

**DIRECT TESTIMONY**

**OF**

**WILLIAM D. MARR  
WATER ENGINEER**

**WATER DEPARTMENT  
FINANCIAL ANALYSIS DIVISION  
ILLINOIS COMMERCE COMMISSION**

**AQUA ILLINOIS, INC.**

**PETITION FOR THE ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE  
AND NECESSITY TO OPERATE A WATER SUPPLY AND DISTRIBUTION SYSTEM  
IN CHAMPAIGN COUNTY, ILLINOIS; AND FOR THE ISSUANCE OF AN ORDER  
APPROVING RATES, ACCOUNTING ENTRIES, AND TARIFF LANGUAGE**

**DOCKET NO. 04-0362**

**DECEMBER 10, 2004**

1 **WITNESS IDENTIFICATION AND BACKGROUND**

2

3 **Q. Please state your name and business address.**

4 A. My name is William D. Marr. My business address is 527 East Capitol Avenue,  
5 Springfield, Illinois 62701.

6

7 **Q. Please describe your present position and its responsibilities.**

8 A. I am presently employed as a Water Engineer in the Water Department of the  
9 Financial Analysis Division of the Illinois Commerce Commission (“ICC” or  
10 “Commission”). My responsibilities have included reviewing and analyzing tariff  
11 filings related to rates, rules, regulations, and conditions of utility service;  
12 reviewing requests for declaratory rulings; reviewing applications for certificates  
13 of public convenience and necessity; reviewing information regarding the  
14 prudence of Qualifying Infrastructure Plant (“QIP”) investment costs; conducting  
15 inspections of public water and sewer facilities; evaluating and performing cost of  
16 service studies (“COSS”) and rate design; reviewing requests for general  
17 increases in rates for water and sewer service; reviewing tariff filings related to  
18 purchased water surcharge riders and information sheets; and presenting expert  
19 witness testimony at Commission hearings.

20

21 **Q. Please describe your professional experience in the regulatory field.**

22 A. I have been employed by the Commission since January 2, 2003. Prior to this  
23 time I worked at the Illinois Environmental Protection Agency (“Illinois EPA”) for

24 ten years as an Environmental Protection Engineer (“EPE”) I, II, and III. My  
25 responsibilities as an EPE included the review and issuance of air pollution  
26 control permits for the Title V - Clean Air Act Permit Program, the Prevention of  
27 Significant Deterioration, and the Major Stationary Sources Construction and  
28 Modification for Non-Attainment Area New Source Review; the review and  
29 approval of Best Available Control Technology and Lowest Achievable Emission  
30 Rate determinations; the review and approval of Emissions Reduction Market  
31 System baseline emissions determinations; the review and approval of Emissions  
32 Reduction Generator proposals; the review and approval of Compliance  
33 Assurance Monitoring Plan submittals; and the determination of air pollution rule  
34 applicability and the verification of compliance of sources.

35

36 **Q. Please describe your educational background.**

37 A. I received a Bachelor of Science Degree in Mechanical Engineering from  
38 Southern Illinois University at Carbondale in December of 1991. I received an  
39 Engineer-In-Training (“EIT”) professional license from the State of Illinois in April  
40 of 1991.

41

42 **Q. Please describe your professional affiliations.**

43 A. I am a member of the American Water Works Association (“AWWA”).

44

45 **Q. Have you previously provided expert testimony in regulatory matters?**

46 A. Yes. I have previously provided expert witness testimony in rulemaking hearings  
47 before the Illinois Pollution Control Board while working at the Illinois EPA. In  
48 addition, I have previously provided testimony before the Commission in Docket  
49 No. 02-0781 for Mancuso Investment Corporation, Docket No. 01-0827 for  
50 Silverleaf Resorts, Inc., Docket No. 03-0069 for Consumers Illinois Water  
51 Company (“CIWC”), Docket No. 03-0177 for CIWC, Docket No. 03-0365 for  
52 Illinois-American Water Company (“IAWC”), Docket No. 03-0398 for Cedar Bluff  
53 Utilities, Inc., Docket No. 03-0400 for Charmar Water Company, Docket No. 03-  
54 0401 for Cherry Hill Water Company, Docket No. 03-0677 for South Beloit Water,  
55 Gas and Electric Company, and Docket No. 04-0522 for IAWC.

