COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Water Service Corporation	)	
of Kentucky for a General Adjustment	)	Case No. 2022-00147
in Existing Rates and a Certificate Of Public	)	
Convenience and Necessity to Deploy	)	
Advanced Metering Infrastructure and Approval	)	
Of Certain Regulatory Accounting Treatment	)	

REBUTTAL TESTIMONY OF DANTE DESTEFANO

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I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Dante DeStefano, and I am the Director of Regulatory Affairs for Corix Infrastructure Inc. ("CII"). My business address is 500 W. Monroe, Suite 3600, Chicago, Illinois 60661.

Q. Please describe your duties in your current position.

A. As Director of Regulatory Affairs, I am responsible for supporting CII's regulatory activities by providing leadership and oversight of the regulatory performance of the operating companies and managing standards, strategies, and procedures across CII.

Q. Please summarize your educational and professional background.

A. I have been employed by CII or an affiliate since October 2018. I graduated from Rutgers University with a Major in Accounting and am a Certified Public Accountant in the State of New Jersey. Prior to joining CII, I was employed by American Water for 10 years - first as a Senior Accountant in the Accounting Department for two years, then in the Rates and Regulatory Department for eight years. During my last eight years with American Water, my duties consisted of preparing and assisting in regulatory filings and related activities for the Eastern Division. My responsibilities included preparing work papers and exhibits, providing testimony in support of rate applications and other regulatory filings, and addressing rate and tariff related matters. I also assisted with preparation of multi-year budgets and other budget modeling responsibilities.

Q. Have you previously testified before any public utility commissions?

A. Yes. I have provided testimony before regulatory commissions in New Jersey, New York, North Carolina, Tennessee, and South Carolina.

Q. What is the purpose of your Rebuttal Testimony?

A. The purpose of my Rebuttal Testimony is to respond to the Direct Testimony of Randy A. Futral on issues related to various rate base, capital structure, and expense adjustments proposed by Mr. Futral on behalf of the Office of the Attorney General of the Commonwealth of Kentucky ("OAG") and the City of Clinton.

II. RATE BASE ADJUSTMENTS

Q. Mr. Futral identified Project Phoenix assets were included in the Company's filing. Does the Company seek to recover Project Phoenix assets?

A. As Mr. Futral noted in his testimony, the Company confirmed Project Phoenix assets were inadvertently included in the application, and the Company is agreeable to removing these assets from the proposed revenue requirement.

Q. Mr. Futral states that other JDE and CC&B costs, not part of Project Phoenix, should also be disallowed. Do you agree?

A. No. As the Company stated in discovery, the post-Project Phoenix enhancements and upgrades to JDE and CC&B have been requested for recovery in at least the last three rate cases - Dockets 2020-00160 ("2020 rate case"), 2018-00208 ("2018 rate case"), 2015-00382 ("2015 rate case") - and have not been contested by the OAG, any other intervening party, nor removed from the requested revenue requirement in the PSC's final order on the basis of correlation to Project Phoenix.

Q. Were the JDE and CC&B upgrades and enhancements "explicitly" requested by the Company in the prior rate cases?

A. These assets were fully available for review and consideration in prior rate cases. While the Company filed on an Operating Margin basis in the two most recent rate cases, the Company's detailed Excel filing template included the listing of all fixed assets requested for recovery. For example, in Docket 2020-00160, Response to Staff DR 1.3 - Filing Template, filed 9/28/2020, wherein on tab "wp-l-computers" the rows can be expanded to see all fixed assets for which rate base and depreciation considerations could be made by the PSC and intervenors. In at least the last two cases where these enhancements were in-service, the Company is not aware of any adjustment made to remove these assets on the basis of correlation to Project Phoenix. The Company also did not make any attempt to conceal these assets. For example, in the direct testimony of Robert Guttormsen in the 2020 rate case, the myUtilityConnect addition to CC&B was specifically and explicitly identified as an enhancement that was placed into service.

Q. Should the rationale used by the PSC to deny recovery of Project Phoenix assets be applied to the later enhancements and upgrades to JDE and CC&B?

