

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Complaint of
Leigh Conti,

Complainant,

v.

Ohio American Water Company,

Respondent.

Case No. 09-591-WW-CSS

ANSWER
OHIO AMERICAN WATER COMPANY,
RESPONDENT

First Unnumbered Paragraph of the Complaint

1. *This complaint is in regard to Ohio American Water Company that services the address above to which I am a customer.*

ANSWER: Ohio American admits Complainant is a customer.

2. *The account number is 22-0013603-0.*

ANSWER: Ohio American admits that this is Complainant's account number.

3. *The Premise Number is 22-009005.*

ANSWER: Ohio American admits that this is Complainant's premise number.

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Second Unnumbered Paragraph of the Complaint

4. *My house was built new in a new development in 2001.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

5. *Since the house was built I have been plagued with water issues.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

6. *These issues include both water quality and (especially) water pressure from the Ohio American Water Company.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

7. *When the house was built, American Water Company was the water supplier to the house.*

ANSWER: Ohio American denies that American Water Company was the water supplier to the house when the house was built in 2001.

8. *Sometime in the last four years, American Water sold to the present water company Ohio American Water Company.*

ANSWER: Ohio American denies that American Water sold the present water company to Ohio American.

Third Unnumbered Paragraph of the Complaint

9. *Water quality has always been extremely poor.*

ANSWER: Ohio American denies this allegation.

10. *To remedy the situation of dishes that would stain in the dishwasher and water marks in toilets, I purchased a water softener and whole house filter.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

11. *That has solved most of the water quality issues.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

Fourth Unnumbered Paragraph of the Complaint

12. *The water pressure issue, however, is equally troublesome but is not reasonably resolved.*

ANSWER: Ohio American denies this allegation.

13. *I am aware that the PUCO requires a minimum of 25 PSI.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

14. *As I have complained to both water companies for low pressure (throughout the years), they have installed water pressure meters on my house to test the rates.*

ANSWER: Ohio American admits that Mr. Conti has contacted the Company seven years ago concerning pressure, and once in February of 2009 at which point the Company checked the pressure at the fire hydrant in front of the house...

15. *However, there are intervals of time when pressure drops below 25 PSI on a regular basis.*

ANSWER: Ohio American denies this allegation based upon its records.

16. *The pressure drops usually occur during peak usage intervals. 6:00 am to 10:00 am. 4:00 pm to 11:30 pm during the weekdays.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

17. *These pressure drops make it impossible more than one water source in my house to be used at a time.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

18. *For example, (1) showers cannot be used when washing clothes, (2) two showers cannot be taken at one time.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

19. *This is evidence of extremely inadequate service.*

ANSWER: Ohio American denies this allegation.

20. *There are times when the water pressure is so low that the sprayer on my kitchen sink will not turn off when pressure is taken off of the switch.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

21. *There is not enough water pressure to push the switch off.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

Fifth Unnumbered Paragraph of the Complaint

22. *All of the houses in my development have a minimum of 2000 square feet.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

23. *That usually includes 2-4 full bathrooms.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

24. *These deed restrictions were well published when the water company applied for the right to supply of the houses in my development with water.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

25. *All of my neighbors complain of the same problems.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

26. *With the above pressure loss that the company is aware of, they tell me that the average pressure is all they are accountable for.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation. Ohio American's records of customer contact do not reflect that such a statement was made.

27. *I don't believe that this is true.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

Sixth Unnumbered Paragraph of the Complaint

28. *I am requesting that you DEMAND that they either raise their water pressure to a consistent PUCO minimum or pay for a water pressure booster (of my choice) to be installed in my house.*

ANSWER: This allegation is not one to which an answer by the Respondent can be made.

Fourth Unnumbered Paragraph of the Complaint

29. *I am outraged that this situation has been present for 9 years without any resolution in sight.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

30. *My neighbors have complained to both The PUCO and Ohio Amer8ican [sic] Water Company to no avail.*

ANSWER: Ohio American denies this allegation for lack of knowledge and information sufficient to form a belief as to the truth of the allegation.

31. *Please HELP!*

ANSWER: This allegation is not one to which an answer by the Respondent can be made.

Respectfully submitted on behalf of,
OHIO AMERICAN WATER COMPANY



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer of Respondent Ohio American Water Company was served upon the Complainant at 1457 Countryside Drive, Mogadore, Ohio 44260 via regular U.S. Mail this 3rd day of August 2009.



Sally W. Bloomfield