

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Aqua Ohio, Inc. to Increase Its Rates and	)	Case No. 22-1094-WW-AIR
Charges for Its Waterworks and Services.	)	

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**DIRECT TESTIMONY  
OF  
BRADLEY H. SHAW  
ON BEHALF OF  
AQUA OHIO, INC.**

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- X   Management policies, practice, and organization
- X   Operating income
- X   Rate base
- Allocations
- X   Rate of return
- Rates and tariffs
- X   Other

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1 **Direct Testimony of**  
2 **Bradley H. Shaw**

3 **I. BACKGROUND AND PURPOSE**

4 **Q1. Would you please state your name and address for the record?**

5 A. My name is Bradley H. Shaw. My business address is 6650 South Avenue,  
6 Boardman, OH 44512.

7 **Q2. Mr. Shaw, by whom are you employed and in what capacity?**

8 A. I currently serve as the State Controller with Aqua Ohio, Inc.

9 **Q3. How long have you been employed by Aqua Ohio, Inc.?**

10 A. I was hired by Aqua Ohio, Inc. as its State Controller in August of 2021.

11 **Q4. What are your duties and responsibilities as the State Controller for Aqua**  
12 **Ohio, Inc.?**

13 A. As Controller, I am primarily responsible for the day-to-day operations of the  
14 accounting department, which includes all financial reporting and budgeting, as well  
15 as various administrative duties. Because of my responsibilities with respect  
16 to the financial aspects of the Company, I am also involved in the preparation of rate  
17 increase applications.

18 **Q5. Please outline your educational background and business experience.**

19 A. I am a 1997 graduate of the University of Dayton with a Bachelor of Science degree  
20 in Accounting. I spent my first five years of employment in public accounting  
21 performing audits, reviews, and various tax returns for clients in multiple industries.  
22 I was then employed by the Goodyear Tire and Rubber Company for close to eight  
23 years, where I held various roles within the North America tire business segment. I  
24 have also spent ten years in the retail and service industries with roles of Controller  
25 and Vice-President, Treasurer. I was hired by Aqua Ohio, Inc. in August of 2021 as  
26 Controller.

1     **Q6. Do you have experience in the regulatory ratemaking process?**

2     A. Yes. In addition to my work in connection with this filing, I was involved in the  
3     Aqua Ohio, Inc. rate case, Case No. 21-0595-WW-AIR and Aqua Ohio Wastewater,  
4     Inc. Rate Case, Case No. 21-0596-ST-AIR.

5     **Q7. Are you familiar with the application filed by Aqua Ohio, Inc. in Public Utilities**  
6     **Commission of Ohio Case No. 22-1094-WW-AIR?**

7     A. Yes. I am responsible for the operating income, rate base, and rate of return sections  
8     of the Standard Filing Requirements (SFR). My direct testimony for this case is in  
9     support of the SFR schedules on which I am identified as the “Witness Responsible.”

10    **II. SECTION B SCHEDULES**

11    **Q8. Your name appears on certain schedules included in Section B – Rate Base.**  
12    **Please explain these schedules.**

13    A. The first schedule to be completed in determining the rate base for this case was  
14    Schedule B-2.3, and it was completed as follows: Each property account for the total  
15    Aqua Ohio, Inc. Water Division and the total Service Center was listed and  
16    identified by the property NARUC number and description in Columns (A) and (B).  
17    The Total Division Beginning Balance Column (C) shows the combined original  
18    cost of the Plant in Service at the last Date Certain of the last rate case. The  
19    Beginning Balances used for Aqua Ohio, Inc. were taken from Case No. 21-0595-  
20    WW-AIR. Workpapers WPB-2.3 support the compilation of the beginning balance  
21    in Column (C), which represents the stipulated balance from Case No. 21-0595-  
22    WW-AIR. These workpapers continue populating Column (D) by identifying the  
23    Staff adjustments made in the previous case. Provided next are the actual additions  
24    and retirements that occurred during the projected period, April 1, 2021, to  
25    December 31, 2021. This establishes the Aqua Ohio, Inc. general ledger utility plant