A. No. As the Company understands it, the PSC denied the recovery of the Project Phoenix assets after a review of the cost-benefit of those specific investments, concluding the improvements were not benefitting customers. There has been no subsequent similar claim or finding for the enhancements to these systems, and they have been recovered unopposed in multiple cases. It does not follow that the logic for the regulatory treatment of a certain asset should be applied to a separate asset with differing characteristics. In addition, the Company would argue that these enhancements have provided benefits to customers by allowing for continuity in existing platforms, resolved issues or limitations to the systems, and facilitated additional customer-focused options, such as the aforementioned myUtilityConnect portal, which allows for a wide array of direct customer access and flexible account management options.

Q. Do you agree with Mr. Futral's assertion that all JDE and CC&B assets were fully depreciated in 2015-2016?

A. Not quite. As the PSC has authorized the Company to use the 1979 NARUC study's rates ("NARUC Study") for certain asset groups for both the 2018 and 2020 rate cases - and the OAG's position did not divert from these rates in its position in the current case - there is a resulting incongruity between the Company's <u>book</u> depreciation and <u>regulated</u> depreciation for recovery. It is correct that the original JDE and CC&B implementation assets (i.e., Project Phoenix) were fully depreciated on the Company's books in 2015 and 2016, respectively. However, the PSC's use of the NARUC Study's rates for certain asset groups means that, for regulatory/ratemaking purposes, assets that are fully depreciated on the books may not be fully recovered from rates. Therefore, for the assets that later enhanced or upgraded the JDE and CC&B systems, and were treated under the 22.5 year life for ratemaking purposes per the NARUC Study, these assets are not necessarily fully recovered. Again, the OAG's position did not contest the reasonableness of restating assets from their net book balances to their regulatory/ratemaking balances, including those that are fully depreciated. In summary, although an asset may be fully depreciated on a <u>book</u> basis, it is not necessarily fully recovered through rates, and therefore no retroactive ratemaking violation would have occurred.

Q. What about the PSC's adjustment for fully depreciated (per books) computer assets in the 2020 rate case final order, page 23?

A. The Company has reviewed this adjustment and confirmed that it was limited to the above-noted adjustment to remove depreciation on fully book-depreciated, non-Project Phoenix assets. As discussed above, the rationale for this adjustment is not the same as the PSC conclusion on Project Phoenix, i.e., the JDE and CC&B implementation assets. Therefore, the Company affirms its position noted above, that the JDE and CC&B enhancement assets were not contested or adjusted on the basis of removing Project Phoenix in the last rate case.

Q. What is your resulting recommendation?

A. The Company recommends the Commission reject the OAG's adjustment for non-Project Phoenix system enhancements, based on the previous recovery of these assets and the depreciation rates authorized by the PSC for ratemaking.

Q. Mr. Futral recommends removing Deferred Rate Case Expenses from rate base, arguing that "the rate case expenses were and will be incurred to benefit Water Service Kentucky's ultimate parent company, CII, and its shareholders. They were and will not be incurred to benefit the Company's customers". Do you agree with this position?

A. No. All reasonable and prudent costs to provide service should be recovered. As shown in the Company's filing, it projects to earn a rate of return of (2.12%) for the Forecast Period, absent a change in rates. As the Commission is aware, the regulator is required to maintain rates that allow the utility to continue to fund operations and attract capital, i.e., a reasonable return on investment. *Fed. Power Comm'n v. Hope Natural Gas*, 320 U.S. 591, 603 (1944); *Bluefield Water Works v. Public Service Comm'n*, 262 U.S. 679, 692-93 (1923). Therefore, it is in the customers' interest that the Company file periodic rate cases to recover its reasonable and prudently incurred costs, including reasonable returns for investors in the Company's system. The claim that rate case expenses are not incurred to benefit customers is inconsistent with law and should not be relied upon by the Commission.

Q. Are there other examples of deferred costs that the Commission has allowed to be included in rate base?

A. Yes. In the 2018 KY American Water rate case, the utility included and was authorized rate base treatment for Materials and Supplies and Deferred Maintenance balances for the Forecast Period. (See *Kentucky-American Water Co.*, Case No. 2018-00358 at 19 (Ky. PSC June 27, 2019)). Both of these balances have very similar characteristics to Deferred Rate Case Expense: 1) costs are incurred in-full and upfront by the utility, which requires financing costs, 2) the upfront cost is expensed (and therefore recovered) over time, 3) the upfront costs are recoverable ("return of") based on reasonableness of incurrence. In addition to this example, the Commission has allowed prepayments to be included in rate base, which also represent similar characteristics to the above noted items. *See, e.g.*, Grayson Rural Elec. Coop., Case No. 2012-00426 at 3 (Ky. PSC July 31, 2013); *Kentucky Util. Co*., Case No. 98-474 at 51 (Ky. PSC Jan. 7, 2000.)