56

57 **INTRODUCTION**

58

59 **Q. What is the purpose of this proceeding?**

60 A. Aqua Illinois, Inc. (“Aqua Illinois” or the “Company”) has filed a Petition for a  
61 Certificate of Public Convenience and Necessity (“Certificate”) to construct, own,  
62 operate, and maintain a public water supply and distribution system, and in  
63 connection therewith, transact a public water utility business within the Village of  
64 Philo located in Philo Township, Champaign County, Illinois, pursuant to Section  
65 8-406 of the Illinois Public Utilities Act (“Act”), 220 ILCS 5/8-406, for approval of  
66 proposed rates for water service in the Village of Philo, and for approval of  
67 accounting entries to record the net original cost of the Village of Philo’s water  
68 facilities proposed to be acquired by the Company.

69

70 **Q. What is the purpose of your testimony in this proceeding?**

71 A. The purpose of my testimony is to review (i) under Section 8-406 of the Act,  
72 whether the public convenience and necessity require that the Company own,  
73 operate, and maintain a public water supply and distribution system within the  
74 Village of Philo, (ii) the Company's proposed certificated service area  
75 encompassing the Village of Philo, (iii) the prudence of the Company's  
76 construction of proposed capital improvements to the Village of Philo's water  
77 system, and (iv) the Company's current Rates, Rules, Regulations, and  
78 Conditions of Service tariffs for water service.

79

80 **PUBLIC CONVENIENCE AND NECESSITY**

81

82 **Q. What criteria did you use to develop your recommendation with respect to**  
83 **public convenience and necessity?**

84 A. I used Section 8-406(b) of the Act, which states, in part:

85 The Commission shall determine that proposed construction will promote the  
86 public convenience and necessity only if the utility demonstrates: (1) that the  
87 proposed construction is necessary to provide adequate, reliable, and efficient  
88 service to its customers and is the least-cost means of satisfying the service  
89 needs of its customers; (2) that the utility is capable of efficiently managing and  
90 supervising the construction process and has taken sufficient action to ensure  
91 adequate and efficient construction and supervision thereof;...

92

93 **Q. Is the proposed acquisition of the Village of Philo's water system**  
94 **necessary to provide adequate, reliable, and efficient service to customers**  
95 **within the Village of Philo?**

96 A. Yes. The water system is necessary to provide adequate, reliable, and efficient  
97 water service to customers within the Village of Philo.<sup>1</sup> It appears that the Village  
98 of Philo no longer wishes to provide water service and has accepted the  
99 Company's bid to purchase the water system. The Company currently provides  
100 adequate, reliable, and efficient water service to customers within the Vermilion  
101 County Division service area.

102

103 **Q. Does the Village of Philo's water system currently have sufficient capacity**  
104 **to provide water service to the Village of Philo without constructing**  
105 **additional water facilities?**

106 A. Yes. The Village of Philo's water system is supplied on a wholesale basis via a  
107 9-mile long, 6-inch in diameter, ductile iron transmission water main from Illinois-  
108 American Water Company's ("IAWC") groundwater system in Champaign-  
109 Urbana, Illinois.<sup>2</sup> The water supply main is the source of water for the Village of  
110 Philo's water system.<sup>3</sup> The Village of Philo will remain on its current source of  
111 supply, which is the purchase of wholesale water from IAWC.<sup>4</sup> The current  
112 capacity of the water supply main is approximately 130 gallons per minute, which  
113 equates to 68,328,000 gallons per year.<sup>5</sup> The Village of Philo used 31,355,335  
114 gallons of water during 2003.<sup>6</sup> The forecasted annual demand for the Village of

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<sup>1</sup> Petition, Paragraph 14, Page 5

<sup>2</sup> Petition, Paragraph 4, Page 2

<sup>3</sup> Petition, Exhibit A, Section 6(i), Page 7

<sup>4</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 5; Company response to ICC Staff data request WD 1.05

<sup>5</sup> Company response to ICC Staff data request WD 1.03

<sup>6</sup> Company response to ICC Staff data request ML-1

115 Philo is 39,312,000 gallons of water for year ending 12/31/2008.<sup>7</sup> Therefore, the  
116 Village of Philo's water system will have sufficient capacity to meet the  
117 forecasted demand of the Village without the need to construct additional water  
118 facilities.