1 in service balance at December 31, 2021, in Column (E). The original cost of  
2 additions, Column (F), and retirements, Column (G), made between January 1, 2022,  
3 and June 30, 2022, for Aqua Ohio, Inc.'s PUCO regulated water divisions and the  
4 Service Center are listed by account. This information is supported by workpapers  
5 WPB-2.3b through WPB-2.3j. Column (H) on Schedule B-2.3 represents the general  
6 ledger utility plant in service balance at June 30, 2022. Column (I) supported by  
7 workpaper WPB-2.3o-y through WPB-2.3z-aa details the projected asset additions  
8 and retirements for the period July 1, 2022, through the Date Certain June 30, 2023.  
9 Schedule B-2.3 Column (J) provides the total Plant in Service at Date Certain June  
10 30, 2023.

11 **Q9. How do you define original cost?**

12 A. "Original cost" as applied to utility plant means the cost of such property to the  
13 person or entity first devoting it to public service.

14 **Q10. How is the original cost of the various items of property determined?**

15 A. Records are maintained by Aqua Ohio, Inc. in compliance with the Uniform System  
16 of Accounts for Class A and B Water Utilities. The original cost of each item of  
17 property is recorded by project number in the activity module. After each item of  
18 property has been placed in service or retired, the appropriate original cost is  
19 transferred from construction work in progress to fixed capital.

20 Beginning with the fixed capital ledger account balances, each transfer to the  
21 fixed capital ledger is checked to assure that the proper original cost has been added  
22 or subtracted. Each authorization for expenditure or retirement is examined and  
23 analyzed for accuracy, and in most cases the appropriate ledger entries are also  
24 analyzed.

1 **Q11. How do you determine that the various items of property are in service at the**  
2 **date certain?**

3 A. Each work order provides a completion report on which is recorded the date  
4 completed and date in service. The date in service is used for that determination.

5 **Q12. Describe how schedule B-2 is completed.**

6 A. After completing Schedule B-2.3, the Total Division Ending Balance, Column (J)  
7 balance was carried forward as applicable to Schedule B-2.1, Column (C). As  
8 required by the SFR, these balances were then allocated and adjusted to determine  
9 the Adjusted Jurisdictional, Column (G), Plant in Service at Date Certain, June 30,  
10 2023. The property records are maintained separately by Aqua Ohio, Inc. for each of  
11 its operating divisions and therefore the Total Division, Column (C) amounts shown  
12 on Pages 1 through 3 on Schedule B-2.1 are allocated 100% to the PUCO Regulated  
13 Divisions and are restated in Column (E) as the Allocated Total. The Service Center  
14 Plant in Service is used to serve all the operating divisions of Aqua Ohio, Inc. and  
15 therefore is allocated at 61.21% for the PUCO Regulated Divisions. The 61.21%  
16 allocation percentage is developed on Schedules B-7 and B-7.1 using the net plant of  
17 the PUCO Regulated Divisions divided by the sum of the net plant of all the  
18 operating divisions less the Service Center net plant. The Allocated Total, Column  
19 (E), as shown on Page 3 of Schedule B-2.1 is the amount applicable to the PUCO  
20 Regulated Divisions for the Service Center General Plant. Line 25, Column (E),  
21 Page 3 of Schedule B-2.1 shows the total PUCO Regulated Divisions and allocated  
22 Service Center Plant in Service at Date Certain June 30, 2023, in the amount of  
23 \$519,888,356.

1     **Q13. Are there any adjustments to plant in service?**

2     A.     Yes. As detailed on Schedule B-2.2, there are proposed adjustments to Plant in  
3           Service. Well field land is excluded in the amount of \$146,442.96 located in Shepard  
4           Hills. The intake in Lake Erie that served the Green Road Plant in Ashtabula is being  
5           excluded in the amount of \$285,464.92. Also excluded is the supply main from the  
6           intake to the Green Road Plant for \$9,791.78. Lastly, land is excluded in the amount  
7           of \$25,973.00 in Mohawk. All of these items were excluded from rate base in Case  
8           No. 21-0595-WW-AIR. The adjustments have been used again in this case as there  
9           has been no change in their status.

10                 Additionally excluded is the capitalized tank painting and misclassified  
11           capitalized tank painting costs in the amount of \$1,191,567.17 to be adjusted in  
12           2022. Schedule B-2.1, Page 3, Line 25, Column (G), Adjusted Jurisdiction results in  
13           an adjusted total of \$518,229,116.

