

STATE OF ILLINOIS)
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COUNTY OF LEE)

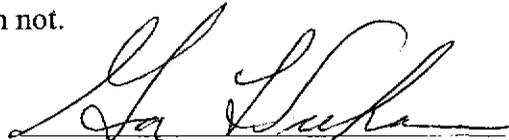
OFFICIAL FILE

I.C.C. DOCKET NO. 00-0337-0339
CIWC Exhibit No. 4.0R
Witness Seehawer
Date 11/7/00 Reporter 20

AFFIDAVIT

I, Gary L. Seehawer, first being duly sworn upon oath depose and say that I am employed by Consumers Illinois Water Company, as Vice President and Division Manager; that I have read the attached and foregoing Rebuttal Testimony of Gary L. Seehawer in Docket Nos. 00-0337, 00-0338 and 00-0339 (consolidated), which is identified as CIWC Exhibit 4.0R; that this document was prepared by me or under my supervision and I know the contents thereof; that said contents are true in substance and in fact; and that CIWC Exhibit 4.0R is the testimony I wish to give in this proceeding.

Further affiant sayeth not.


Gary L. Seehawer

Subscribed and Sworn
to before me this
11 day of November, 2000.


Notary Public

"OFFICIAL SEAL"
JUNIS I. MACKEY
Notary Public, State of Illinois
My Commission Expires 9/16/2002

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CIWC EXHIBIT NO. 4.0-R

REBUTTAL TESTIMONY

OF

GARRY L. SEEHAWER

CONSUMERS ILLINOIS WATER COMPANY

DOCKET NOS. 00-0337, 00-0338, 00-0339

Consolidated

September 29, 2000

1 **WITNESS IDENTIFICATION AND BACKGROUND**

2
3 **Q. Please state your name and business address.**

4 A. Garry L. Seehawer, 5301 E. State St. Suite. #217, Rockford, Illinois.

5 **Q. Have you previously submitted testimony in this proceeding?**

6 A. Yes. I sponsored CIWC Exhibit 4.0 and I sponsored certain of the E Schedule and
7 Exhibits 4.1, through 4.3 for the Woodhaven Water Division.

8 **Q. What is the purpose of your rebuttal testimony?**

9 A. The purpose of my rebuttal testimony is to respond to ICC Staff witness Ms. Diana
10 Hathhorn regarding pro forma plant additions in the Woodhaven Water Division.

11 **PLANT ADDITIONS**

12 **Q. At page 25 of ICC Staff Exhibit 1.00, Ms. Hathhorn describes concerns over the**
13 **Woodhaven Divisions pro forma plant additions. Would you comment on these**
14 **concerns?**

15 A. Yes, Ms. Hathhorn has requested and been provided with updates concerning the monthly
16 progress of the Woodhaven Divisions construction projects. Additionally, documents
17 supporting the total dollars committed to projects through actual expenditures, contracts,
18 capital authorizations, and work orders have been provided. Some of the projects included
19 in the budget could not be started until fall when the occupation of this RV community is
20 lower. We have commenced ordering the large items related to some of these projects and
21 we have contacted contractors to perform the work as soon as permits are received.

1 Q. Where do each of the projects in the functional areas stand at this time with
2 respect to construction percentage complete?

3 A.

4 • The water treatment plant project, generator, and chlorine room have been
5 submitted for permit. The generator is on order, the contractors are identified for
6 the concrete, plumbing and electrical work. The engineering work is complete.

7 • Well pump #2 project is completed.

8 • The booster pump project is completed.

9 • The replacement of filter media is completed.

10 • The riding mower and utility tractor are in service.

11 • The 10" main relocation projected has been engineered and is ready for an EPA
12 permit.

13 • The computer, lab equipment and some small tools have been purchased.

14 • Several other projects have had the capital authorizations issued and are waiting
15 for delivery of the items.

16 As of the end of August, we have paid for 36% of the items on the capital
17 budget with another 35% on order or committed for.

18 Q. Do you see any reason that the capital budget identified in this rate case will
19 not be spent prior to 12/31/2000?

20 A. No.

21 Q. Does this conclude your rebuttal testimony?

22 A. Yes.