# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

DIRECT TESTIMONY
OF PAUL R. HERBERT
ON BEHALF OF
AQUA OHIO, INC.
Management policies, practice and organization
 Management policies, practice and organization  Operating income
 Operating income Rate base
 Operating income

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3	I.	BACKGROUND AND PURPOSE
4	Q1.	Please state your name and address.
5	A.	My name is Paul R. Herbert. My business address is 207 Senate Avenue, Camp Hill,
6		Pennsylvania 17011.
7	Q2.	By whom are you employed?
8	A.	I am employed by Gannett Fleming Valuation and Rate Consultants, LLC as
9		President. My duties and responsibilities include the preparation of accounting and
10		financial data for revenue requirement and cash working capital claims, the
11		allocation of cost of service to customer classifications, and the design of customer
12		rates in support of public utility rate filings.
13 14	Q3.	Have you previously testified in rate case proceedings before regulatory agencies?
15	A.	Yes. I have testified before the Pennsylvania Public Utility Commission, the New
16		Jersey Board of Public Utilities, the Public Utilities Commission of Ohio, the Public
17		Service Commission of West Virginia, the Kentucky Public Service Commission,
18		the Iowa State Utilities Board, the Virginia State Corporation Commission, the
19		Missouri Public Service Commission, the New Mexico Public Regulation
20		Commission, the Public Utilities Commission of the State of California, the Illinois
21		Commerce Commission, the Delaware Public Service Commission, the Arizona
22		Corporation Commission, the Connecticut Department of Public Utility Control, the
23		Idaho Public Utilities Commission, the Hawaii Public Utilities Commission, the
24		New York State Public Service Commission, and the Tennessee Regulatory
25		Authority, concerning revenue requirements, cost of service allocation, rate design

and cash working capital claims. A list of cases in which I have testified is attached to my testimony.

#### Q4. What is your educational background?

- A. I have a Bachelor of Science Degree in Finance from the Pennsylvania State
   University, University Park, Pennsylvania.
- **O5.** Do you have any professional affiliations?
- Yes. I am a member of the American Water Works Association and have served as a
  member of the Management Committee for the Pennsylvania Section. I am also a
  member of the Pennsylvania Municipal Authorities Association. In 1998, I became a
  member of the National Association of Water Companies as well as a member of its
  Rates and Revenue Committee.
- **Q6.** Briefly describe your work experience.
  - A. I joined the Valuation Division of Gannett Fleming Corddry and Carpenter, Inc., predecessor to Gannett Fleming, Inc., in September 1977, as a Junior Rate Analyst. Since then, I advanced through several positions and was assigned the position of Manager of Rate Studies on July 1, 1990. On June 1, 1994, I was promoted to the position of Vice President; on November 1, 2003, I was promoted to Senior Vice President; and on July 1, 2007, I was promoted to my current position as President.

While attending Penn State, I was employed during the summers of 1972, 1973 and 1974 by the United Telephone System - Eastern Group in its accounting department. Upon graduation from college in 1975, I was employed by Herbert Associates, Inc., Consulting Engineers (now Herbert Rowland and Grubic, Inc.), as a field office manager until September 1977.

Q7. What	is the pu	irpose of	your testimoi	ıv in this	sproceeding?
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- 2 A. The purpose of my testimony is to explain Agua Ohio, Inc.'s (Agua Ohio or the 3 Company) cost of service allocation studies for the water operations, set forth in Schedule E-3.2 of the Company's filing. This schedule presents the results of the 4 5 cost of service study I performed for the Company's water operations.
- COST OF SERVICE ALLOCATION WATER OPERATIONS 6 II.
- 7 Briefly describe the purpose of your cost allocation study for the water **Q8.** 8 operations.
- A. The purpose of the study was to allocate the total cost of service, which is the total revenue requirement for the combined service areas of the Company, to the several customer classifications. In the study, the total costs were allocated to the residential, 12 commercial, industrial, public authorities, sales for resale, and private fire protection 13 classifications in accordance with generally accepted principles and procedures. The 14 cost of service allocation results in indications of the relative cost responsibilities of 15 each class of customers. The allocated cost of service is one of several criteria 16 appropriate for consideration in designing customer rates to produce the required revenues. The results of my allocation of the pro forma cost of service for the test year ended December 31, 2016, compared to the revenues under present and proposed rates as of that date are presented in the study.
- 20 **Q9**. Please describe the method of cost allocation that was used in your study.
- 21 The base-extra capacity method, as described in 2012 and prior Water Rates A. 22 Manuals published by the American Water Works Association (AWWA), was used 23 to allocate the pro forma costs. Base-extra capacity is a recognized method for 24 allocating the cost of providing water service to customer classifications in

