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OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application)
of Aqua Ohio, Inc. for Authority) Case No. 09-560-WW-AIR
to Increase its Rates and Charges)
in its Masury Division)

DIRECT TESTIMONY
of
JAMES D. WILLIAMS

ON BEHALF OF THE
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February 22, 2010

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TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. PURPOSE	3
III. CUSTOMER SERVICE ASSESSMENT.....	5
IV. CUSTOMER SURVEY ANALYSIS	13
V. MONTHLY BILLS	14
VI. MISCELLANEOUS CHARGES.....	19
VII. FINANCIAL ASSISTANCE RESOURCES AND PROGRAMS	26
VIII. CONSERVATION ISSUES	28
IX. SUMMARY OF RECOMMENDATIONS	29
X. CONCLUSION.....	31

ATTACHMENTS

JDW-1	List of Previous Testimony Filed at the PUCO by James Williams
JDW-2	Ohio Department of Job and Family Services, Trumbull County Profile
JDW-3	Aqua Response to OCC Interrogatory 28
JDW-4	Aqua Response to OCC Interrogatory 30
JDW-5	Aqua Response to OCC Interrogatory 45
JDW-6	Aqua Response to OCC Interrogatory 34
JDW-7	Aqua Response to OCC Interrogatory 27
JDW-8	Aqua Response to OCC Interrogatory 29
JDW-9	Aqua Response to OCC Interrogatory 51
JDW-10	Aqua Response to OCC Interrogatory 52

JDW-11	Aqua Ohio, Masury Division, 2005 Customer Survey Results
JDW-12	Aqua Response to OCC Interrogatory 50
JDW-13	P.U.C.O. Docket Card for Case 07-567-WW-ATA
JDW-14	Aqua Response to OCC Interrogatory 22
JDW-15	Aqua Response to OCC Request for Production of Documents RPD-24
JDW-16	Aqua Response to OCC Interrogatory 24
JDW-17	Aqua Response to OCC Request for Production of Documents RPD-25
JDW-18	Aqua Response to OCC Request for Production of Documents RPD-26
JDW-19	Aqua Response to OCC Interrogatory 39
JDW-20	Aqua Response to OCC Interrogatory 42

1 **I. INTRODUCTION**

3 ***Q1. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION.***

4 ***A1.*** My name is James D. Williams. My business address is 10 West Broad Street,
5 18th Floor, Columbus, Ohio 43215-3485. I am employed by the Office of the
6 Ohio Consumers' Counsel ("OCC") as a Senior Consumer Protection Research
7 Analyst.

9 ***Q2. WOULD YOU PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
10 ***PROFESSIONAL EXPERIENCE?***

11 ***A2.*** I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a
12 Masters in Business Administration, and a 1978 graduate of Franklin University,
13 in Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My
14 professional experience includes a career in the Air Force and over 14 years of
15 utility regulatory experience with the OCC.

16
17 My initial role in the agency was as a compliance specialist and my duties
18 included the development of compliance programs for the natural gas and water
19 industries. Later, I was appointed to manage all of the agency compliance
20 specialists who were developing compliance programs in each of the utility
21 industries. After six years, my role evolved into the management of the OCC's
22 consumer hotline, the direct service provided to consumers to resolve complaints

1 and inquiries that involve Ohio utilities. Most recently, my responsibilities have
2 expanded further and I am now a Senior Consumer Protection Research Analyst.
3 In this capacity, I am responsible for researching and recommending policy
4 positions on a host of policy issues that affect residential consumers. I have been
5 directly involved in the development of comments in various rulemaking
6 proceedings at the Public Utilities Commission of Ohio ("Commission" or
7 "PUCO") and Ohio Department of Development regarding issues associated with
8 protecting access to essential utility services by low-income consumers, a major
9 policy issue in the state.

10
11 **Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**
12 **COMMISSION?**

13 **A3.** Yes. The cases in which I have submitted testimony or have been deposed as a
14 witness can be found in attachment JDW-1. I have testified in the following cases
15 before the PUCO: *In the Matter of the Cincinnati Gas and Electric Company for*
16 *an Increase in its Rates for Gas Service to All Jurisdictional Customers*, Case No.
17 *95-0656-GA-AIR*; *In the Matter of the Commission's Investigation into the*
18 *Policies and Procedures of Ohio Power Company, Columbus Southern Power*
19 *Company, The Cleveland Electric Illuminating Company, Ohio Edison Company,*
20 *The Toledo Edison Company, and Monongahela Power Company Regarding the*
21 *Installation of New Line Extensions*, Case No. *01-2708-EL-COI*; *In the Matter of*
22 *a Settlement Agreement Between the Staff of the Public Utilities Commission of*

*Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to
Compliance with Customer Service Terms and Conditions in Stipulation And
Recommendation in Case No.07-564-WW-AIR and The Standards for Waterworks
Companies and Sewage Disposal System Companies, Case No. 08-1125-WW-
UNC and In the Matter of the Application of Ohio American Water Company to
Increase its Rates for Water and Sewer Services Provided to its Entire Service
Area, Case No. 09-391-WS-AIR.*

II. PURPOSE

***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY AND CAN YOU
PROVIDE A GENERAL SUMMARY OF YOUR RECOMMENDATIONS?***

A4. I am providing testimony concerning consumer protection issues that were
identified through the review of the Aqua Ohio, Inc. ("Aqua" or the "Company")
application to increase rates. As a result of my review, I have made several
recommendations that, if implemented, will positively impact the Company's
residential consumers. These recommendations include changes in the
Company's policies and procedures regarding disconnection of service that are
necessary in light of the current economic conditions in the geographic area
served by the Company. In addition, because the Company's proposals to initiate
an account activation charge and raise the levels for the reconnection charge and
dishonored check charge can or will have a detrimental impact on customers, I

1 recommend that those proposals be denied. The recommendations included
2 within this testimony are:

- 3 1. Aqua should provide additional payment options and plans to help
4 customers better manage their bills.
- 5 2. The Commission should require Aqua to render bills on a monthly
6 basis as required by their tariff.
- 7 3. The Company's application to increase the reconnection charge
8 from \$29.00 to \$43.00 should be denied. The Reconnection
9 Charge should be reduced to no more than \$24.25. Further, the
10 Company should bill consumers for Reconnection Charges over
11 two months.
- 12 4. The Company Application to implement a new \$21.00 Account
13 Activation Charge should be denied.
- 14 5. The proposed increase in the Dishonored Check Charge should be
15 denied and the scope of when the charge can be applied should not
16 be expanded as proposed by Staff
- 17 6. The Commission should order the Company to provide a one-time
18 \$2,500 contribution for low-income water consumers in the
19 Masury Division, and order the Company to establish a more
20 sustainable program to provide financial assistance in the
21 communities it serves.

1 7. The Commission should establish a stakeholder group to examine
2 the feasibility of implementing a low-income assistance program.

3 8. Staff should review the water conservation programs underway by
4 the Company.

5

6 ***Q5. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF***
7 ***YOUR TESTIMONY?***

8 ***A5.*** I have reviewed portions of the application related to my area of testimony,
9 including the direct testimony of several Company witnesses, the current and
10 proposed tariffs, the Company's responses to discovery requests by the OCC and
11 Staff Data Requests, and the Staff Report in this case.

12

13 **III. CUSTOMER SERVICE ASSESSMENT**

14

15 ***Q6. CAN YOU BRIEFLY SUMMARIZE THE CONTENT OF THE CUSTOMER***
16 ***SERVICE ASSESSMENT REFERENCED IN THE STAFF REPORT?***

17 ***A6.*** Yes. Staff reported that approximately 64 contacts were made to the PUCO call
18 center from customers in the Aqua Masury Division area between January 1, 2008
19 and November 30, 2009.¹ Considering the relatively small number of Aqua
20 customers served in the Masury Division, this number of calls to the PUCO
21 represents a contact rate that is over twice the rate of the other Aqua divisions.

¹ Staff Report at 31.

1 Staff noted there were a total of 1,780 contacts that occurred in 2008 and 2009
2 from all Aqua Ohio customers. Considering that there are approximately 87,000
3 total Aqua Ohio customers, of which 1,400 are in the Masury Division,² the
4 overall rate for Aqua Ohio contacts to the PUCO is about 2%, while the contact
5 rate for the Masury Division is approximately 4.6%. Specifically for the Masury
6 Division, Staff noted that the largest share of the calls (45%) involved billing
7 questions, and that the next highest category of call type related to disconnection
8 for non-payment (33%). The remaining contacts (22%) involved topics such as
9 water quality and water pressure, or were requests for account information.
10

11 ***Q7. GIVEN THE NATURE OF THE CONTACTS TO THE PUCO HOTLINE,***
12 ***ARE YOU SATISFIED WITH STAFF'S RECOMMENDATIONS***
13 ***REGARDING WAYS TO ADDRESS ISSUES RAISED BY MASURY***
14 ***CUSTOMERS?***

15 ***A7.*** No. While Staff acknowledged the types of contacts that were received, Staff
16 provided no specific recommendations of ways that Aqua could and should
17 modify collection policies and procedures to address the issues affecting
18 consumers. While the Masury Division serves a relatively small number of
19 residential consumers, the economic conditions in Trumbull County are bleak and
20 there is no relief in sight. For example, the Trumbull County unemployment level
21 for December 2009 is 13.8 %, which is almost 3% higher than the state average

² Annual Report of Aqua Ohio, Inc., Year Ending December 2008, Schedule 25, p. 49.

1 unemployment level.³ Poverty levels in Trumbull County are at 14.6%, which is
2 significantly higher than the state and national poverty levels.⁴ Per capita income
3 for Trumbull County is approximately 9% below the state average per capita
4 income and 24% below national per capita levels. Trumbull County is also
5 experiencing an increase in the number of households receiving food assistance or
6 other public assistance.⁵ Against this economic backdrop, the Commission cannot
7 overlook the challenge that customers of Masury face in maintaining their water
8 service. This challenge will only become greater, given the magnitude of the rate
9 increase that Aqua has proposed.

10
11 The Company's credit and collection policies should be adapted to be more
12 responsive to the needs of consumers. With almost 33% of the PUCO hotline
13 contacts involving customers who were experiencing issues at some level in
14 maintaining water service, Staff should have conducted a more comprehensive
15 review of the Company's disconnection and reconnection data to determine if
16 changes in the credit and collection policies and practices were appropriate.
17 Even without Staff recommendations regarding ways to improve credit and
18 collection policies, Aqua could, on its own initiative, modify its policies to be
19 more responsive to the needs of customers.

³ <http://jfs.ohio.gov/RELEASES/unemp/201001/UnempPressRelease.asp>.

⁴ Trumbull County Profile, Ohio Department of Job and Family Services, September 2009. (Attached herein as JDW-2).

⁵ JDW-2 at 2.

**Q8. UPON YOUR REVIEW OF COMPANY DISCONNECTION DATA, WHAT
WERE YOUR GENERAL OBSERVATIONS?**

A8. Based on my review of the Company's disconnection data, such as disconnection notices, payment plans offered to consumers, payment plan defaults, late charges imposed by the company, reconnection revenues, and actual disconnections for 2008 and 2009, I made several observations. Table 1 summarizes the data that was reviewed.

Table 1: Aqua Masury Division Disconnection Data

Year	Disconnect Notices⁶	Payment Plans Issued⁷	Payment Plan Defaults	Late Payment Charges⁸	Reconnection Revenues⁹	Disconnects¹⁰
2008	695	190	74	\$7,342	\$1,769	65
2009	785	132	49	\$6,827	\$1,827	95
Total	1,480	322	123	\$14,169	\$3,596	160

The total number of disconnections appears to have increased by approximately 32% between 2008 and 2009. I also observed that the number of customers requesting payment plans has decreased as disconnections have increased. Comparing the total number of payment plans with the actual number of disconnections, the payment plans appear to have been more effective in 2008

⁶ Aqua Response to OCC INT-28 (Attached herein as JDW-3).

⁷ Aqua Response to OCC INT-30 (Attached herein as JDW-4).

⁸ Aqua Response to OCC INT-43 (Attached herein as JDW-5).

⁹ Aqua Response to OCC INT-34 (Attached herein as JDW-6).

¹⁰ Aqua Response to OCC INT-27 (Attached herein as JDW-7).

1 than in 2009. In other words, approximately two of every three customers that
2 were on payment plans were able to avoid disconnection in 2008 by being on a
3 payment plan. In 2009, only one in every 1.4 customers on payment plans was
4 able to avoid disconnection. Further comparing the two years, there was an
5 increase of approximately 12% in the number of disconnection notices that were
6 issued from 2008 to 2009. The bottom line is that more Masury customers are
7 receiving disconnection notices, the effectiveness of payment plans is declining,
8 and the number of disconnections is rising.

9 Effective payment plans can help consumers maintain water services while
10 avoiding spending money on late payment charges and reconnection charges.
11 Unfortunately, as can be seen in Table 1, Aqua Masury customers have spent
12 almost \$18,000 on late payment charges and reconnection charges in the last two
13 years. Viewed another way, the money that was collected for late payment
14 charges and reconnection charges could have been better applied in paying the
15 water bill for almost 950 customers.¹¹

16
17 ***Q9. WHAT TYPE OF EXTENDED PAYMENT PLAN DOES THE COMPANY***
18 ***MAKE AVAILABLE TO CUSTOMERS?***

19 ***A9.*** Aqua will provide a payment arrangement once in a 12-month period.¹² In order
20 to enroll on the payment plan, however, customers must make an upfront payment

¹¹ Based on a typical bill of \$18.82 for 3,790 gallons usage, the \$17,765 paid in reconnect charges and late payment charges could have paid the monthly water bill for 944 residential customers.

¹² Aqua Response to OCC INT-29 (Attached herein as JDW-8).

1 of 25% of the total bill and agree to pay the remaining balance divided in three
2 monthly installments.

3
4 **Q10. DO YOU HAVE RECOMMENDATIONS REGARDING THE EXTENDED**
5 **PAYMENT PLAN?**

6 **A10.** Yes. There are several ways the extended payment plan can be improved. First,
7 the amount of upfront payment could be eliminated consistent with the
8 Commission ruling concerning upfront payments in the other industries.¹³ In
9 addition, the payment term could be spread over 6 or 9 months to help customers
10 stay current on their bills. Worth noting, the Commission recently ordered a one-
11 ninth payment plan for natural gas and electric customers.¹⁴ Additionally, there is
12 no reason why the extended payment plan must be limited to once in a 12 month
13 period. Certainly, customers who have demonstrated an ability to stay current on
14 a payment plan should not be denied the opportunity for another payment plan,
15 should the need arise in a 12-month period. Table 2 compares the current
16 payment requirements with the payment requirements outlined in this testimony.
17 A customer who currently owes \$75 would be required to make an upfront
18 payment of \$18.75, and then be obligated to pay \$18.75, along with the current
19 bill, for the next three months. Under my proposal, the customer would have no

¹³ *In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code*, Case No 08-723-AU-ORD, Entry on Rehearing, at 6.

