Exhibit No.:

Issue(s):
Rate Design
Witness/Type of Exhibit:
Marke/Direct
Sponsoring Party:
Public Counsel
WR-2017-0259

### **DIRECT TESTIMONY**

### OF

### **GEOFF MARKE**

Submitted on Behalf of the Office of the Public Counsel

### INDIAN HILLS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2017-0259

October 13, 2017

### BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Applic Of a Rate Increase For Indian Hills Utility Operating Company, Inc.	eatio	on	) ) )	Case No. WR-2017-0259
		AFFI	DAVIT	OF GEOFF MARKE
STATE OF MISSOURI	)			
COUNTY OF COLE	)	SS		

Geoff Marke, of lawful age and being first duly sworn, deposes and states:

- 1. My name is Geoff Marke. I am a Regulatory Economist for the Office of the Public Counsel.
- 2. Attached hereto and made a part hereof for all purposes is my direct testimony.
- 3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Geoff Marke Chief Economist

Subscribed and sworn to me this 13<sup>th</sup> day of October 2017.

NOTARY SEAL SE

JERENE A. BUCKMAN My Commission Expires August 23, 2021 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My commission expires August 23, 2021.

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### DIRECT TESTIMONY

**OF** 

### **GEOFF MARKE**

### INDIAN HILL UTILITY COMPANY

### CASE NO. WR-2017-0259

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- Q. Please state your name, title and business address.
- A. Geoff Marke, PhD, Chief Economist, Office of the Public Counsel (OPC or Public Counsel),P.O. Box 2230, Jefferson City, Missouri 65102.
- Q. By whom are you employed and in what capacity?
- A. I am employed by the OPC as the Chief Economist.
- Q. Please describe your education and employment background.
- A. I received a Bachelor of Arts Degree in English from The Citadel, a Masters of Arts Degree from The University of Missouri, St. Louis, and a Doctorate of Philosophy in Public Policy Analysis from Saint Louis University ("SLU"). At SLU, I served as a graduate assistant where I taught undergraduate and graduate course work in urban policy and public finance. I also conducted mixed-method research in transportation policy, economic development and emergency management.

I have been in my present position with OPC since April of 2014 where I have been responsible for economic analysis and policy research in electric, gas and water utility operations. Prior to joining OPC, I was employed by the Missouri Public Service Commission as a Utility Policy Analyst II in the Energy Resource Analysis Section, Energy Unit, Utility Operations Department, Regulatory Review Division. My primary duties in that role involved reviewing, analyzing and writing recommendations concerning electric integrated resource planning, renewable energy standards, and demand-side management programs for all investor-owned electric utilities in Missouri. I have also been employed by

Direct Testimony of Geoff Marke Case No. WR-2017-0259

the Missouri Department of Natural Resources (later transferred to the Department of Economic Development), Energy Division where I served as a Planner III and functioned as the lead policy analyst on electric cases. I have worked in the private sector, most notably serving as the Lead Researcher for Funston Advisory based out of Detroit, Michigan. My experience with Funston involved a variety of specialized consulting engagements with both private and public entities.

- Q. Have you been a member of, or participant in, any work groups, committees, or other groups that have addressed electric utility regulation and policy issues?
- A. Yes. I am currently a member of the National Association of State Consumer Advocates (NASUCA) Distributed Energy Resource Committee which shares information and establishes policies regarding energy efficiency, renewable generation, and distributed generation, and considers best practices for the development of cost-effective programs that promote fairness and value for all consumers. I am also a member of NASUCA's Electricity and Water Committees each tasked with analyzing current issues affecting residential consumers.
- Q. Have you testified previously before the Missouri Public Service Commission?
- A. Yes. A listing of the cases in which I have previously filed testimony and/or comments before this commission is attached in GM-1.
- Q. What is the purpose of your direct testimony?
- A. The purpose of this testimony is to provide OPC's proposed rate design for Indian Hills Utility (or the "Company").

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### II. RATE DESIGN

### Q. Did you perform a class cost of service ("CCOS") study?

A. No. A CCOS allocates each cost listed in a Company's cost of service into different cost components such as base costs, maximum day usage and maximum hourly usage. The necessary data to support these allocations generally are not available for small regulated utilities such as Indian Hills. As an alternative, I used a general cost of service to develop rates in the absence of such data.

### Q. What is the general purpose of rate design?

A. The general purpose of rate design is to set "rates" that are both fair and just for the ratepayer, while still affording the Company an opportunity to collect its Commission-approved revenue requirement.