proportion to each classification's use of the commodity, facilities, and services. It is generally accepted as a sound method for allocating the cost of water service and was used by the Company in the Company's previous studies.

## Q10. Please describe the procedure you used to perform the cost allocation study presented in Schedule E-3.2 of the Company's filing.

A.

Each identified classification of cost in the pro forma cost of service was allocated to the customer classifications through the use of appropriate factors. These allocations are presented in Schedule E-3.2b on pages 2 through 7. The items of cost, which include operation and maintenance expenses, depreciation expense, taxes and income available for return, are identified in column 1 of Schedule E-3.2b. The cost of each item, shown in column 3, is allocated to the several customer classifications based on allocation factors referenced in column 2. The development of the allocation factors is presented in Schedule E-3.2c. I will use some of the larger cost items to illustrate the principles and considerations used in the cost allocation methodology.

Purchased electric power, treatment chemicals and waste disposal are examples of costs that tend to vary with the amount of water consumed and are thus considered base costs. They are allocated to the several customer classifications in direct proportion to the average daily consumption of those classifications through the use of Factor 1. The development of Factor 1 is shown in Schedule E-3.2c on page 8 and includes an estimate of consumption for unmetered customers. Other source of supply, water treatment and transmission costs are associated with meeting usage requirements in excess of the average, generally to meet maximum day requirements. Costs of this nature were allocated to customer classifications partially

as base costs, proportional to average daily consumption, partially as maximum day extra capacity costs, in proportion to maximum day extra capacity, and, in the case of certain pumping stations and transmission mains, partially as fire protection costs, through the use of Factors 2 and 3. The development of the allocation factors, referenced as Factors 2 and 3, is shown in Schedule E-3.2c, on pages 8 through 11.

Costs associated with storage facilities and the capital costs of distribution mains were allocated partly on the basis of average consumption and partly on the basis of maximum hour extra demand, including the demand for fire protection service, because these facilities are designed to meet maximum hour and fire demand requirements. The development of the factors, referenced as Factors 4 and 5, used for these allocations is shown in Schedule E-3.2c, on pages 12 through 15.

Fire demand costs were allocated to public and private fire protection service in proportion to the relative potential demands on the system by public fire hydrants and private service lines as presented in Schedule E-3.2d on page 30. The portion of fire demand allocated to Public Fire Protection is reallocated to Residential, Commercial, Industrial, and Public Authority classifications based on meter equivalents.

Costs associated with pumping facilities and the operation and maintenance of mains were allocated on combined bases of maximum day and maximum hour extra capacity because these facilities serve both functions. For pumping facilities, the relative weightings of Factor 2 (maximum day), Factor 3 (maximum day and fire) and Factor 4 (maximum hour) were based on estimated proportion serving maximum day, maximum day and fire and maximum hour functions. The development of this weighted factor, referenced as Factor 6, is presented on page 16.

For operation and maintenance of mains, the relative weightings of Factor 3 (maximum day and fire) and Factor 4 (maximum hour) were based on a sample of the footage of transmission and distribution mains. For cost allocation purposes, mains 10-inch and larger were classified as serving a transmission function and mains less than 10-inch were classified as serving a distribution function. The development of this weighted factor, referenced as Factor 7, is presented on page 17. Costs associated with public fire hydrants were assigned to Residential, Commercial, Industrial and Public Authority classes based on meter equivalents, as shown in Factor 8.

Costs associated with meters were allocated to customer classifications in proportion to the capacity requirements of the sizes and quantities of meters serving each classification. The development of the factor for meters, referenced as Factor 9, is presented on pages 18 and 19. Factor 10, Allocation of Services, on pages 20 and 21, was developed in a similar manner as Factor 9.