119

120 **Q. Is the proposed acquisition of the Village of Philo's water system the least-**  
121 **cost means of satisfying the service needs of the customers within the**  
122 **Village of Philo?**

123 A. If one were to consider all possibilities, IAWC may actually be the least-cost  
124 provider of water service to the Village of Philo residents. IAWC is the existing  
125 wholesale water provider to the Village of Philo and is in a position to render  
126 public water utility service to the Village of Philo.<sup>8</sup> IAWC (or its predecessor,  
127 Northern Illinois Water Corporation) has been providing wholesale water service  
128 to the Village of Philo since 1978 and therefore, has the necessary water supply.  
129 IAWC's Champaign water system is closer to the Village of Philo than Aqua  
130 Illinois's Danville water system.<sup>9</sup> IAWC's Champaign District rates (\$7.60 per  
131 month facilities charge and \$1.9055 per ccf usage charge) are significantly lower  
132 than Aqua Illinois's Vermilion County Division rates (\$12.00 per month facilities  
133 charge and \$2.871 per ccf usage charge).<sup>10</sup>

134

135 During the bidding process, IAWC offered a lower purchase price (\$225,000 plus

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<sup>7</sup> Revised Direct Testimony of Gerard P. Connolly, GPC Exhibit 1

<sup>8</sup> Comment Letter from IAWC filed on May 24, 2004

<sup>9</sup> IAWC response to ICC Staff data request WD 1.22

<sup>10</sup> Comment Letter from IAWC filed on May 24, 2004; IAWC response to ICC Staff data request WD 1.22

136 \$25,000 in transaction costs) for the Village of Philo's water system.<sup>11</sup> However,  
137 the Village of Philo has chosen to accept the higher price (\$425,000 purchase  
138 price plus \$42,500 in transaction costs) offered by Aqua Illinois for its water  
139 system and the utilization of the higher Aqua Illinois's Vermilion County Division  
140 rates rather than IAWC's Champaign District rates.<sup>12</sup> The officials of the Village  
141 of Philo have apparently decided that Aqua Illinois's offer is the best alternative  
142 for its residents when it evaluated the total bid package. In addition, Staff  
143 witness Luth testified that the rate impact upon existing Vermilion County Division  
144 customers would be less than 2/10ths of one percent under Aqua Illinois's  
145 statement of the Village of Philo rate base.<sup>13</sup>

146  
147 The Village of Philo is located approximately 24 miles from the Company's  
148 current Vermilion County Division water distribution system.<sup>14</sup> According to the  
149 Company, no municipal corporation owns a water supply and distribution system  
150 within a reasonable proximity to the Village of Philo, or otherwise is authorized or  
151 able to render water utility service to the Village of Philo.<sup>15</sup>

152  
153 Aqua Illinois asserted that by providing the Village of Philo with improved storage,  
154 fire protection, customer service, maintenance, and engineering, while retaining

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<sup>11</sup> Comment Letter from IAWC filed on May 24, 2004; IAWC response to ICC Staff data requests WD 2.02 and WD 2.05

<sup>12</sup> Petition, Paragraph 12, Page 4; Petition, Paragraph 13, Page 4; Petition, Exhibit A, Section 1.4, Page 3; Petition, Exhibit A, Section 6(a), Page 6; Comment Letter from IAWC filed on May 24, 2004; Revised Direct Testimony of Michael D. Bratetic, Pages 4 and 5; Revised Direct Testimony of Michael D. Bratetic, Revised Attachment 1, Page 1

<sup>13</sup> ICC Staff Exhibit 3.0, Page 7

<sup>14</sup> Petition, Paragraph 3, Page 2; Second Revised Direct Testimony of Gerard P. Connolly, Page 5

<sup>15</sup> Petition, Paragraph 7, Page 3

155 the existing source of supply and water system, that it provides the most cost-  
156 effective benefit of providing water service to the Village of Philo residents.<sup>16</sup>  
157 Under these circumstances, i.e., the acceptance of the Aqua Illinois bid, rather  
158 than the IAWC bid, for the Village of Philo's water system, I have no reason to  
159 dispute that Aqua Illinois will provide a cost efficient means of providing water  
160 service to the Village of Philo.

