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January 20, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Second Floor North
Harrisburg, PA 17120

RE: Audubon Water Company; Docket No. R-2020-3020919; **JOINT PETITION
FOR FULL SETTLEMENT OF RATE PROCEEDING**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Joint Petition for Full Settlement in the above-referenced proceeding.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard

Counsel for Audubon Water Company

WES

Enclosures

cc: Honorable Darlene Heep (via email, dheep@pa.gov)
Pamela McNeal, Legal Assistant (via email, pmcneal@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2020-3020919
Office of Consumer Advocate	:	C-2020-3021396
Office of Small Business Advocate	:	C-2020-3021579
Lower Providence Township	:	C-2020-3021993
Dennis Zajac	:	C-2020-3021410
Steven Burda	:	C-2020-3022127
	:	
v.	:	
	:	
Audubon Water Company	:	

**JOINT PETITION FOR FULL SETTLEMENT
OF RATE PROCEEDING**

TO ADMINISTRATIVE LAW JUDGE DARLENE HEEP:

I. INTRODUCTION

Audubon Water Company (“Audubon” or “Company”), the Bureau of Investigation & Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission” or “PUC”), and the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), and Lower Providence Township (“LPT” or “Township”), (collectively “Joint Petitioners”), by and through their attorneys join in this Joint Petition for Full Settlement of Rate Proceeding (“Settlement”) and respectfully request that Administrative Law Judge Darlene Heep (“ALJ Heep” or “ALJ”) and the Commission expeditiously approve the Settlement as set forth below. All active parties¹ in this proceeding have agreed to the Settlement.

¹ Two Audubon customer[s] filed Formal Complaints against the Company’s proposed rate increase. However, while the customers provided oral testimony at the public input hearings, they did not otherwise actively participate in this matter. As indicated below, the OCA will serve a copy of the Settlement on the inactive customer complainants.

II. HISTORY OF THE PROCEEDINGS

1. On July 20, 2020, Audubon Water Company (Audubon), Utility Code 210060, filed Supplement No. 3 to Tariff Water – Pa. PUC No. 4 (Supplement No. 3) to become effective September 19, 2020. Supplement No. 3 would increase Audubon’s total annual operating revenues for water service by approximately \$934,236, or 41.1%.

2. On August 19, 2020, the Office of Consumer Advocate (OCA) filed a Formal Complaint to the rate filing docketed at C-2020-3021396.

3. On August 27, 2020, the Office of Small Business Advocate (OSBA) filed a Formal Complaint to the rate filing docketed at C-2020-3021579.

4. On September 17, 2020, the Lower Providence Township (LPT) filed a Formal Complaint to the rate filing docketed at C-2020-3021993.

5. Additionally, two consumer complaints were filed by Complainant Zajac at Docket No. C-2020-3021410 and by Complainant Burda at Docket No. C-2020-3022127.

6. On September 17, 2020, the Commission, pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing by operation of law until April 19, 2021, unless permitted by Commission Order to become effective at an earlier date. The Commission also ordered an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in Audubon Water Company’s proposed Supplement No. 3 to Tariff Water – Pa. PUC No. 4.

7. On or about September 25, 2020 an E-serve Notice was issued by the Commission setting a Prehearing Conference in the above-captioned proceedings for October 30, 2020 before the Honorable Darlene Heep (“ALJ Heep”).

8. On September 28, 2020, Audubon filed the compliance tariff that suspended Supplement No. 3 until April 19, 2021.²

9. By Prehearing Conference Order dated September 29, 2020 ALJ Heep directed the parties to file Prehearing Conference Memoranda by October 28, 2020.

10. On October 28, 2020, Audubon, I&E, OCA, OSBA, and LPT filed prehearing memoranda.

11. The Prehearing Conference was held on October 30, 2020. Audubon, BIE, OCA, OSBA, and LPT were in attendance.

12. On Thursday, November 19, 2020 at 6:00 PM and Friday, November 20, 2020 at 1:00 PM, Public Input Hearings were held telephonically due to the ongoing COVID-19 pandemic.

13. The Parties submitted the following written testimony and exhibits:

a. Audubon Direct Testimony

- AWC Statement No. DMK-1: Direct Testimony of Dennis M. Kalbarczyk
- AWC Exhibit No. 1: Exhibit of Dennis M. Kalbarczyk
- AWC Exhibit No. 2: Exhibit of Dennis M. Kalbarczyk

b. OCA Direct Testimony

- OCA Statement 1, Direct Testimony of Scott J. Rubin
- OCA Schedule SJR-1 (Updated in OCA Statement 1S)
- OCA Schedule SJR-2
- OCA Schedule SJR-3
- OCA Schedule SJR-4
- OCA Schedule SJR-5
- OCA Statement 2, Direct Testimony of Stacy L. Sherwood
- OCA Statement 2, Appendix A
- OCA Statement 2, Appendix B
- OCA Statement 2, Appendix C
- OCA Schedule SLS-1
- OCA Schedule SLS-2
- OCA Schedule SLS-3

² Audubon submitted a revised compliance tariff filing on October 1, 2020.

- OCA Schedule SLS-4
 - OCA Schedule SLS-5
 - OCA Schedule SLS-6
 - OCA Schedule SLS-7
 - OCA Schedule SLS-8
 - OCA Schedule SLS-9
 - OCA Schedule SLS-10
 - OCA Schedule SLS-11
 - OCA Schedule SLS-12
 - OCA Statement 3, Direct Testimony of Aaron Rothschild
 - OCA Statement 3, Appendix A
 - OCA Statement 3, Appendix B
 - OCA Schedule ALR-1
 - OCA Schedule ALR-2
 - OCA Schedule ALR-3
 - OCA Schedule ALR-4
 - OCA Schedule ALR-5
 - OCA Statement 4, Direct Testimony of Jerome D. Mierzwa
 - OCA Schedule JDM-1
 - OCA Statement 5, Direct Testimony of Terry L. Fought
 - OCA Statement 5, Appendix A
 - OCA Exhibit TFL-1
 - OCA Exhibit TFL-2
 - OCA Exhibit TFL-3
 - OCA Exhibit TFL-4
 - OCA Exhibit TFL-5
 - OCA Exhibit TFL-6
 - OCA Exhibit TFL-7
- c. BIE Direct Testimony
- I&E Statement No. 1: Direct Testimony of John Zalesky
 - I&E Exhibit No. 1: Exhibit of John Zalesky
 - I&E Statement No. 2: Direct Testimony of Anthony Spadaccio
 - I&E Exhibit No. 2: Exhibit of Anthony Spadaccio
 - I&E Statement No. 3: Direct Testimony of Esyan Sakaya
 - I&E Exhibit No. 3: Exhibit of Esyan Sakaya
- d. OSBA Direct Testimony
- OSBA Statement No. 1, the Direct Testimony of Brian Kalcic
- e. LPT Direct Testimony

- Direct Testimony of Stephanie Butler, P.E. with “Exhibit A” through and including “Exhibit D”
 - Direct Testimony of Michael Rohlfing, Fire Marshal of Lower Providence Township
- f. Audubon Rebuttal Testimony
- AWC Statement No. DMK-1R: Rebuttal Testimony of Dennis M. Kalbarczyk
 - AWC Exhibit No. 1R: Exhibit of Dennis M. Kalbarczyk
 - AWC Exhibit No. 2R: Exhibit of Dennis M. Kalbarczyk
 - AWC Exhibit No. 3R: Exhibit of Dennis M. Kalbarczyk
 - AWC Statement No. JHR-1R: Rebuttal Testimony of J.H. Russell
- g. OSBA Rebuttal Testimony
- OSBA Statement No. 1-R, the Rebuttal Testimony of Brian Kalcic (which includes Exhibit BK-1R)
- h. OCA Surrebuttal Testimony
- OCA Statement 1S, Surrebuttal Testimony of Scott J. Rubin
 - OCA Schedule SJR-6S
 - OCA Schedule SJR-7S
 - OCA Schedule SJR-8S
 - OCA Statement 2S, Surrebuttal Testimony of Stacy L. Sherwood
 - OCA Schedule SLS-1R
 - OCA Schedule SLS-2S
 - OCA Schedule SLS-3S
 - OCA Schedule SLS-4S
 - OCA Schedule SLS-5S
 - OCA Schedule SLS-6S
 - OCA Schedule SLS-7S
 - OCA Schedule SLS-8S
 - OCA Schedule SLS-9R
 - OCA Schedule SLS-10S
 - OCA Schedule SLS-11R
 - OCA Statement 3S, Surrebuttal Testimony of Aaron Rothschild
 - OCA Statement 4S, Surrebuttal Testimony of Jerome D. Mierzwa
 - OCA Schedule JDM-1Revised
 - OCA Statement 5S, Surrebuttal Testimony of Terry L. Fought
 - OCA Exhibit TFL-8
 - OCA Exhibit TFL-9
 - OCA Exhibit TFL-10

- i. BIE Surrebuttal Testimony
 - I&E Statement No. 1-SR: Surrebuttal Testimony of John Zalesky
 - I&E Statement No. 2-SR: Surrebuttal Testimony of Anthony Spadaccio
 - I&E Statement No. 3-SR: Surrebuttal Testimony of Esyan Sakaya
 - I&E Exhibit No. 3-SR: Exhibit of Esyan Sakaya
- j. OSBA Surrebuttal Testimony
 - OSBA Statement No. 1-S, the Surrebuttal Testimony of Brian Kalcic
- k. Audubon Rejoinder Outlines
 - AWC Statement No. DMK-1RJ: Rejoinder Outline of Dennis M. Kalbarczyk
 - AWC Exhibit No. 1RJ: Exhibit of Dennis M. Kalbarczyk
 - AWC Exhibit No. 2RJ: Exhibit of Dennis M. Kalbarczyk
 - AWC Statement No. JHR-1RJ: Rejoinder Outline of J.H. Russel

14. On December 21, 2020, Audubon informed the ALJ that Audubon, I&E, OCA, OSBA, LPT, and Complainants Zajac and Burda all agreed to waive cross examination.

15. On December 22, 2020, a hearing was held for the purpose of admitting the parties' testimony and exhibits.

16. On December 23, 2020 the ALJ issued a Briefing Order establishing the deadlines and requirements for main and reply briefs.

17. On January 8, 2021, Audubon informed the ALJ that Audubon, I&E, OCA, OSBA, LPT were nearing settlement and requested an extension to file a Joint Petition for Settlement by January 19, 2021. The ALJ granted this request.

18. The Joint Petitioners held numerous settlement discussions over the course of this proceeding. As a result of those discussions and the efforts of the Joint Petitioners to examine the issues in the proceeding, the Joint Petitioners have been able to agree to the Settlement.

19. The Joint Petitioners are in full agreement that the Settlement is in the best interests of Audubon and its customers, is therefore in the public interest, and establishes rates which are just and reasonable under Chapter 13 of the Public Utility Code.

III. THE SETTLEMENT

20. The Company, I&E, OCA, OSBA, and LPT engaged in extensive exchange of information, discussions, and negotiations to determine if, consistent with the Commission's policy to "encourage settlements," stated at 52 Pa. Code §5.231(a), a settlement was possible. After extensive discovery by the statutory parties, Audubon, I&E, OCA, OSBA, and LPT engaged in a series of settlement negotiations. The Settlement is the product of those negotiations, representing give-and-take by all Joint Petitioners. The Settlement is a typical "black box" settlement;³ that is, without admission on any particular issue though the terms agreed to are enforceable upon Commission approval. The Joint Petitioners agree that this Settlement is a reasonable resolution of competing positions and interests in a way that meets and promotes the public interest. It also represents an outcome that is preferable to the time, expense and uncertainty of litigation before the Commission and potentially, appellate courts, the reasonable costs of which ratepayers may bear. The Settlement consists of the following terms and conditions:

³ *Pennsylvania Public Utility Commission et al v. Peoples TWP LLC*, 2013 WL 6835105, at *16 (Order entered Dec. 19, 2013) ("We have historically permitted the use of "black box" settlements as a means of promoting settlement among the parties in contentious base rate proceedings. See, Pa. PUC v. Wellsboro Electric Co., Docket No. R-2010-2172662 (Final Order entered January 13, 2011); Pa. PUC v. Citizens' Electric Co. of Lewisburg, PA, Docket No. R-2010-2172665 (Final Order entered January 13, 2011). Settlement of rate cases saves a significant amount of time and expense for customers, companies, and the Commission and often results in alternatives that may not have been realized during the litigation process. Determining a company's revenue requirement is a calculation involving many complex and interrelated adjustments that affect expenses, depreciation, rate base, taxes and the company's cost of capital. Reaching an agreement between various parties on each component of a rate increase can be difficult and impractical in many cases. For these reasons, we support the use of a "black box" settlement in this proceeding and, accordingly, deny this Exception.").

A. Revenue Requirement

21. Audubon shall be permitted to implement a \$703,000 increase in two phases as set forth in the proposed Tariff Supplement attached hereto as Appendix A (“Settlement Rates”). Regarding Phase 1, following Commission approval of this Settlement and no earlier than April 19, 2021, upon one day’s notice the Company will be permitted to implement a \$503,000 increase. An additional \$200,000 increase will be effective on April 19, 2022.

B. Rate Design/Structure

22. Rates were designed to produce an across the board, moderated increase. Attached as Appendix B is a Proof of Revenues showing the rate design in greater detail. Attached as Appendix C is a Typical Customer Bill Analysis.

C. Other Terms

23. Concerning Isolation Valves, Audubon Water Company agrees to maintain a log of when each valve has been exercised or attempted to be exercised in a 5 year period. The log shall note when valves are found to be inoperable, and shall note the repairs to the valves. If the valves were not able to be repaired immediately, Audubon Water Company agrees to submit a report to the Commission with a copy to OCA and I&E on 4/1 of each calendar year for the next 3-years with action taken or to be taken in upcoming year, i.e., for replacing or repairing the isolation valves.

24. Concerning Pressure Surveys, Audubon Company agrees to compile and maintain pressure readings at the highest and lowest ground elevations during periods near maximum and minimum usage for each distribution system and pressure zone (“Field Tests”), beginning 4/1/21. In its next rate case, the company shall also provide these compiled Field Tests in an Excel format, and a customer complaint log that indicates the resolution of pressure complaints.

25. Concerning Customer Complaints, on February 1, 2022 and in its next rate filing, Audubon Water Company agrees to provide a single complaint log (in a live Excel format) that satisfies 52 Pa. Code § 65.3. The complaint log will include the following categories that can be sorted by date and location: dirty water, taste, odor, color, customer property damage, leaking meter, request for meter testing, request for water testing, and incomplete surface restoration.

26. Audubon Water Company agrees to withdraw its request to increase its DSIC cap. Audubon Water agrees that it will file a Long-Term Infrastructure Improvement Plan with the Commission pursuant to Docket No. L-2012-2317274, 66 Pa. C.S. § 1352, and 52 Pa. Code §§ 121.1-121.8.

27. Lower Providence Township Provisions.

- a. **Township Intersection Improvement Project.** Audubon Water Company and Lower Providence Township will work cooperatively and in good faith, including sharing information⁴ on a timely basis, to achieve the water distribution main and associated appurtenances (i.e., valves, hydrants, etc., if any) relocation project related to the State Route 4004-Parke Avenues, Eagleville Road, and Crawford Road Intersection Improvement Project. Audubon Water Company will provide an engineered map of its facilities in electronic format via a flash drive or similar medium to the Township within 15 business days of final settlement approval and the Township will treat this information as Confidential Security Information in that this map will not be disclosed beyond Township personnel, engineering firms that

⁴ Audubon Water Company and Lower Providence Township acknowledge the requirements of the Public Utility Confidential Security Information Disclosure Protection Act (available at <https://www.legis.state.pa.us/WU01/LI/LI/US/PDF/2006/0/0156..PDF>) and will abide by this Act regarding provision of Confidential Security Information.

require it for their work on the project, or PennDOT. To the extent the Township is required to disclose specific locational information regarding Audubon's facilities as part of a competitive bidding process, any map indicating the location of Audubon's facilities will be subject to a non-disclosure agreement between the Township and any party receiving the map that prohibits sharing locational information of Audubon's facilities except to the extent necessary for the project and requires destruction of any materials containing locational information of Audubon's facilities when that entity no longer has a need for the information. The non-disclosure agreement will be presented to Audubon for review prior to execution. Audubon shall also provide the Township a facility relocation design plan within fifteen business days of final settlement approval. The Township will seek to obtain any and all available grants or funding for this project to cover Audubon Water Companies costs associated with the project. In the event the Township does not obtain the full amount of funding to cover Audubon Water Company's costs related to the project, Audubon Water Company will seek to recover the unfunded costs associated with and related to relocating its water distribution main relocation through its Distribution System Improvement Charge (DSIC) to the extent the unfunded costs are DSIC eligible. Once the final design and a timeline for the project is complete, including Audubon's construction plan and which considers the timeline for Commission consideration of the LTIP, Audubon Water Company will file for Commission approval of its LTIP within two

months. After an LTIP is approved by the Commission that includes the water distribution main replacement, Audubon will, consistent with the final timeline for the project, initiate and complete its part of the work. If the Commission does not approve full recovery of Audubon Water Company's DSIC-eligible costs associated with and related to the water main relocation project through Audubon's DSIC, the Township will pay a portion of Audubon's costs which portion will be the lesser of \$100,000 or 50% of Audubon's actual and unrecovered costs. This settlement shall not be construed to bind Lower Providence Township to compensate Audubon for any unrecovered utility facility costs outside of the immediate project area. Audubon will provide proof of costs and the amount of costs that were not recovered through the DSIC or base rates prior to the Township being obligated to pay Audubon for any unrecovered costs. Audubon Water Company will not begin any construction or construction preparation work prior to a Commission decision on its LTIP. No party to this settlement will oppose Audubon Water Company's inclusion of the water main replacement in its LTIP. No party to this settlement will generally oppose Audubon's recovery of costs for relocation and replacement of its water mains associated with the project through Audubon's DSIC or base rates, except that OCA, I&E, and OSBA reserve the right to challenge may review and challenge (1) Audubon's proof of costs and (2) whether specific costs incurred for the project are eligible for DSIC recovery."

b. **Fire Hydrants.** Through its fire hydrant replacement program, Audubon will prioritize a list of high importance hydrants identified by Lower Providence Township and its Fire Marshal to address hydrants of greatest concern first. Audubon will review with LPT's Fire Marshal hydrant flow tests in 2021-2022 to prioritize Audubon's replacement program.

Audubon, in the presence of the Lower Providence Township will perform volume tests on the hydrants at the choice of the Fire Marshal within sixty days of the approval of this Settlement. If any hydrants shall show deficient water volume, Audubon will develop a plan to remedy the same.

28. The Tax Cuts and Jobs Act of 2017 impacts deferred income taxes resulting in reclassification of an amount of excess deferred income taxes ("excess ADIT") to a regulatory liability due to the change in income tax rates from 35% to 21%. The parties agree that the starting balance is \$192,309 and is being amortized over a period of 15 years beginning in the fully projected future test year in this proceeding.

The amount of excess ADIT to be amortized (credited) on an annual basis (\$12,821) is incorporated into the settlement revenue requirement calculation starting with the effective date of new rates, producing a remaining balance of \$179,488 (\$192,309 - \$12,821) at the end of the FPFTY ending March 31, 2022, and so on till fully amortized. Audubon agrees to amortize the remaining excess ADIT balance annually until the full amount is refunded to ratepayers. Subject to any future state and/or federal tax changes, the remaining unamortized excess ADIT balance will continue as a reduction to rate base in all future proceedings until the full amount is returned to ratepayers.

D. Standard Terms

29. The Commission's approval of the Settlement shall not be construed as approval of any Joint Petitioner's position on any issue but rather as an agreed-to compromise of the Joint Petitioners' competing positions. It is understood and agreed among the Joint Petitioners that the Settlement is the result of compromise and does not necessarily represent the position(s) that would be advanced by any Joint Petitioner in this or any other proceeding, if it were fully litigated. Accordingly, this Settlement may not be cited as precedent in any future proceeding, except to the extent required to implement any term specifically agreed to by the Joint Petitioners or to enforce this Settlement.

30. This Settlement is presented without prejudice to the position any of the Joint Petitioners may advance in future proceedings, except to the extent necessary to effectuate or enforce any term specifically agreed to by the Joint Petitioners in this Settlement.

31. This Settlement is conditioned upon the Commission's approval of the terms and conditions contained herein without modification. In reaching this Settlement, the Joint Petitioners thoroughly considered all issues and give and take of positions. As a result of that consideration, the Joint Petitioners believe that the settlement agreement meaningfully addresses all such issues raised and therefore should be approved without modification. If the Commission should disapprove the Settlement or modify any terms and conditions herein, this Settlement may be withdrawn upon written notice to the Commission and all active parties within five (5) business days following entry of the Commission's Order by any of the Joint Petitioners and, in such event, shall be of no force and effect. In the event that the Commission disapproves the Settlement or the Company or any other Joint Petitioner elects to withdraw the Settlement as provided above, the Joint Petitioners reserve their respective rights to fully litigate this case, including, but not

limited to, presentation of witnesses, cross-examination and legal argument through submission of Briefs, Exceptions and Replies to Exceptions.

32. All Joint Petitioners shall support the Settlement and make reasonable and good faith efforts to obtain approval of the Settlement by the ALJ and the Commission without modification. If the ALJ, in the Recommended Decision, recommends that the Commission adopt the Settlement as herein proposed without modification, the Joint Petitioners agree to waive the filing of Exceptions. However, to the extent any terms and conditions of the Settlement are modified, or additional matters are proposed by the ALJ in the Recommended Decision, the Joint Petitioners do not waive their rights to file Exceptions in support of the Settlement. The Joint Petitioners also reserve the right to file Replies to any Exceptions that may be filed provided such Replies support the Settlement.

33. The Joint Petitioners recognize that this Joint Petition is a settlement of, and binding upon, only among the parties signing this document. The OCA represents it will, on the date of the signing of this settlement petition, send an email providing instructions concerning the Complainants' opportunity to address the proposed Settlement. OCA also represents that the emailed letter will explain that the Complainant has until February 1, 2021 to join, disagree but not actively oppose, or object to the proposed settlement and provides contact information for ALJ Heep and the OCA.

34. The Joint Petitioners agree that this document may be signed or executed in separate counterparts or signature pages that shall be binding upon the Joint Petitioners and such counterparts shall be considered as one document.

35. The Joint Petitioners agree and request that if the Settlement is approved, the OCA's Formal Complaint in this matter should be marked satisfied and closed due to the Settlement.

IV. THE SETTLEMENT IS IN THE PUBLIC INTEREST

36. This Settlement was achieved by the Joint Petitioners after an extensive investigation of Audubon's filings, including informal and formal discovery and the submission of direct, rebuttal, and surrebuttal testimony and rejoinder outlines that were admitted into the record by stipulation.

37. Acceptance of the Settlement will avoid the necessity of further administrative and possibly appellate proceedings regarding the settled issues at what would have been a substantial cost to the Joint Petitioners and Audubon's customers.

38. Joint Petitioners have submitted, along with this Settlement, their respective Statements in Support setting forth the basis upon which each believes the Settlement to be fair, just and reasonable and therefore in the public interest. The Joint Petitioners' Statements in Support are attached hereto as Appendices "D" through "H."