¹⁴ Entry on Rehearing at 9.

upfront payment and could spread the amount owed over either 6 or 9 months, to be paid along with current charges.

**Table 2: Payment Levels Using the Aqua Extended Payment Plan Compared
With the OCC Proposed Payment Plans**

Assumed Delinquent Amount	Upfront Payment (Current)	Monthly Payment Balance (3 Months Plus Current Charges)	Upfront Payment (Proposed)	Monthly Payment Balance Proposed (6 Months Plus Current Charges)	Monthly Payment Balance Proposed 9 Months Plus Current Charges)
\$50	12.50	31.55	-0-	27.38	24.61
\$75	18.75	37.80		31.55	27.38
\$100	25	44.05		35.72	30.16

***Q11. WHAT ARE SOME OF THE ADDITIONAL CHARGES THAT AQUA
CUSTOMERS INCUR TO PAY WATER BILLS?***

A11. According to the Company responses to OCC INT-51 (herein attached as JDW-9) and OCC INT-52 (herein attached as JDW-10), Aqua Masury customers have spent over \$3,000 in costs over the last two years by paying water bills using the Speed Pay program. Speed Pay is a third party vendor that accepts credit card and electronic check payments on behalf of Aqua Ohio at a fee of \$3.20 per payment. Aqua customers also pay a \$4.25 fee for payments made through a collection agency, NCO, and a \$3.00 fee for payments made to the Collection Service Center. Aqua also provides the customers the capability to pay in person at the Struthers Office without paying any additional fee. While the Aqua Masury

1 Division does not have authorized agents where payments can be made, the cost
2 for such payments would be limited to two times the cost of a first class stamp, or
3 \$0.88, based on Commission rules.¹⁵
4

5 ***Q12. WHAT IS YOUR RECOMMENDATION CONCERNING THE ADDITIONAL***
6 ***CHARGES FOR PAYING WATER BILLS?***

7 ***A12.*** I would like to see more of the \$3,000 that is currently being spent paying third-
8 party vendors to accept Aqua payments be applied directly to the payment of
9 regulated water charges. Given the magnitude of the proposed water increase,
10 this money could be used to help approximately 87 customers pay their water
11 charges.¹⁶ Therefore, the Company should explore ways to reduce the cost of
12 paying bills, including reducing or eliminating charges for Speed Pay and other
13 charges.
14

15 ***Q13. DO YOU HAVE ANY FURTHER RECOMMENDATIONS CONCERNING***
16 ***THE CUSTOMER SERVICE ASSESSMENT?***

17 ***A13.*** Yes. I recommend that Aqua Ohio provide quarterly reports to the PUCO and
18 OCC that provide information regarding the total number of disconnections for
19 the quarter, number of customers on payment plans, number of customers who
20 default on payment plans, average disconnection amount and period of time that

¹⁵Ohio Adm. Code 4901:1-15-17(D).

¹⁶ Staff Report at 92. Calculation is based on the proposed bill for a 5/8th inch metered customer using 3,700 gallons of water per month.

1 customers are without service prior to reconnection.¹⁷ Such reports will help in
2 on-going assessments of the needs of Aqua's customers.

3
4 **IV. CUSTOMER SURVEY ANALYSIS**

5
6 ***Q14. CAN YOU BRIEFLY SUMMARIZE THE CONTENT OF THE CUSTOMER***
7 ***SURVEY ANALYSIS REFERENCED IN THE STAFF REPORT?***

8 ***A14.*** Yes. Staff referenced a survey that was conducted in the Masury Division in
9 2005.¹⁸ The results of this survey indicated that over 90% of the respondents
10 were generally satisfied with their water quality and service.¹⁹

11
12 ***Q15. ARE YOU SATISFIED THAT STAFF DID NOT CONDUCT A CUSTOMER***
13 ***SURVEY CONCURRENT WITH THIS CASE?***

14 ***A15.*** No. Since customer satisfaction levels can change over time, reliance on 2005
15 data measuring customer satisfaction can result in missed opportunities for ways
16 to improve service in 2010. For example, only 27.5% of the respondents to the
17 2005 survey considered water rates to be reasonable. A customer survey
18 concurrent with this case could have helped measure how customers perceive the
19 reasonableness of water rates now, in light of the current economic challenges in

¹⁷ A similar recommendation was made for the Ohio American water Company in Case No. 09-391-WS-AIR. This case is currently pending before the Commission.

¹⁸ Staff Report at 31.

¹⁹ Aqua Ohio, Masury Division, 2005 Customer Survey Results, 11/28/2005 (Attached herein as JDW-11).

1 the area. In addition, a customer survey concurrent with this case could have
2 revealed why contacts to the PUCO from the Masury Division are higher than the
3 number of contacts from other Aqua Ohio customers. Finally, the customer
4 survey could have been useful to help identify issues related to the billing system
5 problems referenced in the Staff Report.²⁰

6
7 **Q16. DO YOU HAVE ANY FURTHER RECOMMENDATIONS CONCERNING**
8 **THE CUSTOMER SURVEY?**

9 **A16.** Yes. Staff should perform a current customer perception survey and report the
10 findings in this case.

11
12 **V. MONTHLY BILLS**

13
14 **Q17. HAVE YOU IDENTIFIED ISSUES WITH THE COMPANY BILLING**
15 **PRACTICES THAT NEED TO BE ADDRESSED IN THIS CASE?**

16 **A17.** Yes. In 2007, Aqua Ohio filed a request to modify the Masury tariff to change the
17 billing period from bi-monthly to monthly, to change the units of measure for
18 water usage, and to add certain new conversion factors.²¹ The Commission
19 subsequently approved the tariff changes.²² The Aqua Masury Division tariff that
20 was approved at that time exists on the Commission website today and reflects the

²⁰ Staff Report at 9.

²¹ *In the Matter of the Application of the Aqua Ohio, Inc. to Amend Section 2 Rates in its Masury Division Tariff*, Case No. 07-567-WW-ATA, 10 May, 2007.

²² Case 07-567-WW-ATA, Finding and Order, July 25, 2007, at 2.

1 obligation of the Company to render bills to Masury customers on a monthly
2 basis.²³ However, the Company has apparently chosen not to render monthly bills
3 as required per the tariff. According to the Company response to OCC INT-50
4 (herein attached as JDW-12), the Company is currently rendering bills on a bi-
5 monthly basis.

6
7 **Q18. DID STAFF EXPLAIN WHY BILLS ARE NOT BEING RENDERED ON A**
8 **MONTHLY BASIS AS REQUIRED BY TARIFF?**

9 **A18.** Staff mentioned that the issue was related to numerous problems that were
10 experienced with the Company billing system.²⁴ Staff did not explain the nature
11 of these problems or determine whether they are related to the billing and billing
12 backlog issues addressed in PUCO Case No. 08-1125-WW-UNC.

13
14 **Q19. HOW DID STAFF ADDRESS THIS ISSUE IN THE STAFF REPORT?**

15 **A19.** Staff did not address the issue. Staff merely recognized that the "Applicant is
16 confident" that the billing system problems are now resolved and that Aqua is
17 planning to implement monthly bills after the completion of this case.²⁵ Staff did
18 not address the fact that the Company is not in compliance with its tariff and
19 should be rendering monthly bills now. Staff did not address the billing system

²³ [http://www.puco.ohio.gov/emplibrary/files/docketing/tariffs/Water/Aqua%20Ohio,%20Inc/PUCO%20I,
%20Masury%20Water%20Division.pdf](http://www.puco.ohio.gov/emplibrary/files/docketing/tariffs/Water/Aqua%20Ohio,%20Inc/PUCO%20I,%20Masury%20Water%20Division.pdf).

²⁴ Staff Report at 9.

²⁵ Staff Report at 9.

1 problems or provide any assurance that the billing system problems are resolved.

2 Staff did not provide any recommendations related to ensuring that bills are
3 rendered on a monthly basis as required in the Masury Division. Finally, Staff
4 provided no recommendations concerning the ramifications for the Aqua Ohio
5 Masury Division being in non-compliance with its tariff.

6
7 **Q20. DID THE COMPANY REQUEST A WAIVER FROM THE REQUIREMENT**
8 **TO RENDER BILLS IN THE MASURY DIVISION ON A MONTHLY**
9 **BASIS?**

10 **A20.** No. I have attached the docket card for Case No. 97-567-WW-ATA as JDW-13.
11 As can be seen, the case that resulted in an order for the Company to render bills
12 on a monthly basis was closed on August 9, 2007, and there was no waiver
13 request filed by the Company regarding that order.

14
15 **Q21. WHAT ARE THE COMMISSION STANDARDS RELATED TO NON-**
16 **COMPLIANCE BY WATERWORKS COMPANIES?**

17 **A21.** Ohio Adm. Code 4901:1-15-03 addresses the consequences for failure to comply
18 with Commission rules and orders. My understanding of Ohio Adm. Code
19 4901:1-15-03(A), is that the consequence for failure to comply with Commission
20 rules and orders include a forfeiture to the state of not more than ten thousand

1 dollars for each such failure. Further, the rule expressly states, "Each day's
2 continuance of the violation is a separate offense."²⁶

3
4 ***Q22. HOW WAS THE COMPANY AND ITS RESIDENTIAL CUSTOMERS***
5 ***NEGATIVELY IMPACTED AS A RESULT OF NOT RECEIVING***
6 ***MONTHLY BILLS?***

7 ***A22.*** From a Company perspective, the primary benefits of rendering bills on a
8 monthly basis are an improved monthly cash flow, a reduction of uncollectible
9 debt, and the ability to better manage credit and collection activities. The primary
10 benefits of receiving monthly bills from a customer perspective are smaller
11 monthly payments and the ability to better manage monthly finances.
12 Interestingly, the Commission identified these same benefits in approving the
13 change in the billing cycles from bi-monthly to monthly bills in the Masury
14 tariff.²⁷ The Finding and Order states:

15 The Company will benefit by improving efficiency, improving
16 cash flow cycle, reducing bad debt, and spotting problem accounts
17 in a timely fashion. The customer will benefit by being able to
18 budget monthly, make smaller monthly payments rather than larger
19 bimonthly payments, and correct delinquencies easier.
20

21 ***Q22. WHAT IS YOUR RECOMMENDATION CONCERNING MONTHLY BILLS***
22 ***BEING RENDERED IN THE MASURY DIVISION?***

²⁶ Ohio Adm. Code 4901:1-15-03(A).

²⁷ Case 07-567-WW-ATA, Finding and Order, July 25, 2007 at 2.

1 **A22.** The Commission should order Aqua Ohio to render bills on a monthly basis as
2 required pursuant to tariff. Customers in the Masury service area are already
3 struggling to pay their water bills and the magnitude of the proposed rate increase
4 is going to further exacerbate this issue. Receiving monthly bills will at least help
5 lower monthly payment levels. However, there is concern about the potential for
6 more billing system problems. The Commission should ensure that any billing
7 system problems are corrected that would impede the Company's ability to
8 accurately render monthly bills. Staff should be required to independently review
9 and report on the billing system issues in the Masury Division to make sure that
10 the problems are indeed corrected. In addition, Masury consumers who were
11 harmed as a result of not receiving monthly bills since August 2007 should be
12 made whole. The Commission should order Aqua Ohio to credit all late payment
13 charges and reconnection charges that were assessed on residential customer bills
14 from August 2007 until the Company begins rendering monthly bills. Had these
15 customers been rendered a monthly bill as required by tariff, they may have been
16 more capable of managing their water accounts and thus able to avoid the costly
17 consequences for not paying on time. I also recommend that Aqua Ohio be
18 ordered to make an additional \$2,500 available for low-income water assistance in
19 the Masury Division. This topic is addressed in more detail later in this
20 testimony.

1 **Q23. DO YOU HAVE ANY ADDITIONAL RECOMMENDATIONS CONCERNING**
2 **THE MONTHLY BILL ISSUE?**

3 **A23.** Yes. The Commission needs to ensure that the rates residential customers are
4 paying are appropriate given the expected benefits for the Company in efficiency,
5 improved cash flow, and lower bad debt. In addition, the Commission needs to
6 address the consequences to the Aqua Masury Division under Ohio Adm. Code
7 4901:1-15-03(A) for being in non-compliance with a Commission Order.

8 According to that rule, the Company is liable for a forfeiture of up to ten thousand
9 dollars per day for each failure to comply with the Commission's rules or orders.

10 In PUCO Case No. 08-1125-WW-UNC the Company paid a substantial forfeiture
11 for its violations related to billing and billing backlog issues. Similarly, the
12 Company should now face a forfeiture of an amount sufficient to deter future
13 noncompliance with the Commission's order that the Company bill customers
14 monthly.

15
16 **VI. MISCELLANEOUS CHARGES**
17

18 **Q24. WHAT ARE THE PRIMARY CHANGES THAT AQUA HAS PROPOSED**
19 **CONCERNING MISCELLANEOUS CHARGES?**

20 **A24.** The Company has proposed a new Account Activation Charge of \$21.00, which is
21 to be imposed on residential customers that apply for new service or transfer
22 service to another address. Aqua has also proposed an increase in the

1 Reconnection Charge from the current \$29.00 level to \$43.00. Finally, the
2 Company has proposed increasing the Dishonored Check Charge from the current
3 \$15.00 to \$16.00.
4

5 ***Q25. HOW DID THE STAFF REPORT ADDRESS THE NEW ACCOUNT***
6 ***ACTIVATION CHARGE, THE INCREASED RECONNECTION CHARGE,***
7 ***AND THE INCREASE IN DISHONORED CHECK CHARGES?***

8 ***A25.*** Staff found the Account Activation Charge to be reasonable and recommends
9 approval.²⁸ Staff found the increase in the Reconnection Charge to be reasonable
10 and recommended approval.²⁹ Staff found the increase in the dishonored check
11 charge to be reasonable and recommended approval.³⁰ Staff further recommended
12 that the application of the dishonored check charge be expanded to include any
13 dishonored payment, and not just dishonored checks.
14

15 ***Q26. WHAT IS YOUR POSITION ON THE \$21.00 ACCOUNT ACTIVATION***
16 ***CHARGE?***

17 ***A26.*** I recommend that the Commission not approve the Account Activation Charge.
18 Based on the Company's response to OCC INT-22 (herein attached as JDW-14),
19 219 accounts were activated in 2008 and 163 accounts were activated in 2009.
20 The Company has not demonstrated that activating accounts is resulting in any

²⁸ Staff Report, at 19.

