

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

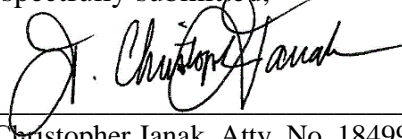
**IN THE MATTER OF THE PETITION OF THE  
TOWN OF WINFIELD, LAKE COUNTY,  
INDIANA, FOR APPROVAL OF A  
REGULATORY ORDINANCE ESTABLISHING A  
SERVICE AREA FOR THE TOWN'S MUNICIPAL  
SEWER SYSTEM PURSUANT TO IND. CODE § 8-  
1.5-6 *ET SEQ.***

**CAUSE NO. 45992**

**PREFILED DIRECT TESTIMONY AND EXHIBITS  
OF JENNIFER Z. WILSON**

Prefiled Direct Testimony of Jennifer Z. Wilson	<u>Petitioner's Exhibit 15</u>
Financial Analysis Report dated April 21, 2025	<u>Petitioner's Exhibit 16</u>
Ordinance No. 143-F, Ordinance Amending Monthly User Rates	<u>Petitioner's Exhibit 17</u>
Ordinance No. 143-G, Ordinance Amending System Development Charges	<u>Petitioner's Exhibit 18</u>
Crown Point Municipal Wastewater Utility Rate Consultant's Report Phase 2, 3 and 4 Project Funding dated February 14, 2025	<u>Petitioner's Exhibit 19</u>
Crown Point Ordinance No. 2025-01-02, Read and Passed at a public hearing and second reading on March 3, 2025 Ordinance Amending Monthly User Rates	<u>Petitioner's Exhibit 20</u>
Crown Point Ordinance No. 2025-01-02, Version with Three Phases presented at first reading on January 6, 2025, and the public hearing on February 3, 2025 Ordinance Amending Monthly User Rates	<u>Petitioner's Exhibit 21</u>
Crown Point Ordinance No. 2020-11-21 Ordinance Establishing Sewer Connection and System Development Charges	<u>Petitioner's Exhibit 22</u>

Respectfully submitted,



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**OF**  
**JENNIFER Z. WILSON**

**ON BEHALF OF**  
**THE TOWN OF WINFIELD, LAKE COUNTY, INDIANA**

**I.**

**INTRODUCTION**

**1. Q PLEASE STATE YOUR NAME AND ON WHOSE BEHALF YOU ARE TESTIFYING.**

A My name is Jennifer Z. Wilson, and I am testifying on behalf of the Petitioner, the Town of Winfield, Indiana ("Winfield" or "Petitioner").

**2. Q BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

A I am a Consulting Director with Crowe LLP ("Crowe"), a certified public accounting and consulting firm. Crowe's Consulting Public Sector Municipal Advisory practice and its predecessor, Municipal Consultants, have been providing rate and financial consulting services to governmental units and various types of utility companies for over fifty-five years. My business address is 3815 River Crossing Parkway, Suite 300, Indianapolis, Indiana 46240.

**3. Q PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS.**

A I received a bachelor's degree in accounting from Indiana University in 1992. During my employment, I have attended numerous seminars and conferences pertaining to accounting, utility, and rate issues. Universities, utility associations, accounting organizations, state regulatory associations, governmental entities, and other organizations sponsored these seminars. I am a Certified Public Accountant licensed in the State of Indiana and am a member of the Indiana CPA Society and the American Institute of Certified Public Accountants. I am designated by the Municipal Securities

