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12
13 **IN THE PUBLIC UTILITIES COMMISSION**
14 **FOR THE**
15 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

16
17 **Petition of the**)
18 **Commonwealth Utilities Corporation**)
19 **For rate relief in its power, water and**)
20 **wastewater business**)

RATE CASE No. 10-01

21) CUCs Prefiled Testimony of:
22) Robert J. Lorenz, Chief Engineer of the
23) Water and Wastewater Division,

24)
25) January 2010

26)
27) **Subjects: Water & Wastewater**
28) **Challenges; Support for**
29) **Economists.com presentation;**
30) **Revenue needs generally**

31
32 Filing date: January 31, 2009

33
34
35 Direct Testimony of
36 Captain Robert J. Lorenz, USPHS, PE
37 Chief Engineer of the Water and Wastewater Division

38
39
40 **Introduction and Purpose**

41
42 Q: Please state your name and business address for the record.
43

1 A: My name is Robert J. Lorenz. I am Chief Engineer of the Water and Wastewater
2 Division of the Commonwealth Utilities Corporation (“CUC”). I am a captain of
3 the US Public Health Service. CUC’s offices are located at the Joeten DanDan
4 Building, 3rd Floor. The mailing address is PO Box 501220 CK, Saipan MP
5 96950. My telephone and fax numbers are: 670.235-7025 (general). My email
6 address is Robert_Lorenz@cucgov.net.

7
8 Q: Are you an adult resident of Saipan, Commonwealth of the Northern Mariana
9 Islands?

10
11 A: Yes, I am.

12
13 Q: Have you testified previously before the Commission?

14
15 A: No, I have not.

16
17 Q: Please state the content and purpose of your testimony.

18
19 A: I am testifying to three matters today. I also provide exhibits in support of my
20 testimony.

21
22 Q: Could you please provide a table of contents to this testimony?

23
24 A: Yes:



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8
9 Q: Who prepared this testimony and the exhibits sponsored through it?

10
11 A: This pre-filed testimony was prepared by me or under my direct supervision and
12 control. Likewise, the exhibits which I reference and sponsor were prepared by
13 me or under my direct supervision and control.

14
15 Q: If you were called to testify "live" to the matters contained within this testimony
16 and were asked the same questions, what would your answers be?

17
18 A: My answers would be as they appear in this pre-filed testimony.

19
20 Q: Do you swear and declare that this testimony, and the exhibits which you
21 sponsor through it, are true and correct to the best of your knowledge,
22 information and belief?

23
24 A: Yes, I do. And I repeat this declaration at the conclusion of this written
25 testimony.



26
27
28 **Qualifications**

29 * **Qualifications in general**

30
31
32
33 Q: Thank you. I would now like to ask you a few questions about your education,
34 training and experience as they relate to your testimony. Then I would like to
35 address the specific preparation you undertook for this testimony.

36
37 A: Please continue.

38
39 Q: Could you please explain your present position?

40
41 A: Yes. My title is Chief Engineer of the Water and Wastewater Division of CUC. I
42 have held this position since October, 2008. My duties include: day-to-day

1 participation in the management and hands-on conduct of all engineering issues
2 of CUC's water and wastewater operations, including new construction. As
3 Chief Engineer I am responsible for virtually all aspects of the functioning of
4 CUC's water and wastewater engineering divisions. My duties include planning
5 design, construction and providing technical assistance on operation of the
6 sanitation facilities. My work includes force account management, construction
7 management, procurement, budgeting, and planning. I supervise staff as well as
8 engage in hands on technical work.
9

10 I report directly to the Deputy Director of the Water and Wastewater Division.
11 CUC. I supervise the CUC professional engineering staff, which currently
12 consists of 3 engineers.
13

14 I have served as CUC's Chief Engineer in the Water and Wastewater Division
15 since October, 2008. Prior to that I worked for over 20 years for the Indian
16 Health Service (IHS) in four different geographic locations, including the Navajo
17 Area IHS, Portland area IHS, Alaska Area IHS, and the Phoenix Area IHS.
18

19 Q: What is your education?

20
21 A: I also have a Bachelor of Science in Civil Engineering from the University of
22 Alaska, Anchorage (1987). I am also 3 credit hours short of receiving my
23 Masters of Science degree from the University of Alaska, Anchorage.
24

25 Q: What is your professional status?

26
27 A: I have current civil professional engineer licenses from the states of Washington
28 and Alaska. I am a member of the American Society of Civil Engineers.
29

30 Q: What other certifications and awards do you hold?

31
32 A: From the US Public Health Service I have received two commendation medals,
33 two unit commendations, two achievement medals, and four unit
34 commendations. I have also received awards for hazardous duty and crisis
35 response service. I am also a General level amateur radio FCC license holder.
36

37 Q: Could you describe briefly the positions you held before this present one and
38 how they relate, if at all, to your testimony today?

