



Office of the Ohio Consumers' Counsel

2
Your Residential Utility Consumer Advocate

Janine L. Migden-Ostrander
Consumers' Counsel

January 29, 2010

Renee Jenkins
Chief of Docketing
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43266-0573

RECEIVED-DOCKETING DIV
2010 JAN 29 PM 5:28
PUCO

Re: Christi Water System, Inc., PUCO Case No. 09-569-WW-AIR

Dear Ms. Jenkins:

Christi Water System, Inc. ("Christi" or "Company"), which serves approximately 192 residential consumers in the Christi Meadows Subdivision, filed an application for an increase in rates on July 7, 2009 in the above-captioned docket. Out of concern for these consumers, the Office of the Ohio Consumers' Counsel ("OCC") has been reviewing documents filed with the Public Utilities Commission of Ohio ("Commission" or "PUCO") in the case. For a variety of reasons, OCC is not at this time intervening in this proceeding. However, OCC offers the following recommendations with respect to the Staff Report, which was issued on December 30, 2009:

- The PUCO Staff recommended that the dishonored payment charge be increased to \$49 instead of the \$35 that the Company had requested. Christi dealt with only two dishonored payments during the test year and indicated that the bank fee costs them \$34 for such transactions. Staff's recommended dishonored payment charge of \$49 appears excessive given that water companies currently charge between \$16 and \$35. Considering the charges of other companies, and considering the fact that Christi already has been charging customers the bank fee instead of the current tariff rate of \$5, OCC recommends that \$34 be the recognized dishonored payment charge.
- The Company proposed that the owner of a rental property have the final responsibility for a tenant's unpaid water bills before restoring service for a new tenant. In the PUCO Staff Report, the Staff finds that this policy is not reasonable and should be deleted from the proposed tariff. The Staff also states that the Company may request that the owner put water service in the name of the owner, but the Company may not require the owner to pay a tenant's unpaid water bill. OCC agrees with Staff that this policy is not reasonable and should be deleted from the proposed tariff.¹ However, OCC recommends that the Staff clarify that the Company can request, but not require, the owner to put service in the landlord's name.

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¹ O.A.C. 4901:1-15-27(c)(1)

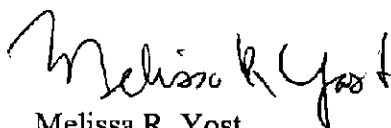
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- There is no mention of OCC in the contact section of the sample bill (see Second Revised Sheet No. 13) that was provided by the Company. OCC recommends that the Company include OCC's name, telephone number and website address to notify customers of their option to contact OCC in the case that a concern with the Company arises.
- OCC recommends that the Company include OCC's name, telephone number and website address in the section of the tariff entitled "Complaint Procedures" in Second Revised Sheet No. 11.
- In Section D of the Company's Notification of Customer Rights, the language regarding Medical Certificates states the following: "...in the event that the service has been disconnected within 14 days prior to certification of special danger to health, service shall be restored to that resident if the proper certification is made, in accordance with the foregoing provisions." The language is inconsistent with Chapter 4901:1-15-27(I)(2), O.A.C., which states, "In the event that service has been disconnected within twenty-one days prior to certification of special danger to health, service shall be restored to that resident if the proper certification is made, in accordance with the foregoing provisions." For the reasons stated above, OCC recommends the necessary change to this section of the Notification of Customer Rights.
- On Schedule B-6 of the Staff Report, the Staff failed to recognize \$400 in service deposits that should be deducted. These represent a non-investor supplied source of funds, the removal of which would result in an incremental adjustment of \$(317). OCC urges the Staff to deduct \$400 in its B-6 Schedule.
- In Account 7311, the Company included \$2,084 of imputed shareholder interest. This interest amount is of benefit to the individual who owns the Company, not the customers. Therefore, OCC recommends the \$2,084 of shareholder interest to be removed from rates.

For the reasons already stated, the Commission should adopt the PUCO Staff's recommendations with the changes and recommendations noted by the Ohio Consumers' Counsel.

Thank you for your consideration of these matters.

Sincerely,



Melissa R. Yost
Assistant Consumers' Counsel

Cc: Parties of Record