1 Rulemaking Board ("MSRB") as a Municipal Advisor Representative and a Municipal  
2 Advisor Principal.

3 **4. Q WHAT IS A DESIGNATION OF MUNICIPAL ADVISOR BY THE MSRB?**

4 A As part of its expanded mandate under the Dodd-Frank Wall Street Reform and  
5 Consumer Protection Act, the MSRB implemented the first qualifying examination for  
6 municipal advisors. MSRB Rule G-3, effective April 27, 2015, created two  
7 classifications of municipal advisor professionals, representative and principal, with  
8 firms required to designate at least one principal to oversee the municipal advisory  
9 activities of the firm. All municipal advisor representatives and principals are required  
10 to take and pass the Series 50 exam to demonstrate the level of knowledge needed to be  
11 sufficiently qualified to perform municipal advisory activities. Furthermore, the MSRB  
12 restricts any party from providing advice concerning the issuance of debt to only those  
13 qualified as a municipal advisor representative or municipal advisor principal. I passed  
14 the Series 50 Pilot exam in 2016 and, because of that, am a Series 50-qualified municipal  
15 advisor representative. I passed the Series 54 Pilot exam in 2019 to demonstrate the  
16 level of knowledge to serve as a municipal advisor principal. My firm has designated  
17 me as a municipal advisor principal.

18 **5. Q HOW LONG HAVE YOU BEEN EMPLOYED BY CROWE AND IN WHAT**  
19 **CAPACITIES?**

20 A I have been employed by Crowe since 1992 after graduating from Indiana University.  
21 During my employment, I have been responsible for supervising and performing  
22 numerous projects including utility rate engagements, feasibility studies, cost of service

1 studies, utility financial analysis, rate evaluation, revenue sufficiency reviews, and other  
2 projects related to a variety of utility issues.

3 I have served as a municipal advisor on both competitive and negotiated bond sales  
4 including debt issuance through agencies of the State of Indiana by the Indiana Bond  
5 Bank and by the Indiana Finance Authority through the State Revolving Fund Loan  
6 Program. While at Crowe, the engagements that I have worked on and been responsible  
7 for have included water, sewer, stormwater, and electric utilities that were established  
8 as not-for-profit, for-profit, governmental, or quasi-governmental entities. I have  
9 prefiled and given oral testimony before the Indiana Utility Regulatory Commission  
10 (“Commission”).

11 **6. Q HAVE YOU TESTIFIED BEFORE THE COMMISSION IN THE PAST?**

12 A Yes, I testified on behalf of the City of Fort Wayne in its water rate case and financing  
13 cases, Cause Nos. 42979 and 42724. I have also testified on behalf of the City of South  
14 Bend in Cause No. 42779, the City of New Castle Water Utility in Cause No. 42984,  
15 the City of Lafayette Water Utility in Cause No. 45006, the Crawfordsville Electric  
16 Light & Power in Cause No. 45420, the City of Bloomington Water Utility in Cause  
17 No. 45533, Granger Water Utility LLC in Cause No. 45568, the City of Marion Water  
18 Utility in Cause No. 45838, the Town of Winfield in Cause No. 45992, American  
19 Suburban Utilities in Cause No. 46017, the City of Anderson Water Utility in Cause No.  
20 46087, the City of Anderson Water Utility in Cause No. 46147, and most recently for  
21 the City of Anderson Water Utility in Cause No. 46171.

1     **7. Q MS. WILSON, PLEASE DESCRIBE YOUR AND YOUR FIRM'S**  
2             **RELATIONSHIP AND INVOLVEMENT WITH WINFIELD.**

3     A Crowe has been the municipal advisor for Winfield since 2021. During this time,  
4         Crowe has performed a number of engagements for Winfield, including, but not  
5         limited to, the issuance of debt, continuing disclosure filings, utility rate analysis, and  
6         other utility related projects. I have been the primary contact for all utility revenue  
7         related engagements.

8     **8. Q WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS CAUSE?**

9     A The purpose of my testimony is to support Winfield's request for approval of Ordinance  
10        No. 358 ("Regulatory Ordinance"). Specifically, I will address the effect of the  
11        Commission's order in this proceeding on the: (i) customer rates and charges for service  
12        provided in the proposed service area ("Winfield Service Territory"); and (ii) present  
13        and future economic development in the Winfield Service Territory. I will also discuss  
14        the potential impact on customer rates and charges and economic development as a  
15        result of the competing service area requests by Winfield and the City of Crown Point,  
16        Indiana ("Crown Point").

II.

