurbishment of deteriorated and failed pipes and manholes.

For example, the Company anticipates that it will complete the following repairs/rehabilitation of gravity pipe, as summarized by year and wastewater system in Table No. 2 below.

TABLE No. 2 – REPAIR/REHABILITATION OF GRAVITY PIPE (LF)

System	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
Clarion	1,348	1,898	2,618	3,848	5,048
Claysville	60	80	160	240	320
Coatesville	6,423	2,870	4,370	8,230	5,620
Pocono	1,000	1,000	1,500	2,000	2,500
Marcel Lk.	200	200	200	1,000	1,200
Koppel	2,500	1,000	-	-	3,500

In addition, the Company included a schedule, broken down by year and system, indicating that it will repair/replace 403 manholes, 1,203 laterals and a lift station during the period of 2015 through 2019.

Comments

No comments were received regarding the location of eligible property.

Resolution

Upon review of the LTIIP, the Commission finds that element three of the Final Implementation Order, the location of eligible property requirement, has been fulfilled.

(4) REASONABLE ESTIMATES OF THE QUANTITY OF PROPERTY TO BE IMPROVED

PAWC's Petition

The estimated quantity of property by year and category of property are shown in Table No. 3 below as submitted in the Company's Petition. To compile these estimates, the best available information was used regarding the infrastructure needs for each wastewater system. The Company states that the actual quantities and scheduling may change depending on the outcome of the sewer system evaluation or other planning studies as described in the LTIIP.

Table No. 3 - PAWC's Reasonable Estimates of the Quantity of Property to be Improved

Category	2015	2016	2017	2018	2019	5 Year Total
Pipeline Replacement LF*	13,700	21,600	25,800	17,200	15,900	94,200
Laterals	219	150	177	349	308	1,203
Manholes	80	60	75	93	95	403
Lift Station	1	-	-	-	-	1

^{*}Includes gravity pipe, low pressure main and force main.

Comments

No comments were received on the quantity of property to be improved.

Resolution

Upon review of PAWC's LTIIP and all supplemental information filed, the Commission finds that the requirements of element four of the Final Implementation Order, reasonable estimates of the quantity of property to be improved, have been fulfilled.

(5) PROJECTED ANNUAL EXPENDITURES AND MEASURES TO ENSURE THAT THE PLAN IS COST EFFECTIVE

PAWC's Petition

The Company states that the most prudent and cost-effective method will be selected, as PAWC uses competitive bidding to ensure all major projects are completed in a cost effective manner.

PAWC projected annual expenditures for the years 2015 through 2019. Some quantities may change depending on engineering studies and sewer system evaluations. The projected annual expenditures in millions of dollars are shown in Table No. 4 below.

Table No. 4 - PAWC Projected Annual LTIIP Budget 2015-2019 (\$ Millions)

Year	2015	2016	2017	2018	2019	Total
Budget	\$5.2	\$5.3	\$5.7	\$5.1	\$4.4	\$25.7

In response to Data Request A-3, to ensure that projects are cost effective, the Company avers that it bids sewer projects with water projects where possible to achieve cost savings. Additionally, when sewer main work is combined with water main work or coordinated with municipal roadway projects or other underground utility work in the same project area, cost savings are achieved by coordinating paving restoration on municipal or state roadways. If projects are not completed, the infrastructure will continue to deteriorate resulting in an increase in I & I and emergency repairs. This results in increased capital expenditures for main and lateral repairs, as well as increased treatment costs.

Two examples can best demonstrate cost effective savings. The first example is a combined water and wastewater main installation on Beale Drive in the Borough of Parkesburg. The existing 4" cast iron main was replaced with an 8" DICL water main, and under the same contract 736 LF of VCP sewer main was replaced with 18" PVC. In this area on Beale Drive the overlay restoration was shared. Additionally, the unit cost of the water and sewer main was lower than historical unit costs of water or sewer main alone. The result was a cost savings of approximately \$33,000.

The second example is a combined water and wastewater main installation project performed in conjunction with a street widening and paving project on South Street in Clarion Borough. The sanitary sewer replacements consisted of the replacement of manholes at four intersections, replacement of approximately 100 LF of 24" sewer, and the replacement of two laterals. The water main replacement consisted of the installation of approximately 1,700 LF of 8" water main. If this work had not been coordinated with the municipality, base repair and mill and overlay for half of the roadway to restore the water and sewer trench areas would have amounted to approximately \$122,000. In this instance, PAWC contributed \$19,107 to the Borough for restoration and their contractor completed the restoration work. The avoided cost of restoration amounted to approximately \$103,000.

Comments

The OCA commented that the information provided should be supplemented by projections of hydraulic and organic loading and planning. Specifically, the OCA recommended that the Company provide the following information pertaining to the LTIIP:

Report containing the information required by 25 Pa. Code 94.12 regarding 5-year hydraulic and organic loading and prioritizing of DSIC eligible projects.

Pennsylvania Department of Environmental Protection (PaDEP) Municipal Waste Load Management regulations in Chapter 94 pertain to treatment plants and sewer systems owned by or serving a municipality. The following PAWC wastewater systems meet these criteria: Coatesville, Clarion, Claysville/Donegal, Koppel, and Franklin. Annual Chapter 94 reports are filed with PaDEP for these systems. The purpose of these regulations is to provide adequate sewage conveyance and treatment for future needs, prevent sewerage facilities from becoming overloaded, limit additional connections to overloaded facilities, correct overload conditions, and prevent the introduction of industrial discharges into sewer systems that will interfere with operations or pass through the treatment plant. These reports are useful in determining future infrastructure improvement needs for both the wastewater treatment plant and collection systems.

The remaining three systems – Pocono Country Place, Lehman Pike (Saw Creek), and Blue Mountain Lake Estates – are residential developments in the Poconos and are not required to file Chapter 94 reports. For planning and management purposes, PAWC evaluates the 5-year hydraulic and organic loading projections for these systems on a regular basis.

Resolution

Upon review of PAWC's LTIIP and all supplemental information filed, the Commission finds that the requirements of element five of the Final Implementation Order, projected annual expenditures and measures to ensure that the plan is cost effective, have been fulfilled.

(6) ACCELERATED REPLACEMENT AND MAINTAINING SAFE AND RELIABLE SERVICE

PAWC's Petition

The Commission's Final Implementation Order noted that utilities should reflect and maintain acceleration of infrastructure replacement. Utilities that have already taken substantial steps towards increasing capital investment to address the issue of aging infrastructure needed to reflect in their LTIIP how the DSIC will maintain or augment acceleration of infrastructure replacement and prudent capital investment.

PAWC states that, overall, the Company spent an average of \$3.79 million annually from 2009 through 2013, or approximately \$239 annually per customer, and that it proposes to increase the wastewater DSIC-eligible spending to \$5.14 million, representing a 35.6 percent increase or approximately \$305 annually per customer, in order to continue making the necessary improvements at an accelerated pace. The historic annual expenditures from 2009 through 2013, as well as the projected annual expenditures from 2015 through 2019, are shown on Figure 2 of PAWC's LTIIP, demonstrating an acceleration of plant investment for DSIC eligible property.

PAWC states that, the proposed replacements that are slated to be completed over five years under the LTIIP, would have taken seven years to complete if the historical average annual spending levels were maintained.

Comments

No comments were received regarding accelerated replacement and maintaining safe and reliable service.

Resolution

Upon review of PAWC's LTIIP and all supplemental information and explanations filed, the Commission finds that the requirements of element six of the Final Implementation Order, manner in which replacement of aging infrastructure will be accelerated and how repair, improvement or replacement will maintain safe and reliable service, have been fulfilled.

(7) WORKFORCE MANAGEMENT AND TRAINING PROGRAM

PAWC's Petition

PAWC states that in order to ensure system reliability and public safety, all wastewater DSIC-eligible projects will be constructed by qualified contractors. PAWC uses competitive bidding and maintains a prequalified process to ensure all contractors are qualified to perform work in a cost-effective, safe and reliable manner. PAWC uses prequalified contractor screening and management services, helping PAWC certify and centralize data, perform pre-project screening, and contractor pre-qualification.

During pre-qualification screening, contractors and subcontractors are

required to submit documentation such as:

- Safety company policy, designated safety inspector, OSHA lost work days, and recordable incidents of OSHA violations.
- Worker's Compensation Experience Ratings.
- Staffing information.
- Annual value of work and percentage of work relevant to bid project.
- Work experience schedule.
- Bonding capacity.
- Liability Insurance coverage.
- References.

All construction projects performed by independent contractors are properly inspected. PAWC employees are actively engaged in the direct supervision of project inspections. The project close-out includes a punch-list to ensure all work is completed according to contract documents.

Comments

No comments were received regarding the workforce management and training program.

Resolution

Upon review of PAWC's LTIIP, the Commission finds that the requirements of element seven of the Final Implementation Order, a workforce management and training program, have been fulfilled.

(8) DESCRIPTION OF OUTREACH AND COORDINATION ACTIVITIES WITH OTHER UTILITIES, PENNDOT AND LOCAL GOVERNMENTS ON PLANNED PROJECTS

PAWC's Petition

PAWC states that the acceleration of aging infrastructure proposed in the LTIIP will lead to disruptions as work is performed in right-of-ways of roads and streets across the PAWC service area. Local municipalities and other utilities/agencies may be planning paving projects or underground infrastructure replacement projects located in the same right-of-ways as PAWC wastewater infrastructure construction. PAWC recognizes that coordination with other utilities minimizes disruption and ensures that infrastructure replacement is efficient and cost effective. Therefore, PAWC plans to take the following steps to reach out to customers about disturbances, and to coordinate with other utilities within the PAWC service area:

- Utilize Pennsylvania's one-call system for "design notifications".
- Maintain open communication with local municipalities to stay informed about planned utility and paving projects.
- Maintain communication with PennDOT Utility Administrators.
- Maintain communication/work relationships with other utilities operating in PAWC service area.
- Where applicable and cost-effective, use trenchless technologies to minimize roadway disturbance.
- Prior to working within a community, issue door-to-door notifications, press releases and/or information letters to notify those customers/community associations affected by the work.

Comments

No comments were received regarding outreach and coordination activities with other utilities, PennDOT, and local governments.

Resolution

Upon review of PAWC's LTIIP and all supplemental information and explanations filed, the Commission finds that the requirements of element eight of the Final Implementation Order, a description of a utility's outreach and coordination activities with other utilities, PennDOT and local governments on planned maintenance/construction projects, have been fulfilled.