161

162 **Q. Please explain the difference between Aqua Illinois's Vermilion County**  
163 **Division water system and IAWC's Champaign District water system.**

164 A. Aqua Illinois's Vermilion County Division source of supply is surface water from  
165 the North Fork of the Vermilion River.<sup>17</sup> IAWC's Champaign District source of  
166 supply is groundwater well. In addition to different sources of supply, the method  
167 of surface water treatment for Aqua Illinois's Vermilion County Division is  
168 different than the method of groundwater treatment for IAWC's Champaign  
169 District. In addition to the different methods of water treatment, there are also  
170 distinct differences in operational and maintenance costs between surface water  
171 and groundwater well treatment processes. Generally speaking, water treatment  
172 is typically more expensive for surface water supply systems as compared to  
173 groundwater well supply systems because surface water typically requires much  
174 more extensive treatment than groundwater since the initial quality of raw surface  
175 supply water is usually poorer than groundwater and there is typically more water

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<sup>16</sup> Petition, Paragraph 4, Page 2; Petition, Paragraph 6, Page 3; Petition, Paragraph 14, Page 5; Second Revised Direct Testimony of Gerard P. Connolly, Page 5

<sup>17</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 4

176 treatment equipment to operate and maintain for surface water supply systems.

177

178 **Q. What will be the source of water supply that Aqua Illinois will be using to**  
179 **provide water service to the Village of Philo?**

180 A. Under Aqua Illinois's ownership, the water system will continue to be supplied on  
181 a wholesale basis via a transmission water main from IAWC's water system in  
182 Champaign-Urbana.<sup>18</sup>

183

184 **Q. Is the Company capable of efficiently managing and supervising the public**  
185 **water supply and distribution system within the Village of Philo?**

186 A. Yes. The Company has the necessary technical and managerial ability to own,  
187 operate, and maintain a public water supply and distribution system within the  
188 Village of Philo.<sup>19</sup> The Company efficiently manages and supervises the public  
189 water supply and distribution system within the Vermilion County Division service  
190 area.

191

192 **PROPOSED CERTIFICATED SERVICE AREA**

193

194 **Q. Please describe the Company's proposed certificated service area.**

195 A. The Company requested a Certificate to serve the area within the corporate limits

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<sup>18</sup> Petition, Paragraph 4, Page 2; Petition, Exhibit A, Section 6(i), Page 7; Second Revised Direct Testimony of Gerard P. Connolly, Page 5; Company response to ICC Staff data request WD 1.05

<sup>19</sup> Petition, Paragraph 8, Page 3

196 of the Village of Philo that currently receives water service.<sup>20</sup> The total acreage  
197 for the certificated service area being requested is 510.5 acres.<sup>21</sup>

198

199 **Q. In your opinion, should the Company's proposed certificated service area**  
200 **encompassing the Village of Philo be approved?**

201 A. Yes. I recommend that the Commission approve the Company's proposed  
202 certificated service area consisting of the area within the corporate limits of the  
203 Village of Philo, which is legally described on Exhibit C of the Petition. The  
204 Company has been requested by, and has entered into an Assets Purchase  
205 Agreement (Petition, Exhibit A) with, the Village of Philo to provide water service  
206 to customers within the Village of Philo presently being served by the water  
207 system.<sup>22</sup> In the Assets Purchase Agreement, the Company agreed that water  
208 received from the water supply main would not be used to supply water to any  
209 property except properties within the corporate limits of the Village of Philo.<sup>23</sup> On  
210 March 17, 2004, the Village of Philo passed Ordinance No. 519 granting the  
211 Company an exclusive water franchise to provide water service within the Village  
212 of Philo.<sup>24</sup> I reviewed the Company's proposed certificated service area and it  
213 appears to be properly defined.

214

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<sup>20</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 6

<sup>21</sup> Company response to ICC Staff data request WD 1.01; Note that the Second Revised Direct Testimony of Gerard P. Connolly, Page 6 contains a typographical error, referencing 510.5 square miles rather than acres.

