Part 280
Implementation Plan
for
Rockwell Utilities, LLC

This Plan is filed pursuant to 83 Ill. Adm. Code 280.15

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I. INTRODUCTION

Rockwell Utilities, LLC ("Rockwell Utilities" or the "Company") was certified as a public utility on August 16, 2006, in ICC Docket No. 06-0522. Rockwell Utilities provides water and sanitary sewer service to approximately 250 customers (one customer is a large apartment complex with approximately 450 units) in Lakemoor, Illinois. Its assets include a water treatment facility, a one-million gallon elevated storage tank, and approximately 13,745 linear feet of mains. Rockwell Investments, LLC ("Rockwell Investments") holds 100% of the membership interest in Rockwell Utilities. Given the relatively small customer base of Rockwell Utilities, its customer facing operations – including establishment of service, deposits, billing, payments, deferred payment arrangements, budget payment plans, and service disconnections – are largely conducted through manual processes conducted through a small staff consisting of one full time and two part time employees.

Pursuant to the Final Order of the Illinois Commerce Commission ("Commission" or "ICC") dated October 22, 2014, in ICC Docket No. 06-0703, the previous version of 83 Ill. Adm. Code 280 ("Old Part 280") was repealed (38 Ill. Reg. 21328) and the new version of 83 Ill. Adm. Code 280 ("New Part 280") was adopted (38 Ill. Reg. 21331) effective November 1, 2014. Rockwell Utilities acknowledges receiving a copy of New Part 280, the Commission's rules governing eligibility for service, deposits, billing, payments, refunds and disconnection of service. Rockwell Utilities intends to take all actions necessary to come into compliance with New Part 280 on or before the May 1, 2016, compliance deadline. Compliance with new Part 280 will require Rockwell Utilities to identify the specific changes needed to comply with new Part 280 and then implement the business process, information distribution, or software / information technology ("IT") changes required to comply with those requirements. The bulk of the compliance work is expected to require business process updates, although new or updated billing software and extensive web page updates will also be required to comply with various requirements of New Part 280.

II. IMPLEMENTATION PLAN

A. Overview

Rockwell Utilities has a small office staff of dedicated personnel working hard to ensure compliance with all regulatory requirements, including New Part 280. Since we are a small company with limited staff, there may be unforeseen issues that could develop causing unanticipated delays in interim implementation dates. Rockwell Utilities will work to ensure that the requirements of New Part 280 are implemented as quickly as reasonably possible and on or before May 1, 2016. We will also do our best to work with any customer that comes to us with concerns. Based on the limited time available to review the requirements of New Part 280, Rockwell Utilities has identified 4 major tasks that will need to be completed for it to fully comply with New Part 280.

First, our existing billing software will need to be upgraded or replaced to be able to address various aspects of the new billing requirements. Our plan is to confer with our existing and new software vendors to determine the available options for obtaining billing software that can issue

bills that are compliant with the requirements of New Part 280. This includes obtaining software that is cable of producing full page bills to be mailed via an envelope instead of the currently utilized postcard bills. At this time, Rockwell Utilities does not know the exact timeline for implementation of new or upgraded billing system software and believes it is prudent and reasonable to schedule such changes to be implemented by May 1, 2016. Thus, our plan calls for new requirements necessitating new or enhanced billing software to be implemented by the end of April, 2016.

Second, while Rockwell Utilities currently has a web page, its current scope and design are relatively simple and its content limited. New Part 280 requires certain information to be provided or available to customers on a utility's web page, and extensive web page design work will need to be completed to comply with these requirements. Rockwell Utilities has not worked out the details of the timeline for implementation of web page updates, but at this time believes it is prudent and reasonable to schedule such changes to be implemented by May 1, 2016. Thus, this plan calls for new requirements necessitating new or enhanced web page capabilities to be implemented by the end of April, 2016.

Third, as noted above, Rockwell Utilities' customer facing operations rely extensively on manual processes given its small customer base. The bulk of the non-software/web page work will require us to update our business processes and information to comply with the requirements of New Part 280. This will require an assessment and identification of the various processes and procedures which need to change, followed by documentation (e.g., internal policies) and implementation of those changes. Rockwell Utilities' goal is to implement the requirements of each Section or Subpart of New Part 280 as a whole, if possible. Rockwell Utilities expects the assessment of required changes to be completed as soon as possible on or before April 1, 2015. Based on current information, Rockwell Utilities expects to implement all business process changes on or before December 31, 2015, but will update this assessment as appropriate with its implementation plan progress reports. In addition, as explained below, some sections of New Part 280 appear to essentially restate existing requirements of Old Part 280 and others appear to contain new requirements that require more limited or straightforward implementation requirements. In those cases, Rockwell Utilities has specified a July 1, 2015, implementation date.

Finally, Rockwell Utilities needs to create and/or modify its documents to conform to changes implemented by New Part 280. The process for this work will parallel the business process change work described above, and has the same expected implementation date of on or before December 31, 2015.