39
40 A: Yes. I am a USPHS Commissioned Corps Officer, and I have worked extensively
41 in the planning, design, construction, and operation and maintenance of water

1 and wastewater sanitation facilities. This work involved communities of roughly
2 the same size as those which CUC serves, and with many of the same problems.
3

4
5 My last posting was with the Phoenix Area IHS as District Engineer in the
6 Eastern Arizona District Office, from June 2003 until 2008. I supervised and led
7 eight civil engineers in providing sanitary and infrastructure facilities for three
8 large Indian reservations in Arizona, serving a population of approximately
9 38,000 people.
10

11 Just prior to that position I was Environmental Engineer Consultant in the Alaska
12 Area for the Alaska Native Tribal Health Consortium, for the years 1998-2003. I
13 supervised and led a multi-disciplined technical staff, which included civil
14 engineers, construction superintendents, plumbers, technicians and drafters, in
15 the planning, management, design, and construction of projects in the Western
16 Region of Alaska. I trained mentors and supervised five engineers. I had
17 responsibility for services to 10 villages with active sanitation facility projects
18 totaling over \$20 million. I managed and oversaw multiple A/E contracts. I
19 supervised and participated in the following activities: nitrate groundwater
20 modeling analysis of lagoon effluent migration; design of circulating water
21 systems, new boiler rooms, and related facilities; developed procurement
22 documents for an engineering consultant to perform a sanitation facility planning
23 study; designed pumps and controls for facility pumping systems, including raw
24 water and glycol; supervised the management of a local city labor force to
25 construct a water treatment plant, vacuum sewage collection station, above-
26 ground circulating water distribution and sewage systems, duplex boilers, and
27 in-house plumbing for 60 homes; oversaw a project engineer's design of a
28 landfill and related two miles of boardwalk; participated in review and redesign of
29 an area purchasing system; and designed and supervised an engineer
30 performing design assistance and construction management on a 10,000 lineal
31 foot buried water and sewer piping system.
32

33 I was a Senior Environmental Engineer in the Portland Area from 1990 through
34 mid-1998, an Environmental Engineer in the Navajo Area from 1987 through
35 mid-1990, and a Student Engineer in the Alaska Area for part of 1986. During
36 those periods I planned designed and developed construction contract packages
37 and represented contracting officers for the construction of sanitation health
38 facilities serving 500 homes, including an aerated lagoon treatment system, a
39 control building, and ocean outfall, sewage lift stations, water treatment plant
40 controls, groundwater study, buried water and sewer pipelines, water storage
41 tank and booster stations, landfills and septic systems. I performed both leak

1 detection on buried water distribution systems, and inflow and infiltration studies
2 on buried sewer collection systems.
3

4 Q: Are you saying that you have a background in all aspects of CUC's water and
5 wastewater collection, supply, treatment and disposal?
6

7 A: Yes. I have carried out the basic tasks of water and wastewater supply and
8 generation, distribution and transmission, treatment and disposal, as well as the
9 management of these activities. I routinely have managed engineering projects,
10 small and large, including planning, engineering, construction, operation, and
11 maintenance. I have trained engineers and technicians in my area of expertise. I
12 have worked closely with EPA regulations, NPDES permits, and OSHA and
13 industry safety regulations. I have, of course, worked closely with American
14 Water Works Association ("AWWA") and other applicable industry standards.
15

16 I have significant experience and responsibility in electrical controls and
17 mechanical facilities. Modern water and wastewater equipment relies heavily on
18 pumps and pumping.
19