²⁹ Staff Report, at 19.

³⁰ Staff Report, at 18.

1 additional expenses that it would not be incurring otherwise through the service
2 department and call center. In response to OCC RPD-24 (herein attached as
3 JDW-15), the Company provided an estimate for the amount of time and costs
4 associated with activating accounts. The Company's response does not prove that
5 the amount of time or effort is reasonable. The Company has not demonstrated
6 that the amount of time that it estimates for call center personnel to "set up" an
7 account or to mail the customer a copy of the Customer Rights and Obligations
8 document that is required pursuant to the rules is reasonable. Also, the Company
9 has failed to demonstrate that the amount of time for the service department to
10 read the meter is reasonable. The rules require waterworks companies to perform
11 many tasks where the cost is imbedded within the rates.³¹ Activating accounts is
12 a core service provided by Aqua and the Company obtains additional revenues
13 through the sale of water each time a new account is activated. Customers obtain
14 benefits from having more customers on the Masury system and the costs
15 associated with having water service being spread over a larger consumer base.
16 Therefore, the Company should not seek recovery of the costs associated with
17 activating an account directly from the consumer. This recommendation is
18 consistent with the practices of the major gas and electric utilities in the state to
19 not assess a charge to activate service.
20

³¹ Ohio Adm. Code 4901:1-15

1 ***Q27. DO YOU HAVE ADDITIONAL RECOMMENDATIONS CONCERNING***
2 ***THE ACCOUNT ACTIVATION CHARGE?***

3 ***A27.*** Yes. In the event that the Commission rejects my earlier recommendation of
4 eliminating the Account Activation Charge, I recommend that Aqua bill the
5 Activation Charge over at least 2 billing periods. In the Company response to
6 OCC INT-24 (herein attached as JDW-16), the Company stated its intent to bill
7 the Account Activation Charge. My suggestion is that the Company should give
8 customers the option of having the charge billed over two billing periods to help
9 lessen the impact of this charge.

10

11 ***Q28. WHAT IS YOUR POSITION CONCERNING THE INCREASE IN THE***
12 ***RECONNECTION CHARGE FROM \$29.00 TO \$43.00?***

13 ***A28.*** I recommend the Commission disapprove the increase in the Reconnection
14 Charge and instead, lower the current amount of the Reconnection Charge from
15 \$29.00 to an amount not to exceed \$24.25. In response to OCC RPD-25 (herein
16 attached as JDW-17), the Company produced a work paper regarding the time and
17 effort associated with the Reconnection Charge. Aqua has imbedded the specific
18 costs that were associated with disconnection of service (\$18.93) into the
19 Reconnection Charge. Aqua makes the decision concerning when to disconnect
20 water service for customers that are unable to pay their water bill, and not the
21 customer. Requiring customers to pay the cost for being disconnected when they
22 have already suffered the impact of losing water service is punitive and should not

1 be permitted by the Commission. While the Commission's rules do not explicitly
2 address customers paying disconnection costs, there are rules related to the
3 disclosure of the costs. The disconnection notice is required to include the
4 statement that "failure to pay the amount required by the date specified on the
5 notice may result in an additional charge for *reconnection*."³² (Emphasis added.)
6 In addition, the Commission's rules state that as a condition for reconnection of
7 service, customers must pay the "full amount of arrears for which service was
8 disconnected including any deposit or *reconnection* charge."³³ (Emphasis
9 added.) Interestingly, Staff objected to an Aqua tariff provision that enabled the
10 Company to add the costs associated with collecting final bills to unpaid balances
11 owed the Company.³⁴ In other words, Staff is opposed to collection costs (which
12 might include the costs associated with disconnection) from being added to
13 unpaid final bills. However, Staff's recommendation in approving the
14 Reconnection Charge supports disconnection costs being added to the
15 Reconnection Charge, or in other words, requiring customers to pay to be
16 disconnected. This policy is inconsistent, contrary to other stated policies, and
17 potentially discriminatory, given that disconnection charges are not being applied
18 fairly.

³² Ohio Adm. Code 4901:1-15-27(D)(27).

³³ Ohio Adm. Code 4901:1-15-28(A)(1).

³⁴ Staff Report at 16.

1 ***Q29. DO YOU HAVE OTHER RECOMMENDATIONS CONCERNING THE***
2 ***RECONNECTION CHARGE?***

3 ***A29.*** Yes. In the event that the Commission rejects my earlier recommendation of
4 reducing the amount of the Reconnection Charge and instead approves the ill-
5 advised \$43.00 Reconnection Charge, I suggest that Aqua bill the Reconnection
6 Charge over at least 2 billing periods. The Commission has previously reduced
7 the impact of payment of reconnection charges for gas and electric utilities by
8 limiting the amount of upfront payment to \$36 during the winter heating season
9 and billing the remainder.³⁵ Payment of a \$43.00 charge, along with the full
10 amount of arrearages, could be difficult and may result in customers being
11 without essential water service for a longer period of time than absolutely
12 necessary. Given the essential need of water for health and safety, water
13 customers need the same consumer protections as gas and electric customers.

14
15 ***Q30. WHAT IS YOUR POSITION CONCERNING THE INCREASE IN THE***
16 ***DISHONORED CHECK CHARGE FROM \$15.00 TO \$16.00?***

17 ***A30.*** In my view, the Commission should not approve the Dishonored Check Charge.
18 In response to OCC RPD-26 (herein attached as JDW-18), the Company provided
19 an estimate for the amount of time and costs associated with processing
20 dishonored checks. The Company has not proven the reasonableness of the
21 amount of time or the labor costs that are estimated for processing these

³⁵ *In The Matter of the Investigation into Long-term Solutions Concerning the Disconnection of Gas and Electric Service in Winter Emergencies*, Case No 09-0782-GE-UNC, September 23, 2009, at 2.

1 transactions. In addition, the volume of dishonored payments does not justify the
2 charge. According to the Company response to OCC INT-39 (herein attached as
3 JDW-19), only 12 dishonored payments were processed in 2009 and none were
4 processed in 2008. The potential for \$12.00 in additional revenues does not
5 justify the impact this charge would have on consumers. Given the problems this
6 Company is experiencing with billing systems, it should only implement
7 necessary changes.

8
9 ***Q31. DO YOU HAVE OTHER RECOMMENDATIONS CONCERNING THE***
10 ***DISHONORED CHECK CHARGE?***

11 ***A31.*** I have two recommendations. First, the Dishonored Check Charge should be
12 waived if the cause of the dishonored check is bank error. According to the
13 Company response to OCC INT-42 (herein attached as JDW-20), the Company
14 will only waive the charge if the Company's financial institution is the cause of
15 the error. The Company should waive the Dishonored Check Charge if the cause
16 of the error is the customer's financial institution. There are many reasons outside
17 of the control of the customer why a check may not clear for payment. Waiving
18 the Dishonored Check Charge reduces the impact on consumers and instills a
19 sense of good will on the part of the Company. Second, the Commission should
20 disregard Staff's recommendation of expanding the scope of the Dishonored
21 Check Charge to include any dishonored payment from any financial institution.³⁶

³⁶ Staff Report at 19.

1 As can be clearly seen on JDW-18, the Company incurs a \$3.60 Bank Charge
2 from National City Bank related to checks that are returned for non sufficient
3 funds. There may or may not be charges related to payments that are returned for
4 reasons other than non-sufficient funds by other financial institutions. The Staff
5 has provided no information to support expanding the scope of this charge.

6
7 ***Q32. DO YOU HAVE ANY OTHER RECOMMENDATIONS CONCERNING THE***
8 ***MISCELLANEOUS CHARGES?***

9 ***A32.*** Yes. Staff recommended that the Company update their company policies to
10 reflect the practice of waiving the imposition of the Late Payment Charge if
11 payment is received within 6 days of the due date. A one-time waiver of the
12 charge would be in the public's interest and help to develop goodwill for the
13 Company.

14
15 **VII. FINANCIAL ASSISTANCE RESOURCES AND PROGRAMS**

16
17 ***Q33. DOES AQUA OHIO PROVIDE FINANCIAL ASSISTANCE NOW FOR***
18 ***CONSUMERS WHO ARE UNABLE TO PAY THEIR WATER BILLS?***

19 ***A33.*** As part of a settlement in Case No, 08-1125-WW-UNC, the Aqua Ohio Lake Erie
20 Division was required to make a one-time financial contribution of \$25,000 for
21 low-income water consumers. Arrangements are underway for distributing these
22 funds through Salvation Army offices in close proximity to Ashtabula, Struthers,

1 and Massillon. However, there were no arrangements in the case for distributing
2 funds specifically in the Masury Division.

3
4 ***Q34. SHOULD THE COMPANY BE REQUIRED TO FUND A LOW-INCOME***
5 ***FINANCIAL ASSISTANCE PROGRAM IN MASURY?***

6 ***A34.*** Yes. As addressed earlier in my testimony, Aqua should be required to make a
7 one-time shareholder funded contribution of \$2,500 to assist low-income water
8 consumers in the Masury Division as a consequence of failing to render bills on a
9 monthly basis.³⁷ The Commission should direct Staff, Aqua, and OCC to
10 determine the agency that will distribute the funds and the eligibility criteria.

11
12 ***Q35. GIVEN THE ECONOMIC CONDITIONS IN TRUMBULL COUNTY AND***
13 ***ELSEWHERE IN THE STATE, SHOULD THE COMMISSION CONSIDER***
14 ***SOME OPTIONS FOR ESTABLISHING A LOW-INCOME WATER***
15 ***ASSISTANCE PROGRAM?***

16 ***A35.*** Yes. On May 28, 2008, Governor Ted Strickland signed Executive Order 2008-11S,
17 which created the Ohio Anti-Poverty Task Force to develop short-term and long-term
18 strategic recommendations to help reduce poverty in Ohio.³⁸ Several of the
19 recommendations addressed specific initiatives to help customers in crisis maintain
20 access to utility services. The recommendations addressed the need for more flexible

³⁷ The \$2,500 recommendation was based on a 25% participation level for the approximate number of low-income households in the Masury area.

³⁸ Strategic Recommendations for Expanding Opportunity and Reducing Poverty in Ohio, April 28, 2009.

1 payment terms and additional financial assistance. Because of the growing problem
2 of poverty in Ohio, the Commission should establish a collaborative process
3 involving Aqua Ohio and other interested stakeholders to examine the feasibility and
4 cost of establishing a low-income program in Ohio. Aqua has a low-income
5 assistance program called *Helping Hand* in Pennsylvania that may have applications
6 in Ohio.³⁹

7
8 **VIII. CONSERVATION ISSUES**

9
10 ***Q36. DID STAFF ADDRESS THE COMPANY'S CONSERVATION***

11 ***PROGRAM(S)?***

12 ***A36.*** No. Staff did not mention the Company conservation programs and, as such,
13 made no recommendations about the existing programs. Water conservation is an
14 important element both in reducing the demand for limited natural resources and
15 in helping lower individual customer bills. Water conservation is especially
16 important given the magnitude of the rate increase proposed by the Company.
17 The Company has some information as part of a Water Smart initiative that is
18 provided on the Company's website.⁴⁰ The U.S. Environmental Protection
19 Agency ("EPA") has additional information about conservation techniques on its

³⁹ <http://www.aquaamerica.com/Pennsylvania/Pages/HelpingHand.aspx>.

⁴⁰ <https://www.aquaamerica.com/Pages/EfficientWaterUse.aspx>

1 website as part of its Water Sense program. The techniques in this program may
2 have application in Ohio.⁴¹

3
4 ***Q37. WHAT ARE YOUR RECOMMENDATIONS CONCERNING***
5 ***CONSERVATION?***

6 ***A37.*** Aqua Ohio should develop a comprehensive report on water conservation in Ohio
7 that includes, at a minimum, a description of existing programs, an analysis of the
8 results of the existing programs, and opportunities for future expansion of
9 conservation initiatives. In addition, the Company should provide additional
10 information about Water Sense on the Aqua Ohio website.

11

12 **IX. SUMMARY OF RECOMMENDATIONS**

13

14 ***Q38. CAN YOU SUMMARIZE THE RECOMMENDATIONS YOU HAVE***
15 ***INCLUDED IN THIS TESTIMONY?***

16 ***A38.*** Yes. I have consolidated the recommendations from each major section of this
17 testimony into Table 2.

18

⁴¹ <http://www.epa.gov/watersense/>

1

Table 2: Summary of Recommendations

Section	Recommendation
Customer Service Assessment	Reduce the upfront payment requirement.
	Provide a 1/6 th and 1/9 th payment plan.
	Assess feasibility of reducing third-party payment fees.
	Provide quarterly disconnection data to Staff and OCC.
	Render bills on a monthly basis as required by tariff.
	Credit residential late payment charges and reconnection charges assessed since August 2007.
	Provide a \$2,500 one-time contribution for low-income water consumers in the Masury Division.
Customer Survey Analysis	Perform a current customer perception survey and report the findings.
Miscellaneous Charges	Do not approve the \$21.00 Account Activation Charge.
	Do not approve the increase in the Reconnection Charge from \$29.00 to \$43.00.
	Reduce the Reconnection Charge from \$29.00 to an amount that is no more than \$24.25.
	Bill the Reconnection Charge over two months.
	Do not approve the increase in the Dishonored Check Charge.
	Do not adopt the Staff recommendation to expand the application of the Dishonored Check Charge to any dishonored payment.
Financial Assistance Resources and Programs	Establish a stakeholder group to examine the feasibility of implementing a low-income assistance program in Ohio.
Conservation	Explore the options for expanding the Company conservation programs and initiatives.

2

1 **X. CONCLUSION**

2

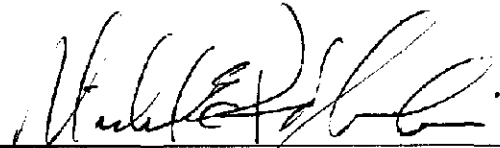
3 ***Q39. DOES THIS CONCLUDE YOUR TESTIMONY?***

4 ***A39.*** Yes. However, I reserve the right to incorporate new information that may
5 subsequently become available through outstanding discovery or otherwise.

6 Additionally, I also reserve the right to supplement my testimony in the event that
7 PUCO Staff fails to support the recommendations made in the Staff Report and/or
8 changes any of its positions made in the Staff Report filed with this Commission
9 on January 21, 2010.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Direct Testimony of James D. Williams of the Office of the Ohio Consumers' Counsel has been served via First Class US Mail this 22nd day of February 2010.