Rockwell Utilities has every intention of being fully compliant by May 1, 2016. As the items addressed above develop further we will refine this implementation plan as necessary. We will also work to make available on our website an implementation checklist starting in February, 2015, to be updated monthly. The following Sections outline certain specific implementation items identified to date.

B. Subpart B – Applications for Utility Service

1. Section 280.30 Application

Rockwell Utilities will update its business processes and documentation to comply with the new application requirements, including all website, tariff, and identification requirements. Outside services will be arranged as needed to update Rockwell Utilities' website.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities will need to obtain bids and quotes to update its website to meet applicable requirements. Costs will be provided upon receipt of quotes and final selection made.

2. Section 280.35 Revert to Landlord/Property Manager Agreements

Rockwell Utilities does not currently plan to enter into arrangements to automatically place service in the name of a landlord or property manager when service in a tenant's name is terminated. We understand such arrangements to be optional for the utility and will comply with applicable requirements if such arrangements are entered into in the future.

Anticipated Compliance date: N/A

C. Subpart C - Deposits

1. Section 280.40 Deposits

Rockwell Utilities will update its business processes and documentation to comply with the new deposit requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. In addition, certain deposit information is required to be provided on customer bills under New Part 280 and thus needs to be coordinated with the billing software solution. The December 31, 2015, implementation date assumes that billing software coordination will not impact the deposit requirement implementation timeline. This is subject to possible revision. Rockwell Utilities will work to identify specific deposit related requirements that can possibly be implemented sooner than end of 2015 and will consider revising this implementation plan schedule if such items are identified.

2. Section 280.45 Deposits for Low Income Customers

Rockwell Utilities will update its business processes and documentation to comply with the new deposit requirements for low income customers.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Issues to be addressed include the process and procedure to inform and identify low income customers. We will explore the possibility of implementing these provisions prior to year end 2015.

D. Subpart D: Regular Billing

1. Section 280.50 Billing

Rockwell Utilities will update its business processes and documentation to comply with the new billing requirements. As mentioned previously, bill are currently issued on a postcard instead of in a sealed envelope. A major task for meeting the new billing requirements will be an upgrade or replacement of the current billing software to meet the new requirements.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software and related equipment. The selected solution will then need to be installed and implemented, including any required data entry or transfer. Costs will be provided upon receipt of quotes and selection of the vendor and solution.

E. Subpart E: Payment

1. Section 280.60 Payment

Rockwell Utilities will update its business processes and documentation to comply with the new payment requirements. In addition, many of the payment requirements are related to or include bill information requirements. Thus, complete implementation of the payment requirements is tied to implementation of new billing software as discussed above.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software and related equipment to implement certain payment requirements. The selected solution will then need to be installed and implemented, including any required data entry or transfer. Similarly, certain payments requirements require information to be posted on the utility's webpage, and those requirements will require implementation of webpage upgrades. Costs will be provided upon receipt of quotes and selection of the vendors and solutions.

2. Section 280.65 Late Payment Fee Waiver for Low Income Customers

Rockwell Utilities will update its business processes and documentation to comply with the new late payment fee waiver for low income customer requirements. In addition, the billing system will need to include a means to identify and track "low income customer" status.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software and related equipment to implement these requirements.

3. Section 280.70 Preferred Payment Date

Rockwell Utilities will update its business processes and documentation to comply with the new preferred payment date requirements. In addition, the billing system will need to include a means to accommodate these requirements. Rockwell Utilities is concerned that the preferred payment date requirements may be unduly burdensome and not be cost-beneficial for a small water utility. Rockwell Utilities also intends to consider whether it should seek a waiver from these requirements, and if it decides to seek such a waiver will do so during 2015.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software to implement these requirements, including identification and tracking of eligible customers.

4. Section 280.80 Budget Payment Plan

Rockwell Utilities will update its business processes and documentation to comply with the new budget payment plan requirements. In addition, the billing system will need to accommodate budget billing plans.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software and related equipment to implement these requirements.

F. Subpart F: Irregular Billing

1. Section 280.90 Estimated Bills

Rockwell Utilities will update its business processes and documentation to comply with the new estimated bill requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the estimated bill requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

2. Section 280.100 Previously Unbilled Service

Rockwell Utilities will update its business processes and documentation to comply with the new previously unbilled service requirements. A major task for meeting the new previously unbilled service requirements will be an upgrade or replacement of the current billing software to meet the new requirements.

Anticipated Compliance date: May 1, 2016

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities will also need to obtain bids and quotes to update or replace its billing software and related equipment. The selected solution will then need to be installed and implemented, including any required data entry or transfer.

G. Subpart G: Refunds and Credits

1. Section 280-110 Refunds and Credits

Rockwell Utilities will update its business processes and documentation to comply with the new refund and credit requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. In addition, certain refund and credit information is required to be provided on customer bills under New Part 280 and needs to be coordinated with the billing software solution. The December 31, 2015 implementation date

assumes that billing software coordination will not impact the refund and credit requirement implementation timeline. This is subject to possible revision.