Q. Mr. Futral also argues that the net rate base for the deferral balance will decline over time as the deferral amortizes. Does the Company agree?

A. It is true that deferral balances will continue to amortize over time, and therefore the unamortized balance will decline. However, this is true for several other rate base balances, namely Accumulated Depreciation and Accumulated Amortization of CIAC and PAA. That is, the depletion of the UPIS, CIAC and PAA balances will continue after the Forecast Period ends and rates are not reset. Presumably, balances such as UPIS and CIAC are expected to continue to add to the gross amounts over time, which offsets the depletion of the existing assets or liabilities[1]. Inevitably, however, rate base must be set based on a point in time (or average of points in time), as the balances involved are from the Balance Sheet, and cannot reasonably be expected to account for the "moving target" or trending of these balances in the future. Therefore, Mr. Futral's statement – which highlights how deferrals act the same way as other rate base items - is not a sufficient reason to exclude the unamortized balance from rate base.

Q. Mr. Futral recommends an adjustment to remove the rate base inclusion and amortization of the proposed Fusion Implementation Cost Regulatory Asset. Do you agree with his proposal?

A. The Company accepts this adjustment.

Q. Mr. Futral adjusted rate base to include the lease reserve related to the Chicago support services office. Do you agree with his adjustment?

A. Yes.

Q. Mr. Futral adjusted rate base for the updated 2022 vehicle purchase estimate, and made a related adjustment for the projected 2023 vehicle purchase. Do you agree with his adjustments?

A. Yes.

Q. Mr. Futral recommends an adjustment to ADIT related to bad debt. Do you agree with his adjustment?

A. No. Mr. Futral is correct that the incurring of bad debt expense is tax deductible on a book basis but not on a tax basis, and therefore there is a temporary difference created (debit to the ADIT liability) due to the Company paying tax on the bad debt expense. This

[1] Notably, the Company has projected no new CIAC to be incurred in the Forecast Period in this case.

temporary difference resolves when the expensed bad debt is written off, becoming a tax deduction. He is correct that this results in a prepayment of income taxes on the bad debt liability ("A/R Reserve") and therefore incurs financing costs. However, his claim that the creation of the A/R Reserve "result[s] in savings in financing costs" is incorrect. This is clear based on basic accounting principles. When the bad debt expense is incurred, expense is increased (debited) and the A/R Reserve is increased (credited). Simply put, a single journal entry cannot generate both a cash inflow <u>and</u> a cash outflow - the bad debt expense incurrence, and therefore the A/R Reserve establishment, only generate a cash outflow (payment of taxes on the expense). The A/R Reserve balance represents a book allowance for the A/R anticipated to not be collected. It does not reflect a source of funds that can be used to pay or otherwise offset the prepaid tax liability that the bad debt ADIT measures. The balance in the A/R Reserve account does not therefore offset the ADIT that the Company has actually funded. A final order from a case involving Commonwealth Edison Company in Illinois provides an explanation of this dynamic. (*See Commonwealth Edison Company*, Case No. 15-0287, at 23-25 (Ill. Commerce Comm'n Dec. 9, 2015), *available at* https://www.icc.illinois.gov/docket/P2015-0287/documents/237272).

Q. Mr. Futral makes an adjustment to remove the Company's Cash Working Capital balance from rate base. Please explain Mr. Futral's adjustment.

A. Mr. Futral states that the Company did not perform a lead/lag study to determine its cash working capital, and that the 1/8th method is not suitable to use in setting rates for the Company. He also cites a Columbia Gas of Kentucky case in which the PSC made a broad declaration for Kentucky utilities to use a lead/lag study to determine cash working capital. He points out that the current case is a transition from the operating margin method to the rate base/rate of return method, and therefore rate base has not been used to set rates in recent cases.

Q. Was Cash Working Capital used to calculate the Company's revenue requirement under the Operating Margin method?

A. Yes. Mr. Futral is incorrect that the Company's prior cases were not set using cash working capital based on the 1/8th method. In Operating Margin cases, rate base is still required to be determined in order to, at minimum, calculate the Interest Expense component of the revenue requirement. As shown on page 25 of the 2020 rate case final order, the PSC included Interest Expense to determine the Company's pro-forma present rate net income upon which to calculate the revenue increase.