In designing rates, certain objectives are typically sought that can often be in conflict with one another such as, revenue stability, conservation, fostering a business-friendly environment and affordability. As such, it is important to understand both the characteristics of the utility and the community it serves. Designing artificially low rates at the expense of the utility's financial health can lead to a sudden, massive rate increase in the future or to failing systems that can endanger public health. Conversely, rate shock and risk transfer to ratepayers can lead to affordability concerns. For example, an approximate 600% increase in rates would be considered a rate shock.

### Q. What are the characteristics of Indian Hill and the community it serves?

A. Indian Hills is located in Cuba, Missouri in Crawford County and services 715 customers. The massive rate request sought by Indian Hill is, in part, a result of rates that were previously kept artificially low. It is OPC's understanding that Indian Hill's ratepayers consist of both seasonal and full-time residents.

Although it represents a rough approximation, a general snapshot of Indian Hills ratepayers can be gleaned by looking at the county-wide Census economic data. According to the U.S.

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Table 1: Crawford County Demographics 2015<sup>1</sup>

follows in Table 1 below.

Population	24,526
Total Households	9,309
Mean Household Income	\$48,500
Median Household Income	\$36,700
% of Households with Income Less than \$10,000	10.3%
Poverty Rate	19.4%
Child Poverty Rate	28.6%
65 years and older Population	4,556
% of Households with Income Between \$50,000 - \$99,999.	27.4%

Census Bureau—American Community Survey ("ACS") 5-year estimate tracks from 2015

Crawford County, Missouri's household income demographics can be broken down as

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What should the Commission note from this table? Q.

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That an order of magnitude rate increase will have an adverse impact on the ratepayers Indian Hills services. For ratepayers that are living paycheck to paycheck or on fixed incomes, large increases in water bills may force households into making difficult decisions regarding essential items such as medicine, food and shelter.

### Q. What is OPC's proposed rate design?

Utilizing the Company's requested revenue requirement, OPC is proposing a seasonal rate A. design to attempt to accommodate the variation in occupancy and estimated seasonal water usage of its ratepayers. The current rate design and proposed seasonal breakdown can be seen in Table 2-4.

<sup>&</sup>lt;sup>1</sup> National Association of Counties: NACo Explorer.: Crawford County, Missouri. <a href="http://explorer.naco.org/#">http://explorer.naco.org/#</a>

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### Table 2: Current Rates for 5/8" Meter

Base Customer Charge	Usage Rate (per 1,000 gallons used)
\$10.81	\$1.89

Table 3: Proposed Seasonal Rates June through September for 5/8" Meter

Base Customer Charge	Usage Rate (per 1,000 gallons used)
\$43.03	\$6.06

Table 4: Proposed Non-Seasonal Rates October through May for 5/8" Meter

Base Customer Charge	Usage Rate (per 1,000 gallons used)
\$13.03	\$16.11

### Q. What is OPC's rationale behind the proposed rates?

A. The seasonal rate design is proposed with piecemeal data to support it. As such, this design may be subject to revisions as more information is obtained regarding the characteristics of the Indian Hills community. It is OPC's understanding that there are a fair amount of ratepayers who utilize service for only several weekends a summer and then discontinue service for the non-summer months. OPC's rate design is designed to recognize both seasonal and non-seasonal ratepayers that are serviced by Indian Hills.

### Q. What documents did you utilize in the development of your proposed rate design?

A. I applied OPC's revenue requirement to Staff's general cost of service study's rate design for the seasonal months of June through September and applied OPC's revenue requirement to

Direct Testimony of Geoff Marke Case No. WR-2017-0259

- OPC's general cost of service study rate design for the non-seasonal months of October through April (see GM-2).
- 3 Q. Does this conclude your testimony?
  - A. Yes.

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### CASE PARTICPATION OF GEOFF MARKE, PH.D.

Company Name	Employed Agency	Case Number	Issues
Indian Hills Utility	Office of Public Counsel (OPC)	WR-2017-0259	Direct: Rate Design
Rule Making	OPC	EW-2018-0078	Comments on cogeneration and net metering
Missouri American Water	OPC	WU-2017-0296	Direct: Lead line replacement pilot program Rebuttal: Lead line replacement pilot program Surrebuttal: Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	Comments on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	Comments on Emerging Issues in Utility Regulation / Presentation: Inclining Block Rate Design Considerations
Rule Making	OPC	EX-2016-0334	Comments on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	Direct: Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy Surrebuttal: EV Charging Station Policy
Kansas City Power & Light		ER-2016-0156	Direct: Consumer Disclaimer Direct: Response to Commission Directed Questions Rebuttal: Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations Rebuttal: Class Cost of Service / Rate Design