Costs for customer accounting, billing and collecting were allocated on the basis of the number of bills rendered for each classification. Costs related to uncollectible accounts and customer related management fees are allocated based on the number of customers. The development of these factors, referenced as Factors 13 and 20 are presented on pages 23 and 29.

Administrative and general costs were allocated on the basis of allocated direct costs, excluding those costs such as purchased water, power, chemicals and waste disposal which require little administrative and general expense. The development of factors for this allocation, referenced as Factor 15, is presented on page 24.

Annual depreciation accruals were allocated on the basis of the function of
the facilities represented by the depreciation expense for each depreciable plant
account. The original cost less depreciation of utility plant in service was similarly
allocated for the purpose of developing factors, referenced as Factor 18, for allocat
ing items such as income taxes and return. The development of Factor 18 is
presented on pages 26 through 28.

Factors 15 and 18, as well as Factors 11, 12, 16, 17 and 19, are composite allocation factors. These factors are based on the result of allocating other costs and are computed internally in the cost allocation program. Refer to Schedule E-3.2c for a description of the bases for each composite allocation factor.

## Q11. What was the source of the total cost of service data set forth in Column 3 of Schedule B?

- A. The pro forma costs of service were furnished by the Company, and are set forth in various Company schedules sponsored by Aqua Ohio witness Richard Hideg.
- 15 Q12. Referring to Schedule E-3.2c, pages 8 and 12, please explain the source of system maximum day and maximum hour ratios used in the development of factors referenced as Factors 2, 3 and 4.
- 18 A. The ratios were based on a review of historic Company data. The maximum day
  19 ratio of 1.5 times the average day approximates the ratio of maximum daily send-out
  20 experienced by the Company in the last five years. The maximum hour ratio of 2.25
  21 times the average hour was estimated based on the relationship of system maximum
  22 hour ratios compared to system maximum day ratios for other similar systems.

1	Q13.	What factors were considered in estimating the maximum day extra capacity
2		and maximum hour extra capacity demands used for the customer
3		classifications in the development of Factors 2, 3 and 4?

- A. The estimated demands were based on judgment which considered field studies of actual customer class demands conducted for other Aqua Companies, field observations of the service areas of the Company, field studies of similar service areas, and generally-accepted customer class maximum day and maximum hour demand ratios.
- 8 Q14. Have you summarized the results of your cost allocation study?
- 9 A. Yes. The results are summarized in Schedule E-3.2a, columns 1, 2 and 3 of Schedule
  10 A on page 1. Column 2 sets forth the total allocated pro forma cost of service for the
  11 test year December 31, 2016, for each customer classification identified in column 1.
  12 Column 3 presents each customer classification's cost responsibility as a percent of
  13 the total cost.
- 14 Q15. Have you compared these cost responsibilities with the proportionate revenue under existing rates for each customer classification?
- 16 Yes. A comparison of the allocated cost responsibilities and the percentage revenue A. under existing rates can be made by comparing columns 3 and 5 of Schedule E-3.2a. 17 18 A similar comparison of the percentage cost responsibilities (relative cost of service) 19 and the percentage of pro forma revenues (relative revenues) under proposed rates 20 can be made by comparing columns 3 and 7 of Schedule A. This comparison shows 21 that revenues under proposed rates generally move toward the indicated cost of 22 service. It should be emphasized that the Cost of Service Study is used as one of the guidelines for rate design. A Cost of Service Study presents parameters for designing 23 24 rates. Designed rates rarely match exactly the rates that would be derived strictly and 25 exclusively from the results of the Cost of Service Study.