V. CONCLUSION

WHEREFORE, Joint Petitioners respectfully request the Judge and the Commission to:

a) approve this Joint Petition for Full Settlement of Rate Proceeding without modification;

b) issue an Order granting Audubon permission to file the tariff supplements after entry of the Order attached hereto as **Appendix A** to become effective upon one (1) day notice but no earlier than April 19, 2021; and

c) terminate its investigation at Docket No. R-2020-3020919, and mark the Formal Complaints filed by the OCA at Docket No. C-2020-3021396, the OSBA at Docket No. C-2020-3021579, and by LPT at Docket No. C-2020-3021993 as satisfied and closed.

Respectfully submitted,



(Dated) 1/20/21

Thomas J. Sniscak, Esquire, I.D. #33891
Whitney E. Snyder, Esquire, I.D. # 316625
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Counsel for Audubon Water Company

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Christine Maloni Hoover

Christine Maloni Hoover, Esquire

Office of Consumer Advocate

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Phone: 717-783-5048

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(Dated) January 20, 2021

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Allison C Kaster

(Dated) January 20, 2021

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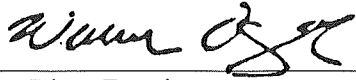
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Steven C. Gray

(Dated) January 20, 2021

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(Dated) 1/20/21

APPENDICES

APPENDIX A	Tariff Supplement
APPENDIX B	Proof of Revenues
APPENDIX C	Typical Customer Bill Analysis
APPENDIX D	Audubon Water Company Statement in Support
APPENDIX E	Bureau of Investigation & Enforcement Statement in Support
APPENDIX F	Office of Consumer Advocate Statement in Support
APPENDIX G	Office of Small Business Advocate Statement in Support
APPENDIX H	Lower Providence Township Statement in Support

Appendix A
Tariff Supplement No. 5

**AUDUBON WATER COMPANY
AUDUBON, PENNSYLVANIA**

**RATES, RULES AND REGULATIONS
GOVERNING THE DISTRIBUTION OF WATER
IN
PORTIONS OF LOWER PROVIDENCE TOWNSHIP
AND ADJACENT AREAS
MONTGOMERY COUNTY, PENNSYLVANIA**

By: Martha M. Russell, President
Audubon Water Company
Valley Forge Corporate Center
2650 Eisenhower Avenue
P.O. Box 7337
Audubon, PA 19407

NOTICE

Filed in compliance with the Order of Pennsylvania Public Utility Commission, entered on _____, 2021 at Docket No. R-2020-3020919. This tariff makes increases and changes in existing rates, rules, and regulations.

LIST OF CHANGES MADE BY THIS SUPPLEMENT

Increases:

(C)

Supplement No. 5 to Tariff Water – Pa. PUC No. 4 increases rates for all water customers under a settlement agreement authorized and approved by the Commission. The increase in rates and resultant change in annual operating revenue is intended to produce an additional \$703,000 per year under a two-step approach: step-1 a \$503,000 annual revenue increase effective on April 19, 2021; and, step-2 a \$200,000 annual revenue increase effective on April 19, 2022.

Changes:

The following changes have been incorporated into Supplement No. 5 to Tariff Water – Pa. PUC No. 4 for consistency with the Commission’s June 1, 2019 changes to 52 Pa. Code Chapter 56:

- Third Revised Page 10: Updated definition of Applicant
- Third Revised Page 11: Updated definition of Customer
- Third Revised Page 21: Updated payment “arrangement” terminology
- Third Revised Page 23: Updated Medical Certification requirements
- Second Revised Page 23A: Updated Restoration of Service provision
- Third Revised Page 29: Updated Residential Customer Deposition Rules
 - Updated payment “arrangement” terminology
 - Updated definition of Customer Deposit Refunds and Interest

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(C)

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PART I: SCHEDULE OF RATES AND CHARGES

Section A: Rates for Metered Service

1. Application: To all metered customers.
2. Consumption Charges: All water used in any billing period will be charged at the following rates:

<u>All Residential Volumes</u>	<u>Effective</u> <u>April 19, 2021</u>	<u>Effective</u> <u>April 19, 2022</u>	
Rate Per 1,000 Gallons	\$8.0323	\$8.6197	(I)
<u>All Remaining Customers – Gallons Per Month</u>	<u>Effective</u> <u>April 19, 2021</u>	<u>Effective</u> <u>April 19, 2022</u>	
First 100,000 Gallons/Month	\$8.0323	\$8.6197	(I)
Over 100,000 Gallons/Month	\$5.3281	\$5.7229	(I)

(I) Indicates Increase

3. Customer Charge: In addition to the consumption charge, each customer will be assessed a customer service charge based upon the size of the customer's meter as follows:

<u>Meter Size</u>	<u>Effective April 19, 2021</u>		<u>Effective April 19, 2022</u>		
	<u>Per Month</u>	<u>Per Quarter</u>	<u>Per Month</u>	<u>Per Quarter</u>	
5/8 inch	\$ 15.60	\$ 46.80	\$ 16.80	\$ 50.40	(I)
3/4 inch	\$ 15.60	\$ 46.80	\$ 16.80	\$ 50.40	(I)
1 inch	\$ 39.80	\$ 119.40	\$ 42.80	\$ 128.40	(I)
1 1/2 inch	\$ 67.80		\$ 72.90		(I)
2 inch	\$ 108.40		\$ 116.40		(I)
3 inch	\$ 203.60		\$ 218.60		(I)
4 inch	\$ 338.80		\$ 363.90		(I)
6 inch	\$ 677.60		\$ 727.80		(I)
8 inch	\$1,084.20		\$1,164.60		(I)
10 inch	\$1,313.30		\$1,410.60		(I)
12 inch	\$1,800.00		\$1,935.00		(I)

(I) Indicates Increase

Section B: Temporary Rates/Water for Building Purposes

The following rates are for the use of water for building purposes and construction in connection therewith, and the water shall not be used for any other purpose.

	<u>Effective</u> <u>April 19, 2021</u>	<u>Effective</u> <u>April 19, 2022</u>	
<u>Single Family Dwelling</u>	\$159.13 per month.	\$170.92 per month.	(I)

All other construction shall receive building water through metered service connection, and payment shall be made in accordance with the schedule of rates for metered service.

Section C: Public Fire Protection Rates

1. Application: To Lower Providence Township.

2. Rate:

	<u>Effective</u> <u>April 19, 2021</u>	<u>Effective</u> <u>April 19, 2022</u>	
Annual charge per hydrant.	\$288.00	\$308.40	(I)
Or a monthly charge per hydrant.	\$ 24.00	\$ 25.70	(I)

(I) Indicates Increase

Section D: Private Fire Protection Rates

1. Application: To all private fire protection service.
2. Rate: A customer charge for private fire protection service will be assessed as follows:

<u>Size of Connection</u>	<u>Effective April 19, 2021</u>		<u>Effective April 19, 2022</u>		
	<u>Per Month</u>	<u>Per Annum</u>	<u>Per Month</u>	<u>Per Annum</u>	
<u>With Main</u>					
1 inch	\$ 28.75	\$ 345.00	\$ 30.80	\$ 369.60	(I)
2 inch	\$ 45.50	\$ 546.00	\$ 48.80	\$ 585.60	(I)
3 inch	\$ 52.50	\$ 630.00	\$ 56.50	\$ 678.00	(I)
4 inch	\$ 64.50	\$ 774.00	\$ 69.40	\$ 832.80	(I)
6 inch	\$ 95.50	\$ 1,146.00	\$ 102.75	\$ 1,233.00	(I)
8 inch	\$ 155.50	\$ 1,866.00	\$ 167.00	\$ 2,004.00	(I)
10 inch	\$ 212.75	\$ 2,553.00	\$ 228.60	\$ 2,743.20	(I)
Hydrants	\$ 95.50	\$ 1,146.00	\$ 102.75	\$ 1,233.00	(I)

In the event of fire or testing, consumption charges shall be billed in accordance with the rates for water consumption.

(I) Indicates Increase

PART II: DEFINITIONS

The following words and phrases, when used in this Tariff, shall have the meanings assigned below unless the context clearly indicates otherwise:

1. Annual Line Extension Costs (For Line Extension Purposes): The sum of the Company's additional annual operating and maintenance costs, debt costs and depreciation charges associated with the construction, operation and maintenance of the line extension.
2. Annual Revenue (For Line Extension Purposes): The Company's expected additional annual revenue from the line extension based on the Company's currently effective tariff rates and on the average annual usage of customers similar in nature and size to the bona fide service applicant.
3. Applicant: A person or entity who applies to become a customer of the Company in accordance with the provisions of this Tariff. The applicant must be the owner of the premises to which water service is requested. The term does not include a person who within 30 days after service termination or discontinuance of service, seeks to have service reconnected at the same location or transferred to another location within the service territory of the public utility. (C)
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(C)
4. Bona Fide Service Applicant (For Line Extension Purposes): A person or entity applying for water service to an existing or proposed structure within the Company's certificated service territory for which a valid occupancy or building permit has been issued if the structure is either a primary residence of the applicant or a place of business. An applicant shall not be deemed a bona fide service applicant if:
 - (a) The applicant is requesting water service to a building lot, subdivision or a secondary residence;
 - (b) The request for service is part of a plan for the development of a residential dwelling or subdivision; or
 - (c) The applicant is requesting special utility service.
5. Commission: The Pennsylvania Public Utility Commission.
6. Company: Audubon Water Company, Valley Forge Corporate Center, 2650 Eisenhower Avenue, P.O. Box 7337, Audubon, PA 19407.

(C) Indicates Change

7. Company Service Line: The water line from the distribution facilities of the Company which connects to the customer service line at the hypothetical or actual property line, including the control valve and valve box. The control valve and valve box determine the terminal point for the Company’s responsibility for the street service connection.

8. Cross-Connection: Any pipe, valve, hose or other arrangement or device connecting the pipelines or facilities of the Company, to and with other pipes or fixtures by which any contamination might be admitted or drawn into the distribution system of the Company from lines other than the Company’s. All business customers shall install backflow protection devices in accordance with the Company’s Backflow Prevention Program set forth in Part VI of this Tariff. All new customers or customers whose residential structure(s) are undergoing construction or reconstruction shall include a backflow protection device that is in compliance with the Backflow Prevention Program. The Company may require existing residential structures to comply with the Backflow Prevention Program to prevent any leakage into the Company’s distribution system if, in the Company’s sole discretion, such protection is required for protection of the Company’s distribution system.

9. Customer: A person or entity who is the owner of the premises to which water service is requested. The term includes a person who, within 30 days after service termination or discontinuance of service, seeks to have service reconnected at the same location or transferred to another location within the service territory of the public utility. (C)
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(C)

10. Customer Service Line: The water line extending from the curb, property line or utility connection to a point of consumption.

11. Debt Costs (For Line Extension Purposes): The Company’s additional annual cost of debt associated with financing the line extension investment based on the current debt ratio and weighted long-term debt cost rate for the Company or that of a comparable jurisdictional water utility.

(C) Indicates Change

(c) The Company will notify a customer and terminate service after giving notice as required, for any of the following actions by the customer:

- (i) Non-payment of an undisputed delinquent account;
- (ii) Failure to comply with the material terms of a payment arrangement; (C)
- (iii) Failure to complete payment of a deposit, provide a guarantee of payment or establish credit;
- (iv) Failure to permit access to the property served for purposes of installing, inspecting, reading, maintaining or removing meters or other facilities or equipment owned by the Company that is used to provide water service;
- (v) Willful or negligent waste of water through improper or imperfect pipes or fixtures, or for failure to repair leaks in pipes or fixtures;
- (vi) Installing or maintaining cross-connections or any unauthorized connection;
- (vii) Receipt by the Company of an order or notice from the Department of Environmental Protection, a health agency, local plumbing inspector or other similar authority, to terminate service to the property served on the grounds of violation of any law or ordinance, or upon notice to the Company from any such authority that it has ordered an existing violation on the property to be corrected and that such order has not been complied with;
- (viii) Making an application for service that contains material misrepresentations;
- (ix) Tampering with any service line, valve, curb stop, meter or meter setting or other Company owned facilities or equipment used to provide service;
- (x) Theft of service, which may include taking service without having made a proper application for service as required by this Tariff; or
- (xi) Material violation of any provisions of this Tariff.

(C) Indicates Change

(ii) Upon termination, the Company will make a good faith attempt to provide a post-termination notice to the customer or a responsible person at the affected premises. In the case of a single meter, multi-unit dwelling, the Company will conspicuously post the notice at the dwelling, including in the common areas when possible.

(f) Timing of Termination: The Company may terminate service for the reasons set forth in this Tariff or in the Commission’s regulations from Monday through Thursday. The Company will not terminate service on a Friday, Saturday, Sunday or holiday, unless necessary due to an emergency or to prevent a danger to a person or the integrity of the Company’s facilities.

(g) Medical Certification: The Company will not terminate service to a premises when a licensed physician or nurse practitioner has certified that the customer or a member of the customer’s household is seriously ill or afflicted with a medical condition that which requires the continuation of service to treat the medical condition. The customer must provide the Company with a letter from a licensed physician nurse practitioner or physician assistant verifying the medical condition. The medical certification procedure will be implemented in accordance with Commission regulations. (C)
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(C)

(h) Dishonorable Tender of Payment After Receiving Termination Notice: After the Company has provided the required written and telephone contact, service may be terminated without additional notice if a customer:

- (i) Tenders payment that is subsequently dishonored; or
- (ii) Tenders payment with an access device that is unauthorized, revoked or canceled.

(C) Indicates Change

4. Payment to Restore Service:

(a) The Company may require a customer whose service was shut off for nonpayment of outstanding bills to pay the full amount owed before water service will be restored to the customer’s premises. The Company also may require the customer to pay a reconnect fee and/or a deposit in addition to the amount of the outstanding charges.

(b) Whenever service is discontinued or terminated pursuant to the provisions of this Tariff, service shall be turned on by the Company only upon the payment by the customer of a turn-on charge and the resolution of the problem that gave rise to the termination of service.

(c) The Company may immediately terminate service if a payment for reconnection of service is subsequently dishonored, revoked, canceled or otherwise not authorized and which has not been cured or otherwise paid in full within 3 business days of the Company providing notice to the customer of the dishonored payment. (C)
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(C)

(C) Indicates Change

Section F: Deposits

1. Residential Customers:

- (a) New Applicants: The Company will provide service without requiring a deposit unless the applicant was terminated for non-payment of an undisputed delinquent account or was terminated for failure to comply with the material terms of a payment arrangement, or has an unpaid balance for prior service from the Company. The amount of the deposit will not be greater than an estimated average bill for one (1) billing period plus the estimated bill for one (1) additional month’s service. Such deposit shall be payable during a 90-day period consistent with Commission regulations. The Company is not required to provide service if the application fails to pay the full amount of the cash deposition with the time periods set forth in 52 Pa. Code § 56.38.
 - (C)
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- (b) Existing Customers: If a customer has paid late on two (2) consecutive occasions or a total of three (3) times within the prior 12-month period, the Company may send a letter informing the customer that a deposit may be required if another late payment is received within the next twelve (12) months. An existing customer may be required to pay a deposit as a condition to having service restored after termination for non-payment or for failure to comply with a payment arrangement. The amount of the deposit will not be greater than an estimated average bill for one (1) billing period plus the estimated bill for one (1) additional month’s service.
 - (C)

- (c) Deposit Refunds and Interest: A deposit will be refunded if service is discontinued and the final bill is paid, or if the customer has paid the bills for the prior 12-month period without having been late on more than two (2) occasions and is not currently delinquent. Deposits from residential customers shall bear simple interest at the simple annual interest rate determined by the Secretary of Revenue for interest on the underpayment of tax under section 806 of The Fiscal Code (72 P.S. § 806), payable annually without deductions for taxes thereon unless otherwise required by law. The applicable interest rate shall become effective on January 1 of each year.
 - (C)
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(C) Indicates Change

Appendix B
Proof of Revenues

AUDUBON WATER COMPANY

Comparative Statement Of Operating Revenues
Twelve Months Ended March 31, 2020 And Pro Forma March 31, 2021 - 2022 At Current, Updated Proposed and Settlement Rates " Moderated Rate Approach"

Description	Existing Rates					12/14/2020 Updated Claim Proposed Rates		Step-1 Settlement Rates		Step-2 Settlement Rates	
	Pro Forma 3/31/21		Pro Forma 3/31/22			Pro Forma 3/31/22		Pro Forma 3/31/22		Pro Forma 3/31/22	
	3/31/2020 Per Books (1)	Adjustments (2)	Adjusted Totals (3)	Adjustments (4)	Adjusted Totals (5)	Base Rate Increase (6)	Adjusted Totals (7)	Base Rate Increase (8)	Adjusted Totals (9)	Base Rate Increase (10)	Adjusted Totals (11)
Operating Revenues											
Residential	\$ 1,253,337	\$ (4,918)	\$ 1,248,419	\$ 5,359	\$ 1,253,778	\$ 519,379	\$ 1,773,157	\$ 286,899	\$ 1,540,677	\$ 114,554	\$ 1,655,231
Commercial	298,361	4,658	303,019	-	303,019	125,141	428,160	69,581	372,600	27,474	400,075
Multi-Family Dwelling	464,744	1,015	465,759	-	465,759	193,353	659,112	106,918	572,677	42,280	614,956
Public Authorities	15,908	24	15,932	-	15,932	6,612	22,544	3,662	19,594	1,441	21,035
Water Sales	\$ 2,032,350	\$ 779	\$ 2,033,129	\$ 5,359	\$ 2,038,488	\$ 844,485	\$ 2,882,973	\$ 467,061	\$ 2,505,549	\$ 185,749	\$ 2,691,297
Private Fire Protection	\$ 116,027	\$ (8,958)	\$ 107,069	\$ -	\$ 107,069	\$ 44,492	\$ 151,561	\$ 24,387	\$ 131,456	\$ 9,923	\$ 141,379
Public Fire Protection	40,866	8,638	49,504	-	49,504	20,456	69,960	11,552	61,056	4,325	65,381
Total Fire Protection	\$ 156,893	\$ (320)	\$ 156,573	\$ -	\$ 156,573	\$ 64,948	\$ 221,521	\$ 35,939	\$ 192,512	\$ 14,248	\$ 206,760
Sub-Total Rev. From Rates	\$ 2,189,243	\$ 459	\$ 2,189,702	\$ 5,359	\$ 2,195,061	\$ 909,433	\$ 3,104,494	\$ 503,000	\$ 2,698,061	\$ 199,996	\$ 2,898,057
Late Payment Charges	4,664	40	4,704	48	4,752	-	4,752	-	4,752	-	4,752
Total Customer Revenues	\$ 2,193,907	\$ 499	\$ 2,194,406	\$ 5,407	\$ 2,199,813	\$ 909,433	\$ 3,109,246	\$ 503,000	\$ 2,702,813	\$ 199,996	\$ 2,902,809
Other Revenues:											
Miscellaneous	116,134	(46,577)	69,557	2,616	72,173	-	72,173	-	72,173	-	72,173
Total Operating Revenues	\$ 2,310,041	\$ (46,078)	\$ 2,263,963	\$ 8,023	\$ 2,271,986	\$ 909,433	\$ 3,181,419	\$ 503,000	\$ 2,774,986	\$ 199,996	\$ 2,974,982

Refer to Schedules 12/14/2020 Updated H-1, H-2, 12/14/2020 Updated H-4 and Supporting Schedule I-1 to I-3 for explanation of adjustments.
Refer to Schedules 12/14/2020 Updated K-3 and 12/14/2020 Updated K-5 for Supporting Revenues by Class at Proposed Mod. Rate Appr.

AUDUBON WATER COMPANY

Comparative Statement Of Operating Revenues
Calculation Of Proposed Revenues And Percentage Increase By Customer Class - Moderated Rate Approach

Description	3/31/2021	3/31/2022	3/31/2022		12/14/2020 Updated Claim			Step 1 - Settlement Rates				Step 2 - Settlement Rates			
	Pro Forma Revenues	Pro Forma Revenues	% Class Rev To Rev. From Rates	% Inc.	Proposed Base Rate	Proposed Adjusted Total	% Class To Rev. Fr. Rates	% Inc.	Settlement Base Rate	Settlement Adjusted Total	% Class To Rev. Fr. Rates	% Inc.	Settlement Base Rate	Settlement Adjusted Total	% Class To Rev. Fr. Rates
	<u>Existing Rates</u>	<u>Existing Rates</u>	<u>(3)</u>	<u>(4)</u>	<u>(5)</u>	<u>(6)</u>	<u>(7)</u>	<u>(8)</u>	<u>(9)</u>	<u>(11)</u>	<u>(12)</u>	<u>(13)</u>	<u>(14)</u>	<u>(15)</u>	<u>(16)</u>
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(11)	(12)	(13)	(14)	(15)	(16)
Operating Revenues From Rates:															
Residential	\$ 1,248,419	\$ 1,253,778	57.12%	41.43%	\$ 519,379	\$1,773,157	57.12%	22.88%	\$ 286,899	\$ 1,540,677	57.10%	7.44%	\$ 114,554	\$ 1,655,231	57.12%
Commercial	303,019	303,019	13.80%	41.30%	125,141	428,160	13.79%	22.96%	69,581	372,600	13.81%	7.37%	27,474	400,075	13.80%
Multi-Family Dwelling	465,759	465,759	21.22%	41.51%	193,353	659,112	21.23%	22.96%	106,918	572,677	21.23%	7.38%	42,280	614,956	21.22%
Public Authorities	15,932	15,932	0.73%	41.50%	6,612	22,544	0.73%	22.99%	3,662	19,594	0.73%	7.35%	1,441	21,035	0.73%
Water Sales	\$ 2,033,129	\$ 2,038,488	92.87%	41.43%	\$ 844,485	\$2,882,973	92.86%	22.91%	\$ 467,061	\$ 2,505,549	92.86%	7.41%	\$ 185,749	\$2,691,297	92.87%
Private Fire Protection	\$ 107,069	\$ 107,069	4.88%	41.55%	\$ 44,492	\$ 151,561	4.88%	22.78%	\$ 24,387	\$ 131,456	4.87%	7.55%	\$ 9,923	\$ 141,379	4.88%
Public Fire Protection	49,504	49,504	2.26%	41.32%	20,456	69,960	2.25%	23.34%	11,552	61,056	2.26%	7.08%	4,325	65,381	2.26%
Total Fire Protection	\$ 156,573	\$ 156,573	7.13%	41.48%	\$ 64,948	\$ 221,521	7.14%	22.95%	\$ 35,939	\$ 192,512	7.14%	7.40%	\$ 14,248	\$ 206,760	7.13%
Sub-Total Rev. From Rates	\$ 2,189,702	\$ 2,195,061	<u>100.00%</u>	41.43%	\$ 909,433	\$3,104,494	<u>100.00%</u>	22.92%	\$ 503,000	\$ 2,698,061	<u>100.00%</u>	7.41%	\$ 199,996	\$2,898,057	<u>100.00%</u>
Late Payment Charges	4,704	4,752	0.00%	0.00%	-	4,752	0.00%	0.00%	-	4,752	0.00%	0.00%	-	4,752	0.00%
Total Customer Revenues	\$ 2,194,406	\$ 2,199,813			\$ 909,433	\$3,109,246		22.87%	\$ 503,000	\$ 2,702,813		7.40%	\$ 199,996	\$2,902,809	
Other Revenues:															
Miscellaneous	69,557	72,173	0.00%	0.00%	-	72,173	0.00%	0%	-	72,173	0.00%	0%	-	72,173	0.00%
Total Operating Revenues	\$ 2,263,963	\$ 2,271,986	40.03%	40.03%	\$ 909,433	\$3,181,419	40.03%	22.14%	\$ 503,000	\$ 2,774,986	40.03%	7.21%	\$ 199,996	\$2,974,982	40.03%

Refer to Schedules 12/14/2020 Updated K-3 and 12/14/2020 Updated K-5 for Supporting Revenues by Class at Proposed Mod. Rate Appr.