LTIIP SUMMARY

The Commission has reviewed each of the eight required elements of PAWC's Petition for Approval of its LTIIP individually and has taken into account the comments received on this petition. While the Commission's Final Implementation Order stated, at page 18, that the LTIIP "need only address the specific property eligible for DSIC recovery," the inclusion of arguably non-DSIC-eligible property does not void the LTIIP application, nor is the inclusion of such property in the LTIIP dispositive of whether the cost of that project will be afforded DSIC recovery. The issues of eligibility and cost recovery, for all property claimed as DSIC-eligible, are to be addressed and resolved in the subsequent DSIC petition and calculation. Accordingly, PAWC's LTIIP is approved.

PAWC'S DISTRIBUTION SYSTEM IMPROVEMENT CHARGE PETITON

Section 1353 requires utilities to file a petition seeking approval of a DSIC that includes the following:

- 1. An initial tariff that complies with the Model Tariff adopted by the Commission, which includes:
 - a. A description of eligible property;
 - b. The effective date of the DSIC;
 - c. Computation of the DSIC;
 - d. The method for quarterly updates of the DSIC; and
 - e. A description of consumer protections.
- 2. Testimony, affidavits, exhibits, and other supporting evidence demonstrating that the DSIC is in the public interest;
- 3. A Long Term Infrastructure Improvement Plan (LTIIP) as described in Section 1352, 66 Pa. C.S. § 1352;
- 4. Certification that a base rate case has been filed within five years prior to the filing of the DSIC petition; and
- 5. Other information required by the Commission.

PAWC's petition addresses each of the elements listed in the statute, as detailed below.

(1) Tariff Filing

Section 1353 requires utilities to file an initial tariff that complies with the Model Tariff adopted by the Commission. PAWC's proposed Supplement No. 4 to Tariff Wastewater – Pa. P.U.C. No. 15 (Supplement No. 4) closely reflects the language of the Model Tariff. However, PAWC shall make the tariff sufficiency modifications as

spelled-out in Appendix A at the conclusion of this Order. We shall review each item in turn.

(a) Eligible Property

PAWC's Petition

PAWC designates the same property as DSIC-eligible as it included in its LTIIP, including the following: collection sewers; collecting mains; service laterals; valves; manholes; lift stations; grinder pumps; flow meters; inflow and infiltration projects; unreimbursed costs related to highway relocation projects; collection main extensions installed to implement solutions to wastewater problems that present health and safety concerns for customers; and other related capitalized costs. Details of PAWC's DSIC-eligible property are discussed thoroughly in the LTIIP section of this Order. Eligible property for wastewater utilities is defined in Section 1352, 66 Pa. C.S. § 1351(4).

Comments

The OCA notes the importance of ensuring that the eligible plant that goes into service in January and February of 2015, hence forming the basis for the calculation of the DSIC to be effective on April 1, 2015, does not include any plant that was included in the fully projected future test year that was utilized by PAWC in its prior rate case at Docket No. R-2013-2355276. The OCA says that, although the plant is projected to go into service by December 31, 2014, it is possible that some projects may be delayed until early 2015, and if that happens, then those projects should not be included in the DSIC calculation. The OCA also points out that, as per an adopted Commission provision related to the PAWC rate case, before it may impose a DSIC PAWC must provide

confirmation that the balances of DSIC-eligible accounts, net of plant funded with customer advances and customer contributions, exceed the December 31, 2014 levels of investment in plant additions projected in the rate case.

Resolution

We agree with both of the OCA's contentions, and in particular affirm the notion that no eligible plant that has previously been slated for recovery as part of a rate case should be eligible for DSIC recovery. As such, PAWC has confirmed with the Commission that any wastewater projects that PAWC claimed to be in-service during 2014 as part of its last rate case are on schedule to be in-service by December 31, 2014, and that any costs associated with these projects that would be recorded after December 31, 2014 would be excluded from the PAWC DSIC filing effective April 1, 2015. In addition, the Company agrees that it will not begin to impose a wastewater DSIC until the balances of the wastewater DSIC-eligible accounts, net of plant funded with customer advances and customer contributions, exceed the December 31, 2014 levels of investment in plant additions projected by PAWC in the rate case at Docket No. R-2013-2355276.

PAWC's description of eligible property in Supplement No. 4 aligns with the description of eligible property for wastewater utilities in the Model Tariff; therefore, the Commission deems PAWC's tariff to be compliant with Section 1353 as it pertains to the issue of eligible property.

(b) Effective Date

PAWC's Petition

PAWC's Supplement No. 4 has an effective date of January 1, 2015 with an initial DSIC rate of 0%. As outlined by Company witness John R. Cox, PAWC will

file for its first non-zero DSIC rate, reflecting plant additions for the months of January and February 2015, to be effective on April 1, 2015.

Comments

The OCA submits that PAWC should not be permitted to implement its DSIC rate until the issues raised have been fully investigated, and it has been determined that the DSIC rate has been calculated in accordance with Act 11 and the Commission's Final Implementation Order.

Resolution

Given that the OCA has raised issues and requested hearings regarding certain elements of PAWC's DSIC petition, we shall refer some of those issues to the OALJ for hearing and recommended decision. However, consideration of those issues need not delay implementation of the DSIC mechanism itself. We shall permit PAWC to implement a DSIC mechanism, pursuant to a tariff filed on a 10-day notice and in compliance with the directives in this Order, but note that the rates charged pursuant to the DSIC surcharge shall be subject to recoupment and refund after final resolution of the issues brought before the OALJ. Therefore, based on requirements for DSIC quarterly updates, as more fully described below, the Commission directs PAWC to file a tariff no later than December 21, 2014, if PAWC wishes to have an effective date of January 1, 2015. PAWC's tariff must be modified in a tariff filing as directed by the Commission in this Order.

² The quarters are fixed by statute. If PAWC does not have an effective date of January 1, 2015, the next earliest effective date would be April 1, 2015.

(c) Computation of the DSIC

PAWC's Petition

With the Supplement No. 4, PAWC proposes a Pro-Forma DSIC rate of 0% effective January 1, 2015. The formula for calculation of the DSIC is as follows:

DSIC =
$$(\underline{DSI * PTRR}) + \underline{Dep + e}$$

PQR

Where:

DSI = Original cost of eligible distribution system improvement

projects net of accrued depreciation.

PTRR = Pre-tax return rate applicable to DSIC-eligible property.

Dep = Depreciation expense related to DSIC-eligible property.

e = Amount calculated under the annual reconciliation feature or

Commission audit.

PQR = Projected quarterly revenues for distribution service

(including all applicable clauses and riders) from existing customers plus revenue from any customers which will be acquired by the beginning of the applicable service period.

PAWC will update this computation ten days before the actual approved effective date of the DSIC rate to reflect the following: the costs of all DSIC-eligible projects that were placed into service during the three month period ending one month prior to the approved effective date; PAWC'S actual capital structure and cost of long term debt as of one month prior to the effective date; and the Commission-allowed rate of return on equity. Therefore, for a DSIC effective January 1, 2015, a three-month period of September through November should be used when calculating the appropriate DSIC rate. PAWC's first non-zero DSIC rate will become effective on April 1, 2015 and will

be calculated to recover the fixed costs of eligible plant additions placed in service between January 1, 2015 and February 28, 2015, so as to not reflect any costs previously reflected in the Company's rates or rate base as part of its last base rate case at Docket No. R-2013-2355276.

In regards to the cost of equity, PAWC states that it will use the equity return rate approved in the Company's last fully litigated base rate proceeding for which a Final Order was entered no more than two years prior to the effective date of the DSIC. If more than two years have elapsed since the last base rate case, PAWC will revise its tariff to reflect the allowed ROE for DSIC purposes, as published by the Commission³.

As stated by Company witness Cox, PAWC proposes to use the summation of projected revenues for the applicable three-month period to calculate its projected quarterly revenues for use in the DSIC computation.

Comments

The OCA claims that PAWC's DSIC calculation is incorrect because the DSIC computation does not reflect the impact of accumulated deferred income taxes (ADIT) associated with DSIC investments made by the Company, which in turn permits PAWC to earn a return on an investment balance that exceeds PAWC's actual investment, and because the calculation of the state income tax component of the DSIC revenue requirement determination requires further examination to ascertain whether it is consistent with the actual taxes paid doctrine.

The OCA also expressed concern that, given the fact that the Company has nine distinct wastewater systems consolidated into five zones for the purposes of cost of

³ The ROE to be used in the DSIC calculation will be that which is calculated by the Commission in its most recent Quarterly Report on the Earnings of Jurisdictional Utilities.

service and revenue requirement, if PAWC proposes a single DSIC rate it is unclear how various issues will be treated if the Company files a base rate case for fewer than all of its systems. Such issues may include, what ROE will be used to calculate the DSIC, which effective date of new base rates will be used and how that will affect the statutory charge reset provision at 66 Pa. C.S. § 1358(b), and how earnings will be reported. Furthermore, the OCA points out that, due to the variation in rates across the five rate zones, the application of a single DSIC rate will result in some customers paying more on their monthly bill than customers in different systems. The OCA insists that it should be considered whether the application of a single DSIC rate would increase the disparity in monthly rates charged to PAWC wastewater customers in differing systems rather than narrow those disparities, as has been the practice over several base rate cases.

The OCA also raises the issue of whether the DSIC should be applied to the Franklin and Koppel wastewater systems. The OCA points out that PAWC's last rate case was in 2013 and that, as verified by Company witness Cox, the Franklin and Koppel systems were not included because they were acquired after the filing of the base rate case. The OCA claims that the Commission addressed this issue in the Final Implementation Order when it said the following:

However, revenue from customers acquired from troubled companies or by the acquisition of such companies should not be factored into projected quarterly revenue and those customers should not be surcharged until their rates have been established by a base rate case of the acquiring utility. The projects affecting service to such customers are not eligible for DSIC treatment until it has been rolled into the acquiring utility's base rates.

Noting the Commission's determination in the Final Implementation Order

– and that PAWC's proposed tariff does not distinguish the Franklin and Koppel rate

zones from the other system rate zones, nor exclude the Franklin and Koppel rate zones

from the applicability of the DSIC – the OCA avers that the DSIC should not be applied to the Franklin and Koppel systems until they are included in a base rate case for PAWC Wastewater, and all eligible property from the Franklin and Koppel systems should be removed from the DSIC.

The OCA states that the DSIC surcharge proposed by PAWC is contrary to the established principles of sound ratemaking and would contribute to bad regulatory policy. The OCA requests that the Commission reject the proposed surcharge, and that the matter be referred to the OALJ for the development of an evidentiary record.