20 I hold a basic qualification as a disaster response engineer and was deployed
21 for service during Hurricane Dean in San Antonio Texas in August of 2007. I
22 also served on the Secretary's Emergency Response Team for Hurricanes
23 Katrina and Rita, in November of 2005.
24

25 Q: I attach my resume, which more fully describes these matters, as Exhibit ____
26 (RJL-001)
27



28
29 * Specific preparation for this testimony
30
31

32 Q: I would now like to focus more closely on what you did to prepare for this case,
33 and the testimony you are providing in it.
34

35 A: Yes. I have both general and specific comments on my work relating to this
36 case.
37


38 Q: What are your general comments?
39

40 A: CUC has been struggling to reach US- and EPA-quality and reliability standards.
41 We are moving rapidly in that direction. I am here to report progress to the

1 Commission, assuming that our work can be properly supported.
2

3 Q: Please discuss your connection with this case generally.
4

5 A: As I mentioned, I am responsible for the water and wastewater testimony and
6 exhibits. I will address both these issues. I work with a small team of committed,
7 hard-working technical people and can present the results of their work.
8
9

10 
11 Q: Please explain the areas in which you will testify.
12

13 A: Yes. I will be testifying as to the Water and Wastewater Division's operations,
14 budgeted and projected expenditures, and our longer-term capital needs. I will
15 address our progress in meeting the many requirements of the federal Stipulated
16 Order #1.
17

18 Q: Please discuss your connection with this case specifically, including your
19 preparation at the office.
20

21 A: I have done a number of things to prepare for this testimony.
22

23 As stated above, my day-to-day work is both hands on and supervisory with
24 respect to the engineering of water and wastewater of CUC sanitation
25 infrastructure. I am responsible for planning, design and construction of capital
26 infrastructure. I also provide technical assistance and consultation on a variety
27 of capacity issues, including technical, financial, and managerial. These last
28 include operations, procurement and training. Design and Construction
29 Management is performed both directly by CUC engineering staff, and
30 outsourced to consultants. My work is both supervisory and hands-on,
31 depending on the task.
32

33 I regularly meet with managers of the following departments in our Division:
34 CUC Lab, Water Operations, Wastewater Operations, Procurement, and the
35 Water Task Force. I also meet routinely with the Deputy Executive Director, the
36 Assistant Executive Director, and as required with the Executive Director.
37

38 I have visited and inspected most, if not all of our water and wastewater
39 treatment plants, lift stations, water wells, water storage facilities, and
40 construction repair projects completed since 2008.
41

1 I have participated on development of the Division's budget, and have
2 developed longer term capital plans. I have developed the CUC Sanitation
3 Engineering Department, I have authored and responded to several Stipulated
4 Order No. 1 requests including No. 18, Development of Engineering Section, No.
5 25, NPDES Permit Effluent and Receiving Wastewater Monitoring Report, and
6 No. 50 – 66 Drinking Water and Wastewater Master Plan Scope of Work. I have
7 also worked on prioritizing CUC capital improvement project grant requests, and
8 supervised the development and submittal of our principal grant requests to the
9 Federal Government for construction and repair.

10
11 I have authored and/or reviewed many of CUC's responses to Stipulated Order
12 No. 1.

13
14 I have discussed this case with my superiors, those who report to me, other
15 senior staff and our counsel, in order to place matters in the proper factual and
16 legal contexts. Over the last year I have spoken with other engineering and
17 utility professionals at the CNMI Department of Environmental Quality, and the
18 Environmental Protection Agency, Region 9. I have also worked with
19 Economists.com's Dan V. Jackson in his preparation of the testimony and
20 exhibits in this case.

21
22 And I have, of course, formed my own opinions as to the matters relating to this
23 case.
24
25

1
2 **Testimony**
3

4 Q: You stated earlier, in your introduction, that you are testifying about three
5 categories. Could you proceed with that testimony?
6

7 A: Yes. I have three major points to address today. In summary, they are the
8 following: (1) The water and wastewater divisions face substantial challenges as
9 we work intensively to provide proper service. (2) We have tried to carefully
10 develop a multi-year projection of expenditures, both capital and operating,
11 which support the Economists.com presentation. (3) Additional financial
12 resources, as in a wastewater rate increase, are essential to our continuing our
13 positive work.
14