Michael Idzkowski
Assistant Consumers' Counsel

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Testimony of James D. Williams
Filed at the Public utilities Commission of Ohio

<u>Case</u>	<u>Description</u>
95-0656-GA-AIR	In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers
01-1228-GA-AIR	In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers
01-2708-EL-COI	In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions.
07-0829-GA-AIR	In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers.
08-72-GA-AIR	In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution.

08-1125-WW-UNC

**In the Matter of a Settlement
Agreement Between the Staff of the
Public Utilities Commission of Ohio,
The Office of the Consumers'
Counsel and Aqua Ohio, Inc.
Relating to Compliance with
Customer Service Terms and
Conditions Outlined in the
Stipulation and Recommendation in
Case No. 07-564-WW-AIR and the
Standards for Waterworks
Companies and Disposal System
Companies.**

09-391-WS-AIR

**In the Matter of the Application of
the Ohio American Water Company
to Increase its Rates for water and
Sewer Services Provided to its Entire
Service Area.**



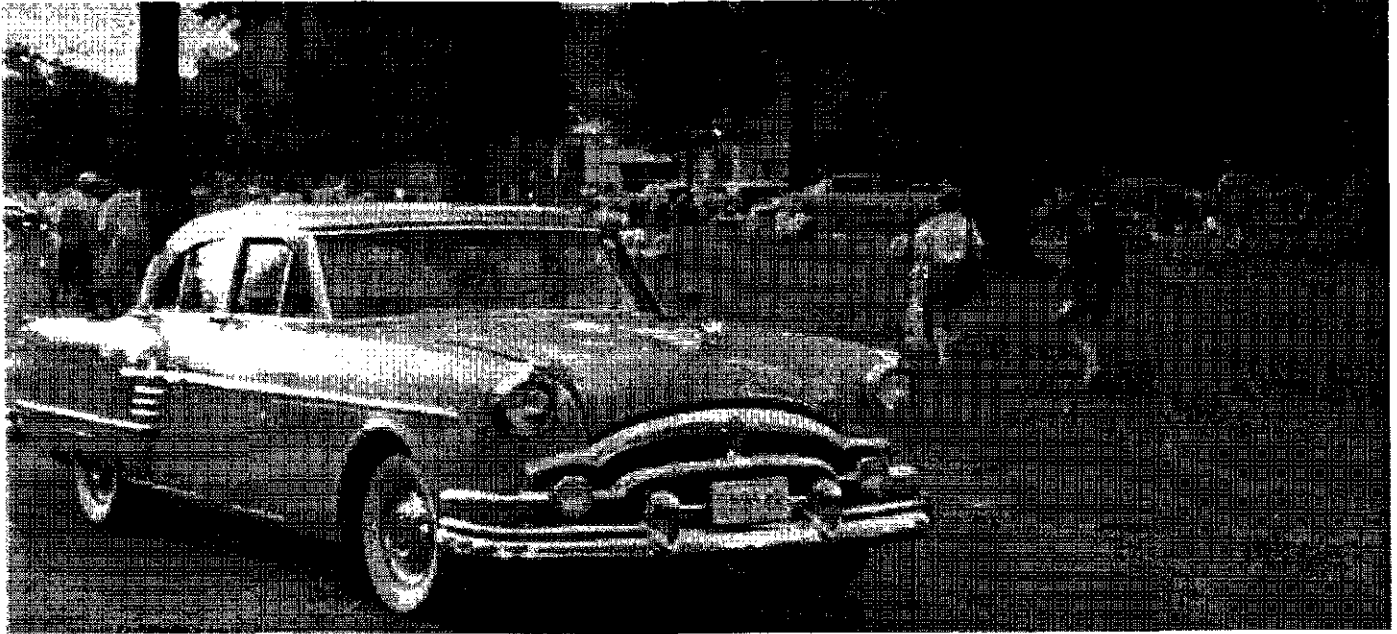
Ohio

Department of
Job and Family Services

Trumbull County Profile

County Commissioners

Frank Fuda, Paul Heltzel, and Daniel Polivka



Packard Museum Car Show at the Packard Music Hall, Warren, Ohio

County Department of Job and Family Services

Diane Shamrock, Interim Director

280 North Park Avenue, Suite 1

Warren, OH 44481-1109

330-675-2000

Child Support Enforcement Agency

Diane Shamrock, Interim Director

106 High Street Northwest, P.O. Box 1350

Warren, OH 44482-1350

330-675-2732 800-720-2732

Public Children Services Agency

Marcia Tiger, Director

2282 Reeves Road Northeast

Warren, OH 44483-4354

330-372-2010

Trumbull County One-Stop

Diane Shamrock, Interim Director

280 North Park Avenue, Suite 1

Warren, OH 44481-1109

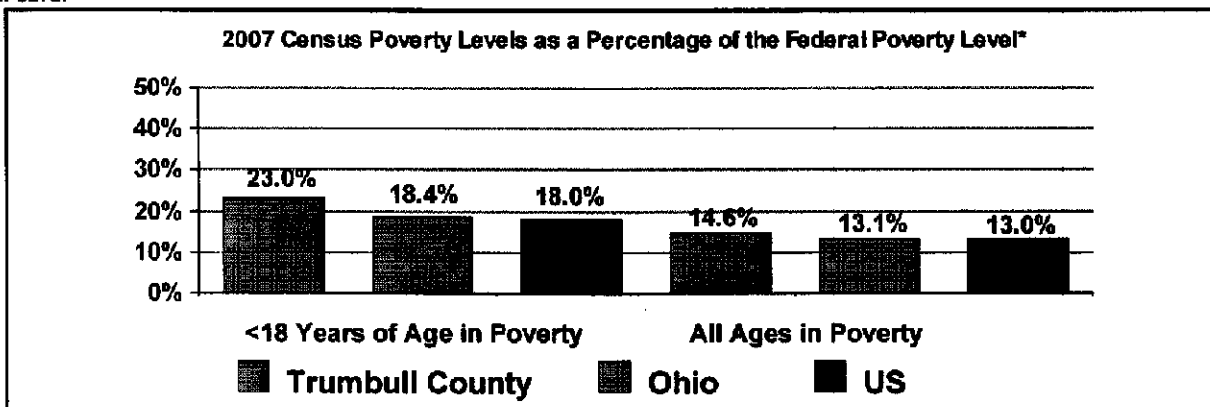
330-675-2179

Trumbull County

Job and Family Services Profile

County Overview

Through its partnerships with community organizations and state and federal government agencies, Trumbull County provides a number of services to families and individuals in need of assistance. These services range from food stamps, cash assistance, and child care subsidies to child support enforcement, job training, and access to medical care.



*Federal Poverty Level as issued by the U.S. Department of Health and Human Services, and published in the Federal Register.

Population	2008 Census Population	211,317	2000 Census Population	225,116
Age Census (2008)	County	State	% of Total Population County	State
Age 0-19	50,921	3,049,827	24.1%	26.6%
Age 60 and Older	48,848	2,155,509	23.1%	18.8%
Median Age (2005-2007)*	41.2	37.6		
Average Household Size (2005-2007)*	2.41	2.48		

*The '2005-2007' data was not available for the following 6 Ohio counties: Harrison, Monroe, Morgan, Noble, Paulding, and Vinton. The data provided on these 6 counties is from the 2000 Census.

	2007-2008	2006-2007
High School Graduation Rate	86.8%	84.6%
High School Honors Graduation Rate	14.1%	18.0%

Vital Statistics	County	County Rate per 1,000	2007 State	State Rate per 1,000
All Births	2,436	11.5	150,784	13.1
Teen Births:				
<15 Years of Age	2	0.3	225	0.6
15-17 Years of Age	76	17.2	4,798	19.7
18-19 Years of Age	204	84.0	11,553	75.7
Marriages	1,181	5.4	70,704	6.2
Divorces	785	3.6	39,305	3.4

Dependency Rate	County	2007 State	County	2006 State
Rate of Dependency on Income Supports*	24.2%	17.6%	23.2%	17.2%
County Rank	23 of 88	N/A	24 of 88	N/A

*The 'Rate of Dependency on Income Supports' is the total amount of income support provided by taxpayer dollars (e.g. Retirement and Disability payments, Unemployment Compensation, Worker's Compensation, TANF, SSI, etc.) divided by total personal income. Note: Ranking based on highest (1) Rate of Dependency to lowest (88) Rate of Dependency.

Trumbull County

Job and Family Services Profile

Family Services

Child Support

The Trumbull County Child Support Enforcement Agency establishes paternitys and obtains, enforces, and collects child support funds for children.

\$33,569,509 in IV-D child support was collected by the county during 2008.

Child Support Cases	FFY 2008		FFY 2007	
	County	State	County	State
Number of Cases	20,600	978,385	19,694	979,749
Paternity Establishment Rate*	97.2%	91.6%	92.6%	87.9%
Cases with Support Orders	15,167	739,995	14,229	723,521
Percentage of Cases with Support Orders	73.6%	75.6%	72.3%	73.8%
Collection Rate on Current Support Due	65.2%	68.8%	65.6%	68.9%
Rate of Cases Paying on Arrears	64.6%	68.2%	63.5%	67.1%

*The Paternity Establishment Rate is the total number of children born out-of-wedlock, who had active child support cases, for whom paternity was established or acknowledged as of the end of the reporting period, divided by the total number of children born out-of-wedlock, who had active child support cases, as reported 12 months prior to the reporting period. In some cases, the rate can exceed 100%.

Food Assistance (FA)

The Food Assistance program is designed to raise nutritional levels, to expand buying power and to safeguard the health and well-being of individuals and families whose gross monthly income is within 130 percent of the federal poverty guideline. Half of all recipients are children.

Food Stamps	CY 2008		CY 2007	
	County	State	County	State
Average Monthly Adult Recipients	12,754	734,421	10,231	611,173
Average Monthly Child Recipients	13,566	719,893	10,018	550,242
Total # of Recipients (Annual Unduplicated)	33,567	1,825,885	29,956	1,686,146
Percent of Population	15.9%	15.9%	14.0%	14.7%
Net Expenditures	\$27,343,773	\$1,603,760,076	\$21,893,086	\$1,329,422,597
Average Annual FS Payment per Recipient	\$815	\$878	\$731	\$788

Ohio Works First (OWF)

Ohio Works First (OWF) is the financial-assistance portion of the state's Temporary Assistance to Needy Families (TANF) program, which provides cash benefits to needy families for up to 36 months.

29 out of every 1,000 residents in Trumbull County received cash benefits through OWF during CY 2008.

Cash Assistance (CA)	CY 2008		CY 2007	
	County	State	County	State
Average Monthly Adult Recipients	714	44,998	570	40,496
Average Monthly Child Recipients	2,324	132,601	2,120	127,124
Total # of Recipients (Annual Unduplicated)	6,192	368,211	5,536	340,861
Percent of Population	2.9%	3.2%	2.6%	3.0%
Net Expenditures	\$5,774,189	\$328,588,993	\$5,132,220	\$306,467,349
Average Annual CA Payment per Recipient	\$933	\$892	\$927	\$899

Trumbull County

Job and Family Services Profile

Family Services

Child Safety and Care/Placement*

The Trumbull County Public Children Services Agency administers local adoption assistance, foster care services, and child welfare intervention programs. The agency strives to reunify children with their families when possible, or find other permanent living arrangements for them when they cannot safely return home.

CY 2008		
	County	State
Reports and Investigations - Allegations of Child Abuse and Neglect Cases	761	86,072

FFY 2008		
	County	State
Children Entering Custody	52	8,279
Children Reentering Custody	7	1,261
Number of Children Reunified	49	4,678
Number of Children Reunified within 12 Months	37	3,206
Percent of Child Reunifications <12 Months	75.5%	68.5%

	2008 (Snapshot Date 9/30/2008)		2007 (Snapshot Date 9/30/2007)	
	County	State	County	State
Children in Licensed/Certified Foster Homes	140	9,057	155	8,894
Children in Permanent Custody	69	5,200	65	5,435

	CY 2008		CY 2007	
	County	State	County	State
Number of Child Deaths	0	74	3	90
Number of Child Deaths in Substitute Care	0	22	0	16

Adoption*

Ohio counties provide a comprehensive scope of services to birth parents, adoptive parents, and adoptive children, particularly those children who have been in foster care.

FFY 2008		
	County	State
Number of Children Adopted	23	1,390
Adoptions Completed within 24 Months	5	426

*The above data, used for Federal reporting purposes, represents member counts, not unduplicated counts.

Kinship Permanency Incentive

KPI provides time-limited incentive payments to relatives caring for minor children who would be at risk of harm if they remained in their own homes.

	CY 2008		CY 2007	
	County	State	County	State
Number of Children Approved for Initial KPI Payments*	68	3,074	61	2,586

*Unduplicated count of initial case approvals.

Trumbull County

Job and Family Services Profile

Family Services

Child Care

Ohio counties provide child care services and early learning opportunities that families need to succeed at work and at school. Through state and federal funding, families whose income is at or below 150 percent of the federal poverty guideline can receive payment for all or part of their monthly child care expenses while parents work or attend job training. A family may remain eligible until income increases to 200 percent of the federal poverty guideline.

Children Served	CY 2008		CY 2007	
	County	State	County	State
Number of Children Using Publicly Funded Child Care (Unduplicated Count)	3,268	198,244	3,311	191,172
Public Funds Used for Child Care Expenditures	\$6,578,044	\$558,762,587	\$6,261,369	\$512,179,646
Annual Average Expenditure per Child	\$2,013	\$2,819	\$1,891	\$2,679

Providers

Number of Licensed Child Care Centers*	47	3,683	47	3,597
--	----	-------	----	-------

*Includes licensed full-time, part-time, Head Start, school-based and combination centers with 7 or more children.

"Step Up To Quality" Program

Step Up To Quality (SUTQ) is Ohio's voluntary quality rating system for child care programs. SUTQ is designed to increase the number of high-quality programs, recognize and support programs that achieve higher quality standards, and provide parents with an easy-to-use tool to assist them in making more informed choices on behalf of their children. Programs with the highest ratings qualify for monetary awards.

The number of Licensed Child Care Centers Earning Quality Ratings as of June 30, 2009: 10

For additional information about child care services, Step Up to Quality (SUTQ), or to search for child care in your area, go to: <http://jfs.ohio.gov/cdc/childcare.stm>

Adult Protective Services (APS)

County Departments of Job and Family Services provide Adult Protective Services to the elderly who are in danger of harm, unable to protect themselves, and/or have no one to assist them.

	CY 2008		CY 2007*	
	County	State	County	State
Adult Cases	473	17,351	343	16,805
Cases Deemed Emergencies	25	1,215	16	1,214
Cases in Need of Protective Services	198	7,469	128	7,538
Cases Where Protective Services Not Available	0	68	0	127
Expenditures	\$669,470	\$21,095,720	\$510,779	\$19,956,788

*CY 2007 data was revised in CY 2009 to reflect updated source data.