14                 This amount includes the Deferred Income Tax from Liberalized  
15           Depreciation, Deferred Credits – Tank Painting and other Regulatory Assets and  
16           Liabilities, all of which are identified on Schedule B-6. The Total Plant in Service at  
17           Date Certain, June 30, 2023, is \$518,229,116. The next component of rate base to be  
18           considered was the Depreciation Reserve. The Total Division Ending Balance,  
19           Column (J) of Schedule B-2.3 was restated on Schedule B-3 as Total Division Plant  
20           Investment, Column (C). The account balances for the depreciation reserve were  
21           then set forth in Column (D) and allocated and adjusted using the same procedure as  
22           was used for the Plant in Service in Schedule B-2.1. The total PUCO Regulated  
23           Divisions and allocated Service Center Reserve for Accumulated Depreciation as of  
24           June 30, 2023 shown on Schedule B-3, Page 3 of 3, Line 22, under Adjusted

Jurisdiction, Column (H) is \$144,152,420. The same amount is reflected on Schedule B-1, Page 1 of 1, Line 2 under Company Proposed Amount, Column (E) as \$144,152,420.

Workpaper support for the depreciation reserve is located on WPB-3a-b page 1 of 2, Total Column, \$135,107,119 for the PUCO Regulated Divisions. The Service Center is on WPB-3a-b page 2 of 2, Total Column, and this amount of \$17,206,542 is allocated at 61.21% on Schedule B-3. Workpaper WPB-3c, Column (G), Line 23, (\$730,529) is the adjustment to reserve for CIAC depreciation expense from October 2022 through June 2023. The final value that affects the depreciation reserve total is the reserve adjustments for the B-2.2 exclusions of (\$1,486,824) found on B-3 Page 3 of 3, Column G, Line 22.

**Q14. How was schedule B-6 completed?**

A. Contributions in Aid of Construction are set forth on Schedule B-6 and then carried forward to Line 10 of Schedule B-1 as \$26,637,969. Line 13 of Schedule B-1 sets forth an amount of \$39,175,461 as Other Items. This amount includes the Deferred Income Tax from Liberalized Depreciation and Deferred Credits, all of which are identified on Schedule B-6.

**Q15. Please summarize Schedule B-1.**

A. At Date Certain, June 30, 2023, the Plant in Service less Depreciation Reserve, plus Construction Work in Progress plus Working Capital, less Contributions in Aid of Construction, Advances for Construction, Customer Advances-Related Facilities, and Other Items results in a Jurisdictional Rate Base of \$307,287,488 for the PUCO Regulated Divisions.



1     **III.     SECTION C SCHEDULES**

2     **Q16.   Moving through the SFR schedules you are sponsoring, please explain what is**  
3     **contained on Schedule C-1.**

4     A.     This schedule contains the jurisdictional proforma income statement of the PUCO  
5             Regulated Water Divisions for the twelve months ended June 30, 2023, the test year  
6             in this proceeding, and reflects three months of actual data and nine months of  
7             projected data, as adjusted for ratemaking purposes. As shown on the schedule, on  
8             an adjusted test year basis, the jurisdiction experienced operating income of  
9             \$15,677,799 under its current rates, which produces a rate of return of 5.10%. The  
10            proposed rates would, on a proforma basis, produce net operating income of  
11            \$22,653,067, which represents a rate of return on the jurisdiction's rate base of  
12            7.37%.

13    **Q17.   What is the nature of the amounts shown in the Schedule C-2, Column (C),**  
14    **captioned "Adjustments"?**

15    A.     These amounts are adjustments to reflect conditions existing at the time of the filing  
16             of the Application, events that are anticipated which did not prevail during the entire  
17             test year, or events reasonably expected to occur within the twelve months  
18             immediately following the end of the test year in accordance with R.C. 4909.15(D).  
19             When applying the adjustments to the amounts in Column (B), the operating income  
20             is increased to \$15,677,799, as shown on Schedule C-2, Column (D).