AUDUBON WATER COMPANY

Current, Updated Proposed, Settlement Tariff Rates - "Moderated Cust. Charge Approach"

	Current Rates		12/14/2020 Updated				Step-1 Settlement Rates				Step-2 Settlement Rates			
	Quarterly	Monthly	Proposed % Inc.		Proposed Rates		Step-1 % Inc.		Step-1 Rates		Step-2 % Inc.		Step-2 Rates	
			Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly
Customer Charge Based on Meter Size														
5/8" & 3/4" Meter	\$ 38.19	\$ 12.73	41.40%	41.40%	\$ 54.00	\$ 18.00	22.55%	22.55%	\$ 46.80	\$ 15.60	7.69%	7.69%	\$ 50.40	\$ 16.80
1" Meter	\$ 97.26	\$ 32.42	38.80%	38.80%	\$ 135.00	\$ 45.00	22.76%	22.76%	\$ 119.40	\$ 39.80	7.54%	7.54%	\$ 128.40	\$ 42.80
1 1/2" Meter		\$ 55.20		44.93%		\$ 80.00		22.83%		\$ 67.80		7.52%		\$ 72.90
2" Meter		\$ 88.19		41.74%		\$ 125.00		22.92%		\$ 108.40		7.38%		\$ 116.40
3" Meter		\$ 165.60		41.91%		\$ 235.00		22.95%		\$ 203.60		7.37%		\$ 218.60
4" Meter		\$ 275.62		45.13%		\$ 400.00		22.92%		\$ 338.80		7.41%		\$ 363.90
6" Meter		\$ 551.23		45.13%		\$ 800.00		22.93%		\$ 677.60		7.41%		\$ 727.80
8" Meter		\$ 882.05		36.05%		\$ 1,200.00		22.92%		\$ 1,084.20		7.42%		\$ 1,164.60
10" Meter		\$ 1,068.43		40.39%		\$ 1,500.00		22.92%		\$ 1,313.30		7.41%		\$ 1,410.60
12" Meter		\$ 1,670.48		7.75%		\$ 1,800.00		7.75%		\$ 1,800.00		7.50%		\$ 1,935.00
Volumetric Rates per 1,000 gallons														
Residential Customers- all volumes	\$ 6.5280	\$ 6.5280	43.17%	43.17%	\$ 9.3461	\$ 9.3461	23.04%	23.04%	\$ 8.0323	\$ 8.0323	7.31%	7.31%	\$ 8.6197	\$ 8.6197
Non-Residential Customers														
First 300,000 quarterly/100,000 monthly	\$ 6.5280	\$ 6.5280	43.17%	43.17%	\$ 9.3461	\$ 9.3461	23.04%	23.04%	\$ 8.0323	\$ 8.0323	7.31%	7.31%	\$ 8.6197	\$ 8.6197
Over 300,000 quarterly/100,000 monthly	\$ 4.3346	\$ 4.3346	42.02%	42.02%	\$ 6.1558	\$ 6.1558	22.92%	22.92%	\$ 5.3281	\$ 5.3281	7.41%	7.41%	\$ 5.7229	\$ 5.7229
Temporary Rates/Water for Building Purposes														
Single Family Dwelling		\$ 129.46		42.56%		\$ 184.56		22.92%		\$ 159.13		7.41%		\$ 170.92
Public Fire Protection														
Hydrants	<u>Monthly</u>	<u>Annual</u>	<u>Monthly</u>	<u>Annual</u>	<u>Monthly</u>	<u>Annual</u>			<u>Monthly</u>	<u>Annual</u>			<u>Monthly</u>	<u>Annual</u>
	\$ 19.46	\$ 233.46	42.60%	42.64%	\$ 27.75	\$ 333.00	23.33%	23.36%	\$ 24.00	\$ 288.00	7.08%	7.08%	\$ 25.70	\$ 308.40
Private Fire Protection														
1" Sprinkler	\$ 23.35	\$ 280.15	49.89%	49.92%	\$ 35.00	\$ 420.00	23.13%	23.15%	\$ 28.75	\$ 345.00	7.13%	7.13%	\$ 30.80	\$ 369.60
2" Sprinkler	\$ 36.97	\$ 443.57	35.24%	35.27%	\$ 50.00	\$ 600.00	23.07%	23.09%	\$ 45.50	\$ 546.00	7.25%	7.25%	\$ 48.80	\$ 585.60
3" Sprinkler	\$ 42.81	\$ 513.61	40.15%	40.18%	\$ 60.00	\$ 720.00	22.63%	22.66%	\$ 52.50	\$ 630.00	7.62%	7.62%	\$ 56.50	\$ 678.00
4" Sprinkler	\$ 52.53	\$ 630.34	42.78%	42.78%	\$ 75.00	\$ 900.00	22.79%	22.79%	\$ 64.50	\$ 774.00	7.60%	7.60%	\$ 69.40	\$ 832.80
6" Sprinkler	\$ 77.82	\$ 933.84	42.64%	42.64%	\$ 111.00	\$ 1,332.00	22.72%	22.72%	\$ 95.50	\$ 1,146.00	7.59%	7.59%	\$ 102.75	\$ 1,233.00
8" Sprinkler	\$ 126.46	\$ 1,517.49	42.34%	42.34%	\$ 180.00	\$ 2,160.00	22.96%	22.97%	\$ 155.50	\$ 1,866.00	7.40%	7.40%	\$ 167.00	\$ 2,004.00
10" Sprinkler	\$ 173.15	\$ 2,077.79	41.50%	41.50%	\$ 245.00	\$ 2,940.00	22.87%	22.87%	\$ 212.75	\$ 2,553.00	7.45%	7.45%	\$ 228.60	\$ 2,743.20
Hydrants	\$ 77.82	\$ 933.54	42.64%	42.68%	\$ 111.00	\$ 1,332.00	22.72%	22.76%	\$ 95.50	\$ 1,146.00	7.59%	7.59%	\$ 102.75	\$ 1,233.00

See Schedules 12/14/2020 Updated K-3 and 12/14/2020 Updated K-5 for Proposed Rates and Proof Of Revenues

Audubon Water Company
Summary of Settlement Step-1 and Step-2 Increase In Revenues Over Current Rates

Across The Board Increase

		% Increase
Revenue From Current Rates	\$ 2,195,061	
Step-1 Settlement Increase	<u>503,000</u>	22.92% Step-1 % Inc. Over Current Rates
Revenue From Settlement Step-1 Proposed Rates	\$ 2,698,061	
Step-2 Settlement Increase	<u>200,000</u>	7.41% Step-2 % Inc. Over Step-1 Rates
Revenue From Settlement Step-2 Proposed Rates/Overall Increase	<u><u>\$ 2,898,061</u></u>	32.03% Overall % Inc. over Current Rates

AUDUBON WATER COMPANY

Current And Proposed Moderated Customer Charge and Usage Settlement Tariff Rates

	Current Rates		Settlement Step-1				Settlement Step-2				Total % Inc.				
			% Inc.		\$ Inc.		Step-1 Rates		% Inc.			\$ Inc.		Step-1 Rates	
	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly		Quarterly	Monthly	Quarterly	Monthly
Customer Charge Based on Meter Size			22.92%	22.92%					7.41%	7.41%					32.03%
5/8" & 3/4" Meter	\$ 38.19	\$ 12.73	22.55%	22.55%	\$ 8.61	\$ 2.87	\$ 46.80	\$ 15.60	7.69%	7.69%	\$ 3.60	\$ 1.20	\$ 50.40	\$ 16.80	31.97%
1" Meter	\$ 97.26	\$ 32.42	22.76%	22.76%	\$ 22.14	\$ 7.38	\$ 119.40	\$ 39.80	7.54%	7.54%	\$ 9.00	\$ 3.00	\$ 128.40	\$ 42.80	32.02%
1 1/2" Meter		\$ 55.20		22.83%		\$ 12.60		\$ 67.80		7.52%		\$ 5.10		\$ 72.90	32.07%
2" Meter		\$ 88.19		22.92%		\$ 20.21		\$ 108.40		7.38%		\$ 8.00		\$ 116.40	31.99%
3" Meter		\$ 165.60		22.95%		\$ 38.00		\$ 203.60		7.37%		\$ 15.00		\$ 218.60	32.00%
4" Meter		\$ 275.62		22.92%		\$ 63.18		\$ 338.80		7.41%		\$ 25.10		\$ 363.90	32.03%
6" Meter		\$ 551.23		22.93%		\$ 126.37		\$ 677.60		7.41%		\$ 50.20		\$ 727.80	32.03%
8" Meter		\$ 882.05		22.92%		\$ 202.15		\$ 1,084.20		7.42%		\$ 80.40		\$ 1,164.60	32.03%
10" Meter		\$ 1,068.43		22.92%		\$ 244.87		\$ 1,313.30		7.41%		\$ 97.30		\$ 1,410.60	32.03%
12" Meter		\$ 1,670.48		7.75%		\$ 129.52		\$ 1,800.00		7.50%		\$ 135.00		\$ 1,935.00	15.83%
Volumetric Rates per 1,000 gallons															
Residential Customers- all volumes	\$ 6.5280	\$ 6.5280	23.04%	23.04%	\$ 1.5043	\$ 1.5043	\$ 8.0323	\$ 8.0323	7.31%	7.31%	\$ 0.5874	\$ 0.5874	\$ 8.6197	\$ 8.6197	32.04%
Non-Residential Customers															
First 300,000 quarterly/100,000 monthly	\$ 6.5280	\$ 6.5280	23.04%	23.04%	\$ 1.5043	\$ 1.5043	\$ 8.0323	\$ 8.0323	7.31%	7.31%	\$ 0.5874	\$ 0.5874	\$ 8.6197	\$ 8.6197	32.04%
Over 300,000 quarterly/100,000 monthly	\$ 4.3346	\$ 4.3346	22.92%	22.92%	\$ 0.9935	\$ 0.9935	\$ 5.3281	\$ 5.3281	7.41%	7.41%	\$ 0.3948	\$ 0.3948	\$ 5.7229	\$ 5.7229	32.03%
Temporary Rates/Water for Building Purposes															
Single Family Dwelling		\$ 129.46		22.92%		\$ 29.67		\$ 159.13		7.41%		\$ 11.79		\$ 170.92	32.03%
Public Fire Protection															
Hydrants	<u>Monthly</u>	<u>Annual</u>					<u>Monthly</u>	<u>Annual</u>					<u>Monthly</u>	<u>Annual</u>	
	\$ 19.46	\$ 233.46	23.33%	23.36%	\$ 4.54	\$ 54.54	\$ 24.00	\$ 288.00	7.08%	7.08%	\$ 1.70	\$ 20.40	\$ 25.70	\$ 308.40	32.10%
Private Fire Protection															
1" Sprinkler	\$ 23.35	\$ 280.15	23.13%	23.15%	\$ 5.40	\$ 64.85	\$ 28.75	\$ 345.00	7.13%	7.13%	\$ 2.05	\$ 24.60	\$ 30.80	\$ 369.60	31.93%
2" Sprinkler	\$ 36.97	\$ 443.57	23.07%	23.09%	\$ 8.53	\$ 102.43	\$ 45.50	\$ 546.00	7.25%	7.25%	\$ 3.30	\$ 39.60	\$ 48.80	\$ 585.60	32.02%
3" Sprinkler	\$ 42.81	\$ 513.61	22.63%	22.66%	\$ 9.69	\$ 116.39	\$ 52.50	\$ 630.00	7.62%	7.62%	\$ 4.00	\$ 48.00	\$ 56.50	\$ 678.00	32.01%
4" Sprinkler	\$ 52.53	\$ 630.34	22.79%	22.79%	\$ 11.97	\$ 143.66	\$ 64.50	\$ 774.00	7.60%	7.60%	\$ 4.90	\$ 58.80	\$ 69.40	\$ 832.80	32.12%
6" Sprinkler	\$ 77.82	\$ 933.84	22.72%	22.72%	\$ 17.68	\$ 212.16	\$ 95.50	\$ 1,146.00	7.59%	7.59%	\$ 7.25	\$ 87.00	\$ 102.75	\$ 1,233.00	32.04%
8" Sprinkler	\$ 126.46	\$ 1,517.49	22.96%	22.97%	\$ 29.04	\$ 348.51	\$ 155.50	\$ 1,866.00	7.40%	7.40%	\$ 11.50	\$ 138.00	\$ 167.00	\$ 2,004.00	32.06%
10" Sprinkler	\$ 173.15	\$ 2,077.79	22.87%	22.87%	\$ 39.60	\$ 475.21	\$ 212.75	\$ 2,553.00	7.45%	7.45%	\$ 15.85	\$ 190.20	\$ 228.60	\$ 2,743.20	32.02%
Hydrants	\$ 77.82	\$ 933.54	22.72%	22.76%	\$ 17.68	\$ 212.46	\$ 95.50	\$ 1,146.00	7.59%	7.59%	\$ 7.25	\$ 87.00	\$ 102.75	\$ 1,233.00	32.08%

AUDUBON WATER COMPANY

Pro Forma Revenues at Existing Rates and Settlement Step-2 Moderated Customer Charge Rates w/Associated Adjusted Usage Rates
For the Twelve Months Ended March 31, 2022

Customer Classifications	# Of Bills	Usage Totals			Step-1 Settlement Rates					Step-2 Settlement Rates					7.44%		
		1st Block	2nd Block	Total	Fixed Rates	Cust. Chrg Revenue	Volumetric Charge Revenue		Total Usage	Total Charges	Fixed Rates	Cust. Chrg Revenue	Volumetric Charge Revenue			Total Usage	Total Charges
							\$ 8.0323	\$ 5.3281					\$ 8.6197	\$ 5.7229			
Residential																	
5/8" & 3/4" Quarterly	6,401	74,736	-	74,736	\$ 46.80	\$299,566.80	\$ 600,301.97	\$ -	\$ 600,301.97	\$ 899,868.77	\$ 50.40	\$ 322,610.40	\$ 644,201.90	\$ -	\$ 644,201.90	\$ 966,812.30	7.44%
1" Quarterly	12	241	-	241	\$ 119.40	1,432.80	1,935.78	-	1,935.78	3,368.58	\$ 128.40	1,540.80	2,077.35	-	2,077.35	3,618.15	7.41%
1" Monthly	396	2,267	-	2,267	\$ 39.80	15,760.80	18,209.22	-	18,209.22	33,970.02	\$ 42.80	16,948.80	19,540.86	-	19,540.86	36,489.66	7.42%
5/8" & 3/4" Monthly	9,396	45,924	-	45,924	\$ 15.60	146,577.60	368,875.35	-	368,875.35	515,452.95	\$ 16.80	157,852.80	395,851.10	-	395,851.10	553,703.90	7.42%
5/8" Monthly Trailer Park	2,596	5,916	-	5,916	\$ 15.60	40,497.60	47,519.09	-	47,519.09	88,016.69	\$ 16.80	43,612.80	50,994.15	-	50,994.15	94,606.95	7.49%
Total Res. See Sch I-1-5	18,801	129,084	-	129,084		\$503,835.60	\$1,036,841.41	\$ -	\$ 1,036,841.41	\$1,540,677.01	\$ 542,565.60	\$1,112,665.35	\$ -	\$ 1,112,665.35	\$1,655,230.95	7.44%	
Commercial																	
5/8"	900	2,118	-	2,118	\$ 15.60	\$ 14,040.00	\$ 17,012.41	\$ -	\$ 17,012.41	\$ 31,052.41	\$ 16.80	\$ 15,120.00	\$ 18,256.52	\$ -	\$ 18,256.52	\$ 33,376.52	7.48%
3/4"	72	94	-	94	\$ 15.60	1,123.20	755.04	-	755.04	1,878.24	\$ 16.80	1,209.60	810.25	-	810.25	2,019.85	7.54%
1"	132	801	-	801	\$ 39.80	5,253.60	6,433.87	-	6,433.87	11,687.47	\$ 42.80	5,649.60	6,904.38	-	6,904.38	12,553.98	7.41%
1 1/2"	248	4,043	238	4,281	\$ 67.80	16,814.40	32,474.59	1,268.09	33,742.68	50,557.08	\$ 72.90	18,079.20	34,849.45	1,362.05	36,211.50	54,290.70	7.38%
2"	425	11,827	6,025	17,852	\$ 108.40	46,070.00	94,998.01	32,101.80	127,099.81	173,169.81	\$ 116.40	49,470.00	101,945.19	34,480.47	136,425.66	185,895.66	7.35%
3"	48	2,633	391	3,024	\$ 203.60	9,772.80	21,149.05	2,083.29	23,232.33	33,005.13	\$ 218.60	10,492.80	22,695.67	2,237.65	24,933.32	35,426.12	7.34%
4"	44	2,276	425	2,701	\$ 338.80	14,907.20	18,281.51	2,264.44	20,545.96	35,453.16	\$ 363.90	16,011.60	19,618.44	2,432.23	22,050.67	38,062.27	7.36%
6"	33	-	-	-	\$ 677.60	22,360.80	-	-	-	22,360.80	\$ 727.80	24,017.40	-	-	-	24,017.40	7.41%
8"	12	53	-	53	\$1,084.20	13,010.40	425.71	-	425.71	13,436.11	\$1,164.60	13,975.20	456.84	-	456.84	14,432.04	7.41%
10"	-	-	-	-	\$1,313.30	-	-	-	-	-	\$1,410.60	-	-	-	-	-	-
Total Commercial	1,914	23,845	7,079	30,924		\$143,352.40	\$ 191,530.19	\$ 37,717.62	\$ 229,247.81	\$ 372,600.21	\$ 154,025.40	\$ 205,536.75	\$ 40,512.41	\$ 246,049.16	\$ 400,074.56	7.37%	
Multi-Family																	
1"	12	116	-	116	\$ 39.80	\$ 477.60	\$ 931.75	\$ -	\$ 931.75	\$ 1,409.35	\$ 42.80	\$ 513.60	\$ 999.89	\$ -	\$ 999.89	\$ 1,513.49	7.39%
1 1/2"	264	15,979	7,850	23,829	\$ 67.80	17,899.20	128,348.12	41,825.59	170,173.71	188,072.91	\$ 72.90	19,245.60	137,734.19	44,924.77	182,658.95	201,904.55	7.35%
2"	36	2,400	23,382	25,782	\$ 108.40	3,902.40	19,277.52	124,581.63	143,859.15	147,761.55	\$ 116.40	4,190.40	20,687.28	133,812.85	154,500.13	158,690.53	7.40%
3"	24	2,400	3,455	5,855	\$ 203.60	4,886.40	19,277.52	18,408.59	37,686.11	42,572.51	\$ 218.60	5,246.40	20,687.28	19,772.62	40,459.90	45,706.30	7.36%
10"	12	1,200	31,430	32,630	\$1,313.30	15,759.60	9,638.76	167,462.18	177,100.94	192,860.54	\$1,410.60	16,927.20	10,343.64	179,870.75	190,214.39	207,141.59	7.40%
Total Multi-Family	348	22,095	66,117	88,212		\$ 42,925.20	\$ 177,473.67	\$ 352,277.99	\$ 529,751.66	\$ 572,676.86	\$ 46,123.20	\$ 190,452.27	\$ 378,380.98	\$ 568,833.25	\$ 614,956.45	7.38%	
Public																	
5/8"	-	-	-	-	\$ 15.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 16.80	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1 1/2"	12	5	-	5	\$ 67.80	813.60	40.16	-	40.16	853.76	\$ 72.90	874.80	43.10	-	43.10	917.90	7.51%
2"	12	1,114	282	1,396	\$ 108.40	1,300.80	8,947.98	1,502.52	10,450.51	11,751.31	\$ 116.40	1,396.80	9,602.35	1,613.86	11,216.20	12,613.00	7.33%
4"	12	364	-	364	\$ 338.80	4,065.60	2,923.76	-	2,923.76	6,989.36	\$ 363.90	4,366.80	3,137.57	-	3,137.57	7,504.37	7.37%
6"	-	-	-	-	\$ 677.60	-	-	-	-	-	\$ 727.80	-	-	-	-	-	-
Total Public	36	1,483	282	1,765		\$ 6,180.00	\$ 11,911.90	\$ 1,502.52	\$ 13,414.43	\$ 19,594.43	\$ 6,638.40	\$ 12,783.02	\$ 1,613.86	\$ 14,396.87	\$ 21,035.27	7.35%	
Total Res, Comm, MF, Pub	21,099	176,507	73,478	249,985		\$696,293.20	\$1,417,757.18	\$ 391,498.13	\$ 1,809,255.31	\$ 2,505,549	\$ 749,352.60	\$1,521,437.39	\$ 420,507.25	\$1,941,944.63	\$ 2,691,297	7.41%	
See Sch. L-1 for Res, Comm, MF, Pub Customers and Usage details																	
Fire Protection:																	
Private - Billing Units																	
4" Sprinkler - Annual	1	8	-	8	\$ 774.00	\$ 2,322.00	\$ 64.26	\$ -	\$ 64.26	\$ 2,386.26	\$ 832.80	\$ 2,498.40	\$ 68.96	\$ -	\$ 68.96	\$ 2,567.36	7.59%
6" Sprinkler - Annual	1	51	-	51	\$1,146.00	46,986.00	409.65	-	409.65	47,395.65	\$1,233.00	50,553.00	439.60	-	439.60	50,992.60	7.59%
8" Sprinkler - Annual	1	21	-	21	\$1,866.00	26,124.00	168.68	-	168.68	26,292.68	\$2,004.00	28,056.00	181.01	-	181.01	28,237.01	7.39%
10" Sprinkler - Annual	1	14	-	14	\$2,553.00	2,553.00	112.45	-	112.45	2,665.45	\$2,743.20	2,743.20	120.68	-	120.68	2,863.88	7.44%
Metered Fire		94	-	94		\$ 77,985.00	\$ 755.04	\$ -	\$ 755.04	\$ 78,740.04		\$ 83,850.60	\$ 810.25	\$ -	\$ 810.25	\$ 84,660.85	7.52%
Hydrants - Mthly	12				\$ 95.50	42,402.00	-	-	-	42,402.00	\$ 102.75	45,621.00	-	-	-	45,621.00	7.59%
Hydrants - Annual	1				\$1,146.00	10,314.00	-	-	-	10,314.00	\$1,233.00	11,097.00	-	-	-	11,097.00	7.59%
Total Private Fire Units						\$130,701.00	\$ 755.04	\$ -	\$ 755.04	\$ 131,456.04		\$ 140,568.60	\$ 810.25	\$ -	\$ 810.25	\$ 141,378.85	
Public - Hyd Units Mthly	12				\$ 24.00	\$ 50,400.00	-	-	-	50,400.00	\$ 25.70	53,970.00	-	-	-	53,970.00	7.08%
Public - Hyd Units Annual	1				\$ 288.00	10,656.00	-	-	-	10,656.00	\$ 308.40	11,410.80	-	-	-	11,410.80	7.08%
Total Public Fire Units						\$ 61,056.00	\$ -	\$ -	\$ -	\$ 61,056.00		\$ 65,380.80	\$ -	\$ -	\$ -	\$ 65,380.80	7.08%
Total Fire Protection Units						\$191,757.00	\$ 755.04	\$ -	\$ 755.04	\$ 192,512.04		\$ 205,949.40	\$ 810.25	\$ -	\$ 810.25	\$ 206,759.65	7.40%
Total Customers/Billing Units	176,601	73,478	250,079			\$888,050.20	\$1,418,512.21	\$ 391,498.13	\$ 1,810,010.34	\$ 2,698,060.54		\$ 955,302.00	\$1,522,247.64	\$ 420,507.25	\$1,942,754.89	\$ 2,898,056.89	7.41%
Pro Forma Revenue Under Current Rates						888,050.20	1,418,512.21	391,498.13	1,810,010.34	2,698,060.54		955,302.00	1,522,247.64	420,507.25	1,942,754.89	2,898,056.89	
Total Settlement Step-2 Increase Based Upon Moderated Customer Charge Approach						\$ 67,251.80	\$ 103,735.43	\$ 29,009.11	\$ 132,744.54	\$ 199,996.34		\$ 67,251.80	\$ 103,735.43	\$ 29,009.11	\$ 132,744.54	\$ 199,996.34	7.41%
												7.57%	7.31%	7.41%	7.33%		
Total Step-2 Settlement Increase																200,000.00	
Increase Over/(Under) Rate Study																\$ (3.66)	