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			Surrebuttal: Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption Direct: Rate Design Rebuttal: Low-Income Programs / Advertising / EEI Dues Rebuttal: Grid-Access Charge / Inclining Block Rates /Economic Development Riders
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	Direct: Consumer Disclaimer Rebuttal: Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low-Income Programs Surrebuttal: Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub-Corp.	OPC	EM-2016-0213	Rebuttal: Response to Merger Impact Surrebuttal: Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	Comments on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Comments on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	Rebuttal: Rate Design, Demand-Side Management, Low-Income Weatherization Surrebuttal: Demand-Side Management, Low-Income Weatherization, Monthly Bill Average
Missouri American Water	OPC	WR-2015-0301	Direct: Consolidated Tariff Pricing / Rate Design Study Rebuttal: District Consolidation/Rate Design/Residential Usage/Decoupling Rebuttal: Demand-Side Management (DSM)/ Supply-Side Management (SSM) Surrebuttal: District

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			Consolidation/Decoupling Mechanism/Residential Usage/SSM/DSM/Special Contracts
Working Case:	OPC	AW-2015-0282	Memorandum: Response to
Decoupling Mechanism	01 0	AW 2015 0202	Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	Rebuttal: Demand-Side Investment Mechanism / MEEIA Cycle II Application Surrebuttal: Potential Study / Overearnings / Program Design Supplemental Direct: Third-party mediator (Delphi Panel) / Performance Incentive Supplemental Rebuttal: Select Differences between Stipulations
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0029	Ameren MEEIA Cycle I Prudence Review Comments
Kansas City Power & Light	OPC	ER-2014-0370	Direct (Revenue Requirement): Solar Rebates Rebuttal: Rate Design / Low-Income Weatherization / Solar Rebates Surrebuttal: Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	Net Metering and Renewable Energy Standard Rule Revisions, Comments
The Empire District Electric Company	OPC	ER-2014-0351	Rebuttal: Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments

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Union Electric	OPC	ER-2014-0258	<b>Direct:</b> Rate Design/Cost of Service
Company d/b/a		2011 0200	Study/Economic Development Rider
Ameren Missouri			Rebuttal: Rate Design/ Cost of
			Service/ Low Income Considerations
			Surrebuttal: Rate Design/ Cost-of-
			Service/ Economic Development
			Rider
KCP&L Greater	OPC	EO-2014-0189	Rebuttal: Sufficiency of Filing
Missouri Operations			Surrebuttal: Sufficiency of Filing
Company			
KCP&L Greater	OPC	EO-2014-0151	Renewable Energy Standard Rate
Missouri Operations			Adjustment Mechanism (RESRAM)
Company			Comments
Liberty Natural Gas	OPC	GR-2014-0152	Surrebuttal: Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	Rebuttal: Energy Efficiency
			Surrebuttal: Energy Efficiency
Union Electric	OPC	ER-2012-0142	Direct: PY2013 EM&V results /
Company d/b/a			Rebound Effect
Ameren Missouri			Rebuttal: PY2013 EM&V results
			Surrebuttal: PY2013 EM&V results
			<b>Direct:</b> Cycle I Performance Incentive
			Rebuttal: Cycle I Performance
		50 2014 0005	Incentive
Kansas City Power &	Missouri Public	EO-2014-0095	Rebuttal: MEEIA Cycle I Application
Light	Service		testimony adopted
	Commission Staff		
KCP&L Greater	Missouri	EO-2014-0065	Integrated Resource Planning: Special
Missouri Operations	Division of	10-2014-0003	Contemporary Topics Comments
Company	Energy (DE)		Contemporary ropics comments
Kansas City Power &	DE	EO-2014-0064	Integrated Resource Planning: Special
Light		2011 0001	Contemporary Topics Comments
The Empire District	DE	EO-2014-0063	Integrated Resource Planning: Special
Electric Company			Contemporary Topics Comments
Union Electric	DE	EO-2014-0062	Integrated Resource Planning: Special
Company d/b/a			Contemporary Topics Comments
Ameren Missouri			composition, representations
The Empire District	DE	EO-2013-0547	Triennial Integrated Resource
Electric Company			Planning Comments
Working Case: State-	OPC	EW-2013-0519	Presentation: Does Better
Wide Advisory			Information Lead to Better Choices?
Collaborative			Evidence from Energy-Efficiency
			Labels
Independence-	OPC	Indy Energy	Presentation: Energy Efficiency
Missouri		Forum 2014	
Independence-	OPC	Indy Energy	Presentation: Rate Design
Missouri	1	Forum2015	1