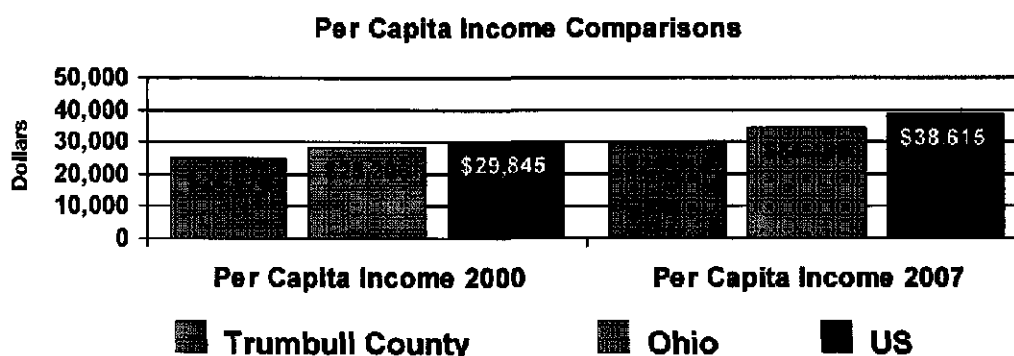
Trumbull County

Job and Family Services Profile

Jobs

Income

The per capita income of a region provides a good barometer of its economic health. Over the last decade, per capita income growth in Ohio has been highly correlated with employment growth.



Labor Force and Employment

The size of a county's labor force is an indication of economic health. It is influenced by both the economy and the size and composition of the population.

	CY 2008			CY 2007		
	County	State	U.S.	County	State	U.S.
Labor Force	106,000	5,971,900	154,287,000	105,300	5,976,500	153,124,000
Employment	98,100	5,582,100	145,362,000	98,600	5,640,100	146,047,000
Unemployment	8,000	389,700	8,924,000	6,700	336,400	7,078,000
Unemployment Rate	7.5	6.5	5.8	6.3	5.6	4.6
1st UC Benefit Payments	8,141	357,192	N/A	5,571	278,006	N/A
Total UC Benefits Issued	\$32,398,802	\$1,586,561,241	N/A	\$22,663,689	\$1,206,523,647	N/A
Average Weekly Benefit	\$277	\$303	N/A	\$260	\$290	N/A
UC Duration	14.0	14.9	N/A	15.5	15.2	N/A

Worker Adjustment and Retraining Notification Act (WARN)

WARN provides protection to workers, their families and communities by requiring employers to provide notification 60 calendar days in advance of plant closings and mass layoffs.

	CY 2008		CY 2007	
	County	State	County	State
Employer WARN Notices	4	165	4	103
WARN Employees Affected	1,495	27,417	566	15,119

Reemployment and Eligibility Assessment (REA)

651 Trumbull County residents, during FFY 2008, participated in the Reemployment and Eligibility Assessment (REA) program, which provides unemployed job seekers with services that promote quicker re-entry into the workforce.

*To learn more about Labor Market and Employment information, go to:

<http://lmi.state.oh.us/asp/laus/vbLAUS.htm>

Commuting to Work

Metropolitan areas tend to draw the most commuters from their own and neighboring counties. The net commuter flow is the difference between the number of people commuting into a county for work and the number of people commuting out of the county for work. According to the 2000 census:

4.70% net commuter flow

21.0 minutes average commute time

Trumbull County

Job and Family Services Profile

Jobs

Workforce Investment Act

The federal Workforce Investment Act (WIA) is a federally funded program that assists employers in obtaining skilled and productive employees; expands the available pool of skilled workers whose skills match current job opportunities; and measures program achievements in terms of customer outcomes and increased local accountability. Ohio has 31 comprehensive, full-service One-Stop sites, and 59 satellite sites throughout 20 local workforce development areas, with at least one site in every Ohio county. The following data is from Ohio's Annual Report for Program Year 2007:

Adult Program	County	State
Total Participants	406	18,863
Total Exiters	273	8,564
Entered Employment		
Exiters	181	6,107
Employed in Q1 After Exit	172	4,794
Employment Rate	95.0%	78.5%
Employment Retention		
Exiters	178	7,436
Employed in Q1, Q2, Q3 After Exit	171	6,413
Retention Rate	96.1%	86.2%
Earnings		
Exiters	95	3,715
Post-Program Earnings after Exit	\$1,405,170	\$55,875,189
Average Earnings	\$14,791	\$15,040
Dislocated Workers		
Total Participants	111	9,228
Total Exiters	58	3,608
Entered Employment		
Exiters	48	3,618
Employed after Exit	47	3,154
Employment Rate	97.9%	87.2%
Employment Retention		
Exiters	31	3,331
Employed after Exit	30	3,079
Retention Rate	96.8%	92.4%
Earnings		
Exiters	16	2,269
Post-Dislocation Earnings Q2 + Q3 After Exit	\$261,572	\$39,595,870
Average Earnings	\$16,348	\$17,451

Youth Programs	County	State
In-School Youth		
Total Participants	44	8,013
Total Exiters	18	2,592
Out-of-School Youth		
Total Participants	46	3,886
Exiters	9	1,488
Total Youth		
Total Participants	90	11,898
Total Youth Exiters	25	4,080
Placement in Employment or Education Exiters	19	3,616
Attainment of Employment or Education by Q1 after Exit	14	2,262
Placement in Employment or Education Rate	73.7%	62.6%
Diploma or Equivalent		
Attainment of Certificate or Diploma Exiters	23	4,162
Attainment of Certificate or Diploma By Q3 after Exit	9	2,244
Attainment of Certificate or Diploma Rate	39.1%	53.9%
Literacy/Numeracy		
Literacy/Numeracy Gains Exiters	2	882
Increased Educational Functioning Level	1	328
Literacy/ Numeracy Gains Rate	50.0%	37.2%

Trumbull County

Job and Family Services Profile

Medical Assistance

Ohio offers a variety of assistance programs to give those with limited resources access to basic medical care. The most comprehensive of these is Medicaid, the federally funded, state-administered program that reimburses doctors and health-care facilities for providing services to eligible individuals with low income.

Health Care Statistics

In Trumbull County:

- 33.9% of hospital visits occurred outside the county (2008)
- 51.3% of all births were paid by Medicaid (2007)
- 64.2% of mothers receiving Medicaid had two or more risk factors for poor birth outcomes (2007)

Medicaid Enrollment and Expenditures

Medicaid is the state and federally funded program that pays for health care services for eligible low-income people of all ages, including children, pregnant women, families, older adults and Ohioans with disabilities. Medicaid services are delivered via contracted health care providers, ensuring that Medicaid consumers get access to needed services, such as physician visits, hospital inpatient care, prescription drugs and home health services.

	SFY 2008			
	County		State	
Residents Enrolled in Medicaid*	34,735	16.3%	1,789,934	15.6%
Children Enrolled in Medicaid*	18,533	39.3%	958,118	34.8%
Annual Medicaid Expenditures**	\$221,369,967	N/A	\$11,962,883,659	N/A
Average Annual Medicaid Cost/Eligible	\$6,483	N/A	\$6,770	N/A

*Data is point-in-time, not cumulative.

**Expenditures reflect payments made directly to providers as well as capitation payments to HMOs.

Nursing Facilities/Residential Care

	CY 2008		CY 2007	
	County	State	County	State
Nursing Homes*	20	961		
Residential Care Facilities**	10	583		
Medicaid Eligibles Living in Nursing Facilities	1,164	51,917	1,186	53,579
Total Expenditures	\$62,001,452	\$3,090,753,003	\$61,449,071	\$3,093,825,746

*Total includes state-licensed and Medicaid-certified facilities. Data is point in time, as of 6/24/2009.

**Data is point in time, as of 6/24/2009.

Trumbull County

Job and Family Services Profile

Medical Assistance

Alternatives to Nursing Facilities (Waiver Programs)

Waiver programs allow people on Medicaid with disabilities to receive care in their homes and communities instead of in nursing homes. The following chart lists the waiver programs available in Ohio for CY 2007 and 2008, and the number of Trumbull County residents participating in them.

Unduplicated Number of Residents Receiving Services Waiver Type	CY 2008		CY 2007	
	County	State	County	State
Choices - Age 60 or older	0	462	0	362
PASSPORT - Pre-admission Screening System Providing Options and Resources Today - Age 60 or older	426	34,419	432	33,334
Assisted living - Age 21 or older	56	1,209	13	405
Individual Options Waiver - Available to all ages	161	14,675	162	13,135
Level One Waiver - Available to all ages with an ICF/MR Level of Care	21	6,210	19	5,306
Ohio Home Care - Age 59 or younger	159	8,907	176	9,697
Transitions - Age 60 or older	78	3,213	74	3,184
Transitions Carve Out - All ages	27	1,766	21	1,575

For more Medicaid Information on Trumbull County, go to:

http://ifs.ohio.gov/ohp/reports/documents/OMR_SFY2006.pdf

**December 2009 Ranking of
Ohio County Unemployment Rates
(Not Seasonally Adjusted)**

Among the state's 88 counties, the December 2009 unemployment rates ranged from a low of 7.4 percent in Holmes County to a high of 17.5 percent in Morgan County. Rates increased in 84 of the 88 counties. In December, the comparable rate for Ohio was 10.7 percent. (See table below).

Four counties had unemployment rates at or below 8.0 percent in December. The counties with the lowest rates, other than Holmes, were: Delaware, 7.7; Geauga, 7.9; and Lawrence, 8.0 percent.

Eighteen counties had unemployment rates above 14.0 percent during December. The counties with the highest rates, other than Morgan, were: Highland and Ottawa, 17.3; Pike, 16.7; Clinton and Noble, 16.2; Huron, 15.9; Adams and Meigs, 15.8; Williams, 14.9; Carroll, 14.5; Fulton, Monroe, and Perry, 14.3; Ashtabula and Vinton, 14.2; Jefferson, 14.1; and Crawford, 14.0 percent.

EDITOR'S NOTE: These estimates, prepared in cooperation with the Bureau of Labor Statistics, U.S. Department of Labor, are based on 2008 benchmark and geared to county of residence. Unemployment rates for all Ohio counties as well as cities with populations of 50,000 or more are presented in the monthly ODJFS *Civilian Labor Force Estimates* publication. Updated statewide historical data may be obtained by contacting the Bureau of Labor Market Information at (614) 466-1109.

January 2010 unemployment rates and nonagricultural wage and salary data for Ohio will be released by ODJFS on Friday, March 5, 2010. County, city and metropolitan area unemployment rates will be available on Tuesday, March 9, 2010. This information and the monthly statistical summaries it is based on are also available at <http://jfs.ohio.gov/releases>.

Ranking Report
Ohio Unemployment Rates by County
December 2009

Rank (b)	County	Unemployment Rate	Rank (b)	County	Unemployment Rate
1	Morgan County	17.5	45	Hocking County	12.1
2	Highland County	17.3	46	Pickaway County	12.1
3	Ottawa County	17.3	47	Logan County	12.1
4	Pike County	16.7	48	Sandusky County	12.1
5	Clinton County	16.2	49	Montgomery County	12.0
6	Noble County	16.2	50	Champaign County	11.9
7	Huron County	15.9	51	Morrow County	11.9
8	Adams County	15.8	52	Jackson County	11.7
9	Meigs County	15.8	53	Darke County	11.7
10	Williams County	14.9	54	Allen County	11.6
11	Carroll County	14.5	55	Tuscarawas County	11.4
12	Monroe County	14.3	56	Marion County	11.2
13	Perry County	14.3	57	Clark County	11.1
14	Fulton County	14.3	58	Wood County	11.1
15	Ashtabula County	14.2	59	Putnam County	11.0
16	Vinton County	14.2	60	Summit County	10.8
17	Jefferson County	14.1	61	Portage County	10.7
18	Crawford County	14.0	62	Greene County	10.6
19	Henry County	13.9	63	Auglaize County	10.6
20	Trumbull County	13.8	64	Clermont County	10.6
21	Scioto County	13.6	65	Gallia County	10.4
22	Van Wert County	13.6	66	Belmont County	10.3
23	Columbiana County	13.5	67	Washington County	10.0
24	Muskingum County	13.4	68	Butler County	9.9
25	Ashland County	13.1	69	Wayne County	9.9
26	Coshocton County	13.1	70	Knox County	9.7
27	Fayette County	13.1	71	Licking County	9.6
28	Seneca County	13.0	72	Hancock County	9.6
29	Richland County	13.0	73	Madison County	9.5
30	Ross County	13.0	74	Hamilton County	9.5
31	Brown County	12.9	75	Lorain County	9.5
32	Guernsey County	12.9	76	Warren County	9.3
33	Mahoning County	12.8	77	Fairfield County	9.3
34	Defiance County	12.8	78	Union County	9.2
35	Wyandot County	12.7	79	Athens County	9.2
36	Paulding County	12.7	80	Lake County	8.9
37	Shelby County	12.5	81	Cuyahoga County	8.9
38	Erie County	12.4	82	Franklin County	8.8
39	Miami County	12.3	83	Medina County	8.2
40	Preble County	12.3	84	Mercer County	8.2
41	Lucas County	12.3	85	Lawrence County	8.0
42	Harrison County	12.3	86	Geauga County	7.9
43	Stark County	12.2	87	Delaware County	7.7
44	Hardin County	12.2	88	Holmes County	7.4

[a] These estimates, prepared in cooperation with the Bureau of Labor Statistics, U.S. Department of Labor, are based on 2008 benchmark, are geared to county of residence, and NOT seasonally adjusted. (b) Rankings based upon unrounded unemployment rates.

Ohio Department of Job and Family Services
Office of Workforce Development
Bureau of Labor Market Information
Columbus 43215

Aqua Ohio-Masury Division

Rate Case: 09-560-WW-AIR

OCC First Set of Interrogatories Dated January 7, 2010

INT-28. How many disconnection notices were sent to residential consumers in each of the last two years?

RESPONSE: The information has been requested.

Stephen J. Saluga

Additional Response Information RE: INT-28 after 1/15/2010 responses mailed to OCC:

RESPONSE:

2008 residential disconnection notices= 695

2009 residential disconnection notices= 785

Stephen J. Saluga

January 20, 2010

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Aqua Ohio, Inc. for Authority to Increase)
Its Rates and Charges in Its Masury) Case No. 09-560-WW-AIR
Division.)

**THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON AQUA OHIO, INC.**

(January 7, 2010)

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Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-8574
idzkowski@occ.state.oh.us
yost@occ.state.oh.us

Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

INT-29. Please describe the different extended payment plans that are offered to residential customers to help avoid disconnection of service?