Q. Has the Commission deemed the 1/8th method suitable, for reasons other than Operating Margin vs. Rate Base/Rate of Return, for calculating the Company's revenue requirements?

A. Yes. On page 4 of the 2020 rate case final order, the Commission states that it "finds the 1/8th approach to be a reasonable approach for Water Service Kentucky, ***particularly given its size and relative sophistication, and the Commission will permit its use in this matter given those factors*****.**" (Emphasis added.) These factors are no different in the current case than they were in the prior case.

The Company does not dispute that, in general, a lead/lag study is a superior method in determining a utility's cash working capital. However, to the Company's knowledge, it is one of the smallest utilities – if not the smallest utility - in Kentucky regulated by the PSC (in terms of rate base) that is required to use the rate base/rate of return method. The Company also noted in discovery that there are concerns regarding the cost/benefit to a company such as WSCK of performing, responding to discovery on, and litigating a lead/lag study in a rate case. Also, while the Commission issued a declaration in the Columbia Gas order, the Company was not a party to that docket, the declaration was not made in a generic docket or stand-alone order, and therefore the Company could not provide its perspective in that forum. The Company believes it is an exception to the broad statement the Commission issued. Therefore, the Company's size and sophistication should be weighed in determining the benefit and impact of requiring a lead/lag study be performed, in both the current and any future case.

Q. Do other jurisdictions accept the 1/8th method as reasonable for setting rates with the rate base/rate of return method, and for entities much larger than the Company?

A. Yes. Within just the Company's affiliate's jurisdictions, the Company can cite several jurisdictions, including North Carolina, South Carolina, Louisiana, and Illinois which have allowed the 1/8th method for cash working capital's inclusion in rate base. All of these affiliates have at least twice the customer count of WSCK.

III. CAPITAL STRUCTURE ADJUSTMENTS

Q. What is Mr. Futral's recommended capital structure?

A. Mr. Futral recommends using "the Company's most current projection of its cost of capital based on the recent actual financing activity." This includes the Company's updates provided in discovery regarding debt and equity ratios and debt issuances with the resulting blended cost of debt rate.

Q. Do you agree with Mr. Futral's recommended capital structure?

A. No. The Forecast Period in this case, as required by Commission rules, utilizes a 13-month average rate base and cost of capital (807 KAR 5:001, Section 16(6)(c)). Mr. Futral's recommendation uses the cost of capital forecast, as updated, as of December 31, 2023, which is the end of the Forecast Period. To be consistent with the PSC's rules, the Company recommends the Commission utilize the 13-month average Forecast Period capital structure - debt/equity ratios and blended cost of debt - per the Company's Base Period update, filed October 31, 2022. With regard to the recommended return on equity to use with the capital structure in determining the Forecast Period rate of return, please see the rebuttal testimony of Mr. D'Ascendis.

IV. OPERATION AND MAINTENANCE EXPENSE ADJUSTMENTS

Q. Has Mr. Futral made an adjustment to the requested recovery of incentive compensation?

A. Yes. For the Company's Employee Incentive Plan ("EIP"), Mr. Futral removed the portion of the projected payout related to financial performance metrics, or 60% of the requested amount. The rationale provided claims that such metrics in incentive plans benefit shareholders while providing customers little benefit.

Q. Do financial metrics in incentive plans produce customer benefits?

A. Yes. The utility needs to have rates set to have an opportunity to achieve its authorized rate of return. This rate of return, by Supreme Court precedent cited above, shall allow the utility the opportunity to raise capital sufficient to supports its operations (and therefore, its customers). As such, as long as the financial metrics are not designed with thresholds for returns above the authorized level, the utility is designing compensation plans that support the incentive to achieve the authorized return, which is precisely what the PSC’s authorized return is required by law to enable. The shareholders only arguably “benefit” (to the detriment of or beyond the customer's benefit) to the extent the incentives are triggered or otherwise compensate for returns above authorized levels – performance targets no higher than the authorized return are designed to address the Supreme Court's requirements and therefore are in the customers interest and benefit, and directly meet the lawful requirements of providing a reasonable return to investors. In addition, the Company includes the EIP for certain employees as part of its total compensation package to attract and retain quality employees in a competitive employment market, which is beneficial for customers.