H. Subpart H: Payment Arrangements

1. Section 280.120 Deferred Payment Arrangements

Rockwell Utilities will update its business processes and documentation to comply with the new deferred payment arrangement requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. In addition, certain deferred payment arrangement information is required to be provided on customer bills under New Part 280 and needs to be coordinated with the billing software solution. The December 31, 2015 implementation date assumes that billing software coordination will not impact the deferred payment arrangement requirement implementation timeline. This is subject to possible revision.

2. Section 280.125 Deferred Payment Arrangements for Low Income Customers

Rockwell Utilities will update its business processes and documentation to comply with the new deferred payment arrangement requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. In addition, certain deferred payment arrangement information is required to be provided on customer bills under New Part 280 and needs to be coordinated with the billing software solution. The December 31, 2015 implementation date assumes that billing software coordination will not impact the deferred payment arrangement for low income customer requirement implementation timeline. This is subject to possible revision.

I. Subpart I: Disconnection

1. Section 280.130 Disconnection of Service

Rockwell Utilities will update its business processes and documentation to comply with the new estimated bill requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the disconnection of service requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

2. Section 280.135 Winter Disconnection of Residential Heating Services, December 1 through March 31

The requirements of Section 280.135 address disconnection of residential heating services and are not applicable to Rockwell Utilities, a water and sewer utility.

3. Section 280.140 Disconnection for Lack of Access to Multi-Meter Premises

Rockwell Utilities does not currently provide service to any multi-metered premises. Thus, the requirements of Section 280.140 have no practical application to Rockwell Utilities. If Rockwell Utilities begins to serve multi-metered premises in the future, it will develop business processes compliant with Section 280.140 for disconnection for lack of access to multi-meter premises.

4. Section 280.150 Disconnection of Master-Metered Apartment Buildings

Rockwell Utilities will update its business processes and documentation to comply with the new disconnection of master-metered apartment building requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the disconnection of master-metered apartment building requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

J. Subpart J: Medical Certification

1. Section 280.160 Medical Certification

Rockwell Utilities will update its business processes and documentation – including internal policy statements – to comply with the new medical certification requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. In addition, certain medical payment arrangement information is required to be provided on customer bills under New Part 280 and needs to be coordinated with the billing software solution. The December 31, 2015 implementation date assumes that billing software coordination will not impact the medical certification requirement implementation timeline. This is subject to possible revision.

K. Subpart K: Reconnection

1. Section 280.170 Timely Reconnection of Service

Rockwell Utilities will update its business processes and documentation to comply with the new timely reconnection of service requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the timely reconnection of service requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

2. Section 280.180 Reconnection of Former Residential Customers for the Heating Season

The requirements of Section 280.180 address reconnection of former residential customers for the heating season and are not applicable to Rockwell Utilities, a water and sewer utility.

L. Subpart L: Unauthorized Service Usage

1. Section 280.190 Treatment of Illegal Taps

Rockwell Utilities will update its business processes and documentation to comply with the new treatment of illegal taps requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the treatment of illegal taps requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

2. Section 280.200 Tampering

Rockwell Utilities will update its business processes and documentation to comply with the new tampering requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the tampering requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

3. Section 280.205 Non-Residential Tampering

Rockwell Utilities will update its business processes and documentation to comply with the new non-residential tampering requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the non-residential tampering requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

4. Section 280.210 Payment Avoidance by Location

Rockwell Utilities will update its business processes and documentation to comply with the new payment avoidance by location requirements. Rockwell Utilities understands implementation of the protections available through Section 280.210 to be optional for the utility. Thus, Rockwell Utilities will also be considering whether to implement the optional protections available under Section 280.210.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same.

M. Subpart M: Complaint Procedures

1. Section 280.220 Utility Complaint Process

Rockwell Utilities will update its business processes and documentation to comply with the new utility complaint process requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the utility complaint process requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

2. Section 280.230 Commission Complaint Process

Rockwell Utilities will update its business processes and documentation to comply with the new Commission complaint process requirements.

Anticipated Compliance date: July 1, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Rockwell Utilities believes its current processes are substantially compliant with the Commission complaint process requirements under New Part 280. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015.

N. Subpart N: Information

1. Section 280.240 Public Notice of Commission Rules

Rockwell Utilities will update its business processes and documentation to comply with the new public notice of Commission rules requirements.

Anticipated Compliance date: May 1, 2016 for website related requirements and July 1, 2015 for all other requirements

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. Excluding the webpage disclosure requirements, the work required to comply should be modest. Thus, Rockwell Utilities anticipates it will be able to implement these requirements by July 1, 2015, except for the web page based requirements which will take longer to implement.

2. Section 280.250 Second Language Requirements

Rockwell Utilities will update its business processes and documentation to comply with the new second language requirements.

Anticipated Compliance date: December 31, 2015

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same.

3. Section 280.260 Customer Information Packet

Rockwell Utilities will update its business processes and documentation to comply with the new customer information packet requirements.

Anticipated Compliance date: May 1, 2016 for web site related requirements and December 31, 2015 for all other requirements

Rationale: Rockwell Utilities needs to analyze its applicable business processes and documentation for necessary updates and implement same. The requirements related to web site disclosure will require completion of the web page design work.