17 * **Exhibits**
18

19 Q: Are you sponsoring any exhibits?
20

21 A: Yes. I present the following:
22

23 RJL-01: My resume/cv

24 RJL-02: Stipulated Order No. 1 Item 18 Engineering Section (Development)
25 submittal to EPA

26 RJL-03: Stipulated Order No. 1 Item 25 NPDES Permit Effluent and Receiving
27 Wastewater Monitoring Report submittal to EPA

28 RJL-04: Stipulated Order No. 1 Item 50 - 66 Drinking Water and Wastewater
29 Master Plan Scope of Work submittal to EPA

30 RJL-05 Lower Base Project
31



34 * **Topic 1: CUC still faces substantial challenges in providing proper water
35 and wastewater services.**
36

37 Q: Do you believe that CUC is capable of providing safe and efficient water and
38 wastewater services to its customers?
39

40 A: Yes, assuming proper resources. But we face some considerable challenges.
41

1 Q: Could you please describe the challenges your Divisions face?
2

3 A: Yes. As the Commission knows, present CUC management inherited a water
4 and wastewater system that was badly in need of repair and upgrade. Recently,
5 for instance, we saw the collapse of miles of our sewage collection pipes, from
6 old age and the particular degradation that our saline environment causes. We
7 have basically exceeded our FY 2009 budget in trying to repair the damage.
8

9 But, as long as the Water and Wastewater Divisions can hire competent staff,
10 staff, the Engineering Division can hire additional engineers, and receive power
11 from the Power Division, we can function. As long as we receive adequate
12 financing, we are up to the task of bringing both systems to US industry
13 standards.
14

15 Q: Can you summarize the US District Court's involvement with CUC?
16

17 A: Yes. The U.S. Department of Justice ("DoJ"), Environment and Natural
18 Resources Division, sued CUC in federal court to come into compliance with
19 critical water and sewage treatment requirements. *USA v. CUC & CNMI*, Civ.
20 No. 08-0051 (D. NMI Mar. 11, 2009) ("Stip Order 1"). (This can be found at
21 http://www.usdoj.gov/enrd/Consent_Decrees.html.) In July 2008 CUC, the CNMI
22 and (in September 2008) the U.S. Environmental Protection Agency ("EPA")
23 stipulated to this first of two orders lodged with the U.S. District Court on the
24 date the Complaint was filed. This Stip Order #1 requires CUC to implement a
25 series of improvements to its water and wastewater technical, managerial and
26 financial systems that respond to years of neglect. The demands are ambitious,
27 very ambitious.
28

29 There are literally hundreds of requirements to meet for Stip Order #1. Some
30 are hands on and technical; some are managerial, and some are financial; many
31 are program development many are paper- or systems-based. This latter
32 category involves putting in plan protocols and plans, like our like our cross-
33 connection control plan, pre-treatment plan, and Interim Financial Plan. Meeting
34 them would tax a larger, better funded utility. But our Divisions have worked
35 diligently to provide the deliverables of the Order.
36

37 The suit was brought, of course, on behalf of the US Environmental Protection
38 Agency. The EPA has been supportive at times, and critical at times, of our
39 compliance activities. I believe that the Commission is aware of our relationship
40 with the EPA and the US District Court. We have been advised that the US
41 District Court would like to review the status of our compliance, now scheduled

1 for late February.
2

3 Q: Could you address some of the challenges your Divisions face in repairing and
4 maintaining the water and wastewater systems?
5

6 A: Yes. Sewage collection piping failures are continuing at an accelerated rate.
7 The Wastewater Division must respond to acid damage in the asbestos cement
8 ("ac") piping system, the product of over 30 years of anaerobic and corrosive
9 conditions in sewers. These have caused significant damage to cement and
10 metal infrastructure, so that key pipe systems have failed. For instance, in mid-
11 December we saw the sixth failure in six months. Failures will continue until
12 approximately 10 miles of sewer pipe are replaced. But replacement involves
13 complex excavations, avoiding electric, phone and water utilities, blocking traffic,
14 trench dewatering to stop the infiltration of seawater (which damages treatment
15 plant facilities), and pumping sewage around blocked and excavated areas. The
16 Division has already far exceeded its repair budget.
17