Q. Does the inclusion of financial metrics for incentive pay override the customer benefits of the other incentive pay metrics?

A. No. The combined financial and non-financial metrics work together to incentivize achievement of broad operational goals, and provide limitation to the possible prioritization of financial goals over other operating responsibilities, such as compliance, safety, customer service, and continuous improvement initiatives. Financial metrics also incentivize prudent financial management of ongoing operations, which benefits customers.

Q. Mr. Futral cites a recent South Kentucky Rural Electric Cooperative rate case in recommending limiting health premium cost thresholds to 78% for single and 66% for family coverage to be borne by the utility, versus the employee. Are these thresholds reasonable?

A. No, there are several reasons to reject this position. First, Mr. Futral's proposal would effectively increase the health premium costs to the Company's employees, reducing their take-home pay. He does not make or recommend any related increase in base pay or other total compensation that would offset this increase in cost to employees. This results in a punitive impact to the Company's employees.

Second, the 2021 Bureau of Labor Statistics ("BLS") data cited by Mr. Futral ultimately derives from the March 2021 Healthcare Benefits Table 11.[2] However, the BLS has a better breakdown of this data that identifies a more relevant dataset for comparison to WSCK. BLS provides a summary of the results cited by Mr. Futral, wherein BLS cites that employers of utility workers – as a subset of the broader "employers of private industry workers" data set – paid 84% of single and 79% of family premiums.[3] In addition, more recent surveying of the utility worker data set supports 84% and 81%, respectively, paid by utility employers.[4] These rates are more representative of WSCK's utility industry peers and correlate favorably to the Company's health care premium cost sharing rates.

V. ADVANCED METER INFRASTRUCTURE ("AMI")

Q. Does Mr. Futral address the useful life of existing meters versus AMI meters?

A. Yes. Focusing on the Vaughn and Melton cost/benefit report ("V&M Report"), Mr. Futral concludes that the AMI meters would be replaced completely in 10 years, despite the currently approved depreciable life of WSCK meters of 44.4 years.

Q. Does Mr. Futral acknowledge the actual expected lives of the current and AMI meters, respectively, in his testimony?

A. Not sufficiently. Mr. Futral states that "the AMI meter turnover will likely exceed the turnover of the existing meters." The Company stated in discovery that the expected lives of the AMI meters is consistent with the warranty period, which extends to 20 years. (See

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[2] Bureau of Labor Statistics, Healthcare Benefits, March 2021, Table 11, private industry workers, https://www.bls.gov/ncs/ebs/benefits/2021/employee-benefits-in-the-united-states-march- 2021.pdf , page 227 of 568

[3] https://www.bls.gov/opub/ted/2021/health-care-benefits-take-up-rate-was-77-percent-for-private-industry-workers-in-march-2021.htm#:~:text=Hover%20over%20chart%20to%20view,End%20of%20interactive%20chart.&text=For%20medical%20care%20premiums%2C%20employers,coverage%20plans%20in%20March%202021

[4] https://www.bls.gov/ncs/ebs/benefits/2022/home.htm , download of "historic Excel format", attached as Exhibit DMD-1.

WSCK's Response to AG DR 1-49.) In addition, the Company stated in discovery that it would use the depreciation rate as authorized on meters, which is currently reflecting 44.4-year life. (See WSCK's Response to AG DR 1-45 and 1-49.) The Company also stated in discovery that the current meters in Clinton are only 12 years old and have reached the end of their useful life. (See WSCK's Response to AG DR 1-45.) This points to the Company's authorized depreciation rate not being representative of the expected life of either its existing nor potential replacement meters, and therefore reliance on the current authorized rate is irrelevant for purposes of comparing current and AMI-meter useful lives.

Q. Does the Company rely on the cost/benefit analysis of Vaughn and Melton to support its need for, and the benefits of, AMI implementation?

A. The Company does not believe it, nor the PSC, are required to reflect all impacts identified from a third-party analysis into the revenue requirement, as there are additional factors that should be considered. As Mr. Futral noted, the Company received the V&M report after it filed the case, and the Company did not provide any update to its as-filed revenue requirement to reflect the estimated impacts of the analysis. This is because the Company generally agrees with Mr. Futral that the AMI implementation may not generate changes such as increased revenues or decreased meter reading costs (due to redeployment of existing personnel), and management considered additional factors that were not included in the analysis such as the Forecast Period used, the phase-in of the program, and local operating needs.

