

ILLINOIS COMMERCE COMMISSION

CASE NO. 11-_____

DIRECT TESTIMONY OF

BRUCE T. HAAS

ON BEHALF OF

CAMELOT UTILITIES, INC.

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**DIRECT TESTIMONY OF
BRUCE T. HAAS
ON BEHALF OF CAMELOT UTILITIES, INC.**

1 **Q1. PLEASE STATE YOUR NAME, PRESENT POSITION AND BUSINESS**
2 **ADDRESS.**

3 A1. My name is Bruce T. Haas and I am the Regional Director of Operations for the Midwest
4 Region of Utilities, Inc. ("UI"), which includes Illinois, Indiana, Kentucky and
5 Tennessee. My business address is 110 Queen Parkway, West Columbia, South Carolina
6 29169.

7 **Q2. WHAT ARE YOUR DUTIES IN YOUR CURRENT POSITION?**

8 A2. In my current position, I am responsible for making sure our customers receive adequate,
9 efficient, reliable, environmentally safe and least-cost water and wastewater utility
10 service. As such, I am responsible for all operations personnel, facilities, maintenance
11 and capital projects as well as other operational issues. In addition, I am responsible for
12 communications with state and federal regulators, including state utility commissions,
13 public staffs in the states that have them, and environmental authorities.

14
15 **Q3. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND.**

16 A3. I first began my employment as a meter reader and maintenance worker in 1978 for Lake
17 Holiday Utilities Corp., a subsidiary of Camelot Utilities, Inc.'s

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1 During the next several years, I was promoted to Operator and Operating Manager
2 positions for a number of Utilities, Inc. subsidiary systems, while earning various water
3 and wastewater licenses in Illinois and Ohio, including the highest levels of water
4 treatment and wastewater treatment licenses from the Illinois EPA. I eventually became
5 the Area Manager for the Peoria, Illinois region, overseeing the water and wastewater
6 facilities in this area. In 1989, I relocated to Charlotte, North Carolina taking on the
7 position of Area Manager for several areas for Carolina Water Service, Inc. of North
8 Carolina, a sister subsidiary under UI, along with the operations of two large UI-
9 subsidiary systems located in York County, South Carolina. While in Charlotte, I was
10 promoted to Regional Manager, during which time I also obtained various water and
11 wastewater licenses in Water Treatment, Water Distribution, Wastewater Collection, and
12 Backflow/Cross-Connection certifications from the State of North Carolina while taking
13 night courses towards a degree in Civil Engineering Technology. I also earned the
14 highest levels of water and wastewater certifications for Water Treatment, Water
15 Distribution, Wastewater Treatment and Wastewater Collection from the State of South
16 Carolina. Additionally, I have successfully completed the utility regulation seminar
17 sponsored by NARUC. In 2002, I was promoted to my current position of Regional
18 Director and given responsibility for the Company's systems in South Carolina and
19 Georgia. Following a reorganization of various Regions within UI in mid-2010, I
20 accepted the position as Regional Director for the Midwest Region.

21 **Q4. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE ILLINOIS COMMERCE**
22 **COMMISSION ("COMMISSION")?**

23 A4. No.

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1 **Q5. HAVE YOU TESTIFIED BEFORE ANY OTHER PUBLIC UTILITY**
2 **COMMISSIONS?**

3 A5. Yes. I have testified before the commissions in North Carolina and South Carolina, along
4 with working with staff of the Illinois Commerce Commission during my tenure with UI.
5

6 **Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

7 A6. My testimony provides support for Camelot Utilities, Inc. ("CUI" or "Company") request
8 to adjust water and sewer rates. In particular, my testimony describes: (1) the Company's
9 service territory and its water and wastewater system operations; (2) capital
10 improvements made to the water and wastewater systems; (3) water quality; and (4)
11 customer complaints.
12

13 **I. SYSTEM DESCRIPTION AND OPERATION**

14 **Q7. PLEASE GENERALLY DESCRIBE THE COMPANY'S SERVICE TERRITORY**
15 **AND WATER/WASTEWATER SYSTEMS.**

16 A7. CUI provides water and wastewater service in Troy Township, Will County, Illinois to
17 approximately 200 water and wastewater utility customers. The potable water is supplied
18 from one ground water well. The water treatment plant is equipped with ion-exchange
19 treatment filters which removes naturally-occurring radium from the water supply. The
20 water from the ion-exchange units is then treated chemically with sodium hypochlorite
21 for disinfection and flows into the two existing hydro-pneumatic storage tanks and water
22 distribution system. Phosphate (Sea Quest) is also added to the finished water for the

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1 purpose of iron sequestration. The potable water distribution system pressure is
2 maintained between approx. 50 PSI to 70 PSI by two existing hydro-pneumatic tanks.
3 The CUI water distribution system is nearly 14,000 linear feet (LF) in length. CUI does
4 not provide fire protection but has flushing hydrants located throughout the system for
5 seasonal flushing and maintenance purposes.