<sup>22</sup> Petition, Paragraph 2, Page 2; Petition, Paragraph 6, Page 3; Petition, Exhibit A, Section 3(d), Page 5; Petition, Exhibit A, Section 5, Page 6

<sup>23</sup> Petition, Exhibit A, Section 6(i), Page 7

<sup>24</sup> Petition, Paragraph 5, Page 2; Petition, Exhibit D

215 **PROPOSED CAPITAL IMPROVEMENTS**

216

217 **Q. Is the Company's construction of proposed capital improvements to the**  
218 **Village of Philo's water distribution system prudent?**

219 A. Yes. According to the Company, the water distribution system presently suffers  
220 from certain water quality, pressure, and fire protection problems.<sup>25</sup> The  
221 Company has proposed to eliminate dead-end water mains with no flushing  
222 capabilities and replace the existing undersized water mains along Jackson  
223 Street, Grant Street, Harrison Street, Monroe Street, Van Buren Street, Adams  
224 Street, Jefferson Street, Pershing Court, Lincoln Street, and Roosevelt Road with  
225 adequately sized water mains in the water distribution system.<sup>26</sup> The elimination  
226 of dead-end water mains will reduce corrosion and taste and odor complaints,  
227 and will improve water quality, pressure, fire protection, and fire flows. The water  
228 distribution system's undersized mains that are proposed to be replaced consist  
229 of 1-inch and 2-inch in diameter copper; 1 ½-inch and 2-inch in diameter  
230 galvanized; 1 ½-inch, 2-inch, and 4-inch in diameter steel; and 2-inch, 3-inch,  
231 and 4-inch in diameter cast iron pipes.<sup>27</sup> The replacement of undersized water  
232 mains will improve water pressure, fire protection, and fire flows. Company  
233 service lines will be replaced from the water main to the property line with copper  
234 water lines as part of the water main replacement projects.<sup>28</sup> The Company has

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<sup>25</sup> Petition, Paragraph 10, Page 4

<sup>26</sup> Petition, Paragraph 11, Page 4; Petition, Exhibit A, Schedule 6(b), Sheets 1-2; Second Revised Direct Testimony of Gerard P. Connolly, Page 6; Company response to ICC Staff data request WD 1.09

<sup>27</sup> Petition, Paragraph 10, Page 4; Petition, Exhibit A, Schedule 6(b), Sheet 2

<sup>28</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 6; Company response to ICC Staff data request WD 1.08

235 proposed to replace and add new fire hydrants to ensure adequate fire  
236 protection, improve fire flows, and ensure proper maintenance and flushing of  
237 water mains.<sup>29</sup> The Company estimated that it would cost approximately  
238 \$450,000 to replace the existing undersized water mains.<sup>30</sup>

239

240 **Q. Is the Company's construction of proposed capital improvements to the**  
241 **Village of Philo's water storage tank prudent?**

242 A. Yes. The Company alleges that the water system presently suffers from certain  
243 pressure and fire protection problems.<sup>31</sup> On June 23, 2004, the Water  
244 Department of the Commission conducted an inspection of the Village of Philo's  
245 water facilities. The exterior of the existing 50,000 gallon elevated water storage  
246 tank was observed to be in poor condition and deteriorated. Considerable  
247 corrosion was observed on the exterior of the elevated water storage tank. The  
248 pressure and fire protection problems are attributed to the water storage tank  
249 being undersized.

250

251 The Company has proposed to replace the existing 50,000 gallon elevated water  
252 storage tank with a reconditioned 300,000 gallon steel elevated pedestal  
253 spheroid water storage tank from Danville, Illinois within the Company's Vermilion

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<sup>29</sup> Petition, Paragraph 11, Page 4; Petition, Exhibit A, Schedule 6(f), Section 14, Page 20; Petition, Exhibit D, Section 14, Page 5; Second Revised Direct Testimony of Gerard P. Connolly, Page 6; Company response to ICC Staff data request WD 1.10

<sup>30</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 6

<sup>31</sup> Petition, Paragraph 10, Page 4

254 County Division.<sup>32</sup> An engineering evaluation report by Tank Industry  
255 Consultants, Inc. showed that the 300,000 gallon steel elevated pedestal  
256 spheroid water storage tank was constructed in 1966 and was in good overall  
257 condition.<sup>33</sup> It was estimated by HDC Engineering that a new 250,000 gallon  
258 elevated spheroid water storage tank would cost between \$661,400-\$726,300.<sup>34</sup>  
259 In comparison, IAWC estimated that a new 250,000 gallon water storage tank  
260 would cost approximately \$500,000.<sup>35</sup> Conversely, it was estimated by both  
261 Pittsburg Tank and Tower, Inc. and Chicago Bridge and Iron, Inc. that it would  
262 cost approximately \$300,000 to relocate and re-erect the existing 300,000 gallon  
263 steel elevated pedestal spheroid water storage tank from Danville to the Village  
264 of Philo.<sup>36</sup> Therefore, the relocation and re-erection of the reconditioned 300,000  
265 gallon steel elevated pedestal spheroid water storage tank from Danville to the  
266 Village of Philo by Aqua Illinois is the least-cost alternative.

