

1 **Q26. Please describe the Department's proposed rule change concerning estimated meter**
2 **reading.**

3 A26. The Department understands that the Commission determined that the Department's
4 estimating logic for estimated billings is not consistent with its rules. From my review,
5 the estimating logic is the same as that used by IWC when it operated the System. David
6 Gadis of Veolia also testifies that the meter reading logic is the same as that used by IWC
7 and testifies that the meter reading logic in use is a reasonable manner on which to
8 estimate bills. The Department proposes to amend its rules to more accurately describe
9 the estimating logic currently being used. Attached as Exhibit MTK-27 is a proposed
10 amendment to the Department's rules concerning estimated meter reading, and I ask the
11 Commission to approve the proposed amendment.

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13 **Additional June 30 Order Compliance Matters**

14 **Q27. Please describe other steps taken by the Department to address the June 30 Order.**

15 A27. The Commission indicated it would review compliance with the Department's
16 compliance with the Commission's Order in Cause No. 43056. The Department has fully
17 implemented the accounting system endorsed by the National Association of Regulatory
18 Utility Commissioners ("NARUC"). The Department worked arduously over a period of
19 several months to accomplish this task after an attempt by a previous consultant for the
20 Department was unsuccessful in resolving the Department's accounting issues. The most
21 recent culmination of this work at the time of the pre-filing of this testimony is that the
22 Department was able to file its monthly cash flows and unaudited financial statements for
23 August 2009 a day early, on September 9, 2009 (see Exhibits MTK-5 and MTK-6), and