6 The wastewater system is comprised of approximately 19,000 linear feet of gravity sewer
7 collection mains and 76 manholes which flow to an influent pump station located at the
8 wastewater treatment plant. Wastewater is then pumped into the 0.100 MGD activated
9 sludge wastewater treatment plant for processing. Following treatment, the final effluent
10 flows through a chlorine contact chamber for disinfection, followed by dechlorination
11 prior to discharging directly into the DuPage River.

12 **Q8. PLEASE DESCRIBE THE DUTIES OF THE STAFF AT CUI.**

13 A8. Staff collects and tests water samples at the point of entry and distribution system on a
14 daily basis. The staff also completes daily operations, equipment repairs and
15 maintenance of assets. They are responsible for submitting complete and accurate
16 monthly reports to the Illinois Environmental Protection Agency ("IEPA") and maintain
17 compliance with all IEPA regulations. They maintain the distribution system, order and
18 safely store and identify necessary chemicals, and complete field activities as well as
19 respond to customer inquiries. Finally, the staff is responsible for reading water meters
20 on a bi-monthly basis.

21 **II. CAPITAL IMPROVEMENTS**

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1 **Q9. PLEASE DESCRIBE THE IMPROVEMENTS MADE BY THE COMPANY TO**
2 **ITS WATER SYSTEM.**

3 A9. Table 1 below lists each project, along with their associated start and completion dates as
4 well as their associated costs. Since the last rate case, which was filed in 1992 and used a
5 1991 test year, CUI has invested over \$1.3 million dollars in total net plant additions,
6 which includes the capital projects listed below.

7
8 **Table 1 – Summary of Capital Projects**

No	Project ID	Description
1	1189512	SANDBLAST AND PAINT EXTERIOR OF STORAGE TANK AT WTP.
2	1169411	INSTALL NEW DECLHORINATION EQUIPMENT AT THE STP.
3	1169713	INSTALL OVERHEAD SEWERS
4	1160001	REPLACE EXISTING 1" SERVICE
5	1150101	NEW PUMP AND MOTOR FOR WELL 1
6	599	SPARE PUMP AND MOTOR
7	1150301	NEW PUMP AND MOTOR FOR WELL 1
8	1160301	I & I FLOW STUDY FOR SEWER COLLECTION SYSTEM
9	1160303	SLUDGE POND TO EQ BASIN CONVERSION
10	1160302	MODIFY THE WWTP
11	1160401	PLANT CLARIFIER MODIFICATIONS
12	1160402	SLUDGE POND TO EQ BASIN CONVERSION

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13	1160403	RELINE SEWER MAIN
14	3368	REPLACE ION EXCHANGE UNIT
15	1150603	EMERGENCY REHAB WELL 1
16	1150602	REHAB WELL 1
17	4277	INSPECT HYDRO TANKS AND GIVE SCOPE FOR REHAB AT CAMELOT
18	1150601	WELL 2 REHAB
19	3894	WELL 2 INSPECTION
20	1160601	FIX I & I
21	1150701	CAMELOT ESTATES WATER SYSTEM STUDY
22	1150702	I & I RESEARCH/REPAIR
23	1150703	ENGINEERING STUDY FOR WWTP REHABILITATION

1

2 **Q10. PLEASE BRIEFLY DESCRIBE EACH OF THE CAPITAL PROJECTS LISTED**
3 **IN TABLE 1.**

4 A10. (1) Sandblast and Paint Exterior of Storage Tank at WTP - Removed existing coating
5 from 10,000 gallon hydro-pneumatic tank at Camelot Water Treatment Plant ("WTP").
6 Recoated exterior of tank in an effort to protect the tank from further exterior corrosion.

7 (2) Install New Dechlorination Equipment at STP - Replaced the equipment that
8 neutralizes the chlorine in the treated water from the Wastewater Treatment Plant
9 ("WWTP") effluent prior to discharging to the DuPage River due to age and failure.