Appendix C
Typical Bill Analysis

AUDUBON WATER COMPANY

Typical Bill Analysis by Customer Class
 Current vs. Updated Proposed, and Settlement Rates

Customer Classifications	# Of Bills	Usage Totals			# Of Bills	Total Usage	Avg. Usage	Typical Usage	Current	Updated Proposed Rates			Settlement Step-1			Settlement Step-2			
		1st Block	2nd Block	Total						Updated	\$ Inc.	% Inc.	Step-1	\$ Inc.	% Inc.	Step-2	\$ Inc.	% Inc.	
Residential																			
5/8" & 3/4" Quarterly	6,401	74,736	-	74,736	6,401	74,736	11.6757	12,000	\$ 116.53	See Schedule M-3	\$ 166.15	\$ 49.62	42.58%	\$ 143.19	\$ 26.66	22.88%	\$ 153.84	\$ 10.65	7.44%
1" Quarterly	12	241	-	241															
1" Monthly	396	2,267	-	2,267															
5/8" & 3/4" Monthly	9,396	45,924	-	45,924	9,396	45,924													
5/8" Monthly Trailer Park	2,596	5,916	-	5,916	2,596	5,916				See Schedule M-2									
Total Res. See Sch I-1-5	18,801	129,084	-	129,084	11,992	51,840	4.3229	4,000	\$ 38.84		\$ 55.38	\$ 16.54	42.58%	\$ 47.73	\$ 8.89	22.89%	\$ 51.28	\$ 3.55	7.44%
Commercial																			
5/8"	900	2,118	-	2,118	900	2,118	2.3533	2,000	\$ 25.79	See Schedule M-4	\$ 36.69	\$ 10.90	42.26%	\$ 31.66	\$ 5.87	22.76%	\$ 34.04	\$ 2.38	7.52%
3/4"	72	94	-	94															
1"	132	801	-	801															
1 1/2"	248	4,043	238	4,281															
2"	425	11,827	6,025	17,852	425	17,852	42.0047	42,000	\$ 362.37	See Schedule M-7	\$ 517.54	\$ 155.17	42.82%	\$ 445.76	\$ 83.39	23.01%	\$ 478.43	\$ 32.67	7.33%
3"	48	2,633	391	3,024															
4"	44	2,276	425	2,701															
6"	33	-	-	-															
8"	12	53	-	53															
10"	-	-	-	-															
Total Commercial	1,914	23,845	7,079	30,924															
Multi-Family																			
1"	12	116	-	116						See Schedule M-6									
1 1/2"	264	15,979	7,850	23,829	264	23,829	90.2614	90,000	\$ 642.72		\$ 921.15	\$ 278.43	43.32%	\$ 790.71	\$ 147.99	23.03%	\$ 848.67	\$ 57.96	7.33%
2"	36	2,400	23,382	25,782															
3"	24	2,400	3,455	5,855															
10"	12	1,200	31,430	32,630	12	32,630	2,719.1667	2,700,000	\$ 12,991.19	See Schedule M-11	\$ 18,439.69	\$ 5,448.50	41.94%	\$ 15,969.59	\$ 2,978.40	22.93%	\$ 17,152.11	\$ 1,182.52	7.40%
Total Multi-Family	348	22,095	66,117	88,212															
Public																			
5/8"	-	-	-	-															
1 1/2"	12	5	-	5															
2"	12	1,114	282	1,396	12	1,396	116.3333	116,000	\$ 810.34	See Schedule M-7	\$ 1,158.10	\$ 347.76	42.92%	\$ 996.88	\$ 186.54	23.02%	\$ 1,069.94	\$ 73.06	7.33%
4"	12	364	-	364															
6"	-	-	-	-															
Total Public	36	1,483	282	1,765															
Total Res, Comm, MF, Pub	21,099	176,507	73,478	249,985															

See Appendix B, Pgs 2-11 for Res, Comm, MF, Pub Customers and Usage details

AUDUBON WATER COMPANY

5/8"-3/4" Monthly

Residential Monthly Bill at Current, Updated Proposed, and Settlement Rates

Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
		Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 5/8"-3/4" Monthly	\$ 12.73	\$ 18.00	\$ 5.27	41.40%	\$ 15.60	\$ 2.87	22.55%	\$ 16.80	\$ 1.20	7.69%	\$ 4.07	31.97%
Volumetric Rates All Residential Usage	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
0	\$ 12.73	\$ 18.00	\$ 5.27	41.40%	\$ 15.60	\$ 2.87	22.55%	\$ 16.80	\$ 1.20	7.69%	\$ 4.07	31.97%
1	19.26	27.35	8.09	42.00%	23.63	4.37	22.69%	25.42	1.79	7.58%	6.16	31.98%
2	25.79	36.69	10.90	42.26%	31.66	5.87	22.76%	34.04	2.38	7.52%	8.25	31.99%
3	32.31	46.04	13.73	42.49%	39.70	7.39	22.87%	42.66	2.96	7.46%	10.35	32.03%
4	38.84	55.38	16.54	42.58%	47.73	8.89	22.89%	51.28	3.55	7.44%	12.44	32.03%
5	45.37	64.73	19.36	42.67%	55.76	10.39	22.90%	59.90	4.14	7.42%	14.53	32.03%
6	51.90	74.08	22.18	42.74%	63.79	11.89	22.91%	68.52	4.73	7.41%	16.62	32.02%
7	58.43	83.42	24.99	42.77%	71.83	13.40	22.93%	77.14	5.31	7.39%	18.71	32.02%
8	64.95	92.77	27.82	42.83%	79.86	14.91	22.96%	85.76	5.90	7.39%	20.81	32.04%
9	71.48	102.11	30.63	42.85%	87.89	16.41	22.96%	94.38	6.49	7.38%	22.90	32.04%
10	78.01	111.46	33.45	42.88%	95.92	17.91	22.96%	103.00	7.08	7.38%	24.99	32.03%
11	84.54	120.81	36.27	42.90%	103.96	19.42	22.97%	111.62	7.66	7.37%	27.08	32.03%
12	91.07	130.15	39.08	42.91%	111.99	20.92	22.97%	120.24	8.25	7.37%	29.17	32.03%
13	97.59	139.50	41.91	42.94%	120.02	22.43	22.98%	128.86	8.84	7.37%	31.27	32.04%
14	104.12	148.85	44.73	42.96%	128.05	23.93	22.98%	137.48	9.43	7.36%	33.36	32.04%
15	110.65	158.19	47.54	42.96%	136.08	25.43	22.98%	146.10	10.02	7.36%	35.45	32.04%
16	117.18	167.54	50.36	42.98%	144.12	26.94	22.99%	154.72	10.60	7.35%	37.54	32.04%
17	123.71	176.88	53.17	42.98%	152.15	28.44	22.99%	163.33	11.18	7.35%	39.62	32.03%
18	130.23	186.23	56.00	43.00%	160.18	29.95	23.00%	171.95	11.77	7.35%	41.72	32.04%
19	136.76	195.58	58.82	43.01%	168.21	31.45	23.00%	180.57	12.36	7.35%	43.81	32.03%
20	143.29	204.92	61.63	43.01%	176.25	32.96	23.00%	189.19	12.94	7.34%	45.90	32.03%
21	149.82	214.27	64.45	43.02%	184.28	34.46	23.00%	197.81	13.53	7.34%	47.99	32.03%
22	156.35	223.61	67.26	43.02%	192.31	35.96	23.00%	206.43	14.12	7.34%	50.08	32.03%
23	162.87	232.96	70.09	43.03%	200.34	37.47	23.01%	215.05	14.71	7.34%	52.18	32.04%
24	169.40	242.31	72.91	43.04%	208.38	38.98	23.01%	223.67	15.29	7.34%	54.27	32.04%
25	175.93	251.65	75.72	43.04%	216.41	40.48	23.01%	232.29	15.88	7.34%	56.36	32.04%
35	241.21	345.11	103.90	43.07%	296.73	55.52	23.02%	318.49	21.76	7.33%	77.28	32.04%
45	306.49	438.57	132.08	43.09%	377.05	70.56	23.02%	404.69	27.64	7.33%	98.20	32.04%
55	371.77	532.04	160.27	43.11%	457.38	85.61	23.03%	490.88	33.50	7.32%	119.11	32.04%
65	437.05	625.50	188.45	43.12%	537.70	100.65	23.03%	577.08	39.38	7.32%	140.03	32.04%
75	502.33	718.96	216.63	43.13%	618.02	115.69	23.03%	663.28	45.26	7.32%	160.95	32.04%
100	665.53	952.61	287.08	43.14%	818.83	153.30	23.03%	878.77	59.94	7.32%	213.24	32.04%
125	828.73	1,186.26	357.53	43.14%	1,019.64	190.91	23.04%	1,094.26	74.62	7.32%	265.53	32.04%
150	991.93	1,419.92	427.99	43.15%	1,220.45	228.52	23.04%	1,309.76	89.31	7.32%	317.83	32.04%
175	1,155.13	1,653.57	498.44	43.15%	1,421.25	266.12	23.04%	1,525.25	104.00	7.32%	370.12	32.04%
200	1,318.33	1,887.22	568.89	43.15%	1,622.06	303.73	23.04%	1,740.74	118.68	7.32%	422.41	32.04%
300	1,971.13	2,821.83	850.70	43.16%	2,425.29	454.16	23.04%	2,602.71	177.42	7.32%	631.58	32.04%

AUDUBON WATER COMPANY
 5/8"-3/4" Quarterly
Residential Quarterly Bill at Current, Updated Proposed, and Settlement Rates

Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
		Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 5/8"-3/4" Quarterly	\$ 38.19	\$ 54.00	\$ 15.81	41.40%	\$ 46.80	\$ 8.61	22.55%	\$ 50.40	\$ 3.60	7.69%	\$ 12.21	31.97%
Volumetric Rates All Residential Usage	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
0	\$ 38.19	\$ 54.00	\$ 15.81	41.40%	\$ 46.80	\$ 8.61	22.55%	\$ 50.40	\$ 3.60	7.69%	\$ 12.21	31.97%
1	44.72	63.35	18.63	41.66%	54.83	10.11	22.61%	59.02	4.19	7.64%	14.30	31.98%
2	51.25	72.69	21.44	41.83%	62.86	11.61	22.65%	67.64	4.78	7.60%	16.39	31.98%
3	57.77	82.04	24.27	42.01%	70.90	13.13	22.73%	76.26	5.36	7.56%	18.49	32.01%
4	64.30	91.38	27.08	42.12%	78.93	14.63	22.75%	84.88	5.95	7.54%	20.58	32.01%
5	70.83	100.73	29.90	42.21%	86.96	16.13	22.77%	93.50	6.54	7.52%	22.67	32.01%
6	77.36	110.08	32.72	42.30%	94.99	17.63	22.79%	102.12	7.13	7.51%	24.76	32.01%
7	83.89	119.42	35.53	42.35%	103.03	19.14	22.82%	110.74	7.71	7.48%	26.85	32.01%
8	90.41	128.77	38.36	42.43%	111.06	20.65	22.84%	119.36	8.30	7.47%	28.95	32.02%
9	96.94	138.11	41.17	42.47%	119.09	22.15	22.85%	127.98	8.89	7.46%	31.04	32.02%
10	103.47	147.46	43.99	42.51%	127.12	23.65	22.86%	136.60	9.48	7.46%	33.13	32.02%
11	110.00	156.81	46.81	42.55%	135.16	25.16	22.87%	145.22	10.06	7.44%	35.22	32.02%
12	116.53	166.15	49.62	42.58%	143.19	26.66	22.88%	153.84	10.65	7.44%	37.31	32.02%
13	123.05	175.50	52.45	42.62%	151.22	28.17	22.89%	162.46	11.24	7.43%	39.41	32.03%
14	129.58	184.85	55.27	42.65%	159.25	29.67	22.90%	171.08	11.83	7.43%	41.50	32.03%
15	136.11	194.19	58.08	42.67%	167.28	31.17	22.90%	179.70	12.42	7.42%	43.59	32.03%
16	142.64	203.54	60.90	42.69%	175.32	32.68	22.91%	188.32	13.00	7.42%	45.68	32.02%
17	149.17	212.88	63.71	42.71%	183.35	34.18	22.91%	196.93	13.58	7.41%	47.76	32.02%
18	155.69	222.23	66.54	42.74%	191.38	35.69	22.92%	205.55	14.17	7.40%	49.86	32.03%
19	162.22	231.58	69.36	42.76%	199.41	37.19	22.93%	214.17	14.76	7.40%	51.95	32.02%
20	168.75	240.92	72.17	42.77%	207.45	38.70	22.93%	222.79	15.34	7.39%	54.04	32.02%
21	175.28	250.27	74.99	42.78%	215.48	40.20	22.93%	231.41	15.93	7.39%	56.13	32.02%
22	181.81	259.61	77.80	42.79%	223.51	41.70	22.94%	240.03	16.52	7.39%	58.22	32.02%
23	188.33	268.96	80.63	42.81%	231.54	43.21	22.94%	248.65	17.11	7.39%	60.32	32.03%
24	194.86	278.31	83.45	42.83%	239.58	44.72	22.95%	257.27	17.69	7.38%	62.41	32.03%
25	201.39	287.65	86.26	42.83%	247.61	46.22	22.95%	265.89	18.28	7.38%	64.50	32.03%
35	266.67	381.11	114.44	42.91%	327.93	61.26	22.97%	352.09	24.16	7.37%	85.42	32.03%
45	331.95	474.57	142.62	42.96%	408.25	76.30	22.99%	438.29	30.04	7.36%	106.34	32.03%
55	397.23	568.04	170.81	43.00%	488.58	91.35	23.00%	524.48	35.90	7.35%	127.25	32.03%
65	462.51	661.50	198.99	43.02%	568.90	106.39	23.00%	610.68	41.78	7.34%	148.17	32.04%
75	527.79	754.96	227.17	43.04%	649.22	121.43	23.01%	696.88	47.66	7.34%	169.09	32.04%
100	690.99	988.61	297.62	43.07%	850.03	159.04	23.02%	912.37	62.34	7.33%	221.38	32.04%
125	854.19	1,222.26	368.07	43.09%	1,050.84	196.65	23.02%	1,127.86	77.02	7.33%	273.67	32.04%
150	1,017.39	1,455.92	438.53	43.10%	1,251.65	234.26	23.03%	1,343.36	91.71	7.33%	325.97	32.04%
175	1,180.59	1,689.57	508.98	43.11%	1,452.45	271.86	23.03%	1,558.85	106.40	7.33%	378.26	32.04%
200	1,343.79	1,923.22	579.43	43.12%	1,653.26	309.47	23.03%	1,774.34	121.08	7.32%	430.55	32.04%
300	1,996.59	2,857.83	861.24	43.14%	2,456.49	459.90	23.03%	2,636.31	179.82	7.32%	639.72	32.04%

AUDUBON WATER COMPANY
5.8"-3/4"

Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 5.8"-3/4"		\$ 12.73	\$ 18.00	\$ 5.27	41.40%	\$ 15.60	\$ 2.87	22.55%	\$ 16.80	\$ 1.20	7.69%	\$ 4.07	31.97%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 12.73	\$ 18.00	\$ 5.27	41.40%	\$ 15.60	\$ 2.87	22.55%	\$ 16.80	\$ 1.20	7.69%	\$ 4.07	31.97%
	1	19.26	27.35	8.09	42.00%	23.63	4.37	22.69%	25.42	1.79	7.58%	6.16	31.98%
	2	25.79	36.69	10.90	42.26%	31.66	5.87	22.76%	34.04	2.38	7.52%	8.25	31.99%
	3	32.31	46.04	13.73	42.49%	39.70	7.39	22.87%	42.66	2.96	7.46%	10.35	32.03%
	4	38.84	55.38	16.54	42.58%	47.73	8.89	22.89%	51.28	3.55	7.44%	12.44	32.03%
	5	45.37	64.73	19.36	42.67%	55.76	10.39	22.90%	59.90	4.14	7.42%	14.53	32.03%
	6	51.90	74.08	22.18	42.74%	63.79	11.89	22.91%	68.52	4.73	7.41%	16.62	32.02%
	7	58.43	83.42	24.99	42.77%	71.83	13.40	22.93%	77.14	5.31	7.39%	18.71	32.02%
	8	64.95	92.77	27.82	42.83%	79.86	14.91	22.96%	85.76	5.90	7.39%	20.81	32.04%
	9	71.48	102.11	30.63	42.85%	87.89	16.41	22.96%	94.38	6.49	7.38%	22.90	32.04%
	10	78.01	111.46	33.45	42.88%	95.92	17.91	22.96%	103.00	7.08	7.38%	24.99	32.03%
	11	84.54	120.81	36.27	42.90%	103.96	19.42	22.97%	111.62	7.66	7.37%	27.08	32.03%
	12	91.07	130.15	39.08	42.91%	111.99	20.92	22.97%	120.24	8.25	7.37%	29.17	32.03%
	13	97.59	139.50	41.91	42.94%	120.02	22.43	22.98%	128.86	8.84	7.37%	31.27	32.04%
	14	104.12	148.85	44.73	42.96%	128.05	23.93	22.98%	137.48	9.43	7.36%	33.36	32.04%
	15	110.65	158.19	47.54	42.96%	136.08	25.43	22.98%	146.10	10.02	7.36%	35.45	32.04%
	16	117.18	167.54	50.36	42.98%	144.12	26.94	22.99%	154.72	10.60	7.35%	37.54	32.04%
	17	123.71	176.88	53.17	42.98%	152.15	28.44	22.99%	163.33	11.18	7.35%	39.62	32.03%
	18	130.23	186.23	56.00	43.00%	160.18	29.95	23.00%	171.95	11.77	7.35%	41.72	32.04%
	19	136.76	195.58	58.82	43.01%	168.21	31.45	23.00%	180.57	12.36	7.35%	43.81	32.03%
	20	143.29	204.92	61.63	43.01%	176.25	32.96	23.00%	189.19	12.94	7.34%	45.90	32.03%
	21	149.82	214.27	64.45	43.02%	184.28	34.46	23.00%	197.81	13.53	7.34%	47.99	32.03%
	22	156.35	223.61	67.26	43.02%	192.31	35.96	23.00%	206.43	14.12	7.34%	50.08	32.03%
	23	162.87	232.96	70.09	43.03%	200.34	37.47	23.01%	215.05	14.71	7.34%	52.18	32.04%
	24	169.40	242.31	72.91	43.04%	208.38	38.98	23.01%	223.67	15.29	7.34%	54.27	32.04%
	25	175.93	251.65	75.72	43.04%	216.41	40.48	23.01%	232.29	15.88	7.34%	56.36	32.04%
	35	241.21	345.11	103.90	43.07%	296.73	55.52	23.02%	318.49	21.76	7.33%	77.28	32.04%
	45	306.49	438.57	132.08	43.09%	377.05	70.56	23.02%	404.69	27.64	7.33%	98.20	32.04%
	55	371.77	532.04	160.27	43.11%	457.38	85.61	23.03%	490.88	33.50	7.32%	119.11	32.04%
	65	437.05	625.50	188.45	43.12%	537.70	100.65	23.03%	577.08	39.38	7.32%	140.03	32.04%
	75	502.33	718.96	216.63	43.13%	618.02	115.69	23.03%	663.28	45.26	7.32%	160.95	32.04%
	100	665.53	952.61	287.08	43.14%	818.83	153.30	23.03%	878.77	59.94	7.32%	213.24	32.04%
	125	773.90	1,106.51	332.61	42.98%	952.03	178.14	23.02%	1,021.84	69.81	7.33%	247.95	32.04%
	150	882.26	1,260.40	378.14	42.86%	1,085.24	202.98	23.01%	1,164.92	79.68	7.34%	282.66	32.04%
	175	990.63	1,414.30	423.67	42.77%	1,218.44	227.81	23.00%	1,307.99	89.55	7.35%	317.36	32.04%
	200	1,098.99	1,568.19	469.20	42.69%	1,351.64	252.65	22.99%	1,451.06	99.42	7.36%	352.07	32.04%
	300	1,532.45	2,183.77	651.32	42.50%	1,884.45	352.00	22.97%	2,023.35	138.90	7.37%	490.90	32.03%

AUDUBON WATER COMPANY

1"

Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 1"		\$ 32.42	\$ 45.00	\$ 12.58	38.80%	\$ 39.80	\$ 7.38	22.76%	\$ 42.80	\$ 3.00	7.54%	\$ 10.38	32.02%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 32.42	\$ 45.00	\$ 12.58	38.80%	\$ 39.80	\$ 7.38	22.76%	\$ 42.80	\$ 3.00	7.54%	\$ 10.38	32.02%
	1	38.95	54.35	15.40	39.54%	47.83	8.88	22.80%	51.42	3.59	7.51%	12.47	32.02%
	2	45.48	63.69	18.21	40.04%	55.86	10.38	22.82%	60.04	4.18	7.48%	14.56	32.01%
	3	52.00	73.04	21.04	40.46%	63.90	11.90	22.88%	68.66	4.76	7.45%	16.66	32.04%
	4	58.53	82.38	23.85	40.75%	71.93	13.40	22.89%	77.28	5.35	7.44%	18.75	32.03%
	5	65.06	91.73	26.67	40.99%	79.96	14.90	22.90%	85.90	5.94	7.43%	20.84	32.03%
	6	71.59	101.08	29.49	41.19%	87.99	16.40	22.91%	94.52	6.53	7.42%	22.93	32.03%
	7	78.12	110.42	32.30	41.35%	96.03	17.91	22.93%	103.14	7.11	7.40%	25.02	32.03%
	8	84.64	119.77	35.13	41.51%	104.06	19.42	22.94%	111.76	7.70	7.40%	27.12	32.04%
	9	91.17	129.11	37.94	41.61%	112.09	20.92	22.95%	120.38	8.29	7.40%	29.21	32.04%
	10	97.70	138.46	40.76	41.72%	120.12	22.42	22.95%	129.00	8.88	7.39%	31.30	32.04%
	11	104.23	147.81	43.58	41.81%	128.16	23.93	22.96%	137.62	9.46	7.38%	33.39	32.03%
	12	110.76	157.15	46.39	41.88%	136.19	25.43	22.96%	146.24	10.05	7.38%	35.48	32.03%
	13	117.28	166.50	49.22	41.97%	144.22	26.94	22.97%	154.86	10.64	7.38%	37.58	32.04%
	14	123.81	175.85	52.04	42.03%	152.25	28.44	22.97%	163.48	11.23	7.38%	39.67	32.04%
	15	130.34	185.19	54.85	42.08%	160.28	29.94	22.97%	172.10	11.82	7.37%	41.76	32.04%
	16	136.87	194.54	57.67	42.13%	168.32	31.45	22.98%	180.72	12.40	7.37%	43.85	32.04%
	17	143.40	203.88	60.48	42.18%	176.35	32.95	22.98%	189.33	12.98	7.36%	45.93	32.03%
	18	149.92	213.23	63.31	42.23%	184.38	34.46	22.99%	197.95	13.57	7.36%	48.03	32.04%
	19	156.45	222.58	66.13	42.27%	192.41	35.96	22.98%	206.57	14.16	7.36%	50.12	32.04%
	20	162.98	231.92	68.94	42.30%	200.45	37.47	22.99%	215.19	14.74	7.35%	52.21	32.03%
	21	169.51	241.27	71.76	42.33%	208.48	38.97	22.99%	223.81	15.33	7.35%	54.30	32.03%
	22	176.04	250.61	74.57	42.36%	216.51	40.47	22.99%	232.43	15.92	7.35%	56.39	32.03%
	23	182.56	259.96	77.40	42.40%	224.54	41.98	23.00%	241.05	16.51	7.35%	58.49	32.04%
	24	189.09	269.31	80.22	42.42%	232.58	43.49	23.00%	249.67	17.09	7.35%	60.58	32.04%
	25	195.62	278.65	83.03	42.44%	240.61	44.99	23.00%	258.29	17.68	7.35%	62.67	32.04%
	35	260.90	372.11	111.21	42.63%	320.93	60.03	23.01%	344.49	23.56	7.34%	83.59	32.04%
	45	326.18	465.57	139.39	42.73%	401.25	75.07	23.01%	430.69	29.44	7.34%	104.51	32.04%
	55	391.46	559.04	167.58	42.81%	481.58	90.12	23.02%	516.88	35.30	7.33%	125.42	32.04%
	65	456.74	652.50	195.76	42.86%	561.90	105.16	23.02%	603.08	41.18	7.33%	146.34	32.04%
	75	522.02	745.96	223.94	42.90%	642.22	120.20	23.03%	689.28	47.06	7.33%	167.26	32.04%
	100	685.22	979.61	294.39	42.96%	843.03	157.81	23.03%	904.77	61.74	7.32%	219.55	32.04%
	125	793.59	1,133.51	339.92	42.83%	976.23	182.65	23.02%	1,047.84	71.61	7.34%	254.26	32.04%
	150	901.95	1,287.40	385.45	42.74%	1,109.44	207.49	23.00%	1,190.92	81.48	7.34%	288.97	32.04%
	175	1,010.32	1,441.30	430.98	42.66%	1,242.64	232.32	23.00%	1,333.99	91.35	7.35%	323.67	32.04%
	200	1,118.68	1,595.19	476.51	42.60%	1,375.84	257.16	22.99%	1,477.06	101.22	7.36%	358.38	32.04%
	300	1,552.14	2,210.77	658.63	42.43%	1,908.65	356.51	22.97%	2,049.35	140.70	7.37%	497.21	32.03%

AUDUBON WATER COMPANY

1 1/2"

Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 1 1/2"		\$ 55.20	\$ 80.00	\$ 24.80	44.93%	\$ 67.80	\$ 12.60	22.83%	\$ 72.90	\$ 5.10	7.52%	\$ 17.70	32.07%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 55.20	\$ 80.00	\$ 24.80	44.93%	\$ 67.80	\$ 12.60	22.83%	\$ 72.90	\$ 5.10	7.52%	\$ 17.70	32.07%
	1	61.73	89.35	27.62	44.74%	75.83	14.10	22.84%	81.52	5.69	7.50%	19.79	32.06%
	2	68.26	98.69	30.43	44.58%	83.86	15.60	22.85%	90.14	6.28	7.49%	21.88	32.05%
	3	74.78	108.04	33.26	44.48%	91.90	17.12	22.89%	98.76	6.86	7.46%	23.98	32.07%
	4	81.31	117.38	36.07	44.36%	99.93	18.62	22.90%	107.38	7.45	7.46%	26.07	32.06%
	5	87.84	126.73	38.89	44.27%	107.96	20.12	22.91%	116.00	8.04	7.45%	28.16	32.06%
	6	94.37	136.08	41.71	44.20%	115.99	21.62	22.91%	124.62	8.63	7.44%	30.25	32.05%
	7	100.90	145.42	44.52	44.12%	124.03	23.13	22.92%	133.24	9.21	7.43%	32.34	32.05%
	8	107.42	154.77	47.35	44.08%	132.06	24.64	22.94%	141.86	9.80	7.42%	34.44	32.06%
	9	113.95	164.11	50.16	44.02%	140.09	26.14	22.94%	150.48	10.39	7.42%	36.53	32.06%
	10	120.48	173.46	52.98	43.97%	148.12	27.64	22.94%	159.10	10.98	7.41%	38.62	32.06%
	11	127.01	182.81	55.80	43.93%	156.16	29.15	22.95%	167.72	11.56	7.40%	40.71	32.05%
	12	133.54	192.15	58.61	43.89%	164.19	30.65	22.95%	176.34	12.15	7.40%	42.80	32.05%
	13	140.06	201.50	61.44	43.87%	172.22	32.16	22.96%	184.96	12.74	7.40%	44.90	32.06%
	14	146.59	210.85	64.26	43.84%	180.25	33.66	22.96%	193.58	13.33	7.40%	46.99	32.06%
	15	153.12	220.19	67.07	43.80%	188.28	35.16	22.96%	202.20	13.92	7.39%	49.08	32.05%
	16	159.65	229.54	69.89	43.78%	196.32	36.67	22.97%	210.82	14.50	7.39%	51.17	32.05%
	17	166.18	238.88	72.70	43.75%	204.35	38.17	22.97%	219.43	15.08	7.38%	53.25	32.04%
	18	172.70	248.23	75.53	43.73%	212.38	39.68	22.98%	228.05	15.67	7.38%	55.35	32.05%
	19	179.23	257.58	78.35	43.71%	220.41	41.18	22.98%	236.67	16.26	7.38%	57.44	32.05%
	20	185.76	266.92	81.16	43.69%	228.45	42.69	22.98%	245.29	16.84	7.37%	59.53	32.05%
	21	192.29	276.27	83.98	43.67%	236.48	44.19	22.98%	253.91	17.43	7.37%	61.62	32.05%
	22	198.82	285.61	86.79	43.65%	244.51	45.69	22.98%	262.53	18.02	7.37%	63.71	32.04%
	23	205.34	294.96	89.62	43.64%	252.54	47.20	22.99%	271.15	18.61	7.37%	65.81	32.05%
	24	211.87	304.31	92.44	43.63%	260.58	48.71	22.99%	279.77	19.19	7.36%	67.90	32.05%
	25	218.40	313.65	95.25	43.61%	268.61	50.21	22.99%	288.39	19.78	7.36%	69.99	32.05%
	35	283.68	407.11	123.43	43.51%	348.93	65.25	23.00%	374.59	25.66	7.35%	90.91	32.05%
	45	348.96	500.57	151.61	43.45%	429.25	80.29	23.01%	460.79	31.54	7.35%	111.83	32.05%
	55	414.24	594.04	179.80	43.40%	509.58	95.34	23.02%	546.98	37.40	7.34%	132.74	32.04%
	65	479.52	687.50	207.98	43.37%	589.90	110.38	23.02%	633.18	43.28	7.34%	153.66	32.04%
	75	544.80	780.96	236.16	43.35%	670.22	125.42	23.02%	719.38	49.16	7.33%	174.58	32.04%
	90	642.72	921.15	278.43	43.32%	790.71	147.99	23.03%	848.67	57.96	7.33%	205.95	32.04%
	100	708.00	1,014.61	306.61	43.31%	871.03	163.03	23.03%	934.87	63.84	7.33%	226.87	32.04%
	125	816.37	1,168.51	352.14	43.14%	1,004.23	187.87	23.01%	1,077.94	73.71	7.34%	261.58	32.04%
	150	924.73	1,322.40	397.67	43.00%	1,137.44	212.71	23.00%	1,221.02	83.58	7.35%	296.29	32.04%
	175	1,033.10	1,476.30	443.20	42.90%	1,270.64	237.54	22.99%	1,364.09	93.45	7.35%	330.99	32.04%
	200	1,141.46	1,630.19	488.73	42.82%	1,403.84	262.38	22.99%	1,507.16	103.32	7.36%	365.70	32.04%
	300	1,574.92	2,245.77	670.85	42.60%	1,936.65	361.73	22.97%	2,079.45	142.80	7.37%	504.53	32.04%

AUDUBON WATER COMPANY

2"

Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge													
2"		\$ 88.19	\$ 125.00	\$ 36.81	41.74%	\$ 108.40	\$ 20.21	22.92%	\$ 116.40	\$ 8.00	7.38%	\$ 28.21	31.99%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 88.19	\$ 125.00	\$ 36.81	41.74%	\$ 108.40	\$ 20.21	22.92%	\$ 116.40	\$ 8.00	7.38%	\$ 28.21	31.99%
	1	94.72	134.35	39.63	41.84%	116.43	21.71	22.92%	125.02	8.59	7.38%	30.30	31.99%
	2	101.25	143.69	42.44	41.92%	124.46	23.21	22.92%	133.64	9.18	7.38%	32.39	31.99%
	3	107.77	153.04	45.27	42.01%	132.50	24.73	22.95%	142.26	9.76	7.37%	34.49	32.00%
	4	114.30	162.38	48.08	42.06%	140.53	26.23	22.95%	150.88	10.35	7.36%	36.58	32.00%
	5	120.83	171.73	50.90	42.13%	148.56	27.73	22.95%	159.50	10.94	7.36%	38.67	32.00%
	6	127.36	181.08	53.72	42.18%	156.59	29.23	22.95%	168.12	11.53	7.36%	40.76	32.00%
	7	133.89	190.42	56.53	42.22%	164.63	30.74	22.96%	176.74	12.11	7.36%	42.85	32.00%
	8	140.41	199.77	59.36	42.28%	172.66	32.25	22.97%	185.36	12.70	7.36%	44.95	32.01%
	9	146.94	209.11	62.17	42.31%	180.69	33.75	22.97%	193.98	13.29	7.36%	47.04	32.01%
	10	153.47	218.46	64.99	42.35%	188.72	35.25	22.97%	202.60	13.88	7.35%	49.13	32.01%
	11	160.00	227.81	67.81	42.38%	196.76	36.76	22.98%	211.22	14.46	7.35%	51.22	32.01%
	12	166.53	237.15	70.62	42.41%	204.79	38.26	22.97%	219.84	15.05	7.35%	53.31	32.01%
	13	173.05	246.50	73.45	42.44%	212.82	39.77	22.98%	228.46	15.64	7.35%	55.41	32.02%
	14	179.58	255.85	76.27	42.47%	220.85	41.27	22.98%	237.08	16.23	7.35%	57.50	32.02%
	15	186.11	265.19	79.08	42.49%	228.88	42.77	22.98%	245.70	16.82	7.35%	59.59	32.02%
	16	192.64	274.54	81.90	42.51%	236.92	44.28	22.99%	254.32	17.40	7.34%	61.68	32.02%
	17	199.17	283.88	84.71	42.53%	244.95	45.78	22.99%	262.93	17.98	7.34%	63.76	32.01%
	18	205.69	293.23	87.54	42.56%	252.98	47.29	22.99%	271.55	18.57	7.34%	65.86	32.02%
	19	212.22	302.58	90.36	42.58%	261.01	48.79	22.99%	280.17	19.16	7.34%	67.95	32.02%
	20	218.75	311.92	93.17	42.59%	269.05	50.30	22.99%	288.79	19.74	7.34%	70.04	32.02%
	21	225.28	321.27	95.99	42.61%	277.08	51.80	22.99%	297.41	20.33	7.34%	72.13	32.02%
	22	231.81	330.61	98.80	42.62%	285.11	53.30	22.99%	306.03	20.92	7.34%	74.22	32.02%
	23	238.33	339.96	101.63	42.64%	293.14	54.81	23.00%	314.65	21.51	7.34%	76.32	32.02%
	24	244.86	349.31	104.45	42.66%	301.18	56.32	23.00%	323.27	22.09	7.33%	78.41	32.02%
	25	251.39	358.65	107.26	42.67%	309.21	57.82	23.00%	331.89	22.68	7.33%	80.50	32.02%
	35	316.67	452.11	135.44	42.77%	389.53	72.86	23.01%	418.09	28.56	7.33%	101.42	32.03%
	42	362.37	517.54	155.17	42.82%	445.76	83.39	23.01%	478.43	32.67	7.33%	116.06	32.03%
	45	381.95	545.57	163.62	42.84%	469.85	87.90	23.01%	504.29	34.44	7.33%	122.34	32.03%
	55	447.23	639.04	191.81	42.89%	550.18	102.95	23.02%	590.48	40.30	7.32%	143.25	32.03%
	65	512.51	732.50	219.99	42.92%	630.50	117.99	23.02%	676.68	46.18	7.32%	164.17	32.03%
	75	577.79	825.96	248.17	42.95%	710.82	133.03	23.02%	762.88	52.06	7.32%	185.09	32.03%
	100	740.99	1,059.61	318.62	43.00%	911.63	170.64	23.03%	978.37	66.74	7.32%	237.38	32.04%
	116	810.34	1,158.10	347.76	42.92%	996.88	186.54	23.02%	1,069.94	73.06	7.33%	259.59	32.03%
	125	849.36	1,213.51	364.15	42.87%	1,044.83	195.48	23.01%	1,121.44	76.61	7.33%	272.09	32.03%
	150	957.72	1,367.40	409.68	42.78%	1,178.04	220.32	23.00%	1,264.52	86.48	7.34%	306.80	32.03%
	175	1,066.09	1,521.30	455.21	42.70%	1,311.24	245.15	23.00%	1,407.59	96.35	7.35%	341.50	32.03%
	200	1,174.45	1,675.19	500.74	42.64%	1,444.44	269.99	22.99%	1,550.66	106.22	7.35%	376.21	32.03%
	300	1,607.91	2,290.77	682.86	42.47%	1,977.25	369.34	22.97%	2,122.95	145.70	7.37%	515.04	32.03%

AUDUBON WATER COMPANY

3"

Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 3"		\$ 165.60	\$ 235.00	\$ 69.40	41.91%	\$ 203.60	\$ 38.00	22.95%	\$ 218.60	\$ 15.00	7.37%	\$ 53.00	32.00%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 165.60	\$ 235.00	\$ 69.40	41.91%	\$ 203.60	\$ 38.00	22.95%	\$ 218.60	\$ 15.00	7.37%	\$ 53.00	32.00%
	1	172.13	244.35	72.22	41.96%	211.63	39.50	22.95%	227.22	15.59	7.37%	55.09	32.00%
	2	178.66	253.69	75.03	42.00%	219.66	41.00	22.95%	235.84	16.18	7.37%	57.18	32.00%
	3	185.18	263.04	77.86	42.05%	227.70	42.52	22.96%	244.46	16.76	7.36%	59.28	32.01%
	4	191.71	272.38	80.67	42.08%	235.73	44.02	22.96%	253.08	17.35	7.36%	61.37	32.01%
	5	198.24	281.73	83.49	42.12%	243.76	45.52	22.96%	261.70	17.94	7.36%	63.46	32.01%
	6	204.77	291.08	86.31	42.15%	251.79	47.02	22.96%	270.32	18.53	7.36%	65.55	32.01%
	7	211.30	300.42	89.12	42.18%	259.83	48.53	22.97%	278.94	19.11	7.35%	67.64	32.01%
	8	217.82	309.77	91.95	42.21%	267.86	50.04	22.97%	287.56	19.70	7.35%	69.74	32.02%
	9	224.35	319.11	94.76	42.24%	275.89	51.54	22.97%	296.18	20.29	7.35%	71.83	32.02%
	10	230.88	328.46	97.58	42.26%	283.92	53.04	22.97%	304.80	20.88	7.35%	73.92	32.02%
	11	237.41	337.81	100.40	42.29%	291.96	54.55	22.98%	313.42	21.46	7.35%	76.01	32.02%
	12	243.94	347.15	103.21	42.31%	299.99	56.05	22.98%	322.04	22.05	7.35%	78.10	32.02%
	13	250.46	356.50	106.04	42.34%	308.02	57.56	22.98%	330.66	22.64	7.35%	80.20	32.02%
	14	256.99	365.85	108.86	42.36%	316.05	59.06	22.98%	339.28	23.23	7.35%	82.29	32.02%
	15	263.52	375.19	111.67	42.38%	324.08	60.56	22.98%	347.90	23.82	7.35%	84.38	32.02%
	16	270.05	384.54	114.49	42.40%	332.12	62.07	22.98%	356.52	24.40	7.35%	86.47	32.02%
	17	276.58	393.88	117.30	42.41%	340.15	63.57	22.98%	365.13	24.98	7.34%	88.55	32.02%
	18	283.10	403.23	120.13	42.43%	348.18	65.08	22.99%	373.75	25.57	7.34%	90.65	32.02%
	19	289.63	412.58	122.95	42.45%	356.21	66.58	22.99%	382.37	26.16	7.34%	92.74	32.02%
	20	296.16	421.92	125.76	42.46%	364.25	68.09	22.99%	390.99	26.74	7.34%	94.83	32.02%
	21	302.69	431.27	128.58	42.48%	372.28	69.59	22.99%	399.61	27.33	7.34%	96.92	32.02%
	22	309.22	440.61	131.39	42.49%	380.31	71.09	22.99%	408.23	27.92	7.34%	99.01	32.02%
	23	315.74	449.96	134.22	42.51%	388.34	72.60	22.99%	416.85	28.51	7.34%	101.11	32.02%
	24	322.27	459.31	137.04	42.52%	396.38	74.11	23.00%	425.47	29.09	7.34%	103.20	32.02%
	25	328.80	468.65	139.85	42.53%	404.41	75.61	23.00%	434.09	29.68	7.34%	105.29	32.02%
	35	394.08	562.11	168.03	42.64%	484.73	90.65	23.00%	520.29	35.56	7.34%	126.21	32.03%
	45	459.36	655.57	196.21	42.71%	565.05	105.69	23.01%	606.49	41.44	7.33%	147.13	32.03%
	55	524.64	749.04	224.40	42.77%	645.38	120.74	23.01%	692.68	47.30	7.33%	168.04	32.03%
	65	589.92	842.50	252.58	42.82%	725.70	135.78	23.02%	778.88	53.18	7.33%	188.96	32.03%
	75	655.20	935.96	280.76	42.85%	806.02	150.82	23.02%	865.08	59.06	7.33%	209.88	32.03%
	100	818.40	1,169.61	351.21	42.91%	1,006.83	188.43	23.02%	1,080.57	73.74	7.32%	262.17	32.03%
	125	926.77	1,323.51	396.74	42.81%	1,140.03	213.27	23.01%	1,223.64	83.61	7.33%	296.88	32.03%
	150	1,035.13	1,477.40	442.27	42.73%	1,273.24	238.11	23.00%	1,366.72	93.48	7.34%	331.59	32.03%
	175	1,143.50	1,631.30	487.80	42.66%	1,406.44	262.94	22.99%	1,509.79	103.35	7.35%	366.29	32.03%
	200	1,251.86	1,785.19	533.33	42.60%	1,539.64	287.78	22.99%	1,652.86	113.22	7.35%	401.00	32.03%
	300	1,685.32	2,400.77	715.45	42.45%	2,072.45	387.13	22.97%	2,225.15	152.70	7.37%	539.83	32.03%

AUDUBON WATER COMPANY

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Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 4"		\$ 275.62	\$ 400.00	\$ 124.38	45.13%	\$ 338.80	\$ 63.18	22.92%	\$ 363.90	\$ 25.10	7.41%	\$ 88.28	32.03%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 275.62	\$ 400.00	\$ 124.38	45.13%	\$ 338.80	\$ 63.18	22.92%	\$ 363.90	\$ 25.10	7.41%	\$ 88.28	32.03%
	1	282.15	409.35	\$ 127.20	45.08%	346.83	64.68	22.92%	372.52	25.69	7.41%	90.37	32.03%
	2	288.68	418.69	\$ 130.01	45.04%	354.86	66.18	22.93%	381.14	26.28	7.41%	92.46	32.03%
	3	295.20	428.04	\$ 132.84	45.00%	362.90	67.70	22.93%	389.76	26.86	7.40%	94.56	32.03%
	4	301.73	437.38	\$ 135.65	44.96%	370.93	69.20	22.93%	398.38	27.45	7.40%	96.65	32.03%
	5	308.26	446.73	\$ 138.47	44.92%	378.96	70.70	22.94%	407.00	28.04	7.40%	98.74	32.03%
	6	314.79	456.08	\$ 141.29	44.88%	386.99	72.20	22.94%	415.62	28.63	7.40%	100.83	32.03%
	7	321.32	465.42	\$ 144.10	44.85%	395.03	73.71	22.94%	424.24	29.21	7.39%	102.92	32.03%
	8	327.84	474.77	\$ 146.93	44.82%	403.06	75.22	22.94%	432.86	29.80	7.39%	105.02	32.03%
	9	334.37	484.11	\$ 149.74	44.78%	411.09	76.72	22.94%	441.48	30.39	7.39%	107.11	32.03%
	10	340.90	493.46	\$ 152.56	44.75%	419.12	78.22	22.95%	450.10	30.98	7.39%	109.20	32.03%
	11	347.43	502.81	\$ 155.38	44.72%	427.16	79.73	22.95%	458.72	31.56	7.39%	111.29	32.03%
	12	353.96	512.15	\$ 158.19	44.69%	435.19	81.23	22.95%	467.34	32.15	7.39%	113.38	32.03%
	13	360.48	521.50	\$ 161.02	44.67%	443.22	82.74	22.95%	475.96	32.74	7.39%	115.48	32.04%
	14	367.01	530.85	\$ 163.84	44.64%	451.25	84.24	22.95%	484.58	33.33	7.39%	117.57	32.03%
	15	373.54	540.19	\$ 166.65	44.61%	459.28	85.74	22.95%	493.20	33.92	7.39%	119.66	32.03%
	16	380.07	549.54	\$ 169.47	44.59%	467.32	87.25	22.96%	501.82	34.50	7.38%	121.75	32.03%
	17	386.60	558.88	\$ 172.28	44.56%	475.35	88.75	22.96%	510.43	35.08	7.38%	123.83	32.03%
	18	393.12	568.23	\$ 175.11	44.54%	483.38	90.26	22.96%	519.05	35.67	7.38%	125.93	32.03%
	19	399.65	577.58	\$ 177.93	44.52%	491.41	91.76	22.96%	527.67	36.26	7.38%	128.02	32.03%
	20	406.18	586.92	\$ 180.74	44.50%	499.45	93.27	22.96%	536.29	36.84	7.38%	130.11	32.03%
	21	412.71	596.27	\$ 183.56	44.48%	507.48	94.77	22.96%	544.91	37.43	7.38%	132.20	32.03%
	22	419.24	605.61	\$ 186.37	44.45%	515.51	96.27	22.96%	553.53	38.02	7.38%	134.29	32.03%
	23	425.76	614.96	\$ 189.20	44.44%	523.54	97.78	22.97%	562.15	38.61	7.37%	136.39	32.03%
	24	432.29	624.31	\$ 192.02	44.42%	531.58	99.29	22.97%	570.77	39.19	7.37%	138.48	32.03%
	25	438.82	633.65	\$ 194.83	44.40%	539.61	100.79	22.97%	579.39	39.78	7.37%	140.57	32.03%
	35	504.10	727.11	\$ 223.01	44.24%	619.93	115.83	22.98%	665.59	45.66	7.37%	161.49	32.04%
	45	569.38	820.57	\$ 251.19	44.12%	700.25	130.87	22.98%	751.79	51.54	7.36%	182.41	32.04%
	55	634.66	914.04	\$ 279.38	44.02%	780.58	145.92	22.99%	837.98	57.40	7.35%	203.32	32.04%
	65	699.94	1,007.50	\$ 307.56	43.94%	860.90	160.96	23.00%	924.18	63.28	7.35%	224.24	32.04%
	75	765.22	1,100.96	\$ 335.74	43.87%	941.22	176.00	23.00%	1,010.38	69.16	7.35%	245.16	32.04%
	100	928.42	1,334.61	\$ 406.19	43.75%	1,142.03	213.61	23.01%	1,225.87	83.84	7.34%	297.45	32.04%
	125	1,036.79	1,488.51	\$ 451.72	43.57%	1,275.23	238.45	23.00%	1,368.94	93.71	7.35%	332.16	32.04%
	150	1,145.15	1,642.40	\$ 497.25	43.42%	1,408.44	263.29	22.99%	1,512.02	103.58	7.35%	366.87	32.04%
	175	1,253.52	1,796.30	\$ 542.78	43.30%	1,541.64	288.12	22.99%	1,655.09	113.45	7.36%	401.57	32.04%
	200	1,361.88	1,950.19	\$ 588.31	43.20%	1,674.84	312.96	22.98%	1,798.16	123.32	7.36%	436.28	32.04%
	300	1,795.34	2,565.77	\$ 770.43	42.91%	2,207.65	412.31	22.97%	2,370.45	162.80	7.37%	575.11	32.03%