- Q16. Did you prepare an analysis of the costs related to the water customer charges?
- 2 A. Yes, I did. Schedule E-3.2e on pages 31 and 32 of the water cost of service study,
- 3 sets forth the calculation of customer charges based on the staff methodology.
- 4 Q17. What are the results of your customer charge analysis?
- 5 A. The total customer cost per month for a 5/8-inch meter is \$10.48, shown on page 32
- of Schedule E-3.2e. A charge of \$10.00 per month is proposed at this time.
- 7 Q18. Does this conclude your direct testimony?
- 8 A. Yes, it does.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Direct Testimony of Paul R. Herbert was served by electronic mail to the following persons on this 14th of June, 2016:

Steven Beeler
Robert Eubanks
Public Utilities Section
Office of Ohio Attorney General
30 East Broad Street, 16<sup>th</sup> Floor
Columbus, Ohio 43215
steven.beeler@ohioattorneygeneral.gov
robert.eubanks@ohioattorneygeneral.gov

Kevin F. Moore Ajay Kumar Office of the Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, Ohio 43215-3485 kevin.moore@occ.ohio.gov ajay.kumar@occ.ohio.gov

/s/ Rebekah J. Glover

One of the Attorneys for Aqua Ohio, Inc.

# PAUL R. HERBERT WITNESS PARTICIPATION

	<u>Year</u>	<u>Jurisdiction</u>	Docket No.	Client/Utility	Subject
1. 2. 3. 4. 5. 6. 7.	1983 1989 1991 1992 1992 1994 1994	Pa. PUC Pa. PUC WV PSC Pa. PUC NJ BPU Pa. PUC Pa. PUC	R-832399 R-891208 91-106-W-MA R-922276 WR92050532J R-943053 R-943124	T. W. Phillips Gas and Oil Co. Pennsylvania-American Water Company Clarksburg Water Board North Penn Gas Company The Atlantic City Sewerage Company The York Water Company City of Bethlehem	Pro Forma Revenues Bill Analysis and Rate Application Revenue Requirements (Rule 42) Cash Working Capital Cost Allocation and Rate Design Cost Allocation and Rate Design Revenue Requirements, Cost Allocation, Rate Design and
8. 9. 10. 11.	1994 1994 1994 1995	Pa. PUC Pa. PUC NJ BPU Pa. PUC	R-943177 R-943245 WR94070325 R-953300	Roaring Creek Water Company North Penn Gas Company The Atlantic City Sewerage Company Citizens Utilities Water Company of Pennsylvania	Cash Working Capital Cash Working Capital Cash Working Capital Cost Allocation and Rate Design Cost Allocation and Rate Design
12. 13. 14. 15.	1995 1995 1996 1997	Pa. PUC Pa. PUC Pa. PUC Pa. PUC	R-953378 R-953379 R-963619 R-973972	Apollo Gas Company Carnegie Natural Gas Company The York Water Company Consumers Pennsylvania Water Company Shenango Valley Division	Rev. Requirements and Rate Design Rev. Requirements and Rate Design Cost Allocation and Rate Design Cash Working Capital
16.	1998	Ohio PUC	98-178-WS-AIR	Citizens Utilities Company of Ohio	Water and Wastewater Cost Allocation and Rate Design