RESPONSE: Aqua will offer residential customers who are in delinquent status one payment arrangement within a twelve month period of time. The payment arrangement requires an initial installment payment of twenty-five percent (25%) of the account balance with the remaining balance divided into three monthly installments. The monthly installments are in addition to future billed charges which become due after the creation date of the arrangement.

Stephen J. Saluga

INT-30. For each of the last two years, how many residential customers were placed on extended payment plans, and how many residential customers defaulted on the extended payment plan?

RESPONSE: Placed on extended payment plans- 2008 =190, 2009=132

Defaulted on extended payment plans- 2008=74, 2009 =49

Stephen J. Saluga

INT-31 Does the Company require upfront payment of the proposed \$43.00 Reconnection Charge prior to reconnection, or will the Company bill this charge?

RESPONSE: Upfront payment is required for the reconnection charge.

Stephen J. Saluga

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Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

INT-42. Will the proposed \$16.00 Dishonored Payment Charge be assessed if the cause for the dishonored payment was a result of error by the financial institution?

RESPONSE: The dishonored payment charge will be assessed if it is the result of an error by the customer's financial institution.

The dishonored payment charge will not be assessed if it is the result of an error by the Company's financial institution.

Stephen J. Saluga

INT-43. Will the Company bill the Dishonored Payment Charges on the customers next regularly scheduled bill?

RESPONSE: Yes.

Stephen J. Saluga

INT-44. In each of the last two years, how many residential accounts by year were subject to the Late Payment Fee?

RESPONSE: This information is not kept in the normal course of business.

Stephen J. Saluga

INT-45. In each of the last two years, what were the total revenues collected by year in Late Payment Fee's?

RESPONSE: 2008= \$7,342

2009=\$6,827

Stephen J. Saluga

INT-46. Will the Company assess the Late Payment Fee on amounts that are deferred on extended payment plans if the payment plan amount is not paid?

RESPONSE: No. Late payment fees based on current charges only.

Stephen J. Saluga

INT-47. Will the Company assess the Late Payment Fee on accounts where payment is dishonored by a financial institution?

RESPONSE: Late payment fees will be assessed if the customer's payment is dishonored by their financial institution.

Stephen J. Saluga

INT-48. In each of the last two years, how many residential Late Payment Fee's were not assessed because payments were mailed on or before the due date on the bill?

RESPONSE: This information is not kept in the normal course of business.

Stephen J. Saluga

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Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

INT-32 Does the Company require upfront payment of Reconnection Charges that are performed outside the normal Company business hours prior to reconnection, or will the Company bill these charge?

RESPONSE: Upfront payment is required of the reconnection charge when reconnection is performed outside normal company business hours.

Stephen J. Saluga

INT-33. Why is the Company proposing increasing the Reconnection Charge from \$29.00 to \$43.00?

RESPONSE: To recover the cost from the party who has caused the cost to be incurred.

Stephen J. Saluga

INT-34. What are the total revenues collected in Reconnection Charges in each of the last two years?

RESPONSE: 2008= \$1,769

2009= \$ 1,827

Stephen J. Saluga

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Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

RESPONSE: The Company activates service only during regular business hours.

Regular business hours are 8:00am – 5:00pm.

Stephen J. Saluga

**INT-26. How did the Company determine the reasonableness of the proposed
\$21.00 Account Activation Charge?**

RESPONSE: See MY ITEM #2

Stephen J. Saluga

**INT-27. How many residential customers were disconnected for non-payment in
each of the last two years?**

RESPONSE: 2008 = 65

2009 = 95

Stephen J. Saluga

**INT-28. How many disconnection notices were sent to residential consumers in
each of the last two years?**

RESPONSE: The information has been requested.

Stephen J. Saluga

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Stephen J. Saluga

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Stephen J. Saluga

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RESPONSE: Upfront payment is required for the reconnection charge.

Stephen J. Saluga

Aqua Ohio-Masury Division

Rate Case: 09-560-WW-AIR

OCC First Set of Interrogatories Dated January 7,2010

INT-51. Please describe the different methods that residential customers have available to pay their water bills, and are there extra fees associated with using each of these payment methods?

RESPONSE:

Mailing in payment to Struthers Cash Center. Postage to mail the payment.

Western Union: Speed Pay Program \$3.20 fee per payment per account

NCO \$4.25 fee per payment

Zip Check-automatically deducts water payment

From customers checking account No fees

Pay at the Struthers, Ohio office No fee

Collection Service Center. \$3.00 per receipt.

Additional Response Information RE: INT-51 after 1/15/2010 responses mailed to OCC:

Aqua Lock Box

postage to mail the payment.

Stephen J. Saluga
January 20, 2010

Aqua Ohio-Masury Division

Rate Case: 09-560-WW-AIR

OCC First Set of Interrogatories Dated January 7,2010

INT-52. For each of the last two years, how many residential bills have been paid using each of the payment methods identified in the previous interrogatory?

RESPONSE: The information has been requested.

Stephen J. Saluga

Additional Response Information RE: INT-52 after 1/15/2010 responses mailed to OCC:

2008 Customer Payments:

<i>Struthers Cash Center</i>	<i>6,202</i>
<i>Aqua Lock Box</i>	<i>207</i>
<i>Western Union: Speed Pay</i>	<i>385</i>
<i>Zip Check</i>	<i>106</i>

2009 Customer Payments:

<i>Struthers Cash Center</i>	<i>6,229</i>
<i>Aqua Lock Box</i>	<i>381</i>
<i>Western Union: Speed Pay</i>	<i>575</i>
<i>Zip Check</i>	<i>134</i>

Stephen J. Saluga

January 20,2010

Aqua Ohio, Masury Division 2005 Customer Survey Results

Published: 11/28/2005

SURVEY OVERVIEW **3**

DESCRIPTION	3
INSTRUCTIONS PROVIDED TO RESPONDENTS	3
RESPONDENT METRICS	3

SURVEY RESULTS **4**

SECTION - SECTION 1	4
1. I would rate my overall water quality as:	4
2. I would rate my water pressure as:	5
3. How often do you experience discolored water during normal operations? (excluding flushing/main break occasions, etc.)	6
4. I currently utilize in my home (check all that apply):	7
SECTION - SECTION 2	8
5. Did you call the Company?:	8
6. Promptly Answered?:	9
7. Professional Manner?:	10
8. If you marked "No" for Professional Manner, please explain:	11
SECTION - SECTION 3	12
9. The Company's response time to service call requests (e.g., meter reread) is:	12
10. The Company's response time to emergencies (e.g., main break) is:	13
11. In your community, which utility rates do you consider reasonable for the service currently received? (check all that apply)	14
12. Please express any comments or suggestions about your water service:	15

Survey Overview

Description

Staff issued a customer survey in October 2005 to all the 500 out of the total 1,545 customers. The survey issued was to measure the customer perceptions regarding the water quality and customer service provided by the water company. The 85 returned surveys reflected the customers are generally satisfied with their water quality and marginally satisfied with the company's customer service.

Instructions Provided To Respondents

The Public Utilities Commission of Ohio's Service Monitoring and Enforcement Department is conducting a survey to identify customer perceptions regarding the water quality and customer service provided by Aqua Ohio, Masury Division. Please keep your responses relative to the service you have received since August 16, 2000.

Respondent Metrics

Respondents: 85
First Response: 11/25/2005 12:52 PM
Last Response: 11/28/2005 02:27 PM

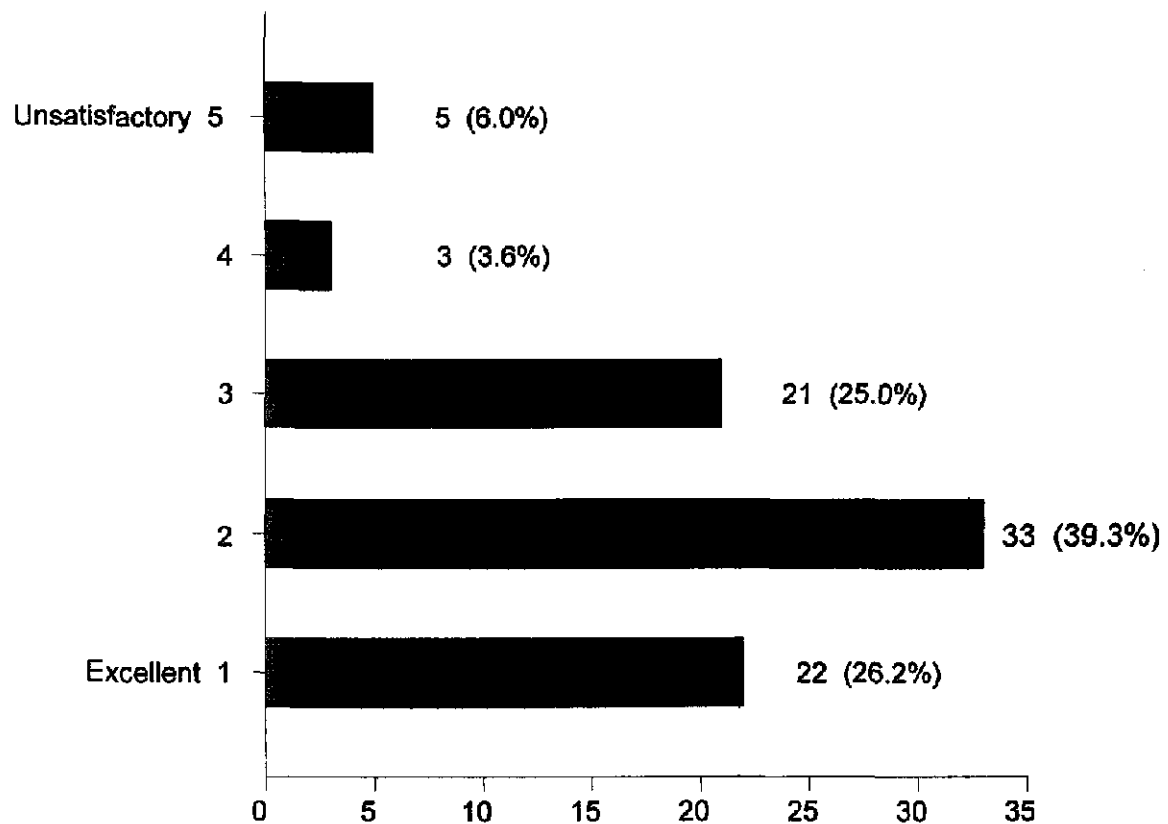
Survey Results

The following is a graphical depiction of the responses to each survey question. Additional comments provided by respondents, if any, are included after each graph.

Section - Section 1

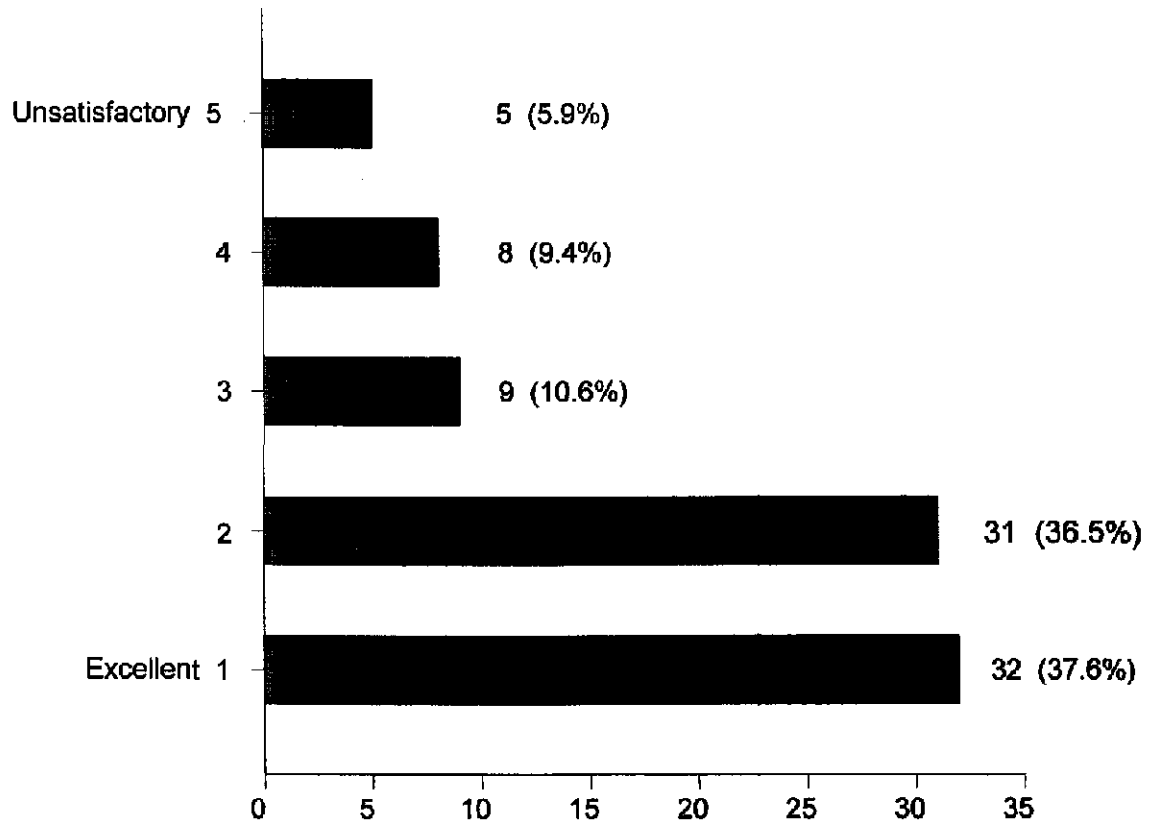
1. I would rate my overall water quality as:

Mean: 2.24



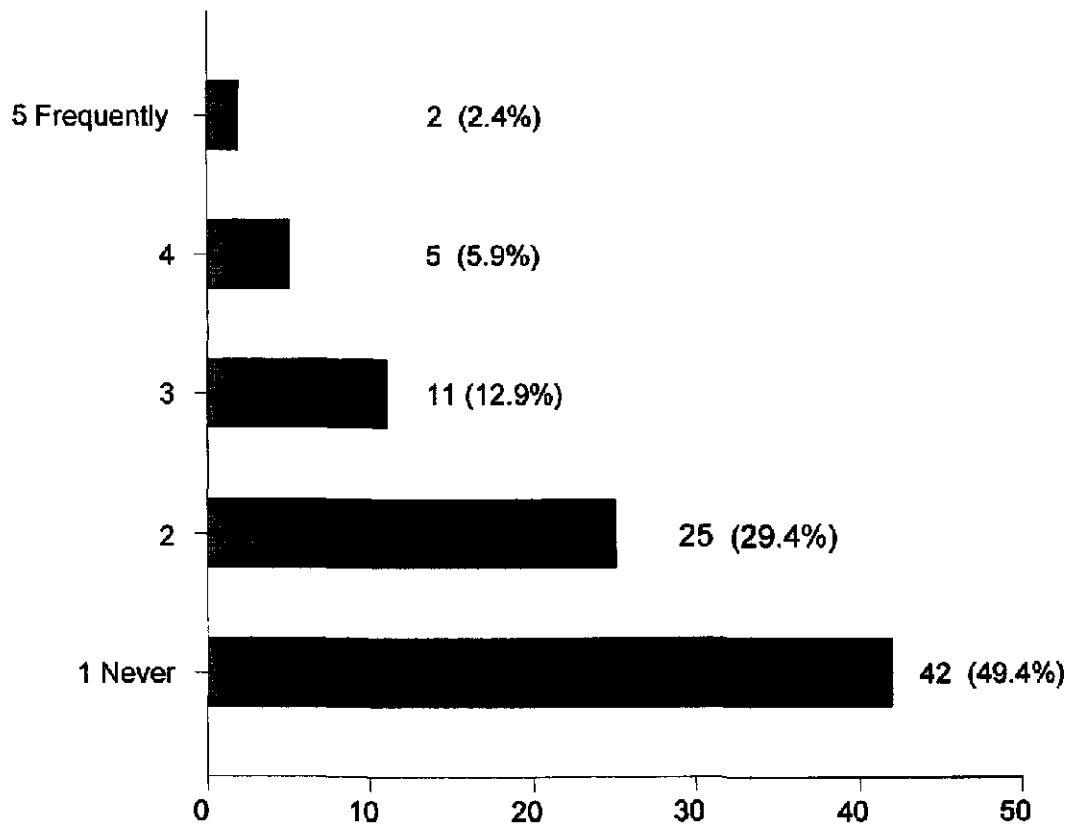
2. I would rate my water pressure as

Mean: 2.09



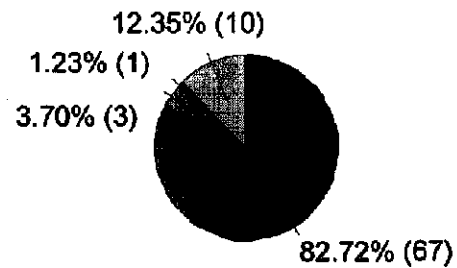
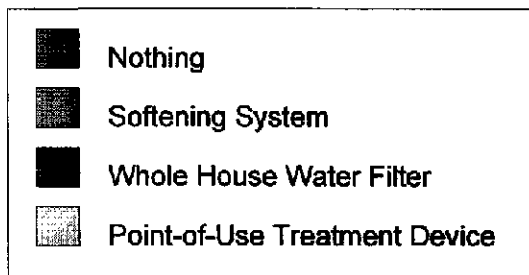
3. How often do you experience discolored water during normal operations? (excluding flushing/main break occasions, etc.)

Mean: 1.82



4. I currently utilize in my home (check all that apply):

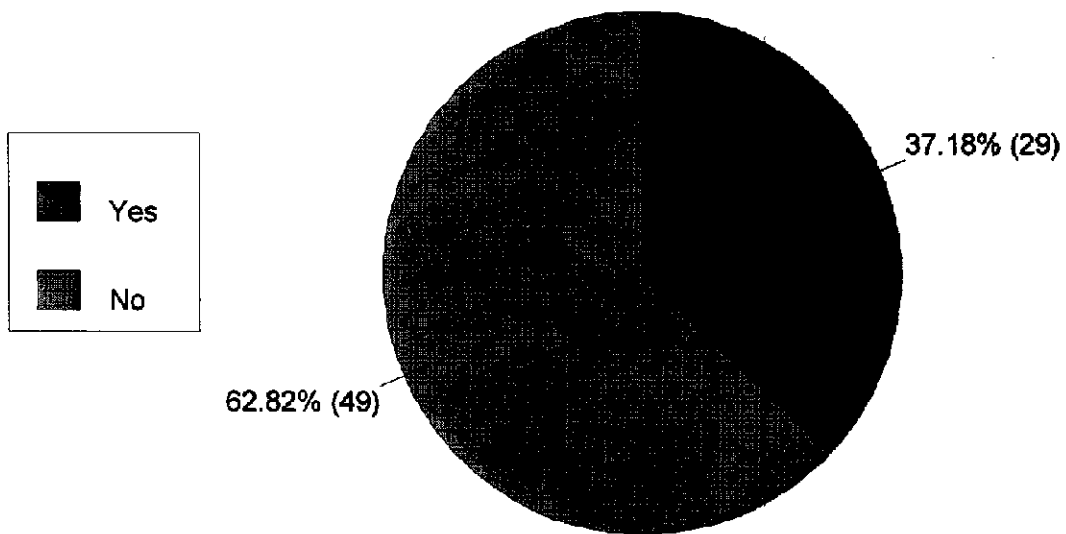
Mean: 1.43



Section - Section 2

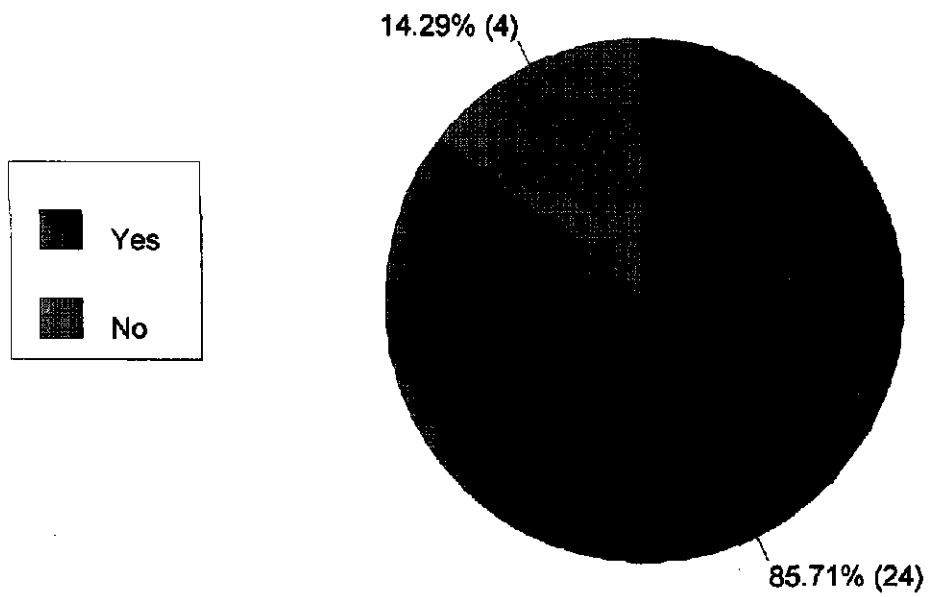
5. Did you call the Company?:

Mean: 1.63



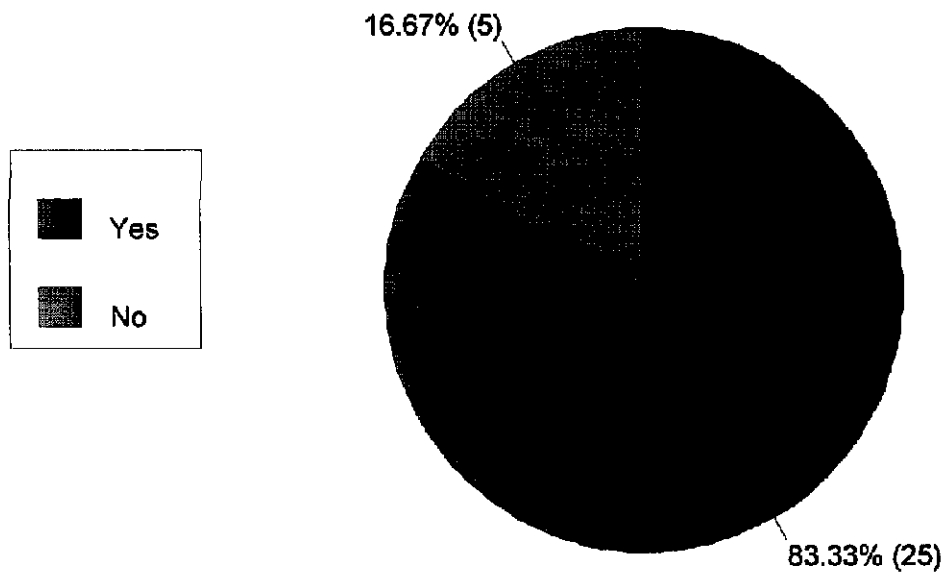
6. Promptly Answered?

Mean: 1.14



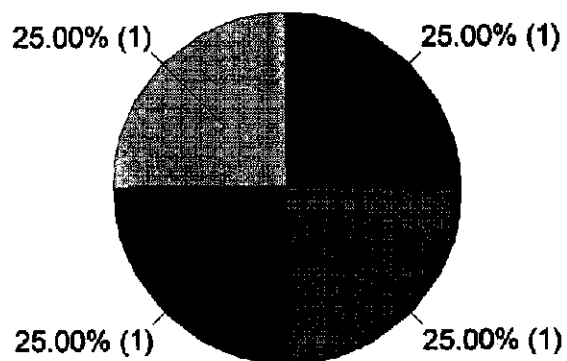
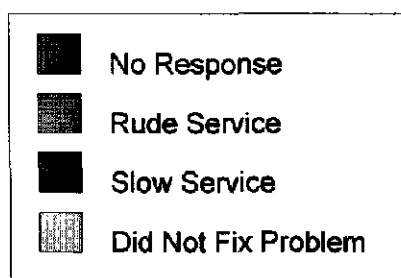
7. Professional Manner?

Mean: 1.17



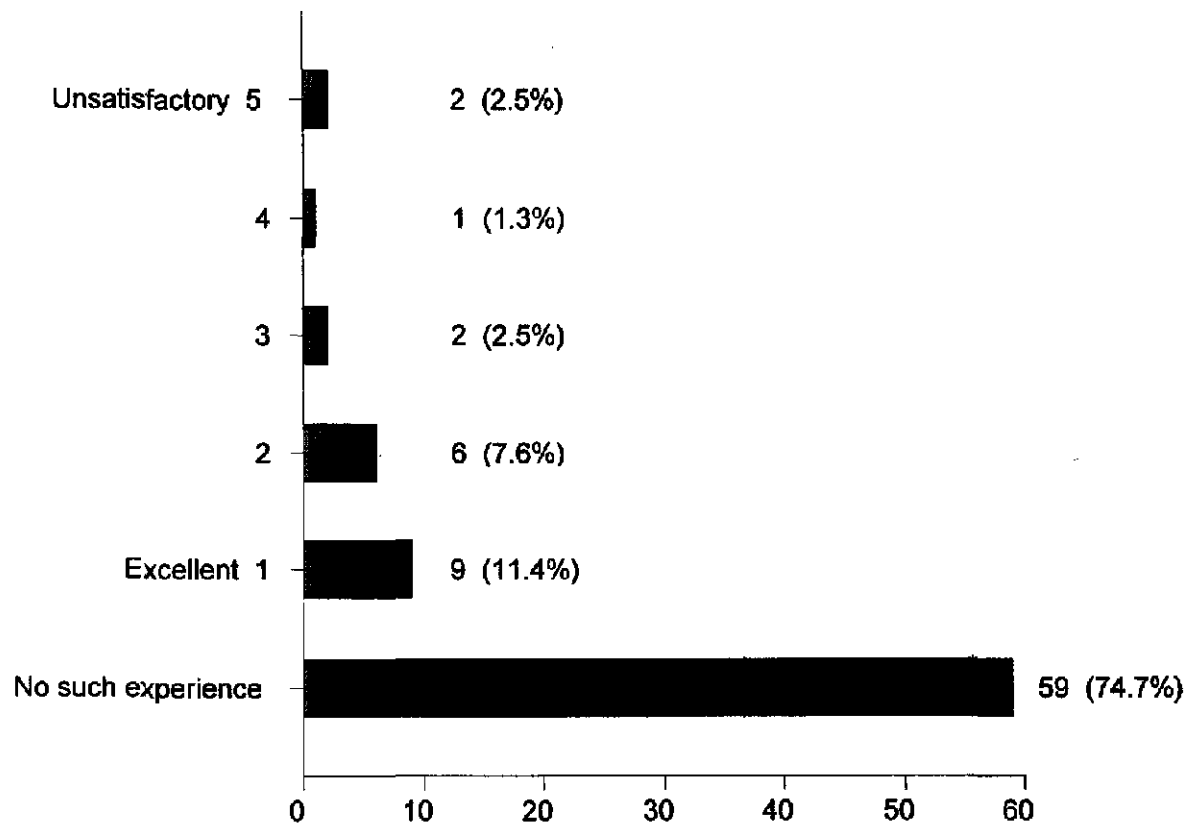
8. If you marked "No" for Professional Manner, please explain.