AUDUBON WATER COMPANY

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Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 6"		\$ 551.23	\$ 800.00	\$ 248.77	45.13%	\$ 677.60	\$ 126.37	22.93%	\$ 727.80	\$ 50.20	7.41%	\$ 176.57	32.03%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 551.23	\$ 800.00	\$ 248.77	45.13%	\$ 677.60	\$ 126.37	22.93%	\$ 727.80	\$ 50.20	7.41%	\$ 176.57	32.03%
	1	557.76	809.35	251.59	45.11%	685.63	127.87	22.93%	736.42	50.79	7.41%	178.66	32.03%
	2	564.29	818.69	254.40	45.08%	693.66	129.37	22.93%	745.04	51.38	7.41%	180.75	32.03%
	3	570.81	828.04	257.23	45.06%	701.70	130.89	22.93%	753.66	51.96	7.40%	182.85	32.03%
	4	577.34	837.38	260.04	45.04%	709.73	132.39	22.93%	762.28	52.55	7.40%	184.94	32.03%
	5	583.87	846.73	262.86	45.02%	717.76	133.89	22.93%	770.90	53.14	7.40%	187.03	32.03%
	6	590.40	856.08	265.68	45.00%	725.79	135.39	22.93%	779.52	53.73	7.40%	189.12	32.03%
	7	596.93	865.42	268.49	44.98%	733.83	136.90	22.93%	788.14	54.31	7.40%	191.21	32.03%
	8	603.45	874.77	271.32	44.96%	741.86	138.41	22.94%	796.76	54.90	7.40%	193.31	32.03%
	9	609.98	884.11	274.13	44.94%	749.89	139.91	22.94%	805.38	55.49	7.40%	195.40	32.03%
	10	616.51	893.46	276.95	44.92%	757.92	141.41	22.94%	814.00	56.08	7.40%	197.49	32.03%
	11	623.04	902.81	279.77	44.90%	765.96	142.92	22.94%	822.62	56.66	7.40%	199.58	32.03%
	12	629.57	912.15	282.58	44.88%	773.99	144.42	22.94%	831.24	57.25	7.40%	201.67	32.03%
	13	636.09	921.50	285.41	44.87%	782.02	145.93	22.94%	839.86	57.84	7.40%	203.77	32.03%
	14	642.62	930.85	288.23	44.85%	790.05	147.43	22.94%	848.48	58.43	7.40%	205.86	32.03%
	15	649.15	940.19	291.04	44.83%	798.08	148.93	22.94%	857.10	59.02	7.40%	207.95	32.03%
	16	655.68	949.54	293.86	44.82%	806.12	150.44	22.94%	865.72	59.60	7.39%	210.04	32.03%
	17	662.21	958.88	296.67	44.80%	814.15	151.94	22.94%	874.33	60.18	7.39%	212.12	32.03%
	18	668.73	968.23	299.50	44.79%	822.18	153.45	22.95%	882.95	60.77	7.39%	214.22	32.03%
	19	675.26	977.58	302.32	44.77%	830.21	154.95	22.95%	891.57	61.36	7.39%	216.31	32.03%
	20	681.79	986.92	305.13	44.75%	838.25	156.46	22.95%	900.19	61.94	7.39%	218.40	32.03%
	21	688.32	996.27	307.95	44.74%	846.28	157.96	22.95%	908.81	62.53	7.39%	220.49	32.03%
	22	694.85	1,005.61	310.76	44.72%	854.31	159.46	22.95%	917.43	63.12	7.39%	222.58	32.03%
	23	701.37	1,014.96	313.59	44.71%	862.34	160.97	22.95%	926.05	63.71	7.39%	224.68	32.03%
	24	707.90	1,024.31	316.41	44.70%	870.38	162.48	22.95%	934.67	64.29	7.39%	226.77	32.03%
	25	714.43	1,033.65	319.22	44.68%	878.41	163.98	22.95%	943.29	64.88	7.39%	228.86	32.03%
	35	779.71	1,127.11	347.40	44.56%	958.73	179.02	22.96%	1,029.49	70.76	7.38%	249.78	32.03%
	45	844.99	1,220.57	375.58	44.45%	1,039.05	194.06	22.97%	1,115.69	76.64	7.38%	270.70	32.04%
	55	910.27	1,314.04	403.77	44.36%	1,119.38	209.11	22.97%	1,201.88	82.50	7.37%	291.61	32.04%
	65	975.55	1,407.50	431.95	44.28%	1,199.70	224.15	22.98%	1,288.08	88.38	7.37%	312.53	32.04%
	75	1,040.83	1,500.96	460.13	44.21%	1,280.02	239.19	22.98%	1,374.28	94.26	7.36%	333.45	32.04%
	100	1,204.03	1,734.61	530.58	44.07%	1,480.83	276.80	22.99%	1,589.77	108.94	7.36%	385.74	32.04%
	125	1,312.40	1,888.51	576.11	43.90%	1,614.03	301.64	22.98%	1,732.84	118.81	7.36%	420.45	32.04%
	150	1,420.76	2,042.40	621.64	43.75%	1,747.24	326.48	22.98%	1,875.92	128.68	7.36%	455.16	32.04%
	175	1,529.13	2,196.30	667.17	43.63%	1,880.44	351.31	22.97%	2,018.99	138.55	7.37%	489.86	32.04%
	200	1,637.49	2,350.19	712.70	43.52%	2,013.64	376.15	22.97%	2,162.06	148.42	7.37%	524.57	32.04%
	300	2,070.95	2,965.77	894.82	43.21%	2,546.45	475.50	22.96%	2,734.35	187.90	7.38%	663.40	32.03%

AUDUBON WATER COMPANY

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Commercial/Public Monthly Bill at Current, Updated Proposed, and Settlement Rates

	Usage 1,000's	Current Rates	Updated Proposed			Settlement Step-1			Settlement Step-2			Overall Increase	
			Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	Rates	\$ Inc.	% Inc.	\$ Inc.	% Inc.
Customer Charge 10"		\$ 1,068.43	\$ 1,500.00	\$ 431.57	40.39%	\$ 1,313.30	\$ 244.87	22.92%	\$ 1,410.60	\$ 97.30	7.41%	\$ 342.17	32.03%
Volumetric Rates													
First 100,000	100	\$ 6.5280	\$ 9.3461	\$ 2.8181	43.17%	\$ 8.0323	\$ 1.5043	23.04%	\$ 8.6197	\$ 0.5874	7.31%	\$ 2.0917	32.04%
All Over 100,000	100	\$ 4.3346	\$ 6.1558	\$ 1.8212	42.02%	\$ 5.3281	\$ 0.9935	22.92%	\$ 5.7229	\$ 0.3948	7.41%	\$ 1.3883	32.03%
	0	\$ 1,068.43	\$ 1,500.00	\$ 431.57	40.39%	\$ 1,313.30	\$ 244.87	22.92%	\$ 1,410.60	\$ 97.30	7.41%	\$ 342.17	32.03%
	1	1,074.96	1,509.35	434.39	40.41%	1,321.33	246.37	22.92%	1,419.22	97.89	7.41%	344.26	32.03%
	2	1,081.49	1,518.69	437.20	40.43%	1,329.36	247.87	22.92%	1,427.84	98.48	7.41%	346.35	32.03%
	3	1,088.01	1,528.04	440.03	40.44%	1,337.40	249.39	22.92%	1,436.46	99.06	7.41%	348.45	32.03%
	4	1,094.54	1,537.38	442.84	40.46%	1,345.43	250.89	22.92%	1,445.08	99.65	7.41%	350.54	32.03%
	5	1,101.07	1,546.73	445.66	40.48%	1,353.46	252.39	22.92%	1,453.70	100.24	7.41%	352.63	32.03%
	6	1,107.60	1,556.08	448.48	40.49%	1,361.49	253.89	22.92%	1,462.32	100.83	7.41%	354.72	32.03%
	7	1,114.13	1,565.42	451.29	40.51%	1,369.53	255.40	22.92%	1,470.94	101.41	7.40%	356.81	32.03%
	8	1,120.65	1,574.77	454.12	40.52%	1,377.56	256.91	22.93%	1,479.56	102.00	7.40%	358.91	32.03%
	9	1,127.18	1,584.11	456.93	40.54%	1,385.59	258.41	22.93%	1,488.18	102.59	7.40%	361.00	32.03%
	10	1,133.71	1,593.46	459.75	40.55%	1,393.62	259.91	22.93%	1,496.80	103.18	7.40%	363.09	32.03%
	11	1,140.24	1,602.81	462.57	40.57%	1,401.66	261.42	22.93%	1,505.42	103.76	7.40%	365.18	32.03%
	12	1,146.77	1,612.15	465.38	40.58%	1,409.69	262.92	22.93%	1,514.04	104.35	7.40%	367.27	32.03%
	13	1,153.29	1,621.50	468.21	40.60%	1,417.72	264.43	22.93%	1,522.66	104.94	7.40%	369.37	32.03%
	14	1,159.82	1,630.85	471.03	40.61%	1,425.75	265.93	22.93%	1,531.28	105.53	7.40%	371.46	32.03%
	15	1,166.35	1,640.19	473.84	40.63%	1,433.78	267.43	22.93%	1,539.90	106.12	7.40%	373.55	32.03%
	16	1,172.88	1,649.54	476.66	40.64%	1,441.82	268.94	22.93%	1,548.52	106.70	7.40%	375.64	32.03%
	17	1,179.41	1,658.88	479.47	40.65%	1,449.85	270.44	22.93%	1,557.13	107.28	7.40%	377.72	32.03%
	18	1,185.93	1,668.23	482.30	40.67%	1,457.88	271.95	22.93%	1,565.75	107.87	7.40%	379.82	32.03%
	19	1,192.46	1,677.58	485.12	40.68%	1,465.91	273.45	22.93%	1,574.37	108.46	7.40%	381.91	32.03%
	20	1,198.99	1,686.92	487.93	40.70%	1,473.95	274.96	22.93%	1,582.99	109.04	7.40%	384.00	32.03%
	21	1,205.52	1,696.27	490.75	40.71%	1,481.98	276.46	22.93%	1,591.61	109.63	7.40%	386.09	32.03%
	22	1,212.05	1,705.61	493.56	40.72%	1,490.01	277.96	22.93%	1,600.23	110.22	7.40%	388.18	32.03%
	23	1,218.57	1,714.96	496.39	40.74%	1,498.04	279.47	22.93%	1,608.85	110.81	7.40%	390.28	32.03%
	24	1,225.10	1,724.31	499.21	40.75%	1,506.08	280.98	22.94%	1,617.47	111.39	7.40%	392.37	32.03%
	25	1,231.63	1,733.65	502.02	40.76%	1,514.11	282.48	22.94%	1,626.09	111.98	7.40%	394.46	32.03%
	35	1,296.91	1,827.11	530.20	40.88%	1,594.43	297.52	22.94%	1,712.29	117.86	7.39%	415.38	32.03%
	45	1,362.19	1,920.57	558.38	40.99%	1,674.75	312.56	22.95%	1,798.49	123.74	7.39%	436.30	32.03%
	55	1,427.47	2,014.04	586.57	41.09%	1,755.08	327.61	22.95%	1,884.68	129.60	7.38%	457.21	32.03%
	65	1,492.75	2,107.50	614.75	41.18%	1,835.40	342.65	22.95%	1,970.88	135.48	7.38%	478.13	32.03%
	75	1,558.03	2,200.96	642.93	41.27%	1,915.72	357.69	22.96%	2,057.08	141.36	7.38%	499.05	32.03%
	100	1,721.23	2,434.61	713.38	41.45%	2,116.53	395.30	22.97%	2,272.57	156.04	7.37%	551.34	32.03%
	125	1,829.60	2,588.51	758.91	41.48%	2,249.73	420.14	22.96%	2,415.64	165.91	7.37%	586.05	32.03%
	150	1,937.96	2,742.40	804.44	41.51%	2,382.94	444.98	22.96%	2,558.72	175.78	7.38%	620.76	32.03%
	175	2,046.33	2,896.30	849.97	41.54%	2,516.14	469.81	22.96%	2,701.79	185.65	7.38%	655.46	32.03%
	200	2,154.69	3,050.19	895.50	41.56%	2,649.34	494.65	22.96%	2,844.86	195.52	7.38%	690.17	32.03%
	300	2,588.15	3,665.77	1,077.62	41.64%	3,182.15	594.00	22.95%	3,417.15	235.00	7.38%	829.00	32.03%
	2700	12,991.19	18,439.69	5,448.50	41.94%	15,969.59	2,978.40	22.93%	17,152.11	1,182.52	7.40%	4,160.92	32.03%

Appendix D

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2020-3020919
Office of Consumer Advocate	:	C-2020-3021396
Office of Small Business Advocate	:	C-2020-3021579
Lower Providence Township	:	C-2020-3021993
Dennis Zajac	:	C-2020-3021410
Steven Burda	:	C-2020-3022127
	:	
v.	:	
	:	
Audubon Water Company	:	

**STATEMENT OF
AUDUBON WATER COMPANY
IN SUPPORT OF THE
JOINT PETITION FOR FULL SETTLEMENT**

TO ADMINISTRATIVE LAW JUDGE DARLENE HEEP:

I. INTRODUCTION

1. Audubon Water Company (“Company” or “Audubon” or “AWC”) hereby submits this Statement in Support of the Joint Petition for Full Settlement of Rate Proceeding (“Joint Petition” or “Settlement”) filed by the Bureau of Investigation & Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission” or “PUC”), and the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), and Lower Providence Township (“LPT” or “Township”), in the above-captioned proceeding. As indicated in the Joint Petition, if approved, the Settlement resolves all issues in the proceeding. Accordingly, as discussed more fully below, Audubon offers its support for the Settlement as being in the public interest and resulting in just and reasonable rates, and requests that the

Presiding Administrative Law Judge and the Commission approve the Settlement as submitted and without modification.

2. Regarding the revenue increase, instead of the \$934,236 increase requested in the filing, the Settlement Rates are designed to produce an increase of annual revenue of \$703,000 in two phases, with \$503,000 effective upon one day notice, on April 19, 2021 following Commission approval of the Settlement, an additional \$200,000 increase to be effective on April 19, 2022.

3. All customer class rates and charges have received an across-the-board increase.

A comparison of rates is shown below:

	Current	Proposed	Settlement (effective April 19, 2021)	Settlement (effective April 19, 2022)
Consumption Charges				
Residential per 1,000 Gallons	\$6.5280	\$9.3461	\$8.0323	\$8.6197
All remaining customers first 100,000 gallons/month	\$6.5280	\$9.3461	\$8.0323	\$8.6197
All remaining customers over 100,000 gallons/month	\$4.3346	\$6.1558	\$5.3281	\$5.7229
Customer Charge				
5/8 inch	\$12.73 per month \$38.19 per quarter	\$18.00 per month \$54.00 per quarter	\$15.60 per month \$46.80 per quarter	\$16.80 per month \$50.40 per quarter
3/4 inch	\$12.73 per month \$38.19 per quarter	\$18.00 per month \$54.00 per quarter	\$15.60 per month \$46.80 per quarter	\$16.80 per month \$50.40 per quarter
1 inch	\$32.42 per month \$97.26 per quarter	\$45.00 per month \$135.00 per quarter	\$39.80 per month \$119.40 per quarter	\$42.80 per month \$128.40 per quarter
1 1/2 inch	\$55.20 per month	\$80.00 per month	\$ 67.80 per month	\$72.90 per month
2 inch	\$88.19 per month	\$125.00 per month	\$108.40 per month	\$116.40 per month
3 inch	\$165.60 per month	\$235.00 per month	\$203.60 per month	\$218.60 per month
4 inch	\$275.62 per month	\$400.00 per month	\$338.80 per month	\$363.90 per month
6 inch	\$551.23 per month	\$800.00 per month	\$677.60 per month	\$727.80 per month
8 inch	\$882.05 per month	\$1,200.00 per month	\$1,084.20 per month	\$1,164.60 per month
10 inch	\$1068.43 per month	\$1,500.00 per month	\$1,313.30 per month	\$1,410.60 per month
12 inch	\$1670.48 per month	\$1,800.00 per month	\$1,800.00 per month	\$1,935.00 per month
Temporary Rates/Water for Building Purposes				
Single Family	\$129.46 per month	\$184.56 per month	\$159.13 per month	\$170.92 per month

	Current	Proposed	Settlement (effective April 19, 2021)	Settlement (effective April 19, 2022)
Dwelling				
Public Fire Protection Rates				
Annual charge per hydrant	\$233.46	\$333.00	\$288.00	\$308.40
Or a monthly charger per hydrant	\$19.46	\$27.75	\$24.00	\$25.70
Private Fire Protection Rates				
1 inch	\$23.35 per month \$280.15 per annum	\$35.00 per month \$420.00 per annum	\$28.75 per month \$345.00 per annum	\$30.80 per month \$369.60 per annum
2 inch	\$36.97 per month \$443.57 per annum	\$50.00 per month \$600.00 per annum	\$45.50 per month \$546.00 per annum	\$48.80 per month \$585.60 per annum
3 inch	\$42.81 per month \$513.61 per annum	\$60.00 per month \$720.00 per annum	\$52.50 per month \$630.00 per annum	\$56.50 per month \$678.00 per annum
4 inch	\$52.53 per month \$630.34 per annum	\$75.00 per month \$900.00 per annum	\$64.50 per month \$774.00 per annum	\$69.40 per month \$832.80 per annum
6 inch	\$77.82 per month \$933.84 per annum	\$111.00 per month \$1,332.00 per annum	\$95.50 per month \$1,146.00 per annum	\$102.75 per month \$1,233.00 per annum
8 inch	\$126.46 per month \$1,517.49 per annum	\$180.00 per month \$2,160.00 per annum	\$155.50 per month \$1,866.00 per annum	\$167.00 per month \$2,004.00 per annum
10 inch	\$173.15 per month \$2,077.79 per annum	\$245.00 per month \$ 2,940.00 per annum	\$212.75 per month \$ 2,553.00 per annum	\$228.60 per month \$2,743.20 per annum
Hydrants	\$77.82 per month \$ 933.54 per annum	\$111.00 per month \$1,332.00 per annum	\$95.50 per month \$ 1,146.00 per annum	\$102.75 per month \$1,233.00 per annum

4. As detailed below, the Settlement is in the public interest and should be approved without modification.

II. BACKGROUND

1. On July 20, 2020, Audubon Water Company (Audubon), Utility Code 210060, filed Supplement No. 3 to Tariff Water – Pa. PUC No. 4 (Supplement No. 3) to become effective September 19, 2020. Supplement No. 3 would increase Audubon’s total annual operating revenues for water service by approximately \$934,236, or 41.1%.

2. On August 19, 2020, the Office of Consumer Advocate (OCA) filed a Formal Complaint to the rate filing docketed at C-2020-3021396.

3. On August 27, 2020, the Office of Small Business Advocate (OSBA) filed a Formal Complaint to the rate filing docketed at C-2020-3021579.

4. On September 17, 2020, the Lower Providence Township (LPT) filed a Formal Complaint to the rate filing docketed at C-2020-3021993.

5. Additionally, two consumer complaints were filed by Complainant Zajac at Docket No. C-2020-3021410 and by Complainant Burda at Docket No. C-2020-3022127.

6. On September 17, 2020, the Commission, pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing by operation of law until April 19, 2021, unless permitted by Commission Order to become effective at an earlier date. The Commission also ordered an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in Audubon Water Company's proposed Supplement No. 3 to Tariff Water – Pa. PUC No. 4.

7. On or about September 25, 2020 an E-serve Notice was issued by the Commission setting a Prehearing Conference in the above-captioned proceedings for October 30, 2020 before the Honorable Darlene Heep (“ALJ Heep”).

8. On September 28, 2020, Audubon filed the compliance tariff that suspended Supplement No. 3 until April 19, 2021.¹

9. By Prehearing Conference Order dated September 29, 2020 ALJ Heep directed the parties to file Prehearing Conference Memoranda by October 28, 2020.

10. On October 28, 2020, Audubon, I&E, OCA, OSBA, and LPT filed prehearing memoranda.

11. The Prehearing Conference was held on October 30, 2020. Audubon, BIE, OCA, OSBA, and LPT were in attendance.

¹ Audubon submitted a revised compliance tariff filing on October 1, 2020.

12. On Thursday, November 19, 2020 at 6:00 PM and Friday, November 20, 2020 at 1:00 PM, Public Input Hearings were held telephonically due to the ongoing COVID-19 pandemic.

13. On December 21, 2020, Audubon informed the ALJ that Audubon, I&E, OCA, OSBA, LPT, and Complainants Zajac and Burda all agree to waive cross examination.

14. On December 22, 2020, a hearing was held for the purpose of admitting the parties' testimony and exhibits.

15. Audubon submitted the following testimony and evidence, which were admitted into the record on December 22, 2020:

AWC Direct Testimony/Exhibits

AWC Statement No. DMK-1: Direct Testimony of Dennis M. Kalbarczyk
AWC Exhibit No. 1: Exhibit of Dennis M. Kalbarczyk
AWC Exhibit No. 2: Exhibit of Dennis M. Kalbarczyk

AWC Rebuttal Testimony/Exhibits

AWC Statement No. DMK-1R: Rebuttal Testimony of Dennis M. Kalbarczyk
AWC Exhibit No. 1R: Exhibit of Dennis M. Kalbarczyk
AWC Exhibit No. 2R: Exhibit of Dennis M. Kalbarczyk
AWC Exhibit No. 3R: Exhibit of Dennis M. Kalbarczyk
AWC Statement No. JHR-1R: Rebuttal Testimony of J.H. Russell

AWC Rejoinder Outline Testimony/Exhibits

AWC Statement No. DMK-1RJ: Rejoinder Outline of Dennis M. Kalbarczyk
AWC Exhibit No. 1RJ: Exhibit of Dennis M. Kalbarczyk
AWC Exhibit No. 2RJ: Exhibit of Dennis M. Kalbarczyk
AWC Statement No. JHR-1RJ: Rejoinder Outline of J.H. Russel

16. On December 23, 2020 the ALJ issued a Briefing Order establishing the deadlines and requirements for main and reply briefs.