Resolution

Based on requirements for DSIC quarterly updates, as more fully described below, the Commission directs PAWC to file a DSIC tariff using actual data for eligible property placed into service during the three-month period ending one month prior to the approved effective date of the DSIC. Furthermore, the Commission recognizes that PAWC's DSIC rate will be set to 0% until April 1, 2015, and that the April 1, 2015 DSIC filing will only include the two-month period of January and February 2015, so as to not reflect any costs previously reflected in the Company's rates or rate base as part of its last base rate case at Docket No. R-2013-2355276. All subsequent DSIC filings will utilize the standard three-month period for eligible property to be included in the DSIC.

In the calculation of its DSIC, to be consistent with what has been allowed for the water utility DSICs as accepted by the Bureau of Audits and approved by the Commission, PAWC should use one-fourth of the annual depreciation expense amount as the basis for its initial accumulated depreciation amount. Each quarter going forward, the calculated depreciation expense for DSIC purposes should be added to the prior quarters calculated depreciation expense to determine the accumulated depreciation amount.

The cost of equity determinations in the Commission's Staff Report on Quarterly Earnings of Jurisdictional Utilities (Quarterly Report) are used for DSIC calculations if more than two years have elapsed since a utility's last fully litigated base rate case. 66 Pa. C.S. § 1357(b)(3). If, in any quarter, a utility will earn more than the ROE used for the DSIC calculations (which may be the ROE determined in the Staff Quarterly Report), the DSIC will be reset to zero. 66 Pa. C.S. § 1358(b)(3). Accordingly, the DSIC must remain at zero until such time that the utility, in a subsequent quarter, earns less than the ROE used for the purpose of DSIC calculation.

Due to the fact that PAWC's last rate case at Docket No. R-2013-2355276 did not contain a fully litigated ROE, to be consistent with Section 1357(b)(3) and as would be appropriate for a January 1, 2015 tariff effective date, the Company should use the ROE calculated in the Quarterly Report for the period ending June 30, 2014 (2nd Quarter Report). Since the Quarterly Report does not determine a DSIC ROE for wastewater companies, the DSIC return for water companies will be used as the surrogate equity return rate whenever a base rate case ROE is not available. The Commission has determined that the water utility industry offers the most suitable surrogate for determining a rate of return for wastewater utilities.

The Commission directs that, along with its updated capital structure and cost rates filed one month prior to the approved effective date of the tariff, PAWC shall file a comprehensive debt schedule, outlining all outstanding debts and their associated interest rates that were used to calculate the long term debt cost rate figure.

The Model Tariff makes available to utilities two options for calculating projected quarterly revenues: 1) The summation of projected revenues for the applicable three-month period; or 2) One-fourth of projected annual revenues. PAWC is choosing to use the summation of projected revenues for the applicable three-month period, which is permitted by the Model Tariff. Therefore, PAWC's use of the summation of projected

revenues for the applicable three-month period as its projected quarterly revenues is appropriate.

The OCA expressed concern over whether the implementation of a single DSIC rate by PAWC would increase the disparity in monthly rates charged to PAWC wastewater customers in differing systems, along with how various issues would be treated if the Company files a base rate case for fewer than all of its systems. We note that the OCA made the same argument in regards to the Little Washington Wastewater Company (LWWC) LTIIP/DSIC filing at Docket No. P-2013-2366873, on which the Commission stated the following in its Opinion and Order entered September 12, 2013:

The Commission is aware of the rate disparity among the separate operating divisions of LWWC, and has made statements in the past encouraging rate consolidation. In regards to LWWC's last base rate filing for the Southeast Division, the Order Entered June 9, 2011 at Docket No. R-2010-2207853 stated, "...future steps toward rate consolidation will be addressed by the Commission as part of subsequent rate filings." Therefore, we aver that a single DSIC rate is in line with the Commission's encouragement of single-tariff pricing, and the current disparity in rates will be handled through future rate proceedings.

We shall align our stance on the implementation of a single DSIC rate by PAWC with the above averment in the LWWC Order.

The OCA also raised the issue of whether the DSIC should be applied to the Franklin and Koppel wastewater systems because PAWC's most recent rate case did not include those systems, yet PAWC still proposed to include Franklin and Koppel property as eligible property for the DSIC and its proposed tariff does not distinguish the Franklin and Koppel rate zones from the other system rate zones. We note that the

Commission, in its Final Implementation Order, added the following statement to the end of the Formula section discussing the calculation of the DSIC, "The DSIC calculation does not factor in the plant of acquired troubled companies or the revenue of customers acquired from troubled companies until such plant and customer rates have been part of a base rate case by the acquiring utility." Final Implementation Order, p. 54.

The OCA opines that PAWC's DSIC calculation should be adjusted to reflect the impact of ADIT associated with DSIC investments made by the Company; otherwise PAWC will earn a return on an investment balance that exceeds PAWC's actual investment. That is, ADIT can be viewed as a source of zero cost capital. The Commission, in its Implementation Order, has determined that the "adjustment, which was not previously used in the DSIC by the water industry, would add unnecessary complexities to the DSIC and, accordingly, will not be included in the model tariff." Final Implementation Order, p. 39.

Additionally, the OCA is reviewing the calculation of the state income tax component of the DSIC revenue requirement determination to ensure that ratepayers receive the full benefit of the tax deductions consistent with the actual taxes paid doctrine.

The Commission notes that it has previously addressed the issues regarding ADIT and the calculation of the state income tax in the Columbia Gas DSIC proceeding. *See Petition of Columbia Gas of Pennsylvania, Inc. for Approval of a Distribution System Improvement Charge*, Docket No. P-2012-2338282 (Order entered May 22, 2014) (*May 22nd Order*). We further note that the OCA has a pending appeal in Commonwealth Court against the May 22nd Order. Specifically, this appeal involves the OCA's issues related to the impact of ADIT associated with DSIC investments and the calculation of

the state income tax component of the DSIC revenue requirement.⁴ Hence, we note that the OCA has preserved the issue. Accordingly, the ADIT issue is now a legal issue, pending at the Commonwealth Court in the OCA's appeal the May 22nd Order. However, since there are no additional and non-tax fact issues raised in the OCA's current protest against the PAWC DSIC filing, we will abide by previous determinations set forth in the May 22nd Order and, thus, we not refer the ADIT issue or the calculation of the state tax component of the DSIC revenue requirement to the OALJ for disposition.

However, we will refer the OCA's issue regarding the applicability of the DSIC to the Franklin and Koppel systems to the OALJ for remediation and hearing. To the extent that PAWC may be permitted to implement a DSIC pending the OALJ proceeding and chooses to do so while this matter is pending in the OALJ, the DSIC recovery shall be subject to recoupment and refund after final resolution.

(d) Quarterly Updates

PAWC's Petition

A utility's DSIC is subject to quarterly updates to reflect eligible plant additions placed in service during the three-month period ending one month prior to the effective date of any DSIC update. Supplement No. 4 includes a chart of the effective dates of PAWC's proposed DSIC updates, and the corresponding period for eligible plant additions that will be reflected in each update. The Company states that once its DSIC is implemented, customers will receive notice of quarterly changes in the DSIC through bill messages, consistent with Act 11 and the Final Implementation Order.

⁴ The Office of Consumer Advocate also has a pending appeal in Commonwealth Court against Little Washington Wastewater Company's (LWWC) DSIC mechanism based on the Commission's resolution of LWWC's ADIT and calculation of the state income tax. *See Petition of Little Washington Wastewater Company for Approval of a Distribution System Improvement Charge*, Docket No. P-2013-2366873 (Order entered July 24, 2014). The Commission approved LWWC's ADIT and state income tax calculation based upon its prior determination in the Columbia Gas DSIC proceeding. *See* McCloskey v. Pa. PUC, 358 C.D. 2014.

Comments

No comments were received regarding quarterly updates for PAWC's DSIC petition.

Resolution

In accordance with 66 Pa. C.S. § 1358(e)(2), the revenue received under the DSIC for the reconciliation period shall be compared to the utility's eligible costs for that period. The difference between revenue and costs shall be recouped or refunded, as appropriate, in accordance with section 1307(e), over a one-year period or quarterly period commencing April 1 of each year. Based on the statute mandating over/under collections be refunded commencing April 1 of each year, the Commission directs any utility filing for a DSIC to schedule the effective dates of their proposed DSIC updates, and the corresponding period for eligible plant additions that will be reflected in each update, to align quarterly with the months of April, July, October, and January. PAWC has suggested such a schedule in the filing of their Supplement No. 4, and hence, the Commission deems PAWC's tariff to be compliant with Section 1353 as it pertains to the issue of quarterly updates.

(e) Consumer Protections

PAWC's Petition

In accordance with the Model Tariff and consistent with Section 1358, PAWC's Supplement No. 4 also includes the following customer safeguards:

- 1. A 5.0% cap on the total amount of distribution revenue that can be collected through the DSIC by PAWC as determined on an annualized basis;
- 2. Annual reconciliations performed by PAWC;
- 3. Audits conducted by the Commission;
- 4. Customer notice of any changes in the DSIC;
- 5. A reset of the DSIC to zero as of the effective date of new base rates that include the DSIC-eligible plant; and
- 6. Provisions for the charge to be set at zero if, in any quarter, PAWC's most recent earnings report shows that PAWC is earning a rate of return that exceeds the allowable rate of return used to calculate its fixed costs under the DSIC.

As a customer safeguard, the Model Tariff states that the DSIC shall be applied equally to all customer classes.

Comments

No comments were received regarding consumer protections for PAWC's DSIC petition.

Resolution

PAWC's proposed Supplement No. 4 is consistent with the Model Tariff and complies with the customer safeguards required by 66 Pa. C.S. § 1358.

(2) Public Interest Considerations

PAWC's Petition

According to the Company, implementing the proposed DSIC and allowing the Supplement No. 4 to go into effect is in the public interest because the DSIC will ensure that customers continue to receive safe and reliable service in the future as required by Section 1501, 66 Pa. C.S. § 1501.

PAWC admits that many of its systems are comprised of aging infrastructures that have led to significant I & I problems. Deteriorating infrastructure in the form of cracks in sewer pipes, faulty lateral connections, deteriorated pipe joints, and cracks in manhole walls can lead to increased levels of I & I, which in turn can pose public health risks in the form of sanitary sewer overflows and sewer backups.

Therefore, the focus of PAWC's LTIIP is on the replacement of aging infrastructure and the reduction of I & I. To accomplish this, over the five year duration of the LTIIP from 2015-2019, PAWC plans to accelerate its replacement of property by replacing approximately 94,000 LF of pipeline, 1,200 laterals, 400 manholes, and one lift station.