**FINANCIAL STATUS OF WINFIELD'S MUNICIPAL SEWER UTILITY AND  
RATES AND CHARGES IN THE WINFIELD SERVICE TERRITORY**

**9. Q PLEASE GENERALLY DESCRIBE THE HISTORY OF WINFIELD'S SEWER  
UTILITY.**

A The Town Sewer Board oversees management of the Winfield Municipal Sewer Utility ("Utility") and the Town Council establishes rates and charges for municipal utility services. The elected Clerk-Treasurer is responsible for the financial records of the Utility. The day-to-day operation of the Utility is provided by an outside contract operator. The Town's existing sewage works system consists of a mechanical treatment plant and collection system apprising of 120,000 feet of gravity and force main and ten lift stations. Winfield was incorporated in 1993. The sewage treatment plant was built in four (4) phases; the first phase was built in 1996 with major expansions completed in 2007 and 2022 to increase treatment capacity from 300,000 gallons per day to 800,000 gallons per day. On December 21, 2023, the Building Corporation of the Town of Winfield issued bonds to fund the further expansion of the treatment plant to 1.6 million gallons per day capacity for treatment as well as other improvements.

The Utility has grown from 42 connections in the year 1997 to 2,545 as of April 2025. In the past three years the Utility has averaged 168 new customers per year. The following table shows the number of customers as of April 2025 and at year end for 2018 through 2024.

<u>Year</u>	<u>Total Number of Customers</u>	<u>Number Increase</u>
April 2025	2,545	86
2024	2,459	170
2023	2,289	180
2022	2,109	155
2021	1,954	86
2020	1,868	60
2019	1,808	65
2018	1,743	

**10. Q DO YOU HAVE AN OPINION ON THE FINANCIAL STATUS OF WINFIELD'S MUNICIPAL SEWER UTILITY?**

A Yes, I do. The Utility is in excellent financial condition. The rates and charges that are currently in place provide adequate revenues for Winfield to address its operation and maintenance expenses, taxes other than income taxes, debt service, and debt service reserve funding. The Utility has substantial coverage on the outstanding debt issuance to allow for annual capital improvement or the buildup of funds for future capital improvements.

**11. Q HAVE YOU RECENTLY PREPARED A FINANCIAL ANALYSIS THAT SUMMARIZES THE CURRENT STATUS OF WINFIELD'S MUNICIPAL SEWER UTILITY AND ITS CURRENT RATES AND CHARGES?**

A Yes, I have. For the Commission's reference, I am attaching as Petitioner's Exhibit 16 a copy of a financial analysis that I, along with other members of my firm that I supervised, have recently prepared for Winfield.

1     **12. Q CAN YOU DESCRIBE THE CONTENTS OF PETITIONER'S EXHIBIT 16 ?**

2           A Petitioner's Exhibit 16 is the Financial Analysis Report for the Town of Winfield  
3           Sewage Works dated April 21, 2025 ("Report"). The purpose of the Report was to  
4           calculate the debt service coverage of the Utility for current debt service payments.  
5           The Report is based on data for the twelve months ended December 31, 2022,  
6           December 31, 2023, and December 31, 2024. The operating receipts were \$1,389,794  
7           for the year ended December 31, 2022, \$1,503,029 for the year ended December 31,  
8           2023, and \$1,574,618 for the year ended December 31, 2024. The operating  
9           disbursements ranged between \$733,100 and \$828,314 resulting in net operating  
10          receipts of \$656,695 in 2022, \$674,715 in 2023, and \$787,839 in 2024. The Utility  
11          has four series of bonds outstanding; the Sewage Works Refunding Revenue Bonds of  
12          2013, Series A ("2013A Bonds"), the Sewage Works Refunding Revenue Bonds of  
13          2013, Series B ("2013B Bonds"), the Sewage Works Revenue Bonds of 2022, Series  
14          A ("2022A Bonds"), and the Sewage Works Revenue Bonds of 2022, Series B  
15          ("2022B Bonds")(together, the "Outstanding Bonds"). The combined maximum  
16          annual debt service on the Outstanding Bonds is \$520,607. Including the interest  
17          income and the System Development Charges, debt service coverage using the  
18          maximum annual debt service on the Outstanding Bonds, is \$681,300 or 231% in the  
19          year 2022, \$889,888 or 271% in the year 2023, and \$1,196,694 or 330% in the year  
20          2024. The coverage amount is available for the funding of the debt service reserve,  
21          funding capital projects, or retaining for funding of future capital projects.

