

**ILLINOIS COMMERCE COMMISSION**

**DOCKET 09-0319**

**IADC EXHIBIT 13.00SUPP**

**SUPPLEMENTAL DIRECT TESTIMONY OF  
J. ROWE MCKINLEY**

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**ILLINOIS-AMERICAN WATER COMPANY**

**August 24, 2009**

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**SUPPLEMENTAL DIRECT TESTIMONY IAWC EX. 13.00SUPP  
OF  
J. ROWE MCKINLEY**

1                                   **I.     WITNESS INTRODUCTION**

2   **Q1.   Please state your name and business address.**

3   **A.**   My name is Jennings Rowe McKinley II and my business address is  
4       11401 Lamar Avenue, Overland Park, Kansas 66211.

5   **Q2.   Are you the same Jennings Rowe McKinley II who provided direct**  
6       **testimony in this proceeding?**

7   **A.**   Yes.

8                                   **II.    PURPOSE OF TESTIMONY**

9   **Q3.   What is the purpose of your Supplemental Direct Testimony?**

10  **A.**   The purpose of my Direct Testimony is to discuss certain corrections to  
11       the tables in the demand study performed by Black & Veatch, entitled  
12       “*Report on Capacity Factors by Customer Class for the Illinois-American*  
13       *Water Company*” (“Capacity Factors Report”). The revised Capacity  
14       Factors Report, which is attached as IAWC Exhibit 13.01 (Revised)  
15       (“Revised Report”), contains corrected tables reflecting certain revised  
16       maximum hour demands and capacity factors for three Illinois-American  
17       Water Company (“IAWC”) service districts.

18                                   **III.   DEMAND STUDY CORRECTIONS**

19  **Q4.   Please discuss the corrections to the Capacity Factors Report.**

20  **A.**   The Capacity Factors Report contains tables which summarize the system  
21       data reported to Black & Veatch by IAWC, including maximum hour  
22       demand data. As discussed in the responses to Staff data requests PL  
23       2.13, 2.14 and 2.17 (attached as IAWC Ex. 13.01SUPP), during the

24 course of IAWC's review of detailed data relating to storage drawdown in  
25 three districts, Pekin, Peoria and Sterling, it was determined that certain  
26 corrections were required to the maximum hour demands for those  
27 districts. The corrections related primarily to incorrect calculations in the  
28 information originally provided to Black & Veatch related to storage  
29 reservoir drawdown in the maximum hour for these three districts. As a  
30 result of the corrections, Tables A, 2, 2a, 3, 14, 15, 17 and 19 of the  
31 Revised Report were revised to reflect the more detailed data.

32 The corrections to maximum hour demand in Pekin, Peoria and  
33 Sterling necessitated revisions to the final capacity factors for Pekin and  
34 Sterling, as well as SPSPSB, which Peoria is a part of. The revisions are  
35 as follows:

- 36 ■ For the SPSPSB rate area, the revised residential maximum hour  
37 capacity factor increases from 255 to 260 percent, commercial from  
38 200 to 205 percent, industrial from 170 to 175 percent and other  
39 public authority from 190 to 195 percent. Capacity factors for large  
40 industrial and other water utilities in the SPSPSB rate area did not  
41 change as a result of the revised maximum hour system demands  
42 for Peoria.
- 43 ■ For Pekin, the residential maximum hour capacity factor changes  
44 from 280 to 275 percent and the industrial maximum hour capacity  
45 factor from 160 to 155 percent with no changes in the commercial  
46 and other public authority maximum hour capacity factors.
- 47 ■ For Sterling, the residential maximum hour capacity factor changes  
48 from 300 to 280 percent, commercial from 250 to 235 percent,  
49 industrial from 185 to 170 percent and other public authority from  
50 220 to 205 percent.

51 These revisions are also reflected in the revised tables listed above and  
52 are contained in the Revised Report.

53                   In addition, the Revised Report also reflects minor changes to the  
54                   maximum hour demand for Champaign shown in Tables 2, 16 and 18.  
55                   These changes update the maximum hour demand for Champaign from  
56                   38.039 to 38.041 MGD, based on the results of the review of more  
57                   detailed data maximum hour data by the Company. These changes do  
58                   not result in any changes to the final capacity factors for Champaign.

59   **Q5. Do these corrections change the conclusions of the Capacity Factors**  
60   **Report discussed in your direct testimony?**

61   **A.** No. The results of the Revised Report continue to be typical of the range  
62                   of capacity factors that I have observed in other water utilities, and, when  
63                   compared to system coincidental demands, produce diversity ratios  
64                   generally in the range considered reasonable by the AWWA Manual M1.

65   **Q6. Do you have any other corrections to make?**

66   **A.** I note that IAWC Exhibit 13.02 to my direct testimony, which is the  
67                   Commission-approved methodology for the demand study, was  
68                   inadvertently omitted from IAWC's initial filing. This document was  
69                   previously filed with IAWC's direct evidence in Docket 08-0463 on January  
70                   30, 2009 and provided to the parties in this case with data response PL  
71                   2.05 issued on August 7, 2009. I am attaching a copy hereto.

72   **Q7. Does this conclude your supplemental direct testimony?**

73   **A.** Yes, it does.