

**FILE**

**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  
Lake Erie Division.

)  
) Case No. 09-1044-WW AIR  
)  
)

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**PREPARED TESTIMONY  
OF  
CLIFFORD T. EVANS, P.E.**

**FACILITY AND OPERATIONS FIELD DIVISION  
SERVICE MONITORING AND ENFORCEMENT DEPARTMENT**

**SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**STAFF EXHIBIT\_\_**

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1 1. Q. Please state your name and business address.

2 A. My name is Clifford T. Evans. My address is 180 E. Broad Street, Columbus,  
3 Ohio 43215-3793.

4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio.

7

8 3. Q. What is your present position with the Public Utilities Commission of Ohio and  
9 what are your duties?

10 A. I am the Water and Wastewater Specialist (Utility Specialist II) in the Facility  
11 and Operations Field Division of the Service Monitoring and Enforcement  
12 Department. My section monitors company performance and compliance with  
13 Ohio Administrative Code (OAC) Chapter 4901:1-15. My section also monitors  
14 and enforces compliance with Commission orders as they relate to water and  
15 wastewater operations and service issues.

16

17 4. Q. Would you briefly state your educational background and work history?

18

19 A. I have a Bachelor of Science degree in Civil Engineering (1975) from the  
20 Pennsylvania State University and am registered in Ohio, Illinois and Indiana as  
21 a professional engineer. I have worked in the water and wastewater utility field  
22 for most of the last 35 years starting in 1975 as a field engineer performing meter  
23 testing, leak studies and distribution modeling for The Pitometer Associates.

1 In 1978 I was employed by the Kankakee Water Company, currently known as  
2 Aqua Illinois, starting as a staff engineer and progressing to the position of  
3 Distribution and Collection manager. My duties included engineering design,  
4 project management, and the supervision of the company's distribution  
5 department.

6 In 1987 I was employed by Utilities, Inc of Northbrook, Illinois as their  
7 Administrative Engineer. My duties included project management and  
8 environmental permitting issues for water and wastewater systems in 11 states.

9 In 1989 I was employed by Citizens Utilities of Illinois as their Manager of Plant  
10 Engineering where I headed the design and project management team for water  
11 and wastewater projects.

12 In 1990 I was employed by the consulting firm of Baxter & Woodman in Crystal  
13 Lake, Illinois as a project engineer where I worked on client water and  
14 wastewater improvement projects.

15 In 1990 I was employed by the consulting firm of Beam, Longest and Neff, Inc.  
16 of Champaign, Illinois as a project engineer where I worked on client water and  
17 wastewater improvement projects.

18 In 1992 I was employed by the Ohio American Water Company as an Operations  
19 Engineer. My duties included various levels of design, permitting, and project  
20 management for improvements in all of the company's facilities referred to as  
21 the Group A, Mansfield, and Lake White systems.

22 In 2000 I was employed as a Senior Project Engineer by Floyd Browne  
23 Associates, an environmental consulting firm. My duties included

1 comprehensive planning studies, permitting, and design of client water and  
2 wastewater projects.

3 In 2002 I was employed as an Environmental Compliance Officer for the  
4 Buckeye Egg Farm (later to become Ohio Fresh Eggs). My duties included the  
5 supervision of the potable water systems at two of the company's northern  
6 properties, and the management of any projects associated with the firm's  
7 environmental permits and compliance agreements.

8 I am a member of the American Water Works Association and joined the Public  
9 Utilities Commission of Ohio in June 2005.

10  
11 5. Q. What is the subject matter of your testimony in this case?

12 A. My testimony concerns certain objections that were filed by Aqua Ohio Water  
13 Company (Aqua or Company) and the Office of the Ohio Consumers' Counsel  
14 (OCC). More specifically I will address Aqua's Objection No. 10 and OCC's  
15 Objection Numbers 36 and 37.

16  
17 6. Q. What was Aqua's Objection Number 10?

18 A. This objection was concerning the Staff's recommendation that the Company  
19 should begin submitting Infrastructure Leakage Index (ILI) calculations in  
20 addition to the Unaccounted-for-Water (UFW). Aqua submits that if ILI  
21 functions better than the UFW ratio, that it should be accepted as a substitute,  
22 rather than a supplement to the UFW rule requirements.