1     **13. Q TO YOUR KNOWLEDGE, HAS WINFIELD RECENTLY ISSUED BONDS**  
2             **FOR THE PURPOSE OF FINANCING THE CONSTRUCTION OF FACILITIES**  
3             **WITH SUFFICIENT CAPACITY TO SERVE THE WINFIELD SERVICE**  
4             **TERRITORY?**

5     A Yes, it has. In fact, Winfield completed the issuance of the \$8,600,000 Town of  
6     Winfield, Indiana Building Corporation Lease Rental Revenue Bonds of 2023 (“2023  
7     Building Corporation Bonds”) on December 21, 2023. The proceeds of the 2023  
8     Building Corporation Bonds are being used to construct a wastewater treatment plant  
9     expansion which will, among other things, be used to treat sewage originating from,  
10    among other areas, the Winfield Service Territory.

11    The principal and interest on the 2023 Building Corporation Bonds are payable from  
12    lease rental payments due from the Town of Winfield to the Building Corporation and  
13    are payable solely from and secured exclusively by the trust estate, which includes the  
14    rent received by the Building Corporation. The 2023 Building Corporation Bonds are  
15    not secured or payable by the revenues of the Utility.

16    **14. Q WHY DIDN'T WINFIELD USE THE REVENUES OF THE UTILITY TO**  
17             **SECURE THE RECENT BOND ISSUANCE THAT FUNDS THE EXPANSION**  
18             **TO THE TREATMENT PLANT?**

19    The Utility has excellent coverage as I previously explained with the inclusion of the  
20    SDC revenues it has collected (please see Petitioner's Exhibit 16, p.10). However, for  
21    the purposes of issuing debt on parity with the Outstanding Bonds, SDC revenues are  
22    not included in the parity coverage calculation. The parity coverage calculation requires

1           that the coverage on the Outstanding Bonds and the bonds proposed to be issued on  
2           parity with the Outstanding Bonds have Net Revenues in excess of 125% of the  
3           maximum annual debt service on the Outstanding Bonds and the bonds proposed to be  
4           issued on parity with the Outstanding Bonds. Net Revenues for the Utility are defined  
5           as gross revenues after deduction only for the payment of the reasonable expenses of  
6           operation, repair and maintenance, but not including payments in lieu of taxes. The  
7           coverage excluding the SDC charges was \$154,950 or 130% for the year 2022, \$260,754  
8           or 150% for the year 2023, and \$406,346 or 178% for the year 2024. The parity  
9           provisions require that the prior calendar year be used in the calculation. Using the year  
10          2022 for the parity coverage calculation, the Utility did not have the capacity to fund the  
11          additional debt service for the issuance of the debt without an increase to its monthly  
12          user rates. Rather than raise monthly user rates and issue sewer revenue bonds, the  
13          Town Council made the decision to finance the wastewater treatment plant expansion  
14          by issuing bonds through the Building Corporation and used \$818,624 in SDC funds  
15          towards the project so that the Utility could maintain its highly competitive user rates,  
16          avoid rate shock to its customers, and encourage economic development.

17   **15. Q DID WINFIELD RECEIVE OTHER BENEFITS BY USING THE BUILDING**  
18   **CORPORATION FINANCING MODEL?**

19   A Yes, it did. By using the Building Corporation financing approach, Winfield provided  
20   the Utility with borrowing flexibility. As it continues to grow and add customers,  
21   Winfield will have more revenues and increased borrowing power to issue new debt to  
22   construct sewer improvements with the goal of avoiding a significant spike in monthly

1 user rates. For these reasons, Winfield is in a good position to be able to finance the  
2 improvements necessary to serve customers both inside its municipal limits and the  
3 Winfield Service Territory.

