

FILE

9



Public Utilities Commission

EOAG0505145L

Case Number

Public Utilities Commission of Ohio
Attn: Docketing
180 E. Broad St.
Columbus, OH 43215

Formal Complaint Form 14-1283-WS-CSS

JAMES F. DAGLEY
Customer Name (Please Print)

6585 WESTPOINT DRIVE
Customer Address

HUDSON OH 44236
City State Zip

Against

445
Account Number

180 CHEYENNE TRAIL (LOT 445)
Customer Service Address (if different from above)

MAHAWK UTILITIES, INC.
Utility Company Name

MALVERN OH 44644
City State Zip

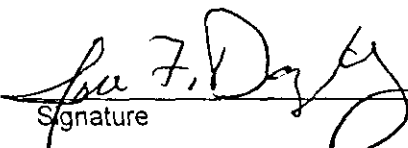
Please describe your complaint. (Attach additional sheets if necessary)

Please refer to attached sheets for
specific complaint.

RECEIVED DOCKETING DIV

2014 JUL 24 AM 11:46

PUCO


Signature
330-352-5734
Customer Telephone Number

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician AM Date Processed 7/24/14

July 23, 2014

PUCO CaseID: EDAG0505145L

Formal Complaint Against Mohawk Utilities, Inc. by James Dagley

Name & Address (Primary Residence):

James F. Dagley
6585 Westpoint Drive
Hudson, OH 44236
(h) 330-655-1