17.	1998	Pa. PUC	R-984375	City of Bethlehem - Bureau of Water	Revenue Requirement, Cost Allocation and Rate Design
18.	1999	Pa. PUC	R-994605	The York Water Company	Cost Allocation and Rate Design
19.	1999	Pa. PUC	R-994868	Philadelphia Suburban Water Company	Cost Allocation and Rate Design
20.	1999	WV PSC	99-1570-W-MA	Clarksburg Water Board	Revenue Requirements (Rule 42), Cost Allocation and Rate Design
21.	2000	Ky. PSC	2000-120	Kentucky-American Water Company	Cost Allocation and Rate Design
22.	2000	Pa. PUC	R-00005277	PPL Gas Utilities	Cash Working Capital
23.	2000	NJ BPU	WR00080575	Atlantic City Sewerage Company	Cost Allocation and Rate Design
24.	2001	la. St Util Bd	RPU-01-4	Iowa-American Water Company	Cost Allocation and Rate Design
25.	2001	Va. St. CC	PUE010312	Virginia-American Water Company	Cost Allocation and Rate Design
26.	2001	WV PSC	01-0326-W-42T	West-Virginia American Water Company	Cost Allocation And Rate Design
27.	2001	Pa. PUC	R-016114	City of Lancaster	Tapping Fee Study
28.	2001	Pa. PUC	R-016236	The York Water Company	Cost Allocation and Rate Design
29.	2001	Pa. PUC	R-016339	Pennsylvania-American Water Company	Cost Allocation and Rate Design
30.	2001	Pa. PUC	R-016750	Philadelphia Suburban Water Company	Cost Allocation and Rate Design
31.	2002	Va.St.CC	PUE-2002-0375	Virginia-American Water Company	Cost Allocation and Rate Design
32.	2003	Pa. PUC	R-027975	The York Water Company	Cost Allocation and Rate Design
33.	2003	Tn Reg Auth	03-	Tennessee-American Water Company	Cost Allocation and Rate Design
34.	2003	Pa. PUC	R-038304	Pennsylvania-American Water Company	Cost Allocation and Rate Design
35.	2003	NJ BPU	WR03070511	New Jersey-American Water Company	Cost Allocation and Rate Design
36.	2003	Mo. PSC	WR-2003-0500	Missouri-American Water Company	Cost Allocation and Rate Design
37.	2004	Va.St.CC	PUE-200 - R-038805	Virginia-American Water Company	Cost Allocation and Rate Design
38. 39.	2004 2004	Pa. PUC Pa. PUC	R-030005 R-049165	Pennsylvania Suburban Water Company The York Water Company	Cost Allocation and Rate Design Cost Allocation and Rate Design
40.	2004	NJ BPU	WRO4091064	The Atlantic City Sewerage Company	Cost Allocation and Rate Design
41.	2005	WV PSC	04-1024-S-MA	Morgantown Utility Board	Cost Allocation and Rate Design
42.	2005	WV PSC	04-1025-W-MA	Morgantown Utility Board	Cost Allocation and Rate Design
43.	2005	Pa. PUC	R-051030	Aqua Pennsylvania, Inc.	Cost Allocation and Rate Design
44.	2006	Pa. PUC	R-051178	T. W. Phillips Gas and Oil Co.	Cost Allocation and Rate Design
45.	2006	Pa. PUC	R-061322	The York Water Company	Cost Allocation and Rate Design
46.	2006	NJ BPU	WR-06030257	New Jersey American Water Company	Cost Allocation and Rate Design