From 2009 to 2013, PAWC claims it spent an average of \$3.79 million annually (about \$239 annually per wastewater customer) on wastewater DSIC-eligible infrastructure improvements. During the duration of the LTIIP, from 2015 to 2019, the Company claims it will increase spending to roughly \$5.14 million annually (about \$305 annually per wastewater customer) on wastewater DSIC-eligible improvements, an increase of 35.6% in total spending and 27.6% in per customer spending when compared to 2009-2013 levels. PAWC asserts that the DSIC is a crucial mechanism in allowing for this continued acceleration of infrastructure improvement, rehabilitation, and replacements.

PAWC declares that the implementation of a DSIC rate is vital in supporting its efforts to improve its aging wastewater infrastructure and enhancing the safety of its system by ensuring replacement of deteriorating facilities. PAWC says the DSIC will ensure the resources the Company needs to carry out its LTIIP strategies, and that because of its application, its customers, the public, and the environment will be better served.

Comments

No comments were received regarding the supporting evidence that PAWC's DSIC is in the public interest.

Resolution

Section 1353 requires testimony, affidavits, exhibits, and other supporting evidence to be submitted demonstrating that the DSIC is in the public interest. Based on PAWC's submitted direct testimonies by the Company's Manager of Rates & Regulation and Vice President of Engineering, as well as exhibits demonstrating how the proposed DSIC supports accelerated infrastructure improvement, the Commission concludes that the DSIC filing is in the public interest and that the Company has met its obligation under Section 1353.

(3) Long Term Infrastructure Improvement Plan

Section 1353 requires that the utility have an approved Long Term Infrastructure Improvement Plan (LTIIP). PAWC filed a LTIIP with the Commission on July 3, 2014, which is recommended for approval concurrently with the DSIC.

(4) Base Rate Case

Section 1353(b)(4) requires a utility to certify that it has filed a base rate case within the five years prior to the date of its DSIC petition. PAWC has provided the required certification that its last base rate case, under which PAWC's current base rates were established, was filed on April 30, 2013.⁵

(5) Other Information Required by the Commission

Section 1354 - Customer Notice

Pursuant to Section 1354, a utility is required to provide customer notice of:

1) Submission of the DSIC petition; 2) Commission's disposition of the DSIC petition; 3)

Any quarterly changes to the DSIC rate; and 4) Any other information required by the Commission. PAWC has verified that it will provide customer notice of the proposed DSIC, Commission action thereon, and quarterly updates through bill inserts, consistent with Act 11 and the Final Implementation Order. These bill inserts will conform to the bill messages that PAWC provides to its water customers for quarterly changes in its water DSIC. The Commission agrees that this is consistent with the notice requirements set forth in the Model Tariff, Act 11, and the Final Implementation Order.

Bills Rendered or Service Rendered

The Final Implementation Order directed utilities to bill customers for the DSIC on a bills rendered basis versus a service rendered basis⁶, based on current practice and procedure for water companies. (*See* 66 Pa. C. S. § 1358). PAWC's Supplement No.

⁵Docket No. R-2013-2355276, Final Order entered on December 19, 2013.

⁶ "Bills rendered" bills are computed based on the effective tariff rate at the time of the bill. "Service-rendered" bills are prorated based on service rendered before and after a tariff rate change.

4 did not specify whether billing for the DSIC would be on a bills rendered or a service rendered basis. Therefore, in accordance with the Final Implementation Order, we direct PAWC to modify the language in the Supplement No. 4 to specify that customers would be billed for the DSIC on a bills rendered basis.

Section 1355 – Commission Review

Section 1355 provides that the Commission shall, after notice and opportunity to be heard, approve, modify or reject a utility's proposed DSIC and initial tariff. The Bureau of Technical Utility Services has reviewed PAWC's proposed DSIC and Supplement No. 4 and has determined that the filing contains all necessary items identified in Section 1353.

DSIC SUMMARY

We will approve the proposed DSIC calculation and Supplement No. 4 subject to the modifications consistent with this Order, including the following:

- 1. A tariff filed on ten days' notice with an effective date no earlier than January 1, 2015;
- 2. A three-month period of September through November for eligible plant additions;
- 3. An initial quarterly depreciation expense being equal to the initial accumulated depreciation; and,
- 4. An appropriate return on equity as outlined in the Commission's Quarterly Report for the period ending June 30, 2014 (2nd Quarter Report).

Section 1355 also states that the Commission shall hold evidentiary and public input hearings as necessary to review the petition. As noted above, the OCA and the OSBA have petitioned to intervene in PAWC's DSIC proceeding, and there were requests to hold evidentiary hearings on several aspects of the DSIC.

Accordingly, we will refer the matter regarding the applicability of the DSIC to the Franklin and Koppel systems to the OALJ for evidentiary hearings and preparation of a recommended decision. To the extent that PAWC elects to implement a DSIC mechanism prior to resolution of these matters, any recovery will be subject to refund or recoupment consistent with final determinations on these matters referred to the OALJ.

We note the filing of the OSBA, and conclude that they have not articulated a basis for denying PAWC the opportunity to implement a DSIC mechanism, consistent with our discussion above.

CONCLUSION

Upon review, the Commission finds that the PAWC Long-Term Infrastructure Improvement Plan and manner in which it was filed conforms to the requirements of Act 11 and our Final Implementation Order.

Additionally, the Commission finds that the Petition of PAWC for a Distribution System Improvement Charge complies with the requirements of Act 11 and our Final Implementation Order. Moreover, the Commission has reviewed the filing and does not find it to be inconsistent with the applicable law or Commission policy. Subject to recoupment and/or refund pending final resolution of the matters referred herein to the OALJ, PAWC may elect to implement a DSIC mechanism consistent with this order on ten days' notice; **THEREFORE**,

IT IS ORDERED:

- 1. That the Petition for approval of a Long-Term Infrastructure Improvement Plan (LTIIP) filed by Pennsylvania-American Water Company Wastewater Operations is approved, consistent with this Order.
- 2. That the Petition for approval of a Distribution System Improvement Charge (DSIC) filed by Pennsylvania-American Water Company Wastewater Operations is approved, consistent with this Order.
- 3. That Pennsylvania-American Water Company Wastewater Operations shall file a tariff, consistent with this Order, on ten days' notice to be effective January 1, 2015, with a DSIC rate of 0%.
- 4. That Pennsylvania-American Water Company Wastewater Operations shall file a tariff, consistent with this Order, on ten days' notice for its first non-zero DSIC rate to be effective April 1, 2015, to recover the fixed costs of eligible plant additions that have not been previously reflected in the Company's rates or rate base and will have been placed in service during the two month period of January 1, 2015 through February 28, 2015. Revenues collected pursuant to said tariff will be subject to refund and recoupment based on the Commission's final resolution of the matters referred herein to the Office of Administrative Law Judge for hearing and recommended decision.
- 5. That the following issue be assigned to the Office of Administrative Law Judge for hearing and preparation of a recommended decision:
 - a. The applicability of the DSIC to the PAWC wastewater systems of Franklin and Koppel.

6. That Pennsylvania-American Water Company Wastewater Operations provides the estimated number of anticipated new jobs to be created for specific replacement projects with its revised DSIC tariff and to track such employment in order to have actual numbers of jobs created when the DSIC fund information is submitted for annual audit and reconciliation.

Rosemary Chiavetta Secretary

(SEAL)

ORDER ADOPTED: December 4, 2014

ORDER ENTERED: December 4, 2014

Appendix A

Tariff Sufficiency Modifications

- On page 5H, under "2. Computation of the DSIC", within the Calculation section, please restate the first sentence to read, "The initial *non-zero* DSIC, effective April 1, 2015".
- On page 5I, under "Pre-tax return", in the first sentence, change "will be calculated" to "shall be calculated".
- On page 5I, under "Pre-tax return", within the last sentence, the phrase "calculated by the Commission in the latest Quarterly Report" should be changed to "calculated by the Commission in the *most recent* Quarterly Report".
- On page 5I, under "Application of DSIC", within the last sentence, the phrase "projected wastewater revenue for the quarterly period" should be changed to "projected wastewater revenue (*including all applicable clauses and riders*) for the quarterly period".
- On page 5J, under "Formula", within the PQR section, the phrase "projected quarterly revenues for wastewater service from existing customers" should be changed to "projected quarterly revenues for wastewater service (*including all applicable clauses and riders*) from existing customers".
- On page 5J, under "Quarterly Updates", add the Commission's Bureau of Audits as a party to receive supporting data for each quarterly update.
- On page 5J, under "3. Customer Safeguards", within the Cap section, the sentence should be changed to read "The DSIC is capped at 5% of the amount billed to customers for distribution service (including all applicable clauses and riders) as determined on an annualized basis."
- At the bottom of page 5J, "Supplement No. 4 to Tariff Wastewater Pa. P.U.C. No. 15" should be moved to the top of page 5K.

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

February 1, 2016

IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN WATER)	
COMPANY REGARDING THE 2015 INVESTMENT)	
AND RELATED EXPENSES UNDER THE QUALIFIED)	DOCKET NO.
INFRASTRUCTURE INVESTMENT PROGRAM)	14-00121
RIDER, THE ECONOMIC DEVELOPMENT)	
INVESTMENT RIDER, AND THE SAFETY AND)	
ENVIRONMENTAL COMPLIANCE RIDER)	

ORDER GRANTING, IN PART, AND DENYING, IN PART, PETITION

This matter came before Vice Chairman David Jones, Director Kenneth C. Hill, and Director Robin Bennett of the Tennessee Regulatory Authority ("Authority" or "TRA"), the voting panel assigned to this docket, at a regularly scheduled Authority Conference held on June 29, 2015 for consideration of the *Petition* filed by Tennessee-American Water Company ("Company" or "TAWC") on October 29, 2014.

BACKGROUND

On October 29, 2014, pursuant to the TRA's decision in Docket No. 13-00130, TAWC filed its initial request and supporting documentation for Authority approval to increase during the 2015 calendar year the tariff percentage rates for its Qualified Infrastructure Investment Program Rider ("QIIP" or "QIIP Rider"), Economic Development Investment Program Rider ("EDI" or "EDI Rider"), and Safety and Environmental Compliance Program Rider ("Safety Rider" or "SEC") (collectively "Capital Riders"). Since filing its *Petition*, TAWC has filed

¹ Petition (October 29, 2015).

revised proposed tariff pages,² supplemental pre-filed testimony and exhibits, responses to the informal data requests of the Consumer Advocate and Protection Division of the Office of the Attorney General ("CAPD" or "Consumer Advocate"), and responses to the Authority's request for certain information it determined necessary to review and consider TAWC's revised proposed tariffs in this docket.