17. On January 8, 2021, Audubon informed the ALJ that Audubon, I&E, OCA, OSBA, LPT were nearing settlement and requested an extension to file a Joint Petition for Settlement by January 19, 2021. The ALJ granted this request.

18. As explained in their respective Statements in Support, I&E, OCA, OSBA, and LPT submitted responsive testimony and evidence of multiple witnesses (Direct and Surrebuttal), which was also entered into the record on December 22, 2020.

19. As explained in the Joint Petition, the Settlement was achieved only after a comprehensive investigation by the Parties into the Company's request and an analysis of the filing, discovery (thousands of pages of detailed information in response to hundreds of questions (including subparts) or document requests from the public advocates regarding all aspects of the requested increase), and the parties' testimony.

20. In the Settlement, the parties have agreed to the revenue requirement, rate design, and other terms including Audubon's operations and ongoing cooperation with Lower Providence Township. The revenue requirement included a two-step phase-in process to help minimize the immediate impact on ratepayers while ultimately providing Audubon with the revenue to maintain safe and reasonable service.

21. The Commission, as stated in its regulations, encourages settlements. *See* 52 Pa. Code §§ 5.231, 69.391, 69.401. This Settlement reflects a carefully balanced compromise of the interests of Audubon, its customers, the statutory advocates, and Lower Providence Township and is in the public interest as explained in greater detail below and in the Joint Petition for Settlement. For these reasons and the reasons set forth below, the Settlement is just and reasonable and should be approved.

III. LEGAL PRINCIPLES

22. In deciding this or any other general rate increase case brought under Section 1308(d) of the Public Utility Code (Code), 66 Pa. C.S. § 1308(d), certain general principles always apply. A public utility is entitled to an opportunity to earn a fair rate of return on the value of the property dedicated to public service. *Pa. Pub. Util. Comm'n v. Pennsylvania Gas*

and Water Co. 341 A.2d 239, 251 (Pa.Cmwlth. 1975). The burden of proof to establish the justness and reasonableness of every element of a public utility's rate increase request rests solely upon the public utility in all proceedings filed under Section 1308(d) of the Code. The standard to be met by the public utility is set forth in Section 315(a) of the Code, 66 Pa.C.S. § 315(a), as follows:

Reasonableness of rates. – In any proceeding upon the motion of the commission, involving any proposed or existing rate of any public utility, or in any proceedings upon complaint involving any proposed increase in rates, the burden of proof to show that the rate involved is just and reasonable shall be upon the public utility.

In reviewing Section 315(a) of the Code, the Pennsylvania Commonwealth Court interpreted a public utility's burden of proof in a rate proceeding as follows:

Section 315(a) of the Public Utility Code, 66 Pa.C.S. § 315(a), places the burden of proving the justness and reasonableness of a proposed rate hike squarely on the public utility.

Lower Frederick Twp. Water Co. v. Pa. Pub. Util. Comm'n, 409 A.2d 505, 507 (Pa.Cmwlth. 1980) (emphasis added). *See also, Brockway Glass Co. v. Pa. Pub. Util. Comm'n*, 437 A.2d 1067 (Pa.Cmwlth. 1981). In order to accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. Pub. Util. Comm'n v. C S Water and Sewer Assoc.*, 74 Pa.PUC 767 (1991); *Pa. Pub. Util. Comm'n v. Philadelphia Electric Co.*, 60 Pa.PUC 1 (1985).

23. Additionally, Commission policy “encourage[s]” settlements. 52 Pa. Code §5.231. Settlements lessen the time and expense the parties must expend litigating a case and at the same time conserves the resources of the Commission. The Commission has indicated that

settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. 52 Pa. Code §69.401. Many proceedings are expensive to litigate. Under longstanding Pennsylvania law,² reasonable rate case expense is recovered 100% from customers in the rates approved by the Commission. This means that a settlement, which allows the parties to avoid the substantial costs of preparing and serving testimony and the cross-examination of witnesses in lengthy hearings, the preparation and service of briefs, reply briefs, exceptions and reply exceptions, together with the briefs and reply briefs necessitated by any appeal of the Commission's decision, yields significant rate case expense savings for the company's customers. This is one reason why settlements are encouraged by long-standing Commission policy.

24. Audubon has met its burden in this case and the Settlement is in the public interest and sets rates which meet the just and reasonable legal standard in Chapter 13 of the Public Utility Code. As explained in detail below, the testimony of Audubon's witnesses, Mr. Kalbarczyk and Mr. Russell shows that without an increase to rates, Audubon will continue to operate at a loss, and the Company has spent significant time and funds in maintaining and investing in the Company's water system. Moreover, the Company outlines in detail that it will expend significant funds for additional projects that will allow customers to continue to enjoy high quality service.

25. In addition, Audubon will work with Lower Providence township on both the Township Intersection Improvement Project and Audubon's fire hydrant replacement program.

² *Butler Twp. Water Co. v. Pa. Pub. Util. Comm'n*, 473 A.2d 219 (Pa. Cmwlth. 1984).

III. SPECIFIC SETTLEMENT TERMS

26. The specific settlement terms are set forth in the Joint Petition for Settlement in ¶¶ 21-35 and are incorporated herein by reference.

27. **Revenue Requirement Increase.** Instead of the \$934,236 increase requested in the filing, the Settlement Rates are designed to produce an increase of annual water revenue of \$703,000, with a \$503,000 increase effective April 19, 2021 with an additional \$200,000 increase effective April 19, 2022 as shown in greater detail on the Proof of Revenues in **Appendix B**. The \$703,000 annual increase, although less than that requested by the Company, will enable the Company to cover its expenses and to continue to invest in facilities that will allow the Company to continue to provide a high quality of service and water to its customers, as well as, respond to the ever increasing demands of Pennsylvania Department of Environmental Protection regulation.

28. As explained by Audubon witness Mr. Kalbarczyk, under present rates, the Company is not able to meet its operating costs and earn a reasonable return on its investment while operating at a net loss. For the forecasted 12 months ended March 31, 2021, Audubon is projected to earn a negative 30.26% return on equity, which is far below the ROEs recommended by Audubon's witness. AWC Statement DMK-1 at 9. Without appropriate rate relief, Audubon's ability to continue to provide environmentally safe, reliable and efficient water and sewer utility services to its customers and meet its financial obligations will be placed in jeopardy. Mr. Kalbarczyk also detailed the multiple plant addition projects, equipment upgrades, vehicle purchases, meter replacement program, distribution replacement programs for looping and system reliability, and information technology system upgrades which Audubon proposed to continue to provide a high level of service. AWC Statement DMK-1.

29. As further explained by Audubon’s witnesses Mr. Russell, Audubon made multiple water infrastructure improvements in the past year and more are planned in the future test period including Audubon’s fire hydrant replacement program, its meter replacement program, maintenance and additions of isolation valves and looping, and increased data collection and record maintenance through Audubon’s information technology upgrades. AWC Statement JHR-1R. These improvements are a reasonable and necessary cost of providing service.

30. **Rate Design and Rate Structure.** This Settlement increases rates across-the-board to all customer classes. Joint Petition at ¶ 22, Appendix B-C. This is a fair and just result that does not cause any customer class to subsidize the costs of others.

31. A comparison of water rates is shown below:

	Current	Proposed	Settlement (effective April 19, 2021)	Settlement (effective April 19, 2022)
Consumption Charges				
Residential per 1,000 Gallons	\$6.5280	\$9.3461	\$8.0323	\$8.6197
All remaining customers first 100,000 gallons/month	\$6.5280	\$9.3461	\$8.0323	\$8.6197
All remaining customers over 100,000 gallons/month	\$4.3346	\$6.1558	\$5.3281	\$5.7229
Customer Charge				
5/8 inch	\$12.73 per month \$38.19 per quarter	\$18.00 per month \$54.00 per quarter	\$15.60 per month \$46.80 per quarter	\$16.80 per month \$50.40 per quarter
3/4 inch	\$12.73 per month \$38.19 per quarter	\$18.00 per month \$54.00 per quarter	\$15.60 per month \$46.80 per quarter	\$16.80 per month \$50.40 per quarter
1 inch	\$32.42 per month \$97.26 per quarter	\$45.00 per month \$135.00 per quarter	\$39.80 per month \$119.40 per quarter	\$42.80 per month \$128.40 per quarter
1 1/2 inch	\$55.20 per month	\$80.00 per month	\$ 67.80 per month	\$72.90 per month
2 inch	\$88.19 per month	\$125.00 per month	\$108.40 per month	\$116.40 per month
3 inch	\$165.60 per month	\$235.00 per month	\$203.60 per month	\$218.60 per month
4 inch	\$275.62 per month	\$400.00 per month	\$338.80 per month	\$363.90 per month
6 inch	\$551.23 per month	\$800.00 per month	\$677.60 per month	\$727.80 per month
8 inch	\$882.05 per month	\$1,200.00 per month	\$1,084.20 per month	\$1,164.60 per month

	Current	Proposed	Settlement (effective April 19, 2021)	Settlement (effective April 19, 2022)
10 inch	\$1068.43 per month	\$1,500.00 per month	\$1,313.30 per month	\$1,410.60 per month
12 inch	\$1670.48 per month	\$1,800.00 per month	\$1,800.00 per month	\$1,935.00 per month
Temporary Rates/Water for Building Purposes				
Single Family Dwelling	\$129.46 per month	\$184.56 per month	\$159.13 per month	\$170.92 per month
Public Fire Protection Rates				
Annual charge per hydrant	\$233.46	\$333.00	\$288.00	\$308.40
Or a monthly charger per hydrant	\$19.46	\$27.75	\$24.00	\$25.70
Private Fire Protection Rates				
1 inch	\$23.35 per month \$280.15 per annum	\$35.00 per month \$420.00 per annum	\$28.75 per month \$345.00 per annum	\$30.80 per month \$369.60 per annum
2 inch	\$36.97 per month \$443.57 per annum	\$50.00 per month \$600.00 per annum	\$45.50 per month \$546.00 per annum	\$48.80 per month \$585.60 per annum
3 inch	\$42.81 per month \$513.61 per annum	\$60.00 per month \$720.00 per annum	\$52.50 per month \$630.00 per annum	\$56.50 per month \$678.00 per annum
4 inch	\$52.53 per month \$630.34 per annum	\$75.00 per month \$900.00 per annum	\$64.50 per month \$774.00 per annum	\$69.40 per month \$832.80 per annum
6 inch	\$77.82 per month \$933.84 per annum	\$111.00 per month \$1,332.00 per annum	\$95.50 per month \$1,146.00 per annum	\$102.75 per month \$1,233.00 per annum
8 inch	\$126.46 per month \$1,517.49 per annum	\$180.00 per month \$2,160.00 per annum	\$155.50 per month \$1,866.00 per annum	\$167.00 per month \$2,004.00 per annum
10 inch	\$173.15 per month \$2,077.79 per annum	\$245.00 per month \$ 2,940.00 per annum	\$212.75 per month \$ 2,553.00 per annum	\$228.60 per month \$2,743.20 per annum
Hydrants	\$77.82 per month \$ 933.54 per annum	\$111.00 per month \$1,332.00 per annum	\$95.50 per month \$ 1,146.00 per annum	\$102.75 per month \$1,233.00 per annum

32. **Other terms.** Audubon and the parties settled on additional terms which are in the public interest. First, regarding isolation valves, Audubon will maintain logs of each isolation valves' maintenance and Audubon will adhere to additional reporting requirements to both the OCA and I&E if valves in need of repair were not immediately addressed. Joint Petition at ¶ 23. Audubon will further compile and maintain pressure readings and customer complaint logs in excel format for use in its next rate case. Joint Petition at ¶ 24-25.

33. Audubon and Lower Providence Township also settled on additional matters involving the Township's intersection improvement project and enhanced coordination on Audubon's fire hydrant replacement program. Joint Petition at ¶ 27.

34. The settlement also agreed to the starting balance and other terms resulting from the Tax Cuts and Jobs Act of 2017, where Audubon will amortize its excess deferred income taxes over a period of 15 years until the full amount is refunded to rate payers. Joint Petition at ¶ 28.

IV. THE SETTLEMENT IS IN THE PUBLIC INTEREST

35. The Settlement establishes rates which are just and reasonable. These rates economically benefit the Company's customers by setting lower rates than originally requested.³ The Settlement also benefits customers because it provides the Company with additional revenues which will promote its continuing to provide a high quality of service.

36. The Settlement is also in the public interest because it balances the Company's need to have funds for upcoming projects versus delay of such projects or substitute projects being undertaken and completed.

37. The Settlement is also in the public interest because it amicably and expeditiously resolves a number of important and potentially contentious issues which would have been very expensive and time-consuming to litigate before this Commission, and likely would have spawned expensive and time-consuming appeals. This Settlement represents a mutually acceptable and reasonable compromise, and will conserve the time, effort and rate case expense of all parties, as well as those of the Commission, the Presiding Officer and the Company's customers.

³ Rate case costs permitted by the Commission are borne by ratepayers of the Company.

38. The Parties arrived at the Settlement terms after extensive review of discovery by the statutory advocates, presentation of testimony and exhibits, and engaging in in-depth settlement discussions. The Settlement terms and conditions constitute a carefully crafted package representing reasonable negotiated compromises on the issues addressed herein. Thus, the Settlement, including its terms and conditions and just and reasonable rates, is consistent with the Commission's rules, practices and procedures encouraging negotiated settlements and is therefore in the public interest. *See* 52 Pa. Code §§ 5.231, 69.391, 69.401.

39. Significantly, three of the signatories, I&E, OCA, and OSBA are charged with specific legal obligations to carefully scrutinize all aspects of a utility's request to increase rates. I&E functions as an independent prosecutorial bureau within the Commission and, as such, is charged with representing the public interest in utility rate proceedings.⁴ The OCA has a statutory obligation to protect the interest of consumers of public utility service.⁵ The OSBA has a statutory obligation to represent the interests of small business customers in regulated utility matters.⁶ As evidenced by their active and extensive participation in all aspects of this case, these statutory parties have discharged their statutory obligations. Their joining in, and fully supporting the Settlement, is strong evidence that the Settlement's rates, terms and conditions are just, reasonable and in the public interest.

40. The Settlement is also without prejudice or admission to any position any party, including Audubon, may take in any subsequent or different proceeding.

41. For all of these reasons, and those stated in the Joint Petition, Audubon Water Company believes that the Settlement is in the public interest and requests that the Presiding

⁴ *See Implementation of Act 129 of 2008 Organization of Bureaus and Offices*, Dkt. No. M-2008-2071852 (Final Order entered August 11, 2011), p.5 ("BI&E will serve as the prosecutory bureau for purposes of representing the public interest in ratemaking and service matters...").

⁵ *See* 71 Pa. C.S. §§ 309-1 *et seq.*

⁶ *See* 73 P.S. §§ 399.41 *et seq.*

Administrative Law Judge and the Commission so find and approve the Settlement and the just and reasonable rates contained in the proposed settlement tariff supplement (**Appendix “A”** to the Joint Petition).

Respectfully submitted,

/s/Whitney E. Snyder

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Counsel for Audubon Water Company

Appendix E

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No.: R-2020-3020919
	:	
Audubon Water Company	:	

**BUREAU OF INVESTIGATION AND ENFORCEMENT
STATEMENT IN SUPPORT OF
JOINT PETITION FOR SETTLEMENT**

TO ADMINISTRATIVE LAW JUDGE DARLENE HEEP:

The Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), by and through its Prosecutor Allison C. Kaster, hereby respectfully submits that the terms and conditions of the foregoing Joint Settlement Petition (Joint Petition or Settlement) are in the public interest and represent a fair, just, and reasonable balance of the interests of Audubon Water Company (Audubon or Company) and its customers.

I. BACKGROUND

1. I&E is charged with representing the public interest in Commission proceedings related to rates, rate-related services, and applications affecting the public interest. In negotiated settlements, it is incumbent upon I&E to identify how amicable resolution of any such proceeding benefits the public interest and to ensure that the public interest is served. Based upon I&E's analysis of the Company's base rate filing,

acceptance of this proposed Settlement is in the public interest and I&E recommends that the Administrative Law Judge and the Commission approve the Settlement in its entirety.

2. On July 20, 2020, Audubon filed Supplement No. 3 to Tariff Water – Pa. PUC No. 4 (Supplement No. 3) to become effective September 19, 2020. Supplement No. 3 would increase Audubon’s total annual operating revenues by approximately \$934,236, or 41.1%.

3. By Order entered September 17, 2020, the Commission instituted a formal investigation to determine the lawfulness, justness, and reasonableness of the existing and proposed rates, rules, and regulations. Pursuant to 66 Pa. C.S. §1308(d), the filing was suspended by operation of law until April 19, 2021, unless permitted by Commission Order to become effective at an earlier date.

4. On August 19, 2020, the Office of Consumer Advocate filed a Formal Complaint at Docket No. C-2020-3021396. On August 27, 2020, the Office of Small Business Advocate filed a Formal Complaint. On September 1, 2020, I&E filed a Notice of Appearance. Lower Providence Township filed a Formal Complaint on September 17, 2020.

5. Administrative Law Judge Darleen Heep (ALJ) was assigned to this proceeding for purposes of conducting hearings and issuing a Recommended Decision.

6. The ALJ held a prehearing conference on October 30, 2020, during which the parties agreed to a schedule for the conduct of the case including the service of testimony among the parties and the dates for evidentiary hearings.

7. Telephonic Public Input Hearings were held on November 19, 2020 at 6:00 p.m. and November 20, 2020 at 1:00 p.m.

8. In accordance with the procedural schedule established at the prehearing conference, I&E served all active parties the following pieces of testimony and accompanying exhibits, which were entered into the evidentiary record on December 21, 2020:

I&E Direct Testimony/Exhibits

I&E Statement No. 1 and I&E Exhibit No. 1: Direct Testimony and Exhibit of John Zalesky

I&E Statement No. 2 and I&E Exhibit No. 2: Direct Testimony and Exhibit of Anthony Spadaccio

I&E Statement No. 3 and I&E Exhibit No. 3: Direct Testimony and Exhibit of Esyan Sakaya

I&E Surrebuttal Testimony/Exhibits

I&E Statement No. 1-SR: Surrebuttal Testimony of John Zalesky

I&E Statement No. 2-SR: Surrebuttal Testimony of Anthony Spadaccio

I&E Statement No. 3-SR and I&E Exhibit No. 3-SR: Surrebuttal Testimony and Exhibit of Esyan Sakaya

9. In accordance with Commission policy favoring settlements at 52 Pa. Code § 5.231, I&E participated in multiple telephonic settlement discussions with the Company and other parties to the proceeding. Following extensive settlement negotiations, the parties reached a settlement.

II. TERMS AND CONDITIONS OF SETTLEMENT

10. It is the policy of the Commission to encourage settlements.¹ The Commission issued the following policy statement that articulates general settlement guidelines and procedures for major rate cases:

In the Commission's judgment, the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding. It is also the Commission's judgment that the public interest will benefit by the adoption of §§ 69.402—69.406 and this section which establish guidelines and procedures designed to encourage full and partial settlements as well as stipulations in major section 1308(d) general rate increase cases.²

11. This policy statement highlights the importance of settlement in Commission proceedings. The instant rate case was filed on July 20, 2020, and over the past six months, the parties engaged in extensive formal and informal discovery, preparation of testimony, and lengthy settlement discussions. All signatories to the Settlement actively participated in and vigorously represented their respective positions during the course of the settlement process. As such, the issues raised by I&E have been satisfactorily resolved through discovery and discussions with the parties and are incorporated in the Joint Petition. I&E represents that the Settlement satisfies all applicable legal standards and results in terms that are preferable to those that may have been achieved at the end of a fully litigated proceeding. Accordingly, for the reasons articulated below, I&E maintains that the proposed Settlement is in the public interest and

¹ 52 Pa. Code § 5.231.

² 52 Pa. Code § 69.401.

requests that the following terms be approved by the ALJ and the Commission without modification:

A. Revenue Requirement (Joint Petition ¶ 20)

The parties agreed to an overall increase of \$703,000 to be phased-in over two steps. The first step of \$503,000 will be effective upon one day notice on April 19, 2021 following Commission approval of the Settlement. An additional \$200,000 increase will be effective on April 19, 2022.

I&E analyzed the ratemaking claims contained in base rate filings including operating and maintenance expenses, rate base, taxes, cash working capital, rate structure, capital structure, and the cost of common equity and long-term debt. The agreed upon Settlement revenue increase is approximately \$90,000 lower than I&E's litigation position, which recommended an overall increase of \$792,485,³ and represents a savings of \$231,236 from Audubon's filed request of \$934,236.

Due to the "black box" nature of the Settlement, there is no agreement upon individual issues; rather, the parties have agreed to an overall increase to base rates that is substantially less than what was requested by the Company. Line-by-line identification and ultimate resolution of every issue raised in the proceeding is not necessary to find that the Settlement satisfies the public interest nor could such a result be achieved as part of a settlement. Black box settlements benefit ratepayers because they allow for the resolution of a contested proceeding at a level of increase that is below the amount

³ I&E St. No. 1-SR, p. 3.

requested by the regulated entity and in a manner that avoids the significant expenditure of time and resources related to further litigation.

Black box settlements are not uncommon in Commission practice. Indeed, the Commission has endorsed the use of black box settlements, as discussed in a recent Order approving such a settlement:

We have historically permitted the use of “black box” settlements as a means of promoting settlement among the parties in contentious base rate proceedings. *See, Pa. PUC v. Wellsboro Electric Co.*, Docket No. R-2010-2172662 (Final Order entered January 13, 2011); *Pa. PUC v. Citizens’ Electric Co. of Lewisburg, PA*, Docket No. R-2010-2172665 (Final Order entered January 13, 2011). Settlement of rate cases saves a significant amount of time and expense for customers, companies, and the Commission and often results in alternatives that may not have been realized during the litigation process. Determining a company’s revenue requirement is a calculation involving many complex and interrelated adjustments that affect expenses, depreciation, rate base, taxes and the company’s cost of capital. Reaching an agreement between various parties on each component of a rate increase can be difficult and impractical in many cases. For these reasons, we support the use of a “black box” settlement in this proceeding and, accordingly, deny this Exception.⁴

I&E individually, and the Joint Petitioners collectively, considered, discussed, and negotiated all issues of import in this Settlement. From a holistic perspective, each party has agreed that the Settlement benefits its particular interest. The Commission has recognized that a settlement “reflects a compromise of the positions held by the parties of interest, which, arguably fosters and promotes the public interest.”⁵ The Settlement in

⁴ *Pa. P.U.C. v. Peoples TWP LLC*, Docket No. R-2013-2355886, p. 28 (Order entered December 19, 2013).

⁵ *Pa. P.U.C. v. C S Water and Sewer Associates*, 74 Pa. PUC 767, 771 (1991).

this proceeding promotes the public interest because a review of the testimony submitted by all parties demonstrates that the Joint Petition reflects a compromise of the litigated positions held by those parties. Therefore, I&E submits that the Settlement balances the interests of Audubon and its customers in a fair and equitable manner.

Public utility regulation allows for the recovery of prudently incurred expenses as well as the opportunity to earn a reasonable return on the value of assets used and useful in public service. The increases proposed in this Settlement respects this principle. Ratepayers will continue to receive safe and reliable service at just and reasonable rates while allowing the Company sufficient additional revenues to meet its operating and capital expenses and providing the opportunity to earn a reasonable return on its investment. Accordingly, I&E submits that the proposed Settlement is in the public interest and requests that it be approved by the ALJ and the Commission without modification.