The Company does believe that, over the longer term, as the AMI program is phased-in over multiple years, incremental savings may occur in several areas. However, for purposes of reflecting the impacts to the Forecast Period specifically - as is required in the current case - the Company did not identify savings that are expected to occur. This is because the Company will only have approximately one-third of its meters replaced with AMI by the end of the Forecast Period, with that level of change only accumulating over the 12-month window. For example, one-third of the phase 1 meters replaced would be in Clinton, which has only 2 employees. It is not possible for the Company to decrease headcount or operator costs in Clinton due to the needs to maintain the system on a 24/7 basis, regardless of the freeing up of time from meter reading.

Mr. Futral therefore does not properly acknowledge with regard to AMI 1) the Company's operational situation, 2) the considerations relevant within a Forecast Period construct, and 3) the qualitative and other benefits illuminated by the Company in its as-filed case and subsequent discovery responses.

Q. Mr. Futral cites the case of South Eastern Water Association ("SEWA"), docket 2021-00222, based on the Company's citation of this case related to AMI. Please describe the Company's understanding of this case and the reason it was cited by the Company in the Application.

A. The current case's CPCN request for AMI implementation is the first such request by WSCK. Therefore, in order to support to the Commission the Company's understanding that a CPCN request is required for implementing AMI, the Company cited another water utility's similar request for a CPCN.

The Company notes that in the SEWA case, certain comparisons to the Company's AMI scenario are notable: (1) SEWA's AMI meters also have a 20-year warranty period, (2) the cost per meter installed for SEWA is $304.56, while in the Company's filing the costs to install is $257.70, (3) the SEWA annual operating expenses for the system are $21,116, compared to the Company's $7,975 (no depreciation expense noted by SEWA) and (4) SEWA proposed to pay for the installation using reserve fund dollars. This last point implies that, while no rate increase was proposed, customers had already received higher rates over time in order to accumulate the fund balance used to pay for installation. Therefore, based on the above, the Company does not agree with Mr. Futral's conclusion that cost savings were higher than implementation costs.

Q. Are there other water utilities in Kentucky that have received approval or implemented advance metering?

A. Yes, I am informed that a review of Commission orders reveals that there are numerous Commission-regulated water utilities that have installed advanced meter reading ("AMR") or AMI, including the following:

Estill County Water District No. 1, Case No. 2021-00207

Northern Kentucky Water District, Case No. 2021-00095

Elkhorn Water District, Case No. 2020-00113

McCreary County Water District. Case No. 2018-00038

Beech Grove Water System, Case No. 2016-00255

Graves County Water District, Case No. 2011-00390

Q. What do you take away from knowing that numerous Commission regulated water utilities are using AMR and AMI technology?

A. Most significantly, this shows that water utilities and the Commission recognize the benefits advanced metering brings to a water utility's customers.

Q. Is Mr. Futral's proposal for "removal of the projected net cost increases included by the Company in the revenue requirement" reasonable, if the AMI program is approved?

A. No, this is a highly problematic and counterproductive position. Such a position would incentivize a utility to abstain from needed investments in its infrastructure simply due to the fact the improvements may increase overall costs to customers. It is not realistic or practical to require an investment in water infrastructure - especially one with noted and uncontested qualitative benefits due to modernization of the system - to provide a net cost benefit in every case. Mr. Futral's definition of "economical" - that savings should be deemed to at least compensate for implementation and operational costs - does not adequately consider all factors, including qualitative benefits to customers.

Q. Does this conclude your prepared rebuttal testimony?

A. Yes.

AFFIDAVIT

The undersigned, Dante DeStefano, being duly sworn, deposes and says that he is the Director of Regulatory Affairs for Corix Infrastructure, Inc., that is authorized to submit this testimony on behalf of Water Service Corporation of Kentucky, and that the information contained in the rebuttal testimony is true and accurate to the best of his knowledge, information and belief, after reasonable inquiry, and as to those matters that are based on information provided to him, he believes to be true and correct.

Dante DeStefano, Affiant

NOTARY CERTIFICATE

STATE OF New Jersey

COUNTY OF Atlantic

Subscribed, acknowledged and sworn to before me by Dante DeStefano on this 22ND day of November, 2022.

My commission expires:

KELLY VITALO
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES AUG. 7, 2027

Kelly Vitalo

NOTARY PUBLIC