On November 26, 2014, the Consumer Advocate filed its *Petition to Intervene*. On January 12, 2015, the panel of Directors assigned to this docket suspended the proposed tariffs for thirty (30) days,³ convened a contested case proceeding, granted the Consumer Advocate's *Petition to Intervene*, and appointed the Authority's General Counsel or her designee to act as Hearing Officer in this matter. On February 11, 2015, the Hearing Officer suspended the revised proposed tariffs an additional sixty (60) days through and including April 14, 2015.⁴ On February 19, 2015, the Hearing Officer granted the *Petition to Intervene* filed by the City of Chattanooga on February 11, 2015.

PETITION

In accordance with the tariffs approved in TRA Docket No. 13-00130, on or before December 1 of each year, the Company shall submit to the Authority an annual filing that calculates the tariff Rider percentage rates for the upcoming calendar year.⁵ As part of the annual rate filing, the Company is required to submit certain supporting information and documentation, including a budget of each Rider's forecasted investments and operating expenses adopted by the Company's board of directors.⁶

² See Revised Proposed Summary of Riders tariff pages filed on November 25, 2014 and December 4, 2015.

³ The proposed tariffs had an initial effective date of January 13, 2015.

⁴ Order Re-Suspending Tariffs through April 14, 2015 (February 11, 2015).

⁵ See Petition, pp. 5-6 (October 29, 2015).

⁶ *Id*.

The QIIP Rider allows TAWC to recover costs associated with replacing aging, non-revenue producing infrastructure between rate cases.⁷ In this docket, the Company seeks authorization to collect \$1,001,897 in QIIP revenue for 2015.⁸ The authorized QIIP revenue for 2014 was \$373,273.⁹ The Company therefore proposes to increase the QIIP revenue requirement by \$628,624, which would result in increasing the QIIP surcharge applied to customers' bills from 0.79% in 2014 to 2.13% in 2015.¹⁰

The EDI Rider authorizes TAWC to recover investments made in infrastructure to assist in the economic development of the communities served by the Company. In this docket, the Company seeks authorization to collect \$288,955 in EDI revenue for 2015.¹¹ The authorized EDI revenue for 2014 was \$84,623.¹² The Company therefore proposes to increase the EDI revenue requirement by \$204,332, which would result in increasing the EDI surcharge applied to customers' bills from 0.18% in 2014 to 0.61% in 2015.¹³

The SEC Rider allows recovery of investments made by the Company to comply with safety and environmental regulations since the previous rate case.¹⁴ In this docket, the Company seeks authorization to collect \$1,664,812 in SEC revenue for 2015.¹⁵ The authorized SEC revenue for 2014 was \$53,015.¹⁶ The Company therefore proposes to increase the SEC revenue requirement by \$1,611,797, which would result in increasing the SEC surcharge applied to customers' bills from 0.11% in 2014 to 3.54% in 2015.¹⁷

⁷ Linda C. Bridwell, Pre-filed Direct Testimony, p. 5 (October 29, 2014).

⁸ Petitioner's Exhibit - Summary – LCB, Page 1 of 1 (October 29, 2014).

⁹ Id.

 $^{^{10}}$ Id.

¹¹ Linda C. Bridwell, Pre-filed Direct Testimony, p. 6 (October 29, 2014).

¹² Petitioner's Exhibit - Summary – LCB, Page 1 of 1 (October 29, 2014).

 $^{^{13}}$ Id.

¹⁴ Linda C. Bridwell, Pre-filed Direct Testimony, pp. 5-6 (October 29, 2014).

¹⁵ Supplemental Petitioner's Exhibit Summary – LCB, Page 1 of 1 (December 29, 2014).

¹⁶ *Id*.

¹⁷ *Id*.

When aggregated together, TAWC requests to increase annual revenues by \$2,444,753 for all three investment Riders. If the Authority approves the requested Rider rates in this docket, the average customer bill would increase by about 5.2% for calendar year 2015.

Under the approved tariffs, an "annual reconciliation factor percentage rate" will be filed by March 1 of each year for each of the three investment Riders to adjust customers' bills over the remainder of the year for differences between the prior year's budgeted investments and actual investments and between the prior year's revenue requirement and actual collections. In addition to the proposed percentage rate increases, the Company's *Petition* also requests approval to incorporate all of the investment activity related to the 2014 calendar year into the initial annual reconciliation filing due on or before March 1, 2015 for each of the three investment Riders. The Company states that since the proposed Riders approved in April 2014 in TRA Docket No. 13-00130 were anticipated to be in effect in January 2014 rather than April 2014, there is an unintended mismatch of the reconciliation periods for the initial year's investment activity under the Riders. In the conciliation periods for the initial year's investment activity under the Riders.

APRIL 20, 2015 HEARING AND APPEARANCES

A Hearing in this matter was held before the voting panel on April 20, 2015, as noticed by the Authority on April 10, 2015. Pursuant to the Procedural Schedule issued by the Hearing Officer on March 23, 2015, TAWC filed Supplemental Testimony on December 29, 2014, the intervening parties filed Direct Testimony on January 2, 2015 and April 6, 2015, and TAWC filed Rebuttal Testimony on April 10, 2015. The parties also filed pre-hearing briefs on April 15, 2015. Participating in the hearing were the following parties and their respective counsel:

¹⁸ See Petition, pp. 5-6 (October 29, 2015).

¹⁹ *Id.* at 6-7.

²⁰ Id.

<u>TAWC</u> - Melvin J. Malone, Esq., Butler, Snow, O'Mara, Stevens & Cannada, PLLC, 1200 One Nashville Place, 150 Fourth Avenue North, Nashville, Tennessee 37219.

<u>Consumer Advocate</u> – Wayne Irvin, Esq., Office of the Attorney General, 425 Fifth Avenue North, Fourth Floor, John Sevier Building, P.O. Box 20207, Nashville, TN 37202.

<u>City of Chattanooga</u> – Frederick L. Hitchcock, Esq., Chambliss, Bahner & Stophel, P.C., Suite 1700, Liberty Tower, 605 Chestnut Street, Chattanooga, TN 37450.

POSITIONS OF THE PARTIES

QIIP

TAWC

TAWC witness Brent E. O'Neill testified regarding seven investment budget items included in the QIIP: (1) Main replacement necessary to address the aging infrastructure needs; (2) Unscheduled Main replacement that will stabilize and extend the life of the main; (3) Relocation of Mains due to ongoing municipal or state agency projects; (4) Hydrants and Valve Replacement with the majority of this amount being spent on 14 broken valves identified over the past several years; (5) Service Replacement involving the replacement of water services or improvements, including replacement of corporation stops, or shut-off valves; (6) Meter Replacement relating to meter replacement or improvement of existing customer meters. Meter settings are necessary to comply with regulatory replacement and due meter malfunctions; and (7) Capitalized Tank Rehabilitation and Painting to rehabilitate and paint one of the tanks at the St. Elmo location.²¹

TAWC witness Linda Bridwell rebuts the assertions of the City's witness, Nick Wilkinson, that TAWC failed to file the annual and quarterly reports as stated in an Agreement between TAWC and the City.²² Ms. Bridwell notes the annual 2014 Investment Plan was part of

²² Linda C. Bridwell, Pre-filed Rebuttal Testimony, p. 1 (April 10, 2015).

²¹ Brent E. O'Neill, P.E., Pre-filed Direct Testimony, pp. 5-10 (October 29, 2015).

the original filing in Docket No. 13-00130 and the City had access to that file.²³ In addition, Ms. Bridwell testifies that TAWC discussed the 2015 Investment Plan with the City and the first quarterly meeting has taken place.²⁴ Ms. Bridwell concludes that this has been the first year with implementation of the Riders and, as such, communication may not have been as effective as either party would have liked, but Ms. Bridwell testifies that TAWC will continue to strive to improve communication.²⁵ According to Ms. Bridwell, while this process should improve in the future, any problems encountered "... in no way diminishes the public interest of the capital riders as alternative rate mechanism [sic] that provide customers with better water quality, better water service, enhancements for economic development, improvements for safety and environmental compliance and replacement of critical infrastructure with gradual rate increases and reduced costs for rate proceedings for all stakeholders."²⁶

CAPD

The Consumer Advocate did not oppose the QIIP Rider.²⁷

THE CITY

The City's witness, Nick Wilkinson, testifies that in return for not seeking intervention in TRA Docket No. 13-00130, TAWC and the City came to an agreement on how TAWC would ensure that any rate increase resulting from the Riders would be in the public interest.²⁸ Mr. Wilkinson testifies that the Agreement provided that TAWC would provide the City with an annual report outlining its infrastructure plan and quarterly reports detailing the implementation of this plan under the QIIP Rider.²⁹ According to Mr. Wilkinson, these reports would allow the

²³ Id.

²⁴ Id at 1-2

²⁵ Linda C. Bridwell, Pre-filed Rebuttal Testimony, p. 18 (April 13, 2015).

²⁶ *Id*, at 17.

²⁷ Transcript of Proceedings, p. 7 (April 20, 2015).

²⁸ Nick Wikinson, Pre-filed Direct Testimony, p. 4 (April 6, 2015).

²⁹ *Id.* at 6.

City to 1) determine if TAWC was spending the rate dollars it was allowed or was seeking a double recovery; 2) determine if the expenditures were for the benefit of existing customers; and 3) respond to TAWC regarding its investment priorities.³⁰ Mr. Wilkinson testifies that these reports and required information are necessary in order for the City to determine if TAWC's infrastructure investments would benefit citizens of Chattanooga. 31 Mr. Wilkinson testifies that TAWC did not provide the annual or quarterly reports as required by the Agreement.³²

EDI

TAWC

TAWC witness Brent E. O'Neill discusses the five investment budget items included in EDI: (1) New Mains which includes new water mains, valves and other appurtenances necessary to perform work funded by TAWC, including upsizing of developer initiated extensions;³³ (2) New Hydrants and Valves that will improve the economic health of the communities it serves and the investment will serve the growing economic development;³⁴ (3) New Services which includes the installation of new water services or improvements, including corporation stops and shut-off valves;³⁵ (4) New Meters;³⁶ and (5) Vehicles Converted to or Purchased with Alternative Fuel Capabilities as part of the overall plan to invest \$400,000 in replacement vehicles for the TAWC fleet.³⁷ Mr. O'Neill testifies this investment is properly associated with the EDI because it will assist TAWC in reducing its carbon footprint.³⁸

³⁰ *Id.* at 6-7. ³¹ *Id.* at 8.

³³ Brent E. O'Neill, P.E., Pre-Filed Direct Testimony, p. 11 (October 29, 2014).

³⁴ Id. at 12.

³⁵ Id. at 12-13.

³⁶ Id. at 13.

³⁷ *Id.* at 13-14.