	Year	<u>Jurisdiction</u>	Docket No.	Client/Utility	Subject
47.	2006	Pa. PUC	R-061398	PPL Gas Utilities, Inc.	Cost Allocation and Rate Design
48.	2006	NM PRC	06-00208-UT	New Mexico American Water Company	Cost Allocation and Rate Design
49.	2006	Tn Reg Auth	06-00290	Tennessee American Water Company	Cost Allocation and Rate Design
50.	2007	Ca. PÜC	U-339-W	Suburban Water Systems	Water Conservation Rate Design
51.	2007	Ca. PUC	U-168-W	San Jose Water Company	Water Conservation Rate Design
52.	2007	Pa. PUC	R-00072229	Pennsylvania American Water Company	Cost Allocation and Rate Design
53.	2007	Ky. PSC	2007-00143	Kentucky American Water Company	Cost Allocation and Rate Design
54.	2007	Mo. PSC	WR-2007-0216	Missouri American Water Company	Cost Allocation and Rate Design
55.	2007	Oh. PUC	07-1112-WS-IR	Ohio American Water Company	Cost Allocation and Rate Design
56.	2007	II. CC	07-0507	Illinois American Water Company	Customer Class Demand Study
57.	2007	Pa. PUC	R-00072711	Aqua Pennsylvania, Inc.	Cost Allocation and Rate Design
58.	2007	NJ BPU	WR07110866	The Atlantic City Sewerage Company	Cost Allocation and Rate Design
59.	2007	Pa. PUC	R-00072492	City of Bethlehem – Bureau of Water	Revenue Reqmts, Cost Alloc.
60.	2007	WV PSC	07-0541-W-MA	Clarksburg Water Board	Cost Allocation and Rate Design
61.	2007	WV PSC	07-0998-W-42T	West Virginia American Water Company	Cost Allocation and Rate Design
62.	2008	NJ BPU	WR08010020	New Jersey American Water Company	Cost Allocation and Rate Design
63.	2008	Va St CC	PUE-2008-0009	Virginia American Water Company	Cost Allocation and Rate Design
64.	2008	Tn.Reg.Auth.	08-00039	Tennessee American Water Company	Cost Allocation and Rate Design
65.	2008	Mo PSC	WR-2008-0311	Missouri American Water Company	Cost Allocation and Rate Design
66.	2008	De PSC	08-96	Artesian Water Company, Inc.	Cost Allocation and Rate Design
67.	2008	Pa PUC	R-2008-2032689	Penna. American Water Co. – Coatesville Wastewater	Cost Allocation and Rate Design
68.	2008	AZ CC.	W-01303A-08-0227 SW-01303A-08-0227	Arizona American Water Co Water - Wastewater	Cost Allocation and Rate Design
69.	2008	Pa PUC	R-2008-2023067	The York Water Company	Cost Allocation and Rate Design
70.	2008	WV PSC	08-0900-W-42T	West Virginia American Water Company	Cost Allocation and Rate Design
71.	2008	Ky PSC	2008-00250	Frankfort Electric and Water Plant Board	Cost Allocation and Rate Design
72.	2008	Ky PSC	2008-00427	Kentucky American Water Company	Cost Allocation and Rate Design
73.	2009	Pa PUC	2008-2079660	UGI – Penn Natural Gas	Cost of Service Allocation
74.	2009	Pa PUC	2008-2079675	UGI – Central Penn Gas	Cost of Service Allocation
75.	2009	Pa PUC	2009-2097323	Pennsylvania American Water Co.	Cost Allocation and Rate Design
76.	2009	la St Util Bd	RPU-09-	Iowa-American Water Company	Cost Allocation and Rate Design
77.	2009	II CC	09-0319	Illinois-American Water Company	Cost Allocation and Rate Design
78.	2009	Oh PUC	09-391-WS-AIR	Ohio-American Water Company	Cost Allocation and Rate Design
79.	2009	Pa PUC	R-2009-2132019	Aqua Pennsylvania, Inc.	Cost Allocation and Rate Design
80.	2009	Va St CC	PUE-2009-0059	Aqua Virginia, Inc.	Cost Allocation (only)
81.	2009	Mo PSC	WR-2010-0131	Missouri American Water Company	Cost Allocation and Rate Design
82.	2010	VaSt CorpCom	PUE-2010-00001	Virginia American Water Company	Cost Allocation and Rate Design
83.	2010	Ky PSC	2010-00036	Kentucky American Water Company	Cost Allocation and Rate Design
84.	2010	NJ BPU	WR10040260	New Jersey American Water Company	Cost Allocation and Rate Design
85.	2010	Pa PUC	2010-2167797	T.W. Phillips Gas and Oil Co.	Cost Allocation and Rate Design
86.	2010	Pa PUC	2010-2166212	Pennsylvania American Water Co.	Cost Allocation and Data Design
87.	2010	Pa PUC	R-2010-2157140	- Wastewater The York Water Company	Cost Allocation and Rate Design Cost Allocation and Rate Design
88.	2010	Ky PSC	2010-00094	Northern Kentucky Water District	Cost Allocation and Rate Design