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NARUC – 2017 Winter	OPC	Committee on	NARUC – 2017 Winter Presentation:
		Consumer	PAYS Tariff On-Bill Financing
		Affairs	
NASUCA – 2017	OPC	Committee on	NASUCA – 2017 Summer
Summer		Water	Presentation: Regulatory Issues
		Regulation	Related to Lead-Line Replacement of
			Water Systems

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### Indian Hills Utility Operating Company, Inc. Rate Making Income Statement-Water

	Seasonal Months (June to Septembe	Customer					
	Operating Revenues at	Current Rates		0.000	Charge	Con	nmodity
1	Tariffed Rate Revenues *	\$	92,555	\$	92,555	\$	-
2	Other Operating Revenues *	\$	4,736	\$	-	\$	4,736
3	Total Operating Revenues	\$	97,291				
4	* See "Revenues - Current Rates" for Details						

	Cost of Service						
	Item		Amount				
5	Misc Source of Supply Expense	\$	-	0.00	\$		\$ -
6	Pumping	\$	17,261	0.00	\$	-	\$ 17,261
7	Chemicals	\$	5,381	0.00	\$	12	\$ 5,381
8	Operation Labor & Expense	\$	90,426	0.30	\$	27,128	\$ 63,298
9	Operation Supervision & Engineering	\$	_	0.50	\$		\$ -
	Transmission & Distribution	\$	=	0.20	\$	=	\$ -
	Contract Water Testing	\$	<u></u>	0.80	\$		\$ =
	Maintenance of Structure and Improvements	\$	5,071	0.50	\$	2,536	\$ 2,536
	Maintenance Pumping	\$	-	0.00	\$	-	\$ ···
	Maintenance Supervision and Engineering	\$	.=	0.50	\$	-	\$ 5 <del>7</del> 3
	Maintenance of Transmission & Distribution	\$	127	0.50	\$	64	\$ 64
	Billing & Collections	\$	17,961	0.80	\$	14,369	\$ 3,592
	Bank Fees			0.00	\$	-	\$ -
	Administrative & General Expenses	. \$	111,601	1.00	\$	111,601	\$ ( <del>-</del> )
	DNR	\$	830	1.00	\$	830	\$ -
	PSC	\$	1,025	1.00	\$	1,025	\$ _
21	Rate Case	\$	7 <u>=</u>	1.00	70.		\$ 
	Business License	\$	74	1.00	\$	74	\$ 
	Sub-Total Operating Expenses	\$ \$ \$	249,757	7-	\$	157,626	\$ 92,131
	SS & Medicare		5,287	0.80	\$	4,230	\$ 1,057
	Unemployment	\$	15 <u>-</u>	0.80		-	\$ =:
	Property Taxes	\$	4,956	0.80		3,965	\$ 991
	Income Taxes	\$	32,538	0.80	\$	26,030	\$ 6,508
	Sub-Total Taxes	\$ \$ \$	42,781	_	\$	34,225	\$ 8,556
	Depreciation	\$	92,589	0.80	•	74,071	\$ 18,518
1000	Amoritzation	\$	X <del>=</del>	0.80		-	\$ ##X
	Interest	\$	60,525	0.60	\$	36,315	\$ 24,210
	Sub-Total Depreciation/Interest/Amortization	\$	153,114		\$	110,386	\$ 42,728
33	Return on Equity	\$	83,749	0.80	\$	66,999	\$ 16,750
	Total Cost of Service	\$ \$ \$ \$	529,401		\$	369,236	\$ 160,165
	Cost to recover in rates	\$	524,665		\$	369,236	\$ 155,429
36	Overall Revenue Increase Needed	\$	432,110		\$	276,681	\$ 155,429

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# Indian Hills Utility Operating Company, Inc.

## Residential Customer Bill Comparison-Water

Seasonal Months (June to September)

	Rates for 5/8" Meter			
	Current Base	Proposed Base	Current	Proposed
Customer	Customer Charge	Customer Charge	Usage Rate	Usage Rate
5/8" Meter	\$ 10.81	\$ 43.03	\$ 1.89	\$ 6.06
48				

current service charge is monthly charge usage rate is per 1,000 gallons used

### MONTHLY BILL COMPARISON

Full Time average 3,000 gallons/month usage.