Ms. Bridwell testifies that the installation of new meters, valves and hydrant benefit economic development.³⁹ This type of investment is necessary because of requests of new or expanding companies, new residential developments and/ or relocation of the customer.⁴⁰ It also fosters economic development by providing reliable drinking water and new or more reliable fire protection.⁴¹ Ms. Bridwell also testifies that TAWC should not be required to certify to the quantity or specific economic benefit because to do so is a speculative process that would result in significant additional expense for all parties.⁴² Ms. Bridwell explains that additional expenses were included in the 2015 proposed EDI Rider that were not included in the 2014 EDI Rider.⁴³ These expenses include \$40,000 to support the Greater Chattanooga Chamber of Commerce to promote economic development and a \$5,000 expense for money given to the Southeast Tennessee STEM Innovation Hub, which works to expand science, technology, engineering and math resources.⁴⁴

CAPD

CAPD witness, William H. "Hal" Novak, recommends disallowance of the Chamber of Commerce fees and the contribution to Southeast Tennessee Innovation Hub because these items appear to be charitable contributions rather than expenses related to capital deployment. Furthermore, Mr. Novak points out that it would have been unlikely that these expenses would have been approved for recovery in TAWC's last rate case if they had been presented. 46

³⁹ Linda C. Bridwell, Pre-filed Rebuttal Testimony, p. 6 (April 10, 2015).

⁴⁰ *Id*.

⁴¹ *Id*.

⁴² *Id.* at 6-7.

⁴³ Linda C. Bridwell, Pre-filed Direct Testimony, pp. 14-15 (October 29, 2015).

⁴⁴ Id.

⁴⁵ William H. Novak, Pre-filed Direct Testimony, p. 6 (January 2, 2015).

⁴⁶ Id.

THE CITY

Nick Wilkinson, the City's witness, testifies that the Agreement between the City and TAWC required TAWC to provide advance notice to the City of all proposed expenditures related to economic development pursuant to the EDI.⁴⁷ According to Mr. Wilkinson, TAWC only provided one report which was related to the Coca-Cola bottling distribution facility, and he agrees that TAWC's investment assisted in having the facility locate in Chattanooga.⁴⁸ Mr. Wilkinson testifies that he does, however, oppose recovery of expenditures for meters, services, valves, or hydrants through the EDI.⁴⁹

SEC

TAWC

TAWC witness Brent O'Neill testifies the SEC Rider includes: 1) Improvements to the System Control and Data Acquisition ("SCADA") Equipment and Systems totaling \$185,000;⁵⁰ 2) Security upgrades to existing security systems amounting to \$190,000;⁵¹ 3) Improvements in Process Plant and Equipment totaling \$2,631,203;⁵² and 4) The Citico Process Wastewater Improvement Project being completed and placed in service during 2015.⁵³

According to Mr. O'Neill, the majority of the SCADA improvements will take place in the upgrade of the Programmable Logic controller for the Citico chemical building.⁵⁴ Security upgrades are necessary in order to ensure TAWC's security systems are in compliance with Homeland Security directives.⁵⁵ The majority of Process Plant Facilities and Equipment

⁴⁷ Nick Wilkinson, Pre-filed Direct Testimony, p. 9 (April 6, 2015).

⁴⁸ *Id*. at 9-10.

⁴⁹ Id at 10

⁵⁰ Brent E. O'Neill, P.E., Pre-Filed Direct Testimony, p. 15 (October 29, 2014).

⁵¹ *Id*. at 16.

⁵² *Id.* at 16-17.

⁵³ Id. at 17-21.

⁵⁴ *Id.* at 15.

⁵⁵ Id. at 16.

Improvement is for the replacement of six conventional filter under-drain systems to ensure environmental compliance is maintained. Mr. O'Neill testifies that the Citico Project will allow TAWC to discontinue sending sludge to the City and allow it to treat and prepare the sludge for disposal within the Citico property.⁵⁶ TAWC maintains the new plant is necessary to address the change in permit requirements from the City of Chattanooga regarding the allowable level of zinc to be discharged to Chattanooga's wastewater collection system.⁵⁷ Mr. O'Neill explains that the capital investment project is necessary pursuant to the City of Chattanooga's new permit. TAWC has historically discharged its sludge to the City of Chattanooga under an "Exception to Wastewater Strength Standard" for arsenic, copper, lead and zinc; the City of Chattanooga, however, issued a new permit on May 15, 2013 which discontinues the exception.⁵⁸ Mr. O'Neill testifies that the exception is being discontinued in order to allow the City of Chattanooga to comply with the EPA Consent Decree and to ensure protection of the Publicly Owned Treatment Works ("POTW"). 59 It also ensures the City's continued compliance with EPA 40 CFR Part 503 - Standards for the Use or Disposal of Sewage Sludge regarding biosolids currently being land applied and processed wastewater discharged from Tennessee American Water consistently meets pretreatment standards.⁶⁰ With this project, TAWC will discontinue sending its sludge to the city and instead prepare the sludge for disposal within the Citico facility.⁶¹

CAPD

The Consumer Advocate did not oppose the SEC as supplemented and amended by Ms. Bridwell's testimony.⁶²

⁵⁶ *Id*.

⁵⁷ *Id.* at 17-18.

⁵⁸ *Id.* at 18-19.

⁵⁹ *Id.* at 19-20.

⁶⁰ Id. at 19.

oi Id

⁶² Transcript of Proceedings, p. 7 (April 20, 2015).

THE CITY

Donald Lee Norris testified on behalf of the City regarding the SEC. Specifically, TAWC's Process Wastewater Improvement Project which he testifies is not mandated by state or federal law.⁶³ Mr. Norris explains that TAWC has chosen a new method for removing waste materials from its wastewater discharge which recovery from the SEC may allow.⁶⁴ According to Mr. Norris, the City is not opposed to this method if it is more cost effective; however, TAWC has not provided sufficient information for the City or the Authority to make such a determination.⁶⁵

FINDINGS & CONCLUSIONS

Tenn. Code Ann. § 65-5-103(d)(3)(A) provides:

A public utility may request and the authority may authorize a mechanism to recover the operational expenses, capital costs or both related to the expansion of infrastructure for the purpose of economic development, if such expenses or costs are found by the authority to be in the public interest. Expansion of economic development infrastructure may include, but is not limited to, the following:

- (i) Infrastructure and equipment associated with alternative motor vehicle transportation fuel;
- (ii) Infrastructure and equipment associated with combined heat and power installations in industrial or commercial sites; and
- (iii) Infrastructure that will provide opportunities for economic development benefits in the area to be directly served by the infrastructure.

In authorizing the Authority to implement alternative regulatory methods under Tenn. Code Ann. § 65-5-103(d), the General Assembly did not alter or limit the Authority's general supervisory, regulatory and rate-setting powers over public utilities within its jurisdiction. Pursuant to its authority to implement alternative regulatory methods, as well as its general utility rate-setting powers, the Authority has the authority and discretion to determine whether

⁶³ Donald Lee Norris, Pre-Filed Direct Testimony, p. 6 (April 7, 2015).

⁶⁴ "....TAWC will dewater all or a significant portion of waste sludge materials to produce a solid waste that will be disposed in a landfill." Donald Lee Norris, Pre-filed Direct Testimony, p. 4 (April 7, 2015).

⁶⁵ Donald Lee Norris, Pre-Filed Direct Testimony, pp. 4-5 (April 7, 2015).

⁶⁶ See Tenn. Code Ann. §§ 65-4-104, 65-4-117(a)(3) and 65-5-101(a).

alternative rate mechanisms produce rates and charges for public utilities services that are just and reasonable and in the public interest. The Authority's power and discretion in this regard applies not only to the initial rate adjustment, but also to all subsequent rate adjustments made under an approved alternative rate mechanism. In carrying out its responsibilities, the Authority may consider whether an alternative regulatory method: (1) is consistent with applicable TRA orders, rules, and established ratemaking policies and principles; (2) ensures that costs and expenses recoverable under the alternative rate mechanism are reasonably and prudently incurred by the utility for the provision of authorized public utilities services; (3) provides for timely, meaningful and transparent review and approval of all rate adjustments made pursuant to the alternative rate mechanism; (4) continues to be in compliance with TRA orders and tariffs establishing the alternative rate mechanism; and (5) remains in the public interest in light of changed circumstances or conditions.

Upon review of the entire evidentiary record in this matter, the following findings and conclusions address the three investment riders separately, the reconciliation issue presented by TAWC, and the City's request for minimum filing requirements and certifications:

For the QIIP, the panel voted unanimously to approve the proposed capital expenditures as filed by the Company, without adjustment for any purported double-recovery of costs related to capital projects identified in a prior docket. This results in a total charge under this program of 2.13% of customers' bills, which is an increase from last year's rider amount of 0.79%.

For the SEC, the panel agreed with the Consumer Advocate and the Company and found that reasonable incremental expenses attributable to increases in chemicals, electricity and hauling are appropriately recoverable through the Production Cost and Other Pass-Throughs ("PCOP") mechanism. Based on this finding, the panel voted unanimously to approve the

Company's proposed revision to remove these expenses from the SEC rider and place them in the PCOP Rider.

Next, the panel found that TAWC is reducing zinc levels to comply with the Company's discharge permit issued by the City, and this discharge permit is necessary for the City to comply with state and federal requirements. Therefore, the investment and related expenses are properly recoverable pursuant to the SEC. Based on the testimony of TAWC's engineer regarding the SCADA improvements, security upgrades and Process Plant and Equipment improvements, the panel found that the investment and related charges are properly recoverable under the SEC Program. Furthermore, based on the Company's expertise in the provision of water and the evidence presented, the panel agreed with the Company's assertion that the Citico Improvement Project is the most economical method for extraction of the zinc. For these reasons, the panel voted unanimously to approve the SEC, as filed by the Company. This results in a total charge under this program of 3.54% of customers' bills, an increase from last year's rider amount of 0.11%.

For the EDI Rider, the panel voted unanimously that TAWC be allowed to recover the proposed EDI infrastructure investment related to replacement of mains and associated lines, valves and hydrants.

Regarding TAWC's proposed EDI investment in infrastructure related to provisioning service to new customers, the panel voted unanimously that these expenses be disallowed for three reasons. First, the panel found that TAWC's proposed recovery of its EDI investment for new services is inconsistent with the plain language of its own EDI tariff, wherein it states "EDI allows the Company to recover outside of a rate case its qualifying incremental non-revenue

producing plant infrastructure investment and expenses." Second, the panel found that TAWC's proposed EDI investment for new services is not related to expansion of economic development as required by statute and, therefore, does not meet the statutory requirements for recovery. Third, the panel found that allowing recovery of infrastructure for provisioning service to new customers under the EDI Rider could result in double recovery of investment and related expenses – expenses which are also recovered by TAWC's revenues generated under its tariff rates established in the Company's most recent rate case.

