

FILED
September 5, 2018
INDIANA UTILITY
REGULATORY COMMISSION

PETITIONER'S EXHIBIT 13

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**PETITION OF THE CITY OF BOONVILLE,)
INDIANA, FOR APPROVAL TO ADJUST ITS)
RATES AND CHARGES AND ISSUE BONDS) CAUSE NO. 45069**

SUPPLEMENTAL TESTIMONY AND EXHIBITS

OF

SHAWN R. WRIGHT

**ON BEHALF OF PETITIONER,
CITY OF BOONVILLE, INDIANA**

September 5, 2018

PETITIONER, CITY OF BOONVILLE, INDIANA
IURC Cause No. 45069
Supplemental Testimony and Exhibits of Shawn R. Wright

I.
Introduction

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4 **1. Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE**
5 **RECORD.**

6 A. My name is Shawn R. Wright and my business address is 117 E. Locust Street,
7 Boonville, Indiana 47601.

8 **2. Q. ARE YOU THE SAME SHAWN R. WRIGHT WHO PREVIOUSLY**
9 **PREFILED TESTIMONY AND EXHIBITS ON BEHALF OF THE**
10 **PETITIONER, CITY OF BOONVILLE, INDIANA (“BOONVILLE”), IN**
11 **THIS PROCEEDING?**

12 A. Yes, I am.

13 **3. Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

14 A. The purpose of my supplemental testimony is to address Boonville's anticipated
15 periodic maintenance expense on a prospective basis.

16
17 style="text-align:center">**II.**
Periodic Maintenance Expense

18
19 **4. Q. ARE YOU GENERALLY FAMILIAR WITH THE TASKS REQUIRED TO**
20 **MAINTAIN BOONVILLE'S EXISTING WATER SYSTEM?**

21 A. Yes, I am. As I indicated in my prefiled direct testimony, my employer, Veolia
22 Water North America-Central, LLC ("Veolia"), is the contractual operator for

1 Boonville. I am Veolia's representative responsible for the day-to-day operations
2 of the water utility. In this role, I am intimately familiar with the tasks that need
3 to be completed in order to maintain Boonville's water system in good working
4 order.

5 **5. Q. ARE YOU FAMILIAR WITH THE REVISED PERIODIC**
6 **MAINTENANCE EXPENSE PROPOSED BY MR. ROOS IN HIS**
7 **SUPPLEMENTAL TESTIMONY?**

8 A. Yes, I am. I have reviewed Petitioner's Exhibit 11, the list of periodic
9 maintenance expenses prepared and submitted by Mr. Roos as part of his
10 supplemental testimony. I have also spoken with Mr. Roos at length about the
11 different tasks associated with maintaining the system and the historical and
12 prospective costs associated with these same tasks.

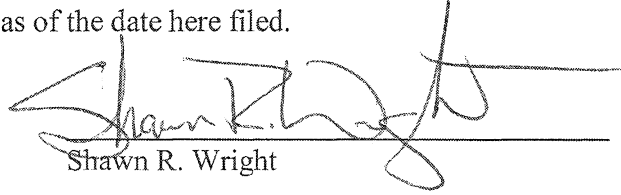
13 **6. Q. DO YOU AGREE WITH MR. ROOS' LIST OF ANTICIPATED**
14 **PERIODIC MAINTENANCE EXPENSE?**

15 A. I definitely agree with both the list of expenses and the proposed amounts. I
16 believe Petitioner's Exhibit 11 is a good faith estimate of the periodic maintenance
17 expense for which Boonville will be responsible.

18 **7. Q. ARE ANY OF THE ITEMS LISTED ON PETITIONER'S EXHIBIT 11**
19 **TASKS THAT WILL BE COMPLETED BY VEOLIA AS PART OF ITS**
20 **CONTRACT WITH BOONVILLE?**

VERIFICATION

I affirm under the penalties of perjury that the foregoing testimony is true to the best of my knowledge, information, and belief as of the date here filed.


Shawn R. Wright

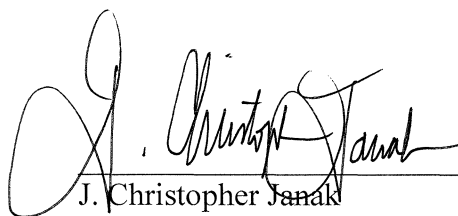
CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *Supplemental Testimony and Exhibits of Shawn R. Wright* was served upon the following by electronic mail this 5th day of September, 2018:

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