21    **Q18.   Could you describe your adjustment totaling \$8,638,248 to Operating Revenues**  
22    **on Schedule C-2, Column (C), Line 5?**

23    A.     The revenue in Column B of Schedule C-2 reflects the actual revenue for three  
24             months ending September 30, 2022, and the budgeted revenue for the nine months  
25             ending June 30, 2023, at current rates. The consumption and revenue as stated on E-  
26             4 represent the actual consumption for the 12 months ending June 30, 2022. The

adjustments show the transition from unadjusted test year revenue to pro forma revenue under current rates.

**Q19. Would you please describe the adjustments under the heading “Operating Expenses” of Schedule C-2, Column C, Line 10?**

A. The adjustments are as follows:

1. Salaries and wages for management are at the projected rate as of June 30, 2023.

The wages for the bargaining units are adjusted to the rates effective at various times per the actual or projected union contracts. The number of employees has also been adjusted to reflect the current labor complement with an adjustment made for allocation of wages for employees that also work in jurisdictional areas not included in this case. The calculation and the adjustment of \$780,388 are shown on Schedule C-3.4.

2. The uncollectible accounts expense must be adjusted to reflect the adjusted revenues on Schedule E-4. Schedule C-3.5, Line 5, shows an uncollectible expense percentage of 1.01% and results in a test-year uncollectible expense of \$734,809, which, if subtracted from the amount in the test year of \$390,613 requires an adjustment of \$344,196. The uncollectible expense percentage of 1.01% is calculated by taking the net charge offs as a percent of revenue.

3. The rate case expense for this case is estimated to be \$958,000 on Schedule C-8, Column B, Line 8. A three-year amortization period would result in estimated rate case expense of \$319,333 for this case as shown on Schedule C-3.6. In addition, the amount remaining from Case No. 21-0595-WW-AIR is \$594,275. Schedule C-8, Column B, Line 16, references the total expense to be amortized for the most recent prior case in the amount of \$776,503, deducted from this amount is the amount that was written-off of \$182,227, resulting in the \$594,275

1 remaining amount to be amortized. This amount will be amortized over a five-  
2 year period which will result in an estimated rate case expense of \$118,855 as  
3 shown on Schedule C-3.6. The estimated total annual rate case expense equals  
4 \$438,188, which if subtracted from the amount in the test year of \$97,044  
5 requires an adjustment of \$341,144. These expenses include fees and costs for  
6 outside consultants, legal services, customer notices, printing and binding of  
7 exhibits, and other miscellaneous costs.

8 4. Tank painting costs were not adjusted in this case due to the projected expenses  
9 being in-line with the test year and reflect anticipated costs in a normal year of  
10 operation. No adjustment is shown on schedule C-3.7.

11 5. The test year employee insurance expense was calculated using the current  
12 employee elections and projected (net) rates effective June 30, 2023. The revised  
13 hospitalization expense of \$1,784,405 is compared to the test year expense of  
14 \$851,898, resulting in an adjustment of \$932,508 as shown on Schedule C-3.8.

15 6. The post-retirement benefit expense of (\$49,176) is based on the latest actuarial  
16 forecast and to this amount is added the portion of amortization related to the  
17 regulatory asset allowed in Case No. 13-2124-WW-AIR of \$21,799. These  
18 revised costs of (\$27,377) are compared to the expense of (\$6,336) included in  
19 the test year expense on C-2, resulting in an adjustment of (\$21,041) reflected on  
20 Schedule C-3.9.

21 7. The pension costs of \$260,255 are based on the latest actuarial forecast and to  
22 this amount is added the amortization of the regulatory assets allowed in Case  
23 No. 13-2124-WW-AIR of \$372,543. These revised costs of \$632,798 are

1 compared to the expense of \$173,646 included in the test year expense on C-2,  
2 resulting in an adjustment of \$459,152 reflected on Schedule C-3.10.

3 8. Billing expenses were not adjusted in this case due to the projected expenses  
4 being in-line with the test year and reflect anticipated costs in a normal year of  
5 operation. No adjustment is shown on schedule C-3.11.

6 9. Transportation expense was adjusted (\$2,071) and workers compensation  
7 expense was adjusted for (\$433) for a total of (\$2,503) to allow for the operating  
8 contracts. The adjustment of (\$2,503) is reflected on Schedule C-3.12.

9 10. The purchased water expense was not adjusted in this case due to the projected  
10 expenses being in-line with the test year and reflect anticipated costs in a normal  
11 year of operation. No adjustment is shown on schedule C-3.13.