Next, due to the lack of evidence that ratepayers and/or the general public will benefit from using alternative fuel vehicles, the panel found that TAWC has not demonstrated that a decision to move its vehicle fleet to alternative fuels is in the public interest. Absent such evidence, the panel voted unanimously that the 2015 amount of \$100,000 proposed by TAWC for alternative fuel vehicles be denied. The panel noted that its decision regarding the alternative fuels does not preclude the Company from transitioning its fleet to alternative fuel vehicles and receiving recovery under alternative ratemaking mechanisms. Recovery, however, would be predicated upon TAWC providing sufficient evidence that such transition benefits ratepayers via a cost/benefit analysis and/or provides other public benefits to warrant a finding that the public interest is served by allowing such recovery. The panel found that such future recovery, if the TRA determines it is prudent, is more appropriate under the QIIP rather than the EDI Rider; therefore the panel directed TAWC to remove the tariff provision relating to recovery of infrastructure designed to use alternative fuels from the EDI Tariff and place it in the tariff for the QIIP.

In addition, the panel voted unanimously to disallow the Chamber of Commerce and STEM donations totaling \$45,000. The panel found that while these donations may have

⁶⁷ Revised Tariff Page, TRA No. 19, First Revised Sheet No. 12-EDI-1(August 28, 2015).

indirectly contributed to economic growth in the Company's service territory, these donations are not the type of "expansion of infrastructure" that is contemplated by the statute. Further, disallowance of these donations is consistent with the Authority's long-standing policy of disallowing charitable contributions and donations for ratemaking purposes as they do not satisfy the guiding principle of necessity and reasonableness, nor is it apparent that they provide a clear benefit to ratepayers. As a result of its decision regarding these donations, the panel voted unanimously that TAWC be required to file amended calculations and tariffs consistent with the panel's decision for the EDI Rider.

The panel found that adopting a 2014 calendar year investment period would lessen any gap between the end of the Company's most recently approved attrition period and the beginning of its alternative ratemaking mechanisms, which is consistent with the approved investment riders. Therefore, the panel voted unanimously to approve the Company's proposal to file a single reconciliation for calendar year 2014.

Finally, the panel agreed with TAWC that there are sufficient requirements and consumer safeguards in place in the existing tariffs to ensure that only reasonable, qualifying capital costs and operational expenses are recovered through the program mechanisms. Therefore, the panel voted unanimously to deny the City's request that the Authority adopt additional minimum filing requirements and certifications.

IT IS THEREFORE ORDERED THAT:

- 1. The *Petition* filed by Tennessee-American Water Company is granted, in part and denied, in part.
- The proposed capital expenditures contained in the Qualified Infrastructure Investment
 Program Rider filed by Tennessee-American Water Company is approved.

- 3. Tennessee-American Water Company move the reasonable incremental expenses attributable to increases in chemicals, electricity, and hauling from the Safety and Environmental Compliance Program Rider to the Production Cost and Other Pass-Throughs Rider.
- 4. The Safety and Environmental Compliance Program Rider as proposed by Tennessee-American Water Company is approved.
- 5. The portion of Tennessee-American Water Company's Economic Development Investment Rider related to replacement of mains and associated lines, valves, and hydrants is approved.
- 6. The portion of Tennessee-American Water Company's Economic Development Investment Rider related to investment in infrastructure for provisioning service to new customers is denied.
- 7. The \$100,000 proposed by Tennessee-American Water Company for alternative fuel vehicles is denied.
- 8. If Tennessee-American Water Company seeks recovery for alternative fuel vehicles in the future, the Company is directed to remove such expense from the Economic Development Investment Rider tariff and put it in the Qualified Infrastructure Investment Program Rider Tariff.
- Tennessee-American Water Company's request for recovery of donations to the Greater Chattanooga Chamber of Commerce and the Southeast Tennessee STEM Innovation Hub is denied.

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10. Tennessee-American Water Company shall file amended calculations and tariffs

consistent with the Authority's ruling regarding the Economic Development Investment

Rider.

11. Tennessee-American Water Company's proposal to file a single reconciliation for

calendar year 2014 is approved.

12. The City of Chattanooga's request that the Authority adopt additional minimum filing

requirements and certifications for Tennessee-American Water Company is denied.

Vice Chairman David F. Jones, Director Kenneth C. Hill, and Director Robin Bennett

concur.

Attest:

Earl Jay ha

Earl R. Taylor, Executive Director

Data Base -- Distribution System Infrastructure Charge ("DSIC") or its equivilent

Date 03/18/2016

					DSIC	Formula Rev.	Rea Compo	nents		Other Relevant Info. DSIC Actual or DSIC Earnings Reconcilation Rate Cust.cla									
		Plant	Eligible		DSIC	PreTax	Deprec.	Property	Revenue		Filing	Prospective	Revenue	Test	Filing (Y/N) &	Recovery	Excluded fr.		Mains
<u>State</u>	Name	Type	UPIS (*)	AD	ADIT	ROR	Exp.	Taxes	based taxes	Uncoll.	Frequency	UPIS	Cap	Applied	Filing Freq.	% / VC / FC	Rate Recov.	Other	Replaced
NJ	DSIC	W	Y (1)	Y (2)	Y (2)	Y (3)	Y (4)	N	Y (5)	Υ	Semi Ann.	Actual	5.0%	Υ	Y - Semi-Ann.	Fixed Chg	Priv.&Pub Fire	(5a)	Y
Ind	DSIC	w	Υ	(2b)	N	Y (3a)	Y (4)	N	n/a	N	Annual	Actual	5.0%	N	Y - Semi-Ann.	%	Priv.&Pub Fire	-	Y
III	QIP	w&ww	Υ	Y (2)	N	Y (3)	Y (4)	N	n/a	N	Annual	A or P (6)	5.0%	Υ	Y - Annual	%	Priv.&Pub Fire	-	Υ
Mo.	ISRS	w	Υ	Y (2a)	Y (2)	Y (3a)	Y (4)	Υ	n/a	N	Semi Ann. (7)	Actual	10.0%	N (7a)	Y - Annual	Volm. Chg	Priv.&Pub Fire	(7b)	Υ
PA	DSIC	w&ww	Υ	Y (2)	N	Y (3)	Y (4)	N	n/a	N	Quarterly	Actual	7.5%	Υ	Y - Annual	%	Pub. Fire	(8)	Υ
NY	SIC	w	Υ	Y (2)	Y (2)	Y (3a)	Y (4)	N	n/a	N	Periodic	Actual	capex\$ cap	Υ	Y - Annual	%	Priv.&Pub Fire	-	SIC
NY	DSIC (see note 9)	W	Y (1)	Y (2)	Y (2)	Y (3a)	Y (4)	N	n/a	N	Semi Ann.	Prospective	capex\$ cap	Υ	Y - Annual	%	Priv.&Pub Fire	(9)	Υ
TN	QIIP	w	Y	Υ	Y (2)	Y (3a)	Y (4)	Υ	Y (5b)	Υ	Annual	Prospective	none	Υ	Y - Annual	%	None	(22)	Υ
WV	IRP (14)				. ,	, ,	. ,		, ,									, ,	
ОН	SIC	w&ww	Υ	Y (2)	N	Y (3a)	Y (4)	N	n/a	N	Annual	Actual	12.75%	Υ	Don't see it addressed in Regs. ?	%	?	(10)	Υ
DE	DSIC	w	Υ	Y (2)	N	Y (3a)	Y (4)	N	n/a	N	Semi Ann.	Actual	7.5%	Υ	Y - Annual	%	?	-	Υ
СТ	WICA	w	Υ	N (12)	N (12)	Y (3a)	Y (4)	Υ	n/a	N	Semi Ann.	Actual	7.5%	Υ	Y - Annual	%	?	-	Υ
NH	WICA	w	Υ	N (13)	N (13)	Y (3a)	Y (4)	Υ	n/a	N	Annual	Actual	7.5%	(15)	Y - Annual	%	?	-	Υ
													10.0% (large						
ME	?	W	Υ	Υ	Υ	Y (3)	Υ	Υ	n/a	N	Semi Ann.	Actual	water util.)	?	Y - Annual	%	None	?	Υ
NC	?	w&ww	Υ	?	?	?	Υ	N	n/a	N	?	?	5.0%	?	?	?	?	?	Υ
AZ	SIB (17)	w	Υ	(18)	N	Y (3a)	Υ	N	?	?	Annual	Actual	5.0%	γ	Y - Annual	Fixed Chg	?	(19)	Υ

OTHER MECHANISMS

RI (20)

NV (21

Notes

- Eligible UPIS = DSIC Additions less retirements associated with the DSIC Additions. IF Retirements are not reflected in calculation as a reduction against Eligible UPIS additions please provide a note to that effect.
- ** Main extensions to eliminate dead ends which negatively impact water quality and reliability and not to serve new customers.
- 1 UPIS eligible for DSIC recovery begins on after the "Base Spending" level is exceeded during each 12 month period. Base Spending is equal to the amount of Annual Book Depreciation Expense on the 343, 345, & 348 accounts as reported in the Annual BPU Commission Report at t
- 2 Amounts are based on the applicable (on an accumulating basis) Eligible DSIC UPIS amount Only. The calc. does not include a roll forward of the AD or ADIT related to UPIS previously included in Rate Base and Base Rates.
- 2a Amounts based on the applicable (on an accumulating basis) Eligible DSIC UPIS amount Only. The calc. does not include a roll forward of the AD or ADIT related to UPIS previously included in Rate Base and Base Rates. Also, the AD calc. does not incld. cost of removal net of salvag

For AD Reserve: only the Cost of Removal (net of salvage) assoc. with DSIC retirements is reflected. DSIC Retirements are used as an off The actual DSIC Formula: DSIC Additions, less DSIC Retirements (*), plus Cost of Removal, less any assoc. CIAC, = Net Rate Base to which the PTROR is applied. (*) = Depr. Exp. calced on DSIC Adds less DSIC Retirements. Net impact of the approach would seem to produce a lower to as a reduction to AD Reserve, offset to some degree by the increase in the Net Rate Base value via not incld. the actual accumulated depr. expense on Net DSIC plant and the addition of Cost of Removal. However, the AD calc. is under Staff review in InAWC's 2013 DSIC filing.

