

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission's Review )  
of Chapter 4901:1-15, of the Ohio )  
Administrative Code, Standards for ) Case No. 11-5605-WS-ORD  
Waterworks Companies and Sewage )  
Disposal Companies. )

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COMMENTS OF AQUA OHIO, INC.

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Comes now Aqua Ohio, Inc. ("Aqua") and respectfully submits these comments on proposed changes to the Ohio Administrative Code, as issued by the Public Utilities Commission of Ohio ("Commission") on November 2, 2011. Per the Commission's November 23, 2011 Entry, initial comments are to be filed no later than December 9, 2011.

Aqua comments on two rules that would be modified by the proposal.

**Rule 4901:1-15-24(E): Billing and Billing Adjustments**

The Rule currently states that "the company shall allow a customer up to the same period of time for which the customer was previously undercharged to pay any additional charges found proper due to inaccurate meters or incorrect bill calculation, unless the inaccuracy is caused by the customer." Aqua proposes the establishment of a limitation on the amount of time a company can back-bill for both undercharged and overcharged customers. Aqua suggests the establishment of a three hundred sixty-five (365) day limit for back-bills. For instance, if a company under-charges a customer for sixteen (16) months, the customer will only be required to pay the most recent twelve (12) months of additional charges found proper due to inaccurate meters or incorrect bill calculation.

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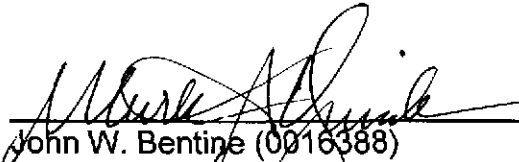
**Rule 4901:1-15-27(I): Disconnection Procedures**

The Rule currently allows for three (3) medical certifications of up to thirty (30) days each in any twelve month period. Aqua has found that by allowing this, the customers continue to get further and further behind in their payments. Aqua proposes that one (1) medical certification be allowed in any twelve (12) month period. Aqua has also found that many of the medical certifications are coming from the same doctor.

**CONCLUSION**

For the reasons stated above, Aqua respectfully suggests that the Commission modify the proposed rules as described.

Respectfully submitted,



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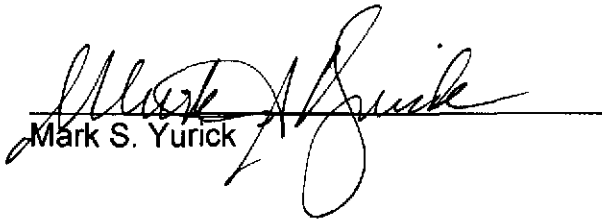
## CERTIFICATE OF SERVICE

I hereby certify that a copy of the *Comments of Aqua Ohio, Inc.* was served this

9<sup>th</sup> day of December, 2011 by U.S. First Class mail upon the following:

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