18 The Division also needs serviceable vehicles to move its workers to and from job
19 sites. Presently six vehicles are in such bad shape that they are dangerous.
20 The resulting reduced vehicle problem raises costs and hurts service, as staff
21 and materials cannot be brought to job sites on time. We understand that the
22 vehicle problem is inherited, and that it is a CUC problem, affecting other
23 divisions.
24

25 Sewage lift station failures present a continuing challenge, with most pumping
26 stations having only one of two required pumps installed. CUC has issued a
27 contract to purchase 30 additional pumps. Once they arrive we will need to
28 allocate staff time to install them.
29

30 CUC Engineer staff shortages continue to hamper CUC's ability to anticipate and
31 fix technical problems. While CUC's Water/Wastewater engineering unit
32 employs four engineers, the poor condition of the CUC sanitation assets
33 requires at least two more engineers immediately. Significant engineering
34 resources are already focused on addressing EPA Stip Order #1 issues. These
35 issues include staffing plans, pre-treatment programs, materials management
36 programs, customer inventory and metering, and cross-connection control
37 programs.
38

39 The increase in the number engineers employed by CUC in my opinion is key to
40 the future success of the CUC. Engineers have the necessary skills to identify
41 and prioritize the required improvements, write grant applications fully supported

1 by technical detail, manage A/E and construction contracts, and provide
2 technical assistance to the operations department. Recruitment and retention of
3 engineering staff to meet these challenges including the appropriate salary
4 commensurate with responsibility has proven difficult.
5

6 Operations in our Divisions requires more such technical staff. The engineering
7 unit also estimates that at least three trained engineering technicians are also
8 required, including a draftsman.
9

10 Q: Can you provide some examples of the materials which EPA requires pursuant
11 to Stip Order #1?
12

13 A: Yes. I provide the following exhibits: RJL-02: Stipulated Order No. 1 Item 18
14 Engineering Section (Development) submittal to EPA; RJL-03: Stipulated Order
15 No. 1 Item 25 NPDES Permit Effluent and Receiving Wastewater Monitoring
16 Report submittal to EPA; RJL-04: Stipulated Order No. 1 Item 50 - 66 Drinking
17 Water and Wastewater Master Plan Scope of Work submittal to EPA; and RJL-
18 05: Lower Base Project.
19

20 We are very proud of the work we have done for these deliverables. The "Lower
21 Base Project", RJL-05, describes a typical project need. I believe the content of
22 the 3 Stip Order documents, RJL-02 through -05 describes many situations
23 which we must encounter. Some noteworthy accomplishments are the design of
24 the Sadog Tasi Wastewater improvements, nearing contract award, and the 90%
25 design of the Agingan wastewater treatment rehabilitation. CUC has been doing
26 a good job meeting most of our Stip Order deliverables, even though projects
27 like those profiled in the exhibits have consumed a lot of time.
28

29 We have discussed these with Economists.com, so that they better understand
30 our work.
31



32 * **Topic 2: The Water and Wastewater Divisions provided the basis for rate**
33 **case expenditures.**
34

35
36 Q: Do your Divisions forecast expenditures?
37

38 A: Yes. The Water and Wastewater Divisions of CUC have tried to carefully
39 develop a multi-year projection of expenditures, both capital and operating.
40

41 Q: Mr. Jackson relies on short- and long-term forecasts of expenditures. To what

1 extent did your Divisions prepare these numbers?

2 A: We did provide them with our multi-year projections and plans. In particular, we
3 provided the following materials: The preliminary capital improvement plan,
4 which is included in App G Ex DVJ-39; and all of the expense items for the IFP.
5

6 Q: Did your Divisions prepare the Interim Financial Plan (“IFP”)?

7
8 A: Not the whole Plan. We produced the expenditure side of the IFP for water and
9 wastewater. CUC transmitted the IFP to the EPA. We have provided the IFP to
10 Economists.com for this case, and, in particular, the underlying budget
11 projections and assumptions. I can respond to questions on the figures.
12



13 * **Topic 3: Additional financial resources, as in a wastewater rate increase,
14 are essential to our continuing our work.**
15

16
17 Q: You are not a numbers witness, but I read you as addressing resources,
18 presumably financial ones. Is that correct?
19

20 A: You are correct on both counts. I am testifying to the work of our Divisions.
21 Economists.com presents the ratemaking numbers. But resource needs are a
22 thread that weaves through my remarks.
23