267

268 **RATES, RULES, REGULATIONS, AND CONDITIONS OF SERVICE TARIFFS**

269

270 **Q. What Rates, Rules, Regulations, and Conditions of Service tariffs does the**  
271 **Company propose to be applied to customers within the Village of Philo for**  
272 **water service?**

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<sup>32</sup> Petition, Paragraph 11, Page 4; Petition, Exhibit A, Schedule 6(b), Sheets 1 and 3; Second Revised Direct Testimony of Gerard P. Connolly, Page 6

<sup>33</sup> Company response to ICC Staff data request WD 1.12

<sup>34</sup> Company response to ICC Staff data request WD 1.11

<sup>35</sup> IAWC response to ICC Staff data request FD-9

<sup>36</sup> Second Revised Direct Testimony of Gerard P. Connolly, Page 6; Company response to ICC Staff data request WD 1.12

273 A. The Company has proposed to include the Village of Philo in the Company's  
274 Vermilion County Division Rate tariffs (ILL. C. C. No. 47, Section No. 8) for water  
275 service.<sup>37</sup> The Company has proposed to include the Village of Philo in the  
276 Company's Rules, Regulations, and Conditions of Service tariffs (ILL. C. C. No.  
277 47, Section No. 1) for water service.<sup>38</sup>

278

279 **Q. Have you reviewed the Company's current Rates, Rules, Regulations, and**  
280 **Conditions of Service tariffs for water service?**

281 A. Yes. I have reviewed the Company's current Rates, Rules, Regulations, and  
282 Conditions of Service tariffs for water service.

283

284 **Q. Do you have any changes to recommend to the Company's current Rates,**  
285 **Rules, Regulations, and Conditions of Service tariffs for water service?**

286 A. Yes. I recommend that the Company's current Rates, Rules, Regulations, and  
287 Conditions of Service tariffs for water service be revised to include the Village of  
288 Philo in Champaign County, Illinois and the Village of Indianola in Vermilion  
289 County, Illinois. On October 22, 2003, the Company was issued a Certificate  
290 under an Order in Docket No. 03-0069, which allowed the Village of Indianola to  
291 be included in the Company's Vermilion County Division tariffs for water service.

292

293 **Q. Do you have any further recommendations to the Commission?**

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<sup>37</sup> Petition, Paragraph 17, Page 5; Petition, Exhibit A, Section 6(c), Page 6; Petition, Exhibit E; Second Revised Direct Testimony of Gerard P. Connolly, Pages 5 and 7

<sup>38</sup> Petition, Paragraph 17, Page 5; Petition, Exhibit A, Section 6(c), Page 6; Second Revised Direct Testimony of Gerard P. Connolly, Pages 5 and 7

294 A. Yes. I recommend that the Commission order the Company to file revised Rates,  
295 Rules, Regulations, and Conditions of Service tariffs for water service that  
296 include the Village of Philo in Champaign County, Illinois and the Village of  
297 Indianola in Vermilion County, Illinois, within ten (10) days of the closing of the  
298 acquisition, with an effective date of not less than ten (10) working days after the  
299 date of filing, for service rendered on and after their effective date, with individual  
300 tariff sheets to be corrected within that time period, if necessary.

301  
302 I also recommend that the Commission order the Company to file a report with  
303 the Chief Clerk of the Commission, bearing Docket No. 04-0362, within seven (7)  
304 days after the closing on the proposed acquisition, indicating the date on which  
305 the closing on the transaction occurred; the Company shall also provide a copy  
306 of this filing to the Manager of the Commission's Water Department.

307

308 **CONCLUSION**

309

310 **Q. Does this conclude your direct testimony?**

311 A. Yes.