12 11. The sludge expense of \$626,967 was adjusted to reflect current contract rates for  
13 the hauling and disposal of the sludge. The sludge adjustment of \$124,743 is  
14 reflected on C-3.14. Source of Supply maintenance cost of \$329,372 was  
15 adjusted for current costs of cleaning intakes and wells. The adjustment of  
16 \$232,195 is shown on C-3.14. These two expense items make the total  
17 adjustment for maintenance operations \$356,938.

18 12. Chemical costs were not adjusted in this case due to the projected expenses being  
19 in-line with the test year and reflect anticipated costs in a normal year of  
20 operation. No adjustment is shown on schedule C-3.20.

21 13. The power costs were not adjusted in this case due to the projected expenses  
22 being in-line with the test year and reflect anticipated costs in a normal year of  
23 operation. No adjustment is shown on C-3.21.

1                   The sum of the above paragraphs one through thirteen totals \$3,190,781,  
2                   which is the adjustment in Column C line 10 of Schedule C-2.

3   **Q20.   Would you explain your adjustments to depreciation expense on Schedule C-2,**  
4   **Column C, Line 12?**

5   A.    The depreciation expense in Column B of Schedule C-2 includes depreciation on  
6           assets placed in service as of June 30, 2023.

7                   It has been the Commission's procedure to calculate the annual depreciation  
8                   expense on the property in service at date certain; therefore, this calculation has been  
9                   made on Schedule B-3.2, Page 4 of 4, Column F, as \$13,286,828, resulting in  
10                  increased depreciation expense of \$116,727 as shown on Schedule C-3.15.

11   **Q21.   Would you explain your computations to arrive at the adjustment of \$646,175**  
12   **increasing Taxes Other Than Income on Schedule C-2, Column C, Line 14?**

13   A.    The "Taxes Other Than Income" adjustment is made up of property taxes, excise tax  
14           and payroll taxes as follows:

- 15           1.   The test year property taxes before adjustment of \$11,774,622 on Schedule C-  
16               2.1, Page 7 of 7, Column E, Line 15, were computed before the actual rates and  
17               valuation were known for the year 2023, and estimates were used. The assessed  
18               valuation at date certain is based on the plant in service less OWDA property  
19               plus inventory times the assessed valuation percentage from December 31, 2021.  
20               The assessed valuation times the average property tax rate of \$88.55 per \$1,000  
21               equals \$12,125,408 resulting in an adjustment for property tax of \$350,786 as  
22               shown on Schedule C-3.16.
- 23           2.   The test year excise tax needs to be adjusted for the pro forma adjustments to test  
24               year operating revenue. Test year operating revenue is reduced by the amount of

1 bad debt expense from Schedule C-3.5 which results in an excise tax expense  
2 adjustment of \$157,466 as shown on Schedule C-3.17.

3 3. The adjustment to payroll taxes is \$137,923 which is shown on Schedule C-3.18  
4 adjusts payroll tax expense based on the pro forma labor expenses shown on  
5 Schedule C-3.4. Federal and state unemployment tax, and FICA and Medicare  
6 were all calculated at current taxable rates.

7 **Q22. Would you explain your computation of the adjustment to Federal income tax**  
8 **on Schedule C-2, Column C, Line 15?**

9 A. Federal income tax adjustment is shown on Schedule C-3.19. This adjustment is  
10 necessary to reflect the impact of the Company's proposed pro forma adjustments to  
11 revenues, expenses, depreciation, general taxes, and the impact of interest  
12 synchronization in the tax calculation as shown on Schedule C-4. The Company is  
13 proposing the use of the statutory current federal tax rate of 21%. Schedule C-3.19  
14 reflects an adjustment for deferred taxes resulting from temporary timing  
15 differences.

16 **Q23. Would you summarize your Schedule C-3 and how it relates to the test-year**  
17 **operating income?**

18 A. Schedule C-3 shows the adjustments by income statement grouping. The net of the  
19 Total Revenue Adjustments and Total Expense Adjustments is \$5,001,735 and can  
20 be found on Schedule C-2, Column C, Line 18. Applying the adjustments to the  
21 unadjusted column results in Column D, "Adjusted Revenue and Expenses." The  
22 adjusted test year operating income is \$15,677,799 and the amounts in Column D are  
23 carried forward to Schedule C-1, Column B.