24 Q: Please explain.
25

26 A: CUC is a relatively small system with an enormous workload. Much of the
27 workload is due to the poor state of the water and wastewater systems after
28 decades of inadequate or nonexistent repair, maintenance and replacement.
29 Stip Order #1 has focused and accelerated many of our tasks – a lot to do in a
30 relatively short time period. The numbers show that the FY 2010 and 2011 fiscal
31 years will demand a lot of work.
32

33 We cannot do this work without dedicated, hard-working people, who have the
34 tools – literally – to do the job. We must have the financial resources to pay
35 these people properly for their work, to buy the needed materials and supplies,
36 and to report to the Commission, the EPA and the US District Court on our
37 progress. Hopefully the Commission will recognize our resource needs.
38

39 Q: How do the Divisions power the treatment plants, pumps and other equipment?
40

41 A: We use electricity. Our only source of electricity is CUC’s power division. We

1 require a constant supply of electricity to run the water and wastewater treatment
2 systems. CUC has very limited on-site emergency generation capability, and for
3 only portions of these systems.
4

5 Q: Do your Divisions buy the electricity?
6

7 A: Whether we pay the Power Division for electricity is not in my responsibility area.
8 Presently we receive CUC Power Division electricity. We are not billed for it.
9 Some of the uses are metered. Some are not. We have carefully determined
10 our usage, through a combination of meter reads and engineering analysis.
11

12 Q: Could all the Divisions' facilities be metered and the meters read every month?
13

14 A: Technically this can be done. But it would be done at a high cost, and with labor
15 that we have already fully scheduled to meet the substantial and immediate
16 requirements of our Water and Wastewater Division systems.
17

18 Q: Should the Divisions' electricity be metered and bills paid to the Power Division?
19

20 A: That is a policy question presented in this case. I believe that Mr. Muna and Mr.
21 Jackson address this issue in their testimony. My day to day concern is that
22 CUC have the electricity available to our Water and Wastewater Divisions so
23 that we can perform our services properly and safely.
24

25 Q: Are there other materials, supplies and services that are important to your work?
26

27 A: Yes. We require chlorine to make our domestic water supplies safe. We must
28 receive lab testing services in order to assure the safety of our water and meet
29 federal standards. This implies the timely ordering and receipt of chemicals,
30 equipment and other testing supplies.
31



34 * **Conclusion**
35

36 Q: Does that complete your testimony?
37

38 A: Yes, it does.
39

40 Q: Do you request that this pre-filed testimony and related exhibits be entered in
41 the record of this case as your declaration?

Testimony of Robert J. Lorenz
Docket no. 10-01

1 A: Yes, I do.
2
3
4

5 I declare under penalty of perjury that the foregoing is true and correct and that this
6 declaration was executed on January 31, 2010, at Saipan, Commonwealth of the
7 Northern Mariana Islands.
8
9

10
11 _____
12 /s/

13 Capt. Robert J. Lorenz,
14 Commonwealth Utilities Corporation
15
16

17
18 **CERTIFICATE OF SERVICE**
19

20 The undersigned, Attorney, being a member of the CNMI Bar, hereby certifies that he served the
21 following person(s) with the following paper(s) by the following method(s) (CPUC prov. RPP 4; Com. R.
22 Civ. Pro. 5(d)):
23

24 Document served: The foregoing: Prefiled Testimony of Robert J. Lorenz, January 2010
25
26

27 Persons served:
28

29 Staff: J. K. Madan (jkmadan@gmail.com); Larry Gawlik (Lrgawlik@aol.com)
30 Counsel for GCG: Lillian A. Tenorio and Robert T. Torres: latenoriolaw@gmail.com;
31 rctlaw.nbb@gmail.com; rctlaw@pticom.com; Semerina Benjamin (semsimbmde@gmail.com)
32

33 Administrative Law Judge, Harry Boertzel (hboertzel@hotmail.com)
34

35 Method and date: by causing electronic service of a copy to the above persons through their indicated
36 email addresses on the above filing date.
37
38

39 _____
40 /s/

41 Alan J. Barak, Attorney at Law (# F0350)
42
43
44

0 RJL Testimony Robert J Lorenz 10-01 on w-ww division.wpd