B. Rate Design/Rate Structure (Joint Petition ¶ 21)

Audubon originally requested a revenue increase of \$934,236; however, through settlement, it agreed to a reduced increase of \$703,000 to be phased in over two steps. As explained in the Settlement, rates were designed to produce an across the board, moderated increase. The proposed across the board increase is appropriate as the Company has not provided a cost of service study; therefore, there is no justification for a scale back targeted to a specific rate or customer class. Accordingly, a proportional scale-back is the most reasonable way to design rates given that the Company will recover less than the full increase requested in the filing under the Settlement. As shown

on Appendix C, the typical residential customer using 4,000 gallons of water per month will pay the following customer charge and usage rate under the Settlement rates:

	Company Present	Company Proposed	Settlement Step 1	Settlement Step 2	Overall % Increase
Customer Charge	\$12.73	\$18.00	\$15.60	\$16.80	31.97%
Usage Rate	\$6.5280	\$9.3461	\$8.0323	\$8.6197	32.04%

I&E fully supports the settled upon revenue allocation and rates design as set forth in the Joint Petition. I&E believes that the settled upon revenue allocations and rate design are in the public interest as they provide stability to the Company and represent a fair and reasonable rate increase to customers.

C. TCJA Amortization (Joint Petition ¶ 27)

The Company identified an amortization of excess accumulated deferred income tax (ADIT) due to the changes made by the Tax Cuts and Jobs Act, which reduced the federal tax rate from 35% to 21%. In testimony, I&E raised concerns that the Company reclassified excess ADIT as a regulatory liability of \$192,309 but did not make a corresponding reduction to rate base and that the Company proposed to amortize this regulatory liability over 15 years starting in 2017 rather than beginning at the end of the fully projected future test year (FPFTY).⁶ To remedy these concerns, I&E recommended that the Company reduce rate base by the excess ADIT balance at the end of the FPFTY in the amount of \$179,488 (\$192,309 - \$12,821), which represents the total regulatory liability of \$192,309 less one year of amortization of \$12,821 that would transpire during

⁶ I&E St. No. 1, pp. 27-29; I&E St. No. 1-SR, pp. 22-25.

the FPFTY.⁷ The Settlement reflects I&E's recommendations as the parties agree that the starting balance of \$192,309 will be amortized over a period of 15 years beginning in the FPFTY and will continue as a reduction to rate base in all future proceedings until the full amount is returned to ratepayers. I&E witness John Zalesky explained that reducing rate base by the excess ADIT remaining balance in this proceeding and all future base rate proceedings until the entire amount is returned to ratepayers is in the public interest because this money was originally received from ratepayers and must ultimately be returned to ratepayers:

When the tax rate decreased as a result of the TCJA, a portion of the ADIT became excess ADIT, or the amount of ADIT that will never be repaid to the government due to decreased tax rates. Because ADIT is factored into rates through the ratemaking formula, the newly reclassified excess ADIT is effectively an interest-free loan from ratepayers. Therefore, it is imperative that ratepayers get this money back through amortization and that the remaining balance be deducted from rate base so that the Company does not earn a return from ratepayers on something that was funded by them in the first place.⁸

Additionally, the timing of the amortization is important to ensure that ratepayers receive the full benefit through rates. Although the lower tax rate took effect January 2018, ratepayers will not experience the benefit until new rates become effective in this proceeding.⁹ For this reason, I&E argued that it was inappropriate to begin amortizing prior to the effective date of new rates, as initially recommended by the Company,

⁷ I&E St. No. 1, p. 29.

⁸ I&E St. No. 1-SR, p. 24.

⁹ I&E St. No. 1, p. 28.

because ratepayers will never be fully refunded. The Settlement remedies this concern as it ensures the full amount will be refunded to ratepayers.

III. THE SETTLEMENT SATISFIES THE PUBLIC INTEREST

12. I&E represents that all issues raised in testimony have been satisfactorily resolved through discovery and discussions with the Company or are incorporated or considered in the resolution proposed in the Settlement. The very nature of a settlement requires compromise on the part of all parties. This Settlement exemplifies the benefits to be derived from a negotiated approach to resolving what can appear at first blush to be irreconcilable regulatory differences. Joint Petitioners have carefully discussed and negotiated all issues raised in this proceeding, and specifically those addressed and resolved in this Settlement. Further line-by-line identification of the ultimate resolution of the disputed issues beyond those presented in the Settlement is not necessary as I&E represents that the Settlement maintains the proper balance of the interests of all parties. I&E is satisfied that no further action is necessary and considers its investigation of this rate filing complete.

13. Based upon I&E's analysis of the filing, acceptance of this proposed Settlement is in the public interest. Resolution of this case by settlement rather than litigation will avoid the substantial time and effort involved in continuing to formally pursue all issues in this proceeding at the risk of accumulating excessive expense.

14. I&E further submits that the acceptance of this Settlement will negate the need for evidentiary hearings, which would compel the extensive devotion of time and expense for the preparation, presentation, and cross-examination of multiple witnesses,

the preparation of briefs, the preparation of exceptions, and the potential of filed appeals, all yielding substantial savings for all parties, and ultimately all customers, as well as certainty on the regulatory disposition of issues.

15. The Settlement is conditioned upon the Commission's approval of all terms without modification. Should the Commission fail to grant such approval or otherwise modify the terms and conditions of the Settlement in any way, it may be withdrawn by the Company, I&E, or any other Joint Petitioner.

16. I&E's agreement to settle this case is made without any admission or prejudice to any position that I&E might adopt during subsequent litigation in the event that the Settlement is rejected by the Commission or otherwise properly withdrawn by any other parties to the Settlement.

17. If the ALJ recommends that the Commission adopt the Settlement as proposed, I&E agrees to waive the filing of Exceptions. However, I&E does not waive its right to file Exceptions with respect to any modifications to the terms and conditions of the Settlement or any additional matters that may be proposed by the ALJ in the Recommended Decision. I&E also does not waive the right to file Replies in the event any party files Exceptions.

WHEREFORE, the Commission's Bureau of Investigation and Enforcement represents that it supports the Joint Petition for Settlement as being in the public interest and respectfully requests that Administrative Law Judge Darlene Heep recommend, and the Commission approve, the terms and conditions contained in the Settlement.

Respectfully submitted,

A handwritten signature in black ink that reads "Allison C. Kaster". The signature is written in a cursive style with a long, sweeping tail on the letter 'K'.

Allison C. Kaster
Deputy Chief Prosecutor
PA Attorney ID No. 93176

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120
(717) 787-1976

Dated: January 20, 2021

Appendix F

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
	:	
v.	:	Docket No. R-2020-3020919
	:	
Audubon Water Company	:	
	:	

**OFFICE OF CONSUMER ADVOCATE’S STATEMENT IN SUPPORT
OF JOINT PETITION FOR FULL SETTLEMENT OF RATE PROCEEDING**

The Office of Consumer Advocate (OCA), one of the signatory parties to the Joint Petition for Full Settlement of Rate Proceeding (Settlement), finds the terms and conditions of the Settlement to be in the public interest for the following reasons:

I. INTRODUCTION

On July 20, 2020, Audubon Water Company (Audubon or Company) filed Supplement No. 3 to Tariff Water - Pa. P.U.C. No. 4, to become effective September 19, 2020. The Company, by filing this tariff supplement, sought Commission approval to make rate changes that would increase the level of rates that it charges for providing water service to its customers.

The proposed tariff contained changes in rates calculated to recover an estimated annual increase in base rate revenues of \$934,243. This represents an approximate 42.65% increase in the Company’s annual revenues. Under Audubon’s proposal, the proposed base rates for an average customer using 4,000 gallons per quarter would increase from \$38.84 to \$55.38, or by 43%. The Company serves approximately 2,700 residential and commercial

customers in portions of Lower Providence Township in Montgomery County, Pennsylvania.

On August 19, 2020, the OCA filed a Formal Complaint and Public Statement against the proposed increase in rates and a Notice of Appearance. The Office of Small Business Advocate (OSBA) filed a Formal Complaint and Public Statement on August 27, 2020. The Bureau of Investigation and Enforcement (I&E) filed a notice of appearance on August 14, 2020.

By Order entered on September 17, 2020, the Commission initiated an investigation into the lawfulness, justness and reasonableness of the proposed rates Supplement No. 3 to Tariff Water - Pa. P.U.C. No. 4, and suspended the effective date until April 19, 2021 by operation of law.

The Commission assigned the case to Administrative Law Judge (ALJ) Heep. A telephonic prehearing conference was held on October 30, 2020. The parties had a series of discussions related to resolving the rate increase filing. As a result of the discussions, the signatory parties were able to reach an agreement in principle to resolve all issues, resulting in the comprehensive settlement terms and conditions set forth herein. As discussed below, the OCA submits that the Settlement is in the best interest of Audubon's ratepayers and public interest and should be adopted.

II. SETTLEMENT TERMS AND CONDITIONS

A. Revenue Increase and Allocation (§20)

The proposed Settlement provides for an overall increase in annual revenues of \$703,000 in two phases. Regarding Phase 1, following Commission approval of this Settlement and no earlier than April 19, 2021, upon one day's notice the Company will be permitted to implement a \$503,000 increase (22.92%). An additional \$200,000 increase will be effective on April 19, 2022 that will be a 7.41% increase over Step 1 rates. The \$703,000 overall increase in annual revenues represents a 32.03% increase, in lieu of the proposed \$934,243 increase originally proposed by

Audubon. See Settlement ¶ 20(a); see also Appendices A and B. This compromise represents a 24.75% reduction from Audubon's original rate increase request.

Under the proposed Settlement, the bill for the typical residential customer using 4,000 gallons of water per month would increase from \$38.84 to \$47.73 per month in Phase 1, a 22.89% increase. During Phase 2, the typical residential customer using 4,000 gallons of water per month would see an additional increase of \$3.55 per month to \$51.28 per month. The overall increase a typical residential customer using 4,000 gallons of water per month would be to \$51.28 per month, a 32.03% increase in April 2022, rather than the \$55.38 increase (42.58%) in April 2021 as originally proposed by the Company. Settlement Appendix C.

Based on the OCA's analysis of the Company's filing, and discovery responses, the amount of the rate increase under the proposed Settlement represents a result that could be within the range of likely outcomes in the event of full litigation of the case. This increase is appropriate when accompanied by other important conditions contained in the Settlement and yields a result that is just and reasonable. This increase, phased in as provided for in the Settlement, represents a reasonable compromise given the extraordinary circumstances resulting from the COVID-19 pandemic. Regarding the pandemic, several parties submitted evidence discussing the hardship it has created for consumers and businesses and advocated that no additional rate increase should be permitted beyond what is necessary to avoid an operating loss. However, the agreed upon rate increase is near the lowest amount feasible to ensure the financial viability of the Company. OCA St. 1 at 23; OCA St. 2S at 1-2.

B. Rate Design/Structure (¶21)

The proposed rates were calculated using an across the board approach. See Appendix B. The OCA proposed a different rate design and scaleback in its testimony (OCA St. 4 at 4-5; OCA

St. 4S at 3-5, 7-8), but the OCA submits that this approach is a reasonable resolution as part of the Settlement in this proceeding.

C. Isolation Valves (¶22)

Concerning isolation valves, the Company has agreed to maintain a log of when each valve has been exercised or attempted to be exercised in a 5 year period. The log shall note when valves are found to be inoperable, and shall note the repairs to the valves. If the valves were not able to be repaired immediately, Audubon Water Company agrees to submit a report to the Commission with a copy to OCA and I&E on 4/1 of each calendar year for the next 3-years with action taken or to be taken in upcoming year, i.e., for replacing or repairing the isolation valves. This provision concerning isolation valve prevents increased water loss during a water main break. See OCA St. 5 at 10. This provision also insures that isolation valves are being exercised regularly in order to avoid difficult repair or replacement procedures. See OCA St. 5 at 10-11. .

D. Pressure Surveys (¶23)

Concerning Pressure Surveys, Audubon agrees to compile and maintain pressure readings at the highest and lowest ground elevations during periods near maximum and minimum usage for each distribution system and pressure zone (“Field Tests”), beginning 4/1/21. In its next rate case, the company shall also provide these compiled Field Tests in an Excel format, and a customer complaint log that indicates the resolution of pressure complaints. This provision concerning pressure surveys ensures that the Company is in compliance with 52 Pa. Code § 65.6, which gives the requirements for water main pressures. See OCA. St. 5 at 15-16.

E. Customer Complaints (¶24)

Concerning Customer Complaints, on February 1, 2022 and in its next rate filing, Audubon Water Company agrees to provide a single complaint log (in a live Excel format) that satisfies 52

Pa. Code § 65.3. The complaint log will include the following categories that can be sorted by date and location: dirty water, taste, odor, color, customer property damage, leaking meter, request for meter testing, request for water testing, and incomplete surface restoration. This provision concerning a customer complaint log ensures the company will be in compliance with 52 Pa. Code § 65.3, which states requirements for investigation and recording customer complaints. See OCA St. 5 at 16-17. This complaint log would also provide helpful information regarding the suitability of sequestration of the Company's water and data demonstrating whether the Company's computer systems and Supervisory Control and Data Acquisition System (SCADA) provides accurate pressure survey information. See OCA St. 5S at 12.

F. DSIC Cap (§25)

Concerning the DSIC Cap, Audubon Water Company agrees to withdraw its request to increase its DSIC cap. Audubon Water agrees that it will file a Long-Term Infrastructure Improvement Plan with the Commission pursuant to Docket No. L-2012-2317274, 66 Pa. C.S. § 1352, and 52 Pa. Code §§ 121.1-121.8. This provision ensures that the Company will comply with the Public Utility Code concerning the Long-Term Infrastructure Improvement Plan while also providing for rate stability for ratepayers. OCA St. 4 at 5-9; OCA St. 4S at 5-6.

G. Lower Providence Township Issues (§26)

The Company and the Lower Providence Township have determined to work cooperatively and in good faith concerning the relocation project related to the State Route 4004-Parke Avenues, Eagleville Road, and Crawford Road Intersection Improvement Project. The Settlement includes the following provisions indicating that the Company will provide engineered maps of its facilities to the Township, and the treatment of engineering maps as Confidential Security Information. The disclosure of the engineered maps as a part of a competitive bidding process will be subject to a

non-disclosure agreement between the township and any party receiving the map. Additionally, the Township will seek to obtain any and all available grants or funding for this project to cover Audubon's costs associated with the project. If the Township does not obtain the full amount of funding to cover Audubon's costs, the Company will seek to recover the unfunded costs through its DISC if eligible. If the Commission does not approve the full recovery of Audubon's DSIC-eligible costs, the Township will pay a portion of Audubon's costs which will be the lesser of \$100,000 or 50% of Audubon's actual and unrecovered costs. This provision should work to provide necessary information from Audubon to the Township while setting forth a process related to the costs of the project.

Concerning fire hydrants, the Company will prioritize a list of high importance hydrants identified by Lower Providence Township and its Fire Marshal to address hydrants of greatest concern first. Audubon will review with the Township's Fire Marshal hydrant flow tests in 2021-2022 to prioritize Audubon's replacement program. Audubon, in the presence of the Lower Providence Township will perform volume tests on the hydrants at the choice of the Fire Marshal within sixty days of the approval of this Settlement. If any hydrants shall show deficient water volume, Audubon will develop a plan to remedy the same. This hydrant replacement program will ensure that ratepayers can rely on water hydrants for fire protection services.

H. The Tax Cuts and Jobs Act of 2017 and Excess ADIT (§ 27)

The federal Tax Cuts and Jobs Act reduced the corporate income tax rate to 21%. The decrease in the federal tax rate creates excess Accumulated Deferred Income Taxes (ADIT). The amount of excess ADIT adjustment to be amortized (credited) on an annual basis is (\$12,821) and is incorporated into the settlement revenue requirement. The parties agree that it is to be returned over a 15-year amortization period starting with the fully projected future test year (ending March

31, 2022) in this proceeding. Settlement ¶ 27. This provision reasonably addresses the issue raised by I&E regarding the return of the excess ADIT to the Audubon customers.

III. CONCLUSION

The terms and conditions of the proposed Settlement of this rate proceeding represent a fair and reasonable resolution of the issues and claims arising in this proceeding. If approved, the proposed Settlement would provide for an increase of approximately \$703,000 in annual revenues to be phased in over two steps. This amount is reduced from the \$934,243 annual increase proposed in Audubon's filing. Additionally, the Commission and all parties would benefit from the reduction in rate case expense and the conservation of resources made possible by adoption of the Settlement in lieu of full litigation.

WHEREFORE, for the foregoing reasons, the Office of Consumer Advocate submits that the proposed Settlement is in the interest of Audubon's ratepayers and the public interest.

Respectfully Submitted,

/s/Christine Maloni Hoover

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Counsel for:
Tanya J. McCloskey
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Fax: (717) 783-7152

DATED: January 20, 2021
302193

Appendix G

**STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE
IN SUPPORT OF THE
JOINT PETITION FOR FULL SETTLEMENT OF RATE PROCEEDING**

Introduction

On July 20, 2020, Audubon Water Company (“Audubon” or the “Company”) filed Supplement No. 3 to Tariff Water Pa. P.U.C. No. 4 (“Supplement No. 3”) with the Pennsylvania Public Utility Commission (“Commission”). The rates set forth in Supplement No. 3, if approved by the Commission, would have increased Audubon’s annual jurisdictional revenues by \$934,243 or by 42.56%.

The Small Business Advocate is authorized and directed to represent the interests of the small business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50. Pursuant to that statutory authority, the Office of Small Business Advocate (“OSBA”) filed a Complaint in response Supplement No. 3 on August 27, 2020.

The OSBA actively participated in the negotiations that led to the proposed Joint Petition for Full Settlement of Rate Proceeding (“*Joint Petition*”) and is a signatory to the *Joint Petition*. The OSBA submits this statement in support of the *Joint Petition*.

The Joint Petition

The *Joint Petition* sets forth a list of issues that were resolved through the negotiation process. The following issues were of particular significance to the OSBA when it concluded that the *Joint Petition* was in the best interests of Audubon's small business customers.

1. Revenue Allocation

OSBA witness Brian Kalcic summarized Audubon's rate classes, as follows:

Audubon currently provides service to three separate rate classes:

- 1) Metered Service ('MS');
- 2) Public Fire Protection Service; and
- 3) Private Fire Protection Service.

Metered service customers pay both a customer charge, which varies by meter size, and a consumption charge. Public and Private Fire Protection customers pay a fixed hydrant or connection charge.

OSBA Statement No. 1, at 2 (formatting added).

Significantly, Audubon did not provide a class cost of service study ("COSS") in this proceeding. *Id.*, at 3. Consequently, Mr. Kalcic continued, as follows:

Absent class cost-of-service information, the Commission would have no objective basis from which to determine whether any alternative proposals that would, by definition, reflect non-uniform class increases, would be cost based. In such circumstances, an across-the-board revenue adjustment is both required and appropriate.

OSBA Statement No. 1, at 4.

The *Joint Petition* proposes an across-the-board increase to Audubon's customer classes. This follows Mr. Kalcic's recommendation. Therefore, the OSBA respectfully submits that this is a just and reasonable resolution to this issue.

2. Moderating the Customer Charge Increases

Audubon proposed to “moderate” its proposed customer charge increases. Mr. Kalcic responded to that proposal, as follows:

Audubon suggests that its proposed customer charges are intended to smooth out, or round, the customer charge to whole dollars. While it is correct that all of the Company’s proposed customer charges are reflective of whole dollars, not all such charges are determined by **rounding down** to the *nearest* whole dollar.

As shown in Audubon’s Schedule G-4, the Company’s proposed whole dollar customer charges are reflective of individual customer charge increases ranging from 7.75% (12” meter) to 45.13% (4” and 6” meters). If Audubon had instead **rounded its customer charges to the nearest whole dollar**, the individual customer charge increases shown in Schedule G-4 would approximate the Company’s requested system average increase of 42.56%.

OSBA Statement No. 1, at 4 (emphasis in original) (emphasis added). Mr. Kalcic recommended:

Given the lack of a COSS in this case, there is no cost basis for applying anything other than a uniform increase (exclusive of rounding impacts) to all of Audubon’s existing tariff charges, including its MS customer charges.

Id.

The *Joint Petition* proposes customer charges that follow the recommendation of Mr. Kalcic. Specifically, customer charges are increased uniformly, with “rounding” limited to the nearest ten cents. *See Joint Petition*, Appendix A, at Supplement No. 5, Second Revised Page No. 5A. The OSBA respectfully submits that this is a just and reasonable resolution to the customer charge issue.

Conclusion

For the reasons set forth in the *Joint Petition*, as well as the additional factors that are enumerated in this statement, the OSBA supports the proposed *Joint Petition* and respectfully requests that the ALJ and the Commission approve the *Joint Petition* in its entirety.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101

Dated: January 20, 2021

Appendix H

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	
v.	:	
	:	Docket No. R-2020-3020919
	:	
AUDUBON WATER COMPANY	:	

**STATEMENT OF LOWER PROVIDENCE TOWNSHIP IN SUPPORT OF
JOINT PETITION FOR SETTLEMENT**

TO THE HONORABLE DARLENE HEEP, ADMINISTRATIVE LAW JUDGE:

Lower Providence Township supports the Joint Petition for Settlement (“Settlement”) to which this Statement in Support is appended. Lower Providence Township (“Township”) is one of the Joint Petitioners filing the Joint Petition and supporting the Settlement. Lower Providence Township believes and avers the Settlement is in the public interest and should be approved by the Administrative Law Judge and the Pennsylvania Public Utility Commission. In support of its position, Lower Providence Township believes and avers the following:

1. Although Lower Providence Township joins in the settlement of all issues, this Statement in Support addresses only those two service-related issues that the Township Lower Providence Township raised in its Formal Complaint to Proposed Rate Increase and its Direct Testimony in support of its Formal Complaint. First, the Township raised the lack of information and necessary system plans needed from Audubon in coordination with a major Township road project. Second, the Township raised the issue of underperforming fire hydrants owned by Audubon. The Settlement satisfactorily addresses the issues raised by Lower Providence Township.

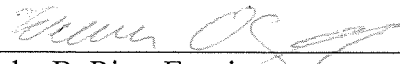
2. The Settlement terms are lawful and task Audubon with certain duties pertaining to the issues raised by the Township. The duties incumbent upon Audubon as a result of this Settlement protect and advance the public interest for the following reasons:
 - a. The Settlement limits the exposure of the residents and taxpayers of Lower Providence Township to pay for relocation and replacement of Audubon facilities located in the public right-of-way.
 - b. The Settlement requires Audubon to provide planning and design documents to Lower Providence Township which permits the Township's major road project to move forward without a delay that could cost taxpayer funds.
 - c. The Settlement requires mutual cooperation between Audubon and Township fire protection officials in ascertaining and remediating underperforming fire hydrants, thereby advancing the public health, safety, and welfare by enhancing the ability of the fire companies operating within Lower Providence Township to provide suitable fire protection.
3. The Settlement provides a resolution to the issues in this proceeding without resort to adversarial litigation and the costs inherent with such litigation.
4. Support for the Settlement is unanimous among the active parties in the case.

WHEREFORE, Lower Providence Township respectfully requests that the Administrative Law Judge approve the Settlement reached by Audubon, the statutory advocates, and Lower Providence Township as proposed, and recommends the Settlement's adoption without modification by the Pennsylvania Public Utility Commission.

Date: January 20, 2021

Respectfully Submitted,

GRIM, BIEHN & THATCHER

By: 

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Attorneys for Lower Providence Township

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

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Dated: January 20, 2021