24 **Q24. Has Aqua Ohio prepared jurisdictional federal income tax summaries?**

25 A. Yes. Summaries are located in Schedules C-4 and C-4.1.

1     **Q25. Does Aqua Ohio's tax rate reflect all recent tax reform at the federal level?**

2     A.     Yes, rates reflect federal tax reform. Aqua Ohio incorporated the most current  
3           income tax rate in calculating the revenue requirement in this proceeding.

4     **Q26. Is amortization of investment tax credit a component of income tax expense?**

5     A.     No. Investment Tax Credit is fully amortized.

6     **Q27. Please discuss the income tax support Aqua Ohio receives from Essential.**

7     A.     Essential's tax department oversees all aspects of income tax accounting,  
8           compliance, and reporting. This includes, tax provisioning, current and deferred tax  
9           accounting, tax return preparation and filing, consolidation, and payments or refund  
10          processing. The Essential tax department works directly with Aqua Ohio's finance  
11          and accounting teams to coordinate these activities and support the tax positions  
12          ultimately taken by the Company.

13     **IV. SECTION D SCHEDULES**

14     **Q28. What capital structure do you recommend for computing the Company's**  
15     **weighted average cost of capital?**

16     A.     I recommend using the Company's actual capital structure as of September 30, 2022,  
17           which falls within the test year in this proceeding. That capital structure consists of  
18           47.11% long-term debt, and 52.89% common equity, as shown in the Rate of Return  
19           Summary on Schedule D-1.

20     **Q29. Does short-term debt also represent a component of a company's total**  
21     **capitalization?**

22     A.     While short-term debt is obviously also a source of capital, because short-term  
23           borrowings are typically rolled over into long-term obligations, some regulatory  
24           commissions do not regard short-term debt as a separate component of the capital  
25           structure of the utility under study. I understand that, historically, this has been the  
26           Commission's practice. Thus, I have followed the Commission's customary practice

1 and excluded short-term debt for purposes of my analysis in this case. Furthermore,  
2 Aqua Ohio, Inc. does not have any short term debt as can be seen by referencing  
3 Schedule D-2.

4 **Q30. Please briefly describe Schedule D-1.**

5 A. Schedule D-1 summarizes the amounts and cost rates for each capital component.  
6 The cost rate for each capital component is multiplied by its percentage proportion in  
7 the capital structure, which results in a weighted cost. The weighted costs for each  
8 capital component are then summed to produce a weighted cost of capital. Schedule  
9 D-1 shows that Aqua Ohio, Inc.'s weighted cost of capital is 7.37% as of September  
10 30, 2022. This weighted cost of capital reflects a cost of long-term debt of 3.86%  
11 and a cost of common equity of 10.50%, which is in the range supported by the  
12 testimony provided by Company witness Dylan D'Ascendis.

13 **Q31. Please explain Schedule D-2.**

14 A. Schedule D-2 shows Aqua Ohio, Inc. short-term debt obligations as of September  
15 30, 2022, along with the applicable interest rate and the annualized interest  
16 requirement.

17 **Q32. Please explain Schedules D-3 and D-4.**

18 A. Schedules D-3 and D-4, respectively, show the embedded cost of debt and preferred  
19 stock of the Company, although I would note that Aqua Ohio, Inc. has no preferred  
20 stock. As calculated on Schedule D-3 the embedded cost of debt for Aqua Ohio, Inc.  
21 is 3.86%.

22 **Q33. Please explain Schedule D-5.**

23 A. Schedule D-5 lists comparative financial data for the previous 10 calendar years  
24 and the period ending September 30, 2022. Data on this schedule pertains to



1 plant, construction work in progress, capital structure, condensed income  
2 statement and fixed interest charge coverage.

3 **V. SECTION E SCHEDULES**

4 **Q34. Are you also the witness responsible for certain schedules in Section E?**

5 A. Yes. I am responsible for Schedules E-1, E-2, E-2.1, and E-3.

6 **Q35. Please explain Schedules E-1.**

7 A. Schedules E-1 contains the copies of the proposed tariff sheets as filed with the  
8 “Notice of Intent to File” and if applied to the current consumption will generate the  
9 revenue requested on Schedule C-1. Mrs. Heppenstall’s Cost of Service testimony  
10 calculates the proposed rates according to the Commission’s methodology.

