

Estimating is handled using an Oracle function named GetEstCons. All active meters are estimated during the billing cycle if no actual reading exists. The rules used to estimate are as follows:

1. Veolia reviews the 12-month average consumption for a site and the 2-month average for a site and takes the greater of the two to use as the estimated value.
2. Veolia uses a default value for a customer's first estimate if the customer has no history. Default values are based upon meter size as depicted below.

Meter Size	Default Value (hundred cubic feet)
5/8"	8
3/4"	8
1"	11
1-1/2"	23
2"	40
3"	86
4"	132
Larger than 4"	293

Note: For customers with 5/8" and 3/4" meters, the default value is 3 rather than 8 for customers who have been active for 15 or fewer days.

3. Defaults are also used when the estimated value seems unreasonable.
4. Both first and final bills may be estimated. If they are, they are pro-rated. Final bills are usually not estimated, but may be if a final reading cannot occur due to weather, inaccessibility to meter, etc.
5. If a customer has a negative average, which can occur due to a bad reading, Veolia uses the default values in the above table.
6. Customer service agents can manually reset a customer's average, if the customer shows excessive consumption due to leaks or bad readings.

Department of Waterworks' current Rules and Regulations, including those for estimating bills, were approved by the Indiana Utility Regulatory Commission on September 11, 2002. These Rules are being produced in response to Plaintiffs' First Request for Production.

Further answering, Veolia refers Plaintiffs to the documents being produced in response to Plaintiffs' First Request for Production.