	Current customer charge includes 4,000 gallons of water	ĵ				8
	\$ 10.81	\$ 43.03 \$ 18.19 \$ 61.23		\$32.22 298.10%	\$18.19 N.A.	\$50.42 466.38%
Monthly Billing	Customer Charge \$ Customer Charge \$ Usage Charge \$ Total Bill \$	Proposed Rates Customer Charge \$ Usage Charge \$ Total Bill \$	INCREASES	Customer Charge \$1 Increase \$1 % Increase \$29	Usage Charge \$ Increase % Increase	Total Bill \$ Increase \$ Norease 46

### Indian Hills Utility Operating Company, Inc. Rate Making Income Statement-Water

	Non-Seasonal Months (October to	May)		C	ustomer		
	Operating Revenues	at Current Rates			Charge	Con	nmodity
1	Tariffed Rate Revenues *	\$	92,555	\$	92,555	\$	-
2	Other Operating Revenues *	\$	4,736	\$	-	\$	4,736
3	Total Operating Revenues	s	97 291				

4 \* See "Revenues - Current Rates" for Details

90.00	Cost of Service						
	Item		Amount				
5	Misc Source of Supply Expense	\$	=	0.00	\$	-	\$ -
	Pumping	\$	17,261	0.00	\$	-	\$ 17,26
7	Chemicals	\$	5,381	0.00	\$	-	\$ 5,38
8	Operation Labor & Expense	\$	90,426	0.00	\$	-	\$ 90,42
9	Operation Supervision & Engineering	\$		0.00	\$	-	\$ -
10	Transmission & Distribution	\$	· ·	0.20	\$	-	\$ -0
11	Contract Water Testing	\$	: <del>-</del>	0.00	\$	-	\$ -
	Maintenance of Structure and Improvements	\$	5,071	0.25	\$	1,268	\$ 3,80
	Maintenance Pumping	\$	•	0.00	\$	=	\$ -
14	Maintenance Supervision and Engineering	\$	·	0.00	\$	_	\$ 
	Maintenance of Transmission & Distribution	\$	127	0.00	\$	-	\$ 12
16	Billing & Collections	\$	17,961	0.80	\$	14,369	\$ 3,59
	Bank Fees	**	\$1	0.00	\$	-	\$ _
18	Administrative & General Expenses	\$	111,601	0.00	\$	-	\$ 111,60
	DNR	\$	830	1.00	\$	830	\$ -
20	PSC	\$	1,025	0.00	\$	-	\$ 1,02
21	Rate Case	\$	-	1.00	\$	-	\$ -
22	Business License	\$	74	0.00	-	-	\$ 7
23	Sub-Total Operating Expenses	\$ \$ \$	249,757		\$	16,467	\$ 233,29
24	SS & Medicare	\$	5,287	0.00	\$		\$ 5,28
25	Unemployment	\$		0.00	0.00	-	\$
	Property Taxes	\$	4,956	0.50		2,478	\$ 2,47
27	Income Taxes		32,538	0.50		16,269	\$ 16,26
28	Sub-Total Taxes	\$ \$ \$	42,781		\$	18,747	\$ 24,03
29 -	Depreciation	\$	92,589	0.50	\$	46,295	\$ 46,29
30	Amoritzation	\$	2011 E	0.50	\$	-	\$ 
31	Interest	\$	60,525	0.50	\$	30,263	\$ 30,26
32	Sub-Total Depreciation/Interest/Amortization	\$	153,114	1	\$	76,557	\$ 76,55
	Return on Equity	\$	83,749	0.00	\$	-	\$ 83,74
34	Total Cost of Service	\$	529,401	-	\$	111,771	\$ 417,63
35	Cost to recover in rates	\$ \$ \$ \$	524,665	1 <del></del>	\$	111,771	\$ 412,89
26	Overall Revenue Increase Needed	\$	432,110	)) <del>-</del>	\$	19,216	\$ 412,89

# Indian Hills Utility Operating Company, Inc.

### Residential Customer Bill Comparison-Water

Non-Seasonal Months (October to May)

	Proposed Usage Rate \$ 16.11	
	Current Usage Rate \$ 1.89	
	Proposed Base Customer Charge \$ 13.03	
Rates for 5/8" Meter	Current Base Customer Charge \$ 10.81	
	Customer 5/8" Meter	

current service charge is monthly charge usage rate is per 1,000 gallons used

MONTHLY BILL COMPARISON Full Time average 3,000 gallons/month usage.

	Current customer charge includes 4,000 gallons of water	T				
10.81	10.81	13.03 48.33 61.35		\$2.22 20.51%	\$48.33 N.A.	\$50.54 467.55%
rthly Billing rge	Usage Charge \$ Total Bill \$	Proposed Rates Customer Charge \$ Usage Charge \$ Total Bill \$	INCREASES	Customer Charge \$ Increase % Increase	Usage Charge \$ Increase % Increase	Total Bill \$ Increase \$ % Increase 44