4 **16. Q ARE YOU FAMILIAR WITH WINFIELD'S CURRENT RATES AND**  
5 **CHARGES FOR SEWER SERVICE?**

6 A Yes, I am. For the Commission's convenience, a copy of Winfield's ordinance,  
7 Ordinance No. 143-F, which amended its monthly service charges is attached as  
8 Petitioner's Exhibit 17. In addition, I am attaching as Petitioner's Exhibit 18 a copy of  
9 Ordinance No. 143-G, which amended Winfield's system development charges.  
10 These two ordinances set forth rates and charges that are imposed on users within the  
11 Winfield Service Territory.

12 **17. Q DOES WINFIELD HAVE HIGHER RATES FOR CUSTOMERS LOCATED**  
13 **OUTSIDE OF ITS MUNICIPAL BOUNARIES?**

14 A No, it does not.

15 **18. Q MS. WILSON, DO YOU HAVE AN OPINION ON WHETHER THE**  
16 **COMMISSION ORDER AUTHORIZING WINFIELD TO SERVE THE**  
17 **WINFIELD SERVICE TERRITORY WILL HAVE A POSITIVE EFFECT ON**  
18 **WINFIELD'S RATES AND CHARGES FOR SERVICE?**

19 A Yes, I do. Winfield has already planned, designed, and is in the process of constructing  
20 facilities with sufficient capacity to serve inside its municipal boundaries and to areas  
21 within the proposed Winfield Service Territory. Assuming Winfield is authorized to

serve the Winfield Service Territory, Winfield will be able to spread its fixed costs over a larger customer base, which will allow Winfield to achieve greater economies of scale and maintain the lowest possible rates for its existing and future customers. I believe a Commission order granting Winfield the authority to be the exclusive provider to the Winfield Service Territory would have a positive impact on rates and charges for service in the area.

### **III.**

#### **IMPACT ON CUSTOMERS RATES AND CHARGES IN THE DISPUTED AREA**

**19. Q HAVE YOU ANALYZED CROWN POINT'S FINANCIAL ABILITY TO SERVE THE DISPUTED AREA?**

A I have analyzed the City of Crown Point Municipal Wastewater Utility Rate Consultant's Report Phase 2, 3, and 4 Project Funding ("Crown Point Rate Study") dated February 14, 2025, which was prepared by Financial Solutions Group Inc. and attached to my testimony as Petitioner's Exhibit 19. Crown Point relied on the Crown Point Rate Study in the passage of Crown Point Ordinance No. 2025-01-02 for the increase in the sewer rates and charges for the Crown Point Wastewater Utility on March 3, 2025 ("Crown Point Rate Ordinance"). The Crown Point Rate Ordinance is attached to my testimony as Petitioner's Exhibit 20.

1     **20. Q WHAT DOES CROWN POINT CHARGE FOR 5,000 GALLONS OF**  
2             **MONTHLY USAGE?**

3     A According to the Crown Point Rate Ordinance and the Crown Point Rate Study, the  
4         monthly charge for 5,000 gallons usage is \$83.55 for an inside city user and \$104.44 for  
5         an outside city user since passage of the Crown Point Rate Ordinance in March. The  
6         Crown Point Rate Ordinance authorizes a rate increase on January 1, 2026, at which time  
7         the monthly charge for 5,000 gallons usage will be \$105.30 for an inside city user and  
8         \$131.63 for an outside city user.

9     **21. Q IN COMPARISON, WHAT IS WINFIELD'S CURRENT CHARGE FOR 5,000**  
10            **GALLONS OF USAGE?**

11    A Winfield charges a monthly flat rate for non-metered customers single family  
12       residential dwelling of \$59.75 which encompasses most of the residential users in  
13       Winfield. The residents of the Double Tree Project Area are charged an additional \$10  
14       per month for a total of \$69.75. The metered customers are charged a treatment rate of  
15       \$11.95 per 1,000 gallons.