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- 1 (3) Install Overhead Sewers --Replaced sections of sewer mains located above grade
2 with DIP.(4) Replace Existing 1" Service – Replaced the water service line that
3 supplies potable water to the WWTP at Camelot due to age and leaks.
- 4 (5) New Pump and Motor for Well #1 – Replaced the well pump and motor in Well
5 #1 due to failure.
- 6 (6) Spare Pump and Motor – Camelot's main potable water source comes from Well
7 #1. CUI purchased a spare pump and motor to eliminate the lead time for delivery in the
8 event that the pump and motor failed again.
- 9 (7) New Pump and Motor for Well #1 – Well #1 pump and motor failed. The
10 existing spare pump and motor purchased previously was installed to enable CUI to
11 quickly restore service to the customers.
- 12 (8) Inflow and Infiltration ("I & I") Flow Study for Sewer Collection System – CUI
13 purchased flow monitoring equipment to install in manholes throughout the sewer
14 collection system. This equipment records the flow of water through a particular pipe.
15 CUI personnel utilize this equipment to identify areas that exhibit higher flows during
16 rain events.
- 17 (9) Sludge Pond to Equalization ("EQ") Basin Conversion – Sludge was removed
18 from the sludge lagoon at the CUI WWTP so that new piping could be installed to enable
19 the contents in the sludge lagoon to be pumped back into the treatment plant.
- 20 (10) Modify the WWTP – Engineering for permitting with IEPA and design for
21 necessary piping to complete the EQ basin conversion.

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1 (11) Plant Clarifier Modifications – Necessary modifications and repairs were
2 completed to the clarifier at the CUI WWTP to allow continued efficient operations of
3 the wastewater treatment facility.

4 (12) Sludge Pond to EQ Basin Conversion – Construction of the necessary piping to
5 transfer the contents of the sludge lagoon back to the WWTP was completed.

6 (13) Reline Sewer Main – Approximately 300 feet of the 12 inch sewer trunk main
7 which transports all wastewater flows from the collection system to the WWTP had
8 deteriorated and was replaced.

9 (14) Replace Ion-Exchange Unit – The groundwater at Camelot contains radium
10 content that must be removed to an acceptable level to meet IEPA standards for potable
11 water. The Ion-Exchange Unit that is used as a filtration system for the radium removal
12 process had aged and needed to be replaced to ensure that CUI would remain in
13 compliance with IEPA regulations.

14 (15) Emergency Rehab Well #1 – Well #1 water production had dropped significantly
15 following the previous rehabilitation effort. Air Burst technology was performed to clean
16 the well's formation and restore the well production.

17 (16) Rehab Well #1 – Well #1 water production had dropped to a point that made it
18 impossible to produce enough water to meet the demand of the Camelot customers.
19 Chemical rehabilitation was introduced in an effort to restore the well's production of
20 water.

21 (17) Inspect Hydro Tanks and Give Scope for Rehab at Camelot – There are two
22 10,000 gallon hydro-pneumatic tanks used for water storage and system pressure needs.

23 Due to the age and condition of the tanks, engineers were hired to inspect the interiors of

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1 the two tanks and report the results of the inspection to provide an understanding of the
2 tank's metal integrity.

3 (18) Well #2 Rehab – Well #2 was rehabilitated to restore its pumping capacity as a
4 result of the previous well inspection.

5 (19) Well #2 Inspection – The pumping equipment was removed from Well #2 and the
6 down pipe and screen was videotaped to troubleshoot the reason for the well's lost
7 capacity.

8 (20) Fix I & I – CUI hired an outside company to investigate and make repairs to
9 manholes throughout the wastewater collection system to help eliminate inflow from
10 entering the collection system and causing significant flows to the WWTP.

11 (21) Camelot Estates Water System Study – Engineering was performed to provide
12 options for upgrades to Camelot's water system. This study modeled the water system to
13 allow CUI to prepare for future demands and needs of the water system.

14 (22) I & I Research and Repair – Based on documentation from the previous I & I
15 studies, portions of the wastewater collection system were replaced to eliminate broken
16 mains. Manholes near the roadway to the WWTP top sections were elevated to raise the
17 rim levels higher than the river flows during high rain periods to eliminate surface water
18 from entering the collection system.

19 (23) Engineering Study for WWTP Rehabilitation – An engineering review was done
20 of the WWTP to provide options for possible upgrades to the WWTP.

21
22 **Q11. DOES THE COMPANY CURRENTLY HAVE ANY ISSUES REGARDING ITS**
23 **WATER QUALITY?**

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1 A11. No. The water at CUI is compliant with IEPA standards for safe drinking water.

2 **Q12. PLEASE SUMMARIZE ANY CUSTOMER COMPLAINTS RECEIVED WITHIN**
3 **THE LAST 12 MONTHS.**

4 A12. Of the four quality/service complaints received during the last 12 months, two were
5 customer issues or problems regarding low pressure; one involved a yard
6 repair/landscaping that we resolved; and the other involved a customer's sewer lateral.
7 There were no water quality issues reported during 2010. CUI has 24 hour/7-day/Wk.
8 emergency on-call response personnel to investigate or respond to customer service
9 issues as necessary.

10 **Q13. DOES THIS CONCLUDE YOUR PREPARED DIRECT TESTIMONY?**

11 A13. Yes it does.

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