1 7. Q. What is Staff's position with regards to this objection?

2 A. Staff stated in the Staff Report on page 30 that "the Infrastructure Leakage Index  
3 (ILI) developed by the American Water Works Association (AWWA)<sup>1</sup> and the  
4 International Water Association (IWA) may function better than the UFW ratio  
5 required by the current rules as a benchmark indication of a system's  
6 performance in minimizing the impact of excessive water losses on water  
7 customers." Staff acknowledges that much of the data necessary for the  
8 calculation of UFW and ILI may be redundant. However, the approach taken by  
9 the current rules sets a firm target value of 15% UFW for all systems and under  
10 all conditions. The ILI approach allows for flexibility in the establishment of ILI  
11 target values based on additional factors not considered in the UFW calculations,  
12 but that may better reflect the cost impact of unavoidable leakage on the  
13 Company's customers. Staff finds that some period of evaluation of the two  
14 approaches in parallel is necessary to set these target values for each individual  
15 system.

16 8. Q. Do you have any comments on the Company's position that ILI be accepted as a  
17 substitute for UFW?

18 A. Yes, I do. Staff finds that as promising as the ILI method may be, that the Ohio  
19 Administrative Code specifically requires the submission of UFW figures in  
20 Quarterly Reports. As long as the rules require this or until such time as the  
21 Commission itself acts to permit the substitution of ILI data, Staff finds that  
22 UFW must continue to be reported quarterly.

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<sup>1</sup> AWWA Manual of Water Supply Practices M36, Water Audits and Loss Control Programs, 3<sup>rd</sup> Edition.

1 9. Q. OCC Objection Number 36 was concerning water quality issues in several of the  
2 Company's service areas. What are your comments on this objection?

3 A. The Staff Report referred to taste, discolored water and pressure issues called  
4 into the Company by its customers in 2009 and reported to the Staff in the  
5 quarterly operations reports as required by OAC Rule 4901:1-15-14(H). Staff  
6 did not find that the level of the complaints received indicated any large scale  
7 water quality issues, but recommended that the Company revisit the issues and  
8 provide a report within 60 days of the Opinion and Order in this case to better  
9 establish any underlying causes and any remedial actions that may have been  
10 taken. OCC stated that it is within the Staff's authority to investigate these  
11 issues without a Commission order and that delaying the inquiry was  
12 unreasonable.

13 10. Q. What is Staff's position on OCC's objection?

14 A. Staff agrees that in its management oversight role it has the authority to conduct  
15 this type of investigation without a Commission order. However, Staff also  
16 disagrees that including the investigation it is asking for in the Commission order  
17 to be issued as part of this case will create an unreasonable delay in any actions  
18 that may be deemed appropriate to reduce the incidents of future similar  
19 contacts.

20 11. Q. OCC also objected (OCC Objection Number 37) to the Staff Report's apparent  
21 failure to adequately address the Company's compliance with the Lake Seneca  
22 Stipulation Commitment from rate case 07-564-WW-AIR. What are you  
23 comments on this objection?

1       A. As stated in the Staff Report, only one discolored water complaint was received  
2       by the Commission call center since the issuance of an Opinion and Order in the  
3       last rate case. This incident reported in the complaint was the outfall of a system  
4       flushing and was handled by the local operator directly according to his standard  
5       business practices. OCC recommends that the business practice for such  
6       complaints should be documented in writing and all future communications and  
7       ultimate resolutions of similar future complaints should be memorialized to  
8       avoid the possibility of future uncertainty or misunderstandings. Staff agrees  
9       that it is in the best interest of the Company and its customers that this  
10      information should be logged or recorded, and that the records should be made  
11      available to the Staff for review upon request.

12     12. Q. Does this conclude your testimony?

13      A. Yes, it does.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing **Prepared Testimony of Clifford T. Evans, P.E.** was served upon the following parties of record by regular U.S. mail, postage prepaid, this 20<sup>th</sup> day of July, 2010.



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