89.	2010	WV PSC	10-0920-W-42T	West Virginia American Water Co.	Cost Allocation and Rate Design
90.	2010	Tn Reg Auth	10-0920-77-421	Tennessee American Water Company	Cost Allocation and Rate Design
91.	2010	Ct PU RgAth	10-09-08	United Water Connecticut	Cost Allocation and Rate Design
92.	2010	Pa PUC	R-2010-2179103	City of Lancaster-Bureau of Water	Rev Rqmts, Cst Alloc/Rate Design
93.	2010	Pa PUC	R-2010-2173103	UGI Central Penn Gas, Inc.	Cost Allocation
94.	2011	Pa PUC	R-2010-2214413	The Newtown Artesian Water Co.	Revenue Requirement
95.	2011	Pa PUC	R-2011-2232243	Pennsylvania-American Water Co.	Cost Allocation and Rate Design
96.	2011	Pa PUC	R-2011-2232985	United Water Pennsylvania Inc.	Demand Study, COS/Rate Design
97.	2011	Pa PUC	R-2011-2244756	City of Bethlehem-Bureau of Water	Rev. Rqmts/COS/Rate Design
98.	2011	Mo PSC	WR-2011-0337-338	Missouri American Water Company	Cost Allocation and Rate Design
99.	2011	Oh PUC	11-4161-WS-AIR	Ohio American Water Company	Cost Allocation and Rate Design
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	Year	Jurisdiction	Docket No.	Client/Utility	Subject
100.	2011	NJ BPU	WR11070460	New Jersey American Water Company	Cost Allocation and Rate Design
101.	2011	ld PUC	UWI-W-11-02	United Water Idaho Inc.	Cost Allocation and Rate Design
102	2011	II CC	11-0767	Illinois-American Water Company	Cost Allocation and Rate Design
103.	2011	Pa PUC	R-2011-2267958	Aqua Pennsylvania, Inc.	Cost Allocation and Rate Design
104.	2011	VaStCom	2011-00099	Aqua Virginia, Inc.	Cost Allocation
105.	2011	VaStCom	2011-00127	Virginia American Water Company	Cost Allocation and Rate Design
106.	2012	TnRegAuth	12-00049	Tennessee American Water Company	Cost Allocation and Rate Design
107.	2012	Ky PSC	2012-00072	Northern Kentucky Water District	Cost Allocation and Rate Design
108.	2012	Pa PUC	R-2012-2310366	Lancaster, City of – Sewer Fund	Cost Allocation and Rate Design
109.	2012	Ky PSC	2012-00520	Kentucky American Water Co.	Cost Allocation and Rate Design
110.	2013	WV PSC	12-1649-W-42T	West Virginia American Water Co.	Cost Allocation and Rate Design
111.	2013	la St Util Bd	RPU-2013-000_	Iowa American Water Company	Cost Allocation and Rate Design
112.	2013	Pa PUC	R-2013-2355276	Pennsylvania American Water Co.	Cost Allocation and Rate Design
113	2013	Pa PUC	R-2012-2336379	The York Water Company	Cost Allocation and Rate Design
114.	2013	Pa PUC	R-2013-2350509	City of DuBois – Bureau of Water	Cost Allocation and Rate Design
115.	2013	Pa PUC	R-2013-2390244	City of Bethlehem – Bureau of Water	Cost Allocation and Rate Design
116.	2014	Pa PUC	R-2014-2418872	City of Lancaster – Bureau of Water	Cost Allocation and Rate Design
117.	2014	Pa PUC	R-2014-2428304	Borough of Hanover	Cost Allocation and Rate Design
118.	2014	VAStCom	2014-00045	Aqua Virginia, Inc.	Cost Allocation
119.	2015	NJ BPU	WR15010035	New Jersey American Water Company	Cost Allocation and Rate Design
120.	2015	Pa PUC	R-2015-2462723	United Water PA	Cost Allocation and Rate Design
121.	2015	WV PSC	15-0676-W-42T	West Virginia American Water Company	Cost Allocation and Rate Design
122.	2015	ld PUC	UWI-W-15-01	United Water Idaho Inc.	Pro Forma Revenues
123.	2015	Mo PSC	WR-2015-0301	Missouri American Water Company	Cost Allocation and Rate Design
124.	2015	Va St Com	PUE-2015-00097	Virginia American Water Company	Cost Allocation and Rate Design
125.	2015	Hi PSC	2015-0350	HOH Utilities, Inc.	Cost Allocation and Rate Design
126.	2016	Ky PSC	2015-00418	Kentucky American Water Company	Cost Allocation and Rate Design
127.	2016	Pa PUC	R-2015-2518438	UGI Utilities, Inc Gas Division	Cost Allocation
128.	2016	II CC	16-0093	Illinois American Water Company	Cost Alloc/Rate Dsgn/Demand Sty
129.	2016	NY PSC	16-W-0130	SUEZ Water New York Inc.	Cost Allocation and Rate Design

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Summary: Text Direct Testimony of Paul R. Herbert electronically filed by Ms. Rebekah J. Glover on behalf of Aqua Ohio, Inc.