- 3 Reflects "adjusted WACC". Adjusted WACC = ROE and Capital Structure as authorized per most recent Base Case Filing, but Debt cost rates updated to current (not to exceed cost rate in prior Base case) and grossed up for recovery of applicable Income Taxes
- 3a Reflects the WACC per most recent Base Case Filing and grossed up for recovery of applicable Income Taxes
- 3b Reflects "adjusted WACC". Adjusted WACC = ROE as authorized per most recent Base Case Filing, with Capital Structure, and Debt cost rates updated to current (not to exceed cost rate in prior Base case) and grossed up for recovery of applicable Income Taxes
- 4 Amount is based only on the applicable Eligible UPIS amount. Depreciation rates as authorized in most recent Base Rate Case filing.
- 5 Includes GRFT, and BPU / RPA Assessments each of which is included within regular Base Rates
- 5a DSIC program will be re-evaluated for renewal after initial 5 year program (approx. 2017-18). Also DSIC Program requires a 'Foundational Filing' made prior to implementation of the initial semi-annual DSIC filing.
- b Includes income taxes, GRFT
- 6 Annual Filing based on Prospective 13 Month Average Plant utilized if Company's prior Base Case used a Forecated Test Year, otherwise a Quarterly filing based on Historical Plant is utilized.
- 6a Illinois Amer. QIP Mains replacement has been almost entirely focused on small mains that also need upsizing so Cleaning and Lining is not an option. Only recently have they begun performing some C&L on larger main replacement projects. Regs. Don't explicitly address this category

Other Delevent Info

Data Base -- Distribution System Infrastructure Charge ("DSIC") or its equivilent

Date 03/18/2016

											Other Relevant into.								
DSIC Formula Rev. Req. Components											DSIC	Actual or	DSIC	Earnings	Reconcilation	Rate	Cust.classes		
		Plant	Eligible			PreTax	Deprec.	Property	Revenue		Filing	Prospective	Revenue	Test	Filing (Y/N) &	Recovery	Excluded fr.		Mains
State	Name	Type	<u>UPIS (*)</u>	AD	ADIT	ROR	Exp.	Taxes	based taxes	Uncoll.	Frequency	UPIS	Cap	Applied	Filing Freq.	% / VC / FC	Rate Recov.	Other	Replaced

- 7 In Missouri's case semi-annual means that there can be 2 filings in a year but do not necessarily have to be 6 mos. apart, e.g. can file the first in March and the second in July.
- 7a Not a traditional ongoing or routine Earnings Test BUT they must file a Base Rate Case within 3 years of the each initial DSIC implementation.
- 7b Currrently only available in St. Louis County portion of MAWC's service territory.
- 7c Valves and Hydrants included but only those associated with a Main Replacement, not if stand-alone. Missouri Amer. is currently trying (5/1/13) to change the legislation to have DSIC also allow stand-alone valves and hydrants, and addition of Meters, AMR & AMI, and Services. -
- 8 Wastewater Cap is 5% between Base Rate Cases.
- 9 LIWC's DSIC Tariff Rider surcharge was eliminated and replaced in 2012 with 3 annual Base Rate Step Increases with each including a the rev. req. to cover DSIC Capex spending above a minimum base level spend amount. Prior DSIC mechanism details noted above.
- 10 Wastewater Cap is 9% between Base Rate Cases and no more than a 3% increase in any one year.
- 10a Replacement of chemical feed systems, filters, pumps, motors, plant generators, minimum land or land rights associated with the replacement of other eligible DSIC plant.
- 11 New or additional water treatment facilities, plant or equip, required to meet changes in state or federal water quality standards, rules or regs. Certain water supply sources to resolve regional water supply concerns.
- 12 WICA Water Infrastructure and Conservation Adjust. -- The Statute speaks to the Pre Tax ROR being applied to the "new original cost of eligible projects" with no mention of either AD or ADIT. Should verify this.
- 12a Leak Detection Equipment, Pressure Reducing Valves, Production meters
- 13 The Aquarion Water Co. Tariff show to the PTROR being applied to the ISA with ISA defined as "the original cost to the Company of of eligible infrastructure system improvement projects", with no mention of either AD or ADIT. Should verify this.
- 13a Pressure Reducing Valves, Production meters
- 14 WV did not authorize a DSIC but in its most recent Order "...the Commission will direct WVAWC to seek authorization for an IRP (Infrastructure Replacement Program) Surcharge mechanism, if it chooses to do so, in a separate proceeding outside a general rate case filing." (Februar
- 15 Earnings Test not addressed in NH Commission's Aquarion Water Co. Rate Order authorizing the WICA, but the Order notes Aquarion modeled it N.H. proposed WICA after its Connecticut WICA which has an Earnings Test.
- 16 Incds. New Equip. & Infra. Installed to comply with primary & secondary drinking water standards; wastewater incld. Collection mains installed to implement solutions to problems, improve. To reduce I&I, unrembursed facilities relocation, replacement pumps, motors, blowers, & Incomplete the primary incomplete the prim
- 17 System Improvements Benefit mechanism.
- 18 Order says Eligible Plant is net of retirements but not other mention of AD or ADIT.
- 19 The Surcharge Revenue Requirement includes an "Efficiency Credit" of 5% of the SIB Rev. Req. before the credit. Also, there is a limit of 5% SIB cap between base rate cases.
- 20 Statute is not a DSIC type mechanism. Statute provides for the establishment of an Infrastructure Replacement Fund, funded by users (in base rates??) based on the annual funding requirements of facility improvements over each successive 20 year period. Will need a base case to
- 21 The Act requires the Commission to adopt Regulations which authorize recovery outside of a general rate case, certain costs relating to the planning, acquistion or construction of certain utility facilities which the Commission determines are prudent. Will need a base case to see a
- 22 Intal Compliance Rider. Both can include Operating Expenses related to the capital investment. The EDI can be for revenue-producing mains.

Initial Rate Case

Data B

		Eligible UPIS							Statute	Regulation	DSIC authorized		
<u>State</u>	Mains Cleaned & Lined	Main <u>Relocations</u>	Mains Elim. Dead -ends (**)	<u>Valves</u>	Services	<u>Hydrants</u>	Meters	<u>Other</u>					
NJ	Υ	Υ	N	Y	Υ	Υ	N	none	n/a	NJAC 14:9-10 (new Reg. created via agency Rulemaking)	NJBPU Dock.No. QO10090655 (the NJBPU's Generic Rulemaking Docket, not a NJA Rate Case docket)		
Ind	Υ	Υ	Υ	Υ	Υ	Υ	Υ	none	IC 8-1-31 (2000)	IAC 170, r. 61.1-1	Ind. Amer. Cause No. 42351 (filed 12/19/02)		
III	(6a)	Υ	Υ	Υ	Υ	Υ	Υ	(6a)	220 ILCS 5/9-220.2 & 10-101 (1999) Missouri Law 393.1000 to 393.1006; (House Bill	83 ILAC Chpt. I: subchpt E: Part 656	III. Amer. Dock.No. 04-0336 (filed 4/14/04)		
Mo.	Υ	Y	N	Y (7c)	N (7c)	Y (7c)	N (7c)	(7c)	208) (2003) 66 Pa. C.S.A. part I, subpart C, chpt. 13, subchpt. B	4 CSR 240-3.650	Missor. Amer. Dock.No. WO 2004-0116 (filed 9/23/03)		
PA	Υ	Υ	Υ	Υ	Υ	Υ	Υ	none	\$ 1350-1360 (1996)	?	PA-Amer. Dock. No. P-00961031 (filed 3/15/96)		
NY o	overs non-DS	SIC eligible plant	e.g. well rehabil	itations, pui	mping & trea	tement impro	ovements, et	c	n/a	n/a	LIWC - Case 07-W-0508 (filed 5/1/07) (SIC)		
NY	Υ	?	?	Υ	Υ	Υ	N	none	n/a	n/a	LIWC - Case 04-W-0577 (filed 4/30/04) (DSIC)		
TN	Υ	Υ	Υ	Υ	Υ	Υ	Υ	(22)	Tenn Ann. 65-5-103	TCA Section 65-5-103	TAW Case 13-00130		
WV									n/a	n/a	West Vir.Am. Case No. 15*0675-W-42T		
ОН	Υ	Υ	Y	Υ	Υ	Υ	Υ	(10a)	Ohio Revised Code Sec. 4909.172	O.A.C. 4901:1-15-35 (PUC Case No. 13-234-WS-ORD)			
DE	Υ	Υ	Υ	Υ	Υ	Υ	Υ	(11)	26 Del.C. \$ 314 C.G.S.A. \$ 16-262v&w (chapter 283); (House Bill	26 Del.Admin.Code 1009	CTDPUC Original Generic Decision to allow WICA's Docket No. 07-		
СТ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	(12a)	7178)		09-09 4/30/09 Aquarion Water Co. Pilot Program authorized Docket No. DW 08-		
NH	Υ	Υ	Υ	Υ	Υ	Υ	Υ	(13)	n/a	n/a	098, Order No. 25,019 (9/25/09)		
ME	Υ	Υ	Υ	Υ	Υ	Υ	Υ	?	35-A M.R.S. sec.6105, 6107-A & resolves 2013, ch.9	65-407 Chapter 675 eff. 6/21/13			
NC	Υ	Υ	Υ	Υ	Υ	Υ	Υ	(16)	NCGS 62-133.12 (HB 710) eff 6/12/13	???	5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
AZ FOR M <i>l</i>	?	Y	?	Y	Υ	Υ	Υ	none	n/a	n/a	Docket No. W-01445-11-0310 Decision 73938 (Arizona Water Co. Order Effective 6/27/2013)		
OTHER													
RI									Title 46, Chpt. 46-15.6 Section 46-15.6-6	???			
NV Notes									Assembly Bill 436 (3/25/13)	???			

¹ he time of the Foundational Filing.

set to DSIC Additions for purpose of the Net Plant amount and for the Deprec. Expense calculation. Net Rate Base value since Retirements are incld. only as a reduction against DSIC Additions but not

5b

2b

²a ge value on retirements assoc. with DSIC additions.

³ 3a 3b 4 5

⁶a ;ory and IAWC hasn't yet requested.

Initial Rate Case

Data B

											miliai Nate Case
			Eligib	le UPIS					Statute	Regulation	DSIC authorized
	Mains		Mains								
	Cleaned	Main	Elim. Dead								
State	& Lined	Relocations	-ends (**)	Valves	Services	Hydrants	Meters	Other			
7											
7a											
7b											
	per D. Willia	ms F/1/12									
	per D. Willia	1115 5/1/15.									
8											
9											
10											
10a											
11											
12											
12a											
13											
13a											
14	y 24, 2016, p	. 27).									
15											
16	other mecha	nical equip.									
17											
18											
19											
	a see details	of implementat	ion								
		oj implementati elementation.	1011.								
22	recuits of IIII	nementation.									
22											