Mean: 2.50



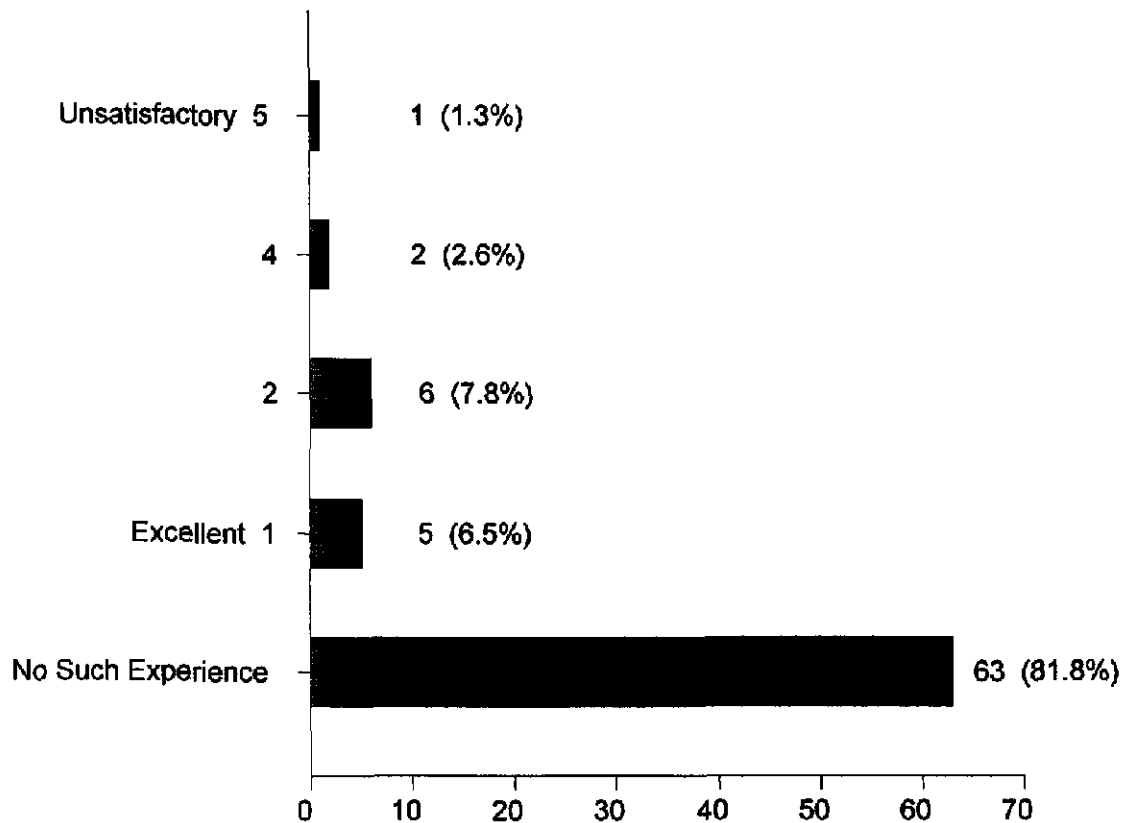
Section - Section 3**9. The Company's response time to service call requests (e.g., meter reread) is:**

Mean: 1.52



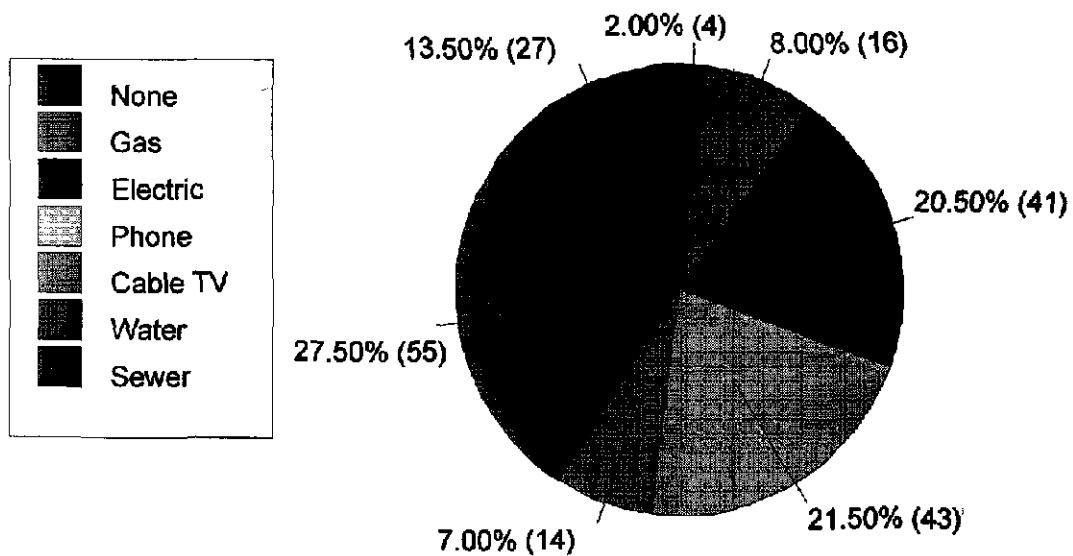
10. The Company's response time to emergencies (e.g., main break), is:

Mean: 1.39



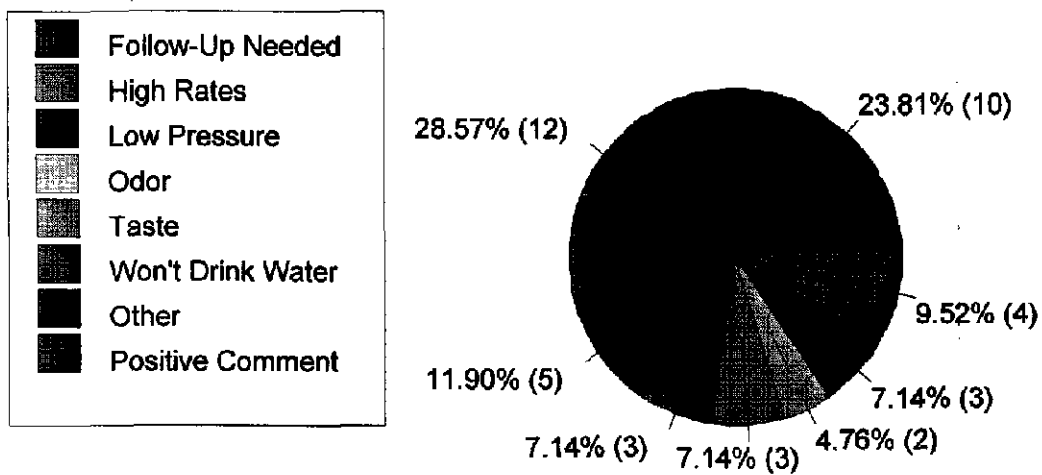
11. In your community, which utility rates do you consider reasonable for the service currently received? (check all that apply)

Mean: 4.60



12. Please express any comments or suggestions about your water service:

Mean: 8.81



**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Aqua Ohio, Inc. for Authority to Increase)
Its Rates and Charges in Its Masury) Case No. 09-560-WW-AIR
Division.)

**THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON AQUA OHIO, INC.**

(January 7, 2010)

The Office of the Ohio Consumers' Counsel (OCC), in the above-captioned proceeding before the Public Utilities Commission of Ohio (PUCO), submits the following Interrogatories and Requests for Production of Documents pursuant to Sections 4901-1-19 and 4901-1-20 and of the Ohio Adm. Code for response from Aqua Ohio, Inc. ("Aqua" or "the Company"), within the 20-day period of time as provided for in the Commission's rules. An electronic response should be provided to the extent possible to the OCC at the following addresses:

Michael E. Idzkowski,
Counsel of Record
Melissa R. Yost
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-8574
idzkowski@occ.state.oh.us
yost@occ.state.oh.us

Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

INT-49. For each of the last two years, how many residential accounts were assessed a deposit and what was the average amount of the deposit?

RESPONSE: No deposits assessed.

Stephen J. Saluga

INT-50. For each of the last two years, how many residential customers did not receive a monthly bill that should have, and were instead rendered bills for a period of time longer than one month?

RESPONSE: Masury residential customers are currently being billed on a bi-monthly basis.

Stephen J. Saluga

INT-51. Please describe the different methods that residential customers have available to pay their water bills, and are there extra fees associated with using each of these payment methods?

RESPONSE:

Mailing in payment to Struthers Cash Center. Postage to mail the payment.

Western Union: Speed Pay Program \$3.20 fee per payment per account

JDW
ATTACHMENT - 13

CASE NUMBER: 07-0567-WW-ATA

CASE
DESCRIPTION: AQUA OHIO, INC.DOCUMENT
SIGNED ON: 2/18/2010

DATE OF SERVICE: _____

08/09/2007 Memo automatically closing case with an effective date of 8/9/2007.08/01/2007 Revised tariff pages correcting typographical errors filed by T. Rodgers on behalf of Aqua Ohio, Inc.07/27/2007 Revised tariff pages of Aqua Ohio, Inc. for PUCO Tariff No. 4 filed by T. Rodgers.07/25/2007 Service Notice07/25/2007 Finding and order stating that the application filed by Aqua Ohio, Inc. be approved.06/28/2007 Additional supplemental information in support of its application to amend Masury Division tariff filed by T. Rodger on behalf of Aqua Ohio, Inc.06/14/2007 Supplement to application to amend Masury Division PUCO Tariff No. 4 filed by T. Rodgers on behalf of Aqua Ohio, Inc.05/10/2007 In the matter of the application of Aqua Ohio, Inc. to amend PUCO Tariff No. 4, Section 2 Rates in its Masury Division.

Aqua Ohio-Masury Division

Rate Case: 09-560-WW-AIR

OCC First Set of Interrogatories Dated January 7, 2010

INT-22. How many residential accounts were activated in each of the last two years?

RESPONSE: The information has been requested.

Stephen J. Saluga

Additional Response Information RE: INT-22 after 1/15/2010 responses mailed to OCC:

RESPONSE:

2008 residential activations = 219

2009 residential activations = 163

*Stephen J. Saluga
January 20, 2010*

Masury Rate Case

Rate Case: 09-560-WW-AIR

OCC 1st Set Discovery Final

Request Dated: 1-7-2010

Request for Production of Documents

RPD - 24

My ITEM
13

Proposed Activation Charge
Calculation.

AQUA OHIO, INC
MASURY DIVISION
09-0580-WW-AIR

WORKSHEET FOR DETERMINING ACTIVATION FEE

						AMOUNT
1. CSR receives phone call to transfer the water service into another name. The CSR prepares a workorder for the Serviceman to read the meter and activate service. The CSR sets up the new account on the Customer Accounting System.						
ACCT : 903-1	LABOR:	0.250	hour(s)	X	\$14.75	rate per hour
				X	1.3000	(employee benefits)
						\$4.79
2. Serviceman travel to and from customer premises to read the meter and insure service is on.						
ACCT : 903-1	LABOR:	0.333333	hour(s)	X	\$23.11	rate per hour
				X	1.6383	(employee benefits & transportation)
						\$12.62
3 CSR reviews new customer/occupant database -Sends copy of "Customer Rights and obligations" CSR also sends Direct Pay brochure						
ACCT : 903-1	LABOR:	0.200000	hour(s)		\$14.75	rate per hour
				X	1.3000	(employee benefits)
						\$3.84
ACCT : 903-2	POSTAGE	0.41			1	
						\$0.41
TOTAL ACTIVATION FEE						\$21.66

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idzkowski@occ.state.oh.us
yost@occ.state.oh.us

Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

Stephen J. Saluga

INT-22. How many residential accounts were activated in each of the last two years?

RESPONSE: The information has been requested.

Stephen J. Saluga

INT-23. Will the proposed Account Activation Charge be assessed if the Company does not have to physically visit the premise to initiate service?

RESPONSE: Yes.

Stephen J. Saluga

INT-24. Does the Company intend to require payment of the proposed Account Activation Charge prior to initiating service, or will this charge be billed to the consumer?

RESPONSE: The account activation charge will be billed.

Stephen J. Saluga

INT-25. Does the Company activate service only during regular business hours, and what are the Company regular business hours?

Masury Rate Case

Rate Case: 09-560-WW-AIR

OCC 1st Set Discovery Final

Request Dated: 1-7-2010

Request for Production of Documents

RPD - 25

My ITEM
14

Proposed Reconnection Fee
Calculation

WORKSHEET FOR DETERMINING THE RECONNECTION OR TURN ON FEE DURING REGULAR BUSINESS HOURS

	LABOR:	hour(s)	X	\$14.75	rate per hour	X	1.3000	(employee benefits)		AMOUNT
1. Preparation of, and postage for mailing the DISCONNECTION NOTICE.										\$0.62
2. Collection Rep reviews the account prior to ordering shut-off.										
3. Service link work order received at local office and CSN reviews and assigns to service department.										\$3.20
4. Serviceman travel to and from customer premises and shut off service. Serviceman attempts to contact customer and leaves door hanger if unable to. Serviceman then closes out work order on service link.										
	LABOR:	0.800000	X	\$23.11	rate per hour	X	1.6383	(employee benefits includes transportation)		\$18.93
5. Company receives payment from customer, and CSR clears all paper work on the account and issues work order to reconnect service.										
	LABOR:	0.063333	X	\$14.75	rate per hour	X	1.3000	(employee benefits)		\$1.60
5. Serviceman travel to and from customer premises and turn on service.										
	LABOR:	0.800000	X	\$23.11	rate per hour	X	1.6383	(employee benefits includes transportation)		\$18.93
TOTAL RECONNECTION OR TURN ON FEE										\$43.18

Masury Rate Case

Rate Case : 09-560-WW-AIR

OCC 1st Set Discovery Final

Request Dated: 1-7-2010

Request for Production of Documents

RPD - 26

My ITEM
15

Proposed Dishonored
Payment Charge

AQUA OHIO, INC.
MASURY DIVISION
CASE #09-580-WW-AIR

- (1) Dishonored payment received in mail at the Service Center in Boardman. Information on check is entered into an excel database where the status of the dishonored payment is maintained. The check and debit notification is sent to division for handling.

15 Min.

- (2) Customer payment status is maintained on the above data base at all times pending disposition.

5 Min.

Totals

20 Min.

Admin Assistant (.33 HRS x \$26.06 x 1.5308 (Employee Benefits))

\$12.73

Bank Charge NSF Fee as listed below

\$3.60

TOTAL IN-HOUSE PROCESSING COST

\$16.33

The returned dishonored payment fee is \$ 3.60 EA.
National City Bank
P.O. Box 5756
Cleveland OH 44101-0756

04/11/11
04/11/11
04/11/11
04/11/11

INT-38. In each of the last two years, how many disconnections of residential service were made as a result of cross connections?

RESPONSE: This information is not kept in the normal course of business.

Stephen J. Saluga

INT-39. In each of the last two years, how many residential accounts were subject to the Dishonored Payment Charge?

RESPONSE: 2008= none

2009= 12 dishonored payments

Stephen J. Saluga

INT-40. Why is the Company proposing increasing the Dishonored Payment Charge from \$15.00 to \$16.00?

RESPONSE: To recover the cost from the party causing the cost to be incurred.

Stephen J. Saluga

INT-41. Will the Company waive the Dishonored Payment Charge if the customer has only incurred a single dishonored payment in the previous 12-months?

RESPONSE: No.

Stephen J. Saluga

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Additionally, Aqua must use the definitions and follow the instructions provided herein in responding to the inquiries.

INT-42. Will the proposed \$16.00 Dishonored Payment Charge be assessed if the cause for the dishonored payment was a result of error by the financial institution?

RESPONSE: The dishonored payment charge will be assessed if it is the result of an error by the customer's financial institution.

The dishonored payment charge will not be assessed if it is the result of an error by the Company's financial institution.

Stephen J. Saluga

INT-43. Will the Company bill the Dishonored Payment Charges on the customers next regularly scheduled bill?

RESPONSE: Yes.

Stephen J. Saluga

INT-44. In each of the last two years, how many residential accounts by year were subject to the Late Payment Fee?

RESPONSE: This information is not kept in the normal course of business.

Stephen J. Saluga

INT-45. In each of the last two years, what were the total revenues collected by year in Late Payment Fee's?