11 **Q36. Please explain Schedule E-2 and Schedule E-2.1.**

12 A. Schedules E-2 are copies of the tariff sheets that are currently in effect and  
13 Schedules E-2.1 are redlined copies of the tariff sheets

14 **VI. SERVICE IMPROVEMENT PROJECT (“SIP”)**

15 **Q37. Please discuss the Service Improvement Project.**

16 A. Essential desires to significantly improve customer service, network reliability,  
17 safety, current capabilities, and add multiple channels for a better customer service  
18 experience across all of its entities. As such, Essential is progressing with an  
19 enterprise-wide project, including Aqua Ohio, to make these improvements a reality.

20 **Q38. Are the Aqua Ohio systems currently fully integrated?**

21 A. No. Notably, Aqua Ohio has been on our Lawson financial platform since 1999 and  
22 similarly our Banner customer service platform since approximately 2007. As such,  
23 upgrades of these two systems makes up the primary investment goal of the SIP  
24 project. The SIP project will create a new business software platform for Essential

1 and Aqua Ohio and allow it to retire or eliminate dependency on old, unsupported  
2 software modules by a host of different software manufacturers.

3 **Q39. Can you describe the “SAP” component of the Service Improvement Project?**

4 A. Since Essential must invest in new software systems, it is implementing a proven,  
5 fully integrated system. SAP is at the top of the market. SAP is a robust system that  
6 is expected to become the backbone of the Essential companies. Roughly 80% of  
7 the largest utilities use this software. In terms of excellence, it has been the leader  
8 for the 13th consecutive time in Gartners quadrant. Over 800 utilities worldwide use  
9 SAP’s customer management and billing modules. Peoples Natural Gas, an  
10 Essential-owned entity, has already implemented SAP and its experience has shown  
11 SAP has significantly improved its customer service numbers. Additionally,  
12 significant improvement to network reliability, backup, disaster recovery, and  
13 security will be accomplished through the SIP.

14 **Q40. What specific benefits do Essential and Aqua Ohio, Inc. expect from SAP?**

15 A. SAP has several characteristics that are inherently attractive to Essential and Aqua  
16 Ohio:

- 17 • Expandable to allow for growth of the enterprise.
- 18 • Comfortably supports a multi-company and multi-utility corporate framework.
- 19 • Easily integrates with other commercially sold software, as well as custom  
20 developed applications.
- 21 • Has a significant number of proven implementations at other utilities.
- 22 • Shows a commitment to supporting utility-type businesses.
- 23 • Exhibits a proven track record with improving customer service.

1     **Q41. Was SAP in service for Aqua Ohio, Inc. as of January 1, 2022?**

2     A.     Yes.

3     **Q42. Please address the costs of the SIP initiative.**

4     A.     Essential will bear the cost of this effort, with Aqua Ohio, Inc. assuming its share.

5             Essential's cost for the SIP project is estimated to be \$143,000,000, which is broken

6             out between Phase I implementation (SAP/Financials) and Phase II (Customer

7             Service). Aqua Ohio's share of this amount is approximately \$17,000,000, which is

8             allocated on the basis of customers or approximately 15% of the water and

9             wastewater segment subsidiaries.

10    **Q43. How much of Aqua Ohio, Inc.'s estimated share is reflected in these**  
11    **proceedings?**

12    A.     Approximately \$6,100,000.

13    **Q44. Does this conclude your direct testimony?**

14    A.     Yes, it does.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Direct Testimony of Bradley H. Shaw was served by electronic mail to the following persons on this 13<sup>th</sup> of January 2023:

John Jones  
Chief, Public Utilities Section  
Office of Ohio Attorney General  
30 East Broad Street, 16th Floor  
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*/s Nicole R. Woods*

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Nicole R. Woods

One of the Attorneys for Aqua Ohio, Inc.

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Summary: Testimony Direct Testimony of Bradley Shaw electronically filed by Ms.  
Nicole R. Woods on behalf of Aqua Ohio, Inc.