

FILE

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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2006 DEC -6 PM 5:06

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. 06-433-WW-AIR **PUCO**

MOTION FOR SUBPOENAS

Now comes the Office of the Ohio Consumers' Counsel ("OCC") and, pursuant to Ohio Adm. Code 4901-1-25, hereby respectfully moves the Public Utilities Commission of Ohio ("Commission" or "PUCO"), any commissioner, the legal director, the deputy legal director, or the attorney examiner assigned to this case to issue subpoenas compelling:

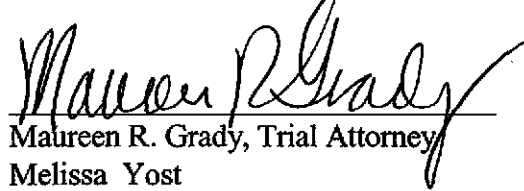
- (1) Ruth Wiechman , Utilities Coordinator, District 6, Ohio Department of Transportation; and,
- (2) Carolyn O'Neal, Environmental Specialist Ohio EPA , Division of Drinking and Ground Water, Central Office;

to appear for hearing and attend day-to-day to submit to oral examination as on cross-examination in this proceeding until completed to provide fact information about the Ohio Department of Transportation (ODOT) required water main replacement project or information related to the Huber Ridge brown water issue and the Lake Darby softening issues. Grounds for this Motion are set forth in the accompanying Memorandum in Support.

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Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER
CONSUMERS' COUNSEL

A handwritten signature in black ink, appearing to read "Maureen R. Grady", is written over a horizontal line.

Maureen R. Grady, Trial Attorney
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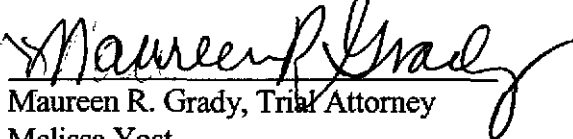
MEMORANDUM IN SUPPORT

The OCC requests subpoenas, pursuant to Ohio Adm. Code 4901-1-25, to command Ruth Wiechman, Utilities Coordinator, District 6, Ohio Department of Transportation and Carolyn O'Neal, Environmental Specialist Ohio EPA, Division of Drinking and Ground Water, Central Office, to appear for the hearing and attend day-to-day to submit to oral examination as on cross-examination by OCC in this proceeding until completed.

The hearing in this case is currently scheduled to begin on December 11, 2006. The ODOT required main replacement project, the brown water issue at Huber Ridge, and the softening water issues related to Lake Darby are central issues in this case. The subpoenaed individuals have in-depth knowledge and/or expertise on these issues and will facilitate a full and completely developed record upon which the Commission can base its decision.

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER
CONSUMERS' COUNSEL

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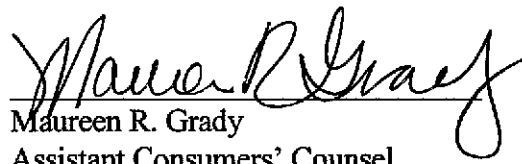
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Subpoenas, was served by first class mail, or by hand delivery, to the following parties of record, this the 6th day of December, 2006.


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Assistant Consumers' Counsel

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