16    **22. QWHAT WOULD BE THE IMPACT ON CUSTOMER RATES IF CROWN**  
17            **POINT'S PETITION WERE GRANTED BY THE COMMISSION?**

18    A If the Commission were to approve Crown Point's proposed regulatory ordinance, the  
19       rates for customers in the Disputed Area would be much higher than if Winfield was  
20       authorized to serve this same area. If served by Crown Point, the customers in the  
21       Disputed Area will pay 120% more than if they were served by Winfield (assuming

1           5,000 gallons monthly usage). The disparity is greater the more the customer uses  
2           since Winfield's rate is a flat rate and Crown Point's charge will increase for each  
3           additional 1,000 gallons used. Currently, the Crown Point charge per 1,000 gallons is  
4           \$20.89 for outside City customers and will increase to \$26.33 per 1,000 gallons in  
5           January 2026.

6       **23. QIS WINFIELD CONSIDERING A SEWER RATE INCREASE?**

7           A The Town is not considering a sewer rate increase in the foreseeable future. As I have  
8           explained in my testimony previously, the Town has utilized other means of financing  
9           the recent improvements to the Sewage Treatment Plant in order to maintain the  
10          current rates and charges without an increase to the sewer rates.

11       **24. QIS CROWN POINT CONSIDERING A SEWER RATE INCREASE ABOVE**  
12       **THAT PASSED IN THE CROWN POINT RATE ORDINANCE?**

13          A The Crown Point Rate Study appears to indicate that an additional twenty-two percent  
14          (22%) rate increase will be needed in 2027 (see pages 30 to 32 of Petitioner's Exhibit  
15          19). If this increase is enacted, the monthly charge for 5,000 gallons usage will be  
16          \$128.45 for an inside city user and \$160.56 for an outside city user.

1     **25. Q DID CROWN POINT CONSIDER IMPLEMENTING THE 2027 SEWER**  
2             **RATE INCREASE?**

3             A Yes. At the first reading of the Crown Point Rate Ordinance on January 6, 2025, and  
4             the Public Hearing on February 3, 2025, Ordinance No. 2025-01-02 included a third  
5             phase of rate increase of twenty-two percent (22%). This phase III rate increase was  
6             removed for the public hearing and second reading on March 3, 2025. The versions of  
7             the Ordinance No. 2025-01-02 considered at each meeting is attached to my testimony  
8             as Petitioner's Exhibit 21.

9     **26. Q IS THE REMOVAL OF THE PHASE III INCREASE PERMANENT?**

10            A No, it is not. According to the testimony at the public hearing, Crown Point only  
11            temporarily removed the phase III rate increase. The Crown Point representatives at  
12            the public hearing stated the phase III implementation will be reevaluate again in one  
13            year. If the phase III rate increase is implemented at the same amount as considered  
14            previously this year, then the rates for the out of town customers will be \$32.11 per  
15            1,000 gallons which calculates to a monthly charge of \$128.45 for a 5,000 gallon user.

16     **27. Q WHAT DOES CROWN POINT CHARGE TO CONNECT TO THE SEWER**  
17             **SYSTEM?**

18            A According to the Crown Point Ordinance No. 2020-11-21, the charge to connect a base  
19            unit (defined as a single family house) is \$3,590, and Crown Point also imposes a system  
20            development charge of \$2,052 per equivalent dwelling unit. The total connection fees for

1 a new residential home are \$5,642. Crown Point Ordinance No. 2020-11-21 is attached  
2 as Petitioner's Exhibit 22 to my testimony.

3 **28. Q IN COMPARISON, WHAT IS WINFIELD'S CHARGE TO CONNECT TO THE**  
4 **SEWER SYSTEM?**

5 A Winfield charges a system development charge of \$3,190 for a meter size of 5/8 inch  
6 or 3/4 inch meter. The connection charge is \$2,452 less than the amount charged by  
7 Crown Point.

8 **IV.**  
9 **IMPACT OF APPROVAL OF WINFIELD SERVICE TERRITORY ON**  
10 **PRESENT AND FUTURE ECONOMIC DEVELOPMENT**

11 **29. Q MS. WILSON, DO YOU BELIEVE APPROVAL OF WINFIELD'S SERVICE**  
12 **AREA WILL HAVE AN IMPACT ON PRESENT AND FUTURE ECONOMIC**  
13 **DEVELOPMENT IN THE AREA?**

14 A Yes, I do. As I discussed above, the approval of the Winfield Service Territory will allow  
15 Winfield to extend service to areas that otherwise are not currently being served. The  
16 extension of sewer service to this area should facilitate new economic development in  
17 the area and allow existing homes the option of connecting to the sewer system. Over  
18 the course of time (and assuming approval of the Winfield Service Territory), Winfield  
19 will be able to extend service, achieve economies of scale, and offer competitive rates  
20 for all customers, all of which will be beneficial to present and future economic  
21 development in the area.

1     **30. Q DO YOU HAVE ANY OTHER COMMENTS REGARDING THE POTENTIAL**  
2           **IMPACT ON ECONOMIC DEVELOPMENT BY THE COMETING**  
3           **REGULATORY ORDINANCES FROM WINFIELD AND CROWN POINT?**

4           A Yes, I do. Winfield is offering a monthly sewer rate of \$59.75 per month and a  
5           very competitive connection charge of \$3,190. These rates are far lower than the  
6           rates enacted and proposed by Crown Point. As I stated above, Crown Point's out  
7           of town sewer rate is currently \$20.89 per 1,000 gallons and will increase to \$26.33  
8           per 1,000 gallons in January 2026. If Crown Point enacts its proposed phase III  
9           rate increase as presented in the Crown Point Rate Study, then the rate will be  
10          \$32.11 per 1,000 gallons for the out of town customers. While I have not  
11          exhaustedly researched the issue, these are some of the highest rates in the State of  
12          Indiana, especially for a community the size of Crown Point.

13          The Commission states on page 75 of its 2024 Annual Report (available at  
14          <https://www.in.gov/iurc/files/IURC-2024-Annual-Report-web.pdf>) that, as of  
15          January 1, 2024, the average wastewater rate approved by the Commission for  
16          4,000 gallons of wastewater was \$59.42. Winfield's residential flat rate (based  
17          upon 5,000 gallons of wastewater service) is \$59.75, just 33 cents more than the  
18          Commission's average for **4,000** gallons of wastewater. Conversely, Crown  
19          Point's rates for the Winfield Service Territory (based on 4,000 gallons usage)  
20          would be \$24.13 more than the average at its present rate (\$83.55), \$45.88 more at  
21          the rate (\$105.30) that is to take effect in January 2026), and \$69.03 more than its  
22          potential phase III rates (\$128.45).

1  
2 Particularly troubling from my perspective is the fact that the rate per 1,000 gallons  
3 will be a deterrent to large volume users. The disparity in rates is even more  
4 apparent with increased monthly usage. By way of example, a user that is using  
5 20,000 gallons per month if Crown Point is the sewer provider would currently pay  
6 a monthly sewer bill of \$417.80. A customer using 100,000 gallons per month  
7 would have a monthly sewer bill of \$2,089.00. Starting in January, these charges  
8 will increase to \$526.60 for 20,000 gallons and \$2,633.00 for 100,000 gallons  
9 usage. My concern is that if Crown Point were the provider, it would not only deter  
10 residential customers from connecting but it would particularly deter larger volume  
11 users whose rates would be cost prohibitive and could cause such development to  
12 locate elsewhere.

13 **IV.**  
14 **CONCLUSION**

15 **31. Q DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A Yes.

**VERIFICATION**

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

  
\_\_\_\_\_  
Jennifer Z. Wilson

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served upon the following by electronic mail this 21st day of April, 2025:

**Indiana Office of Utility Consumer Counselor**

[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)

A handwritten signature in black ink, appearing to read "J. Christopher Janak", written over a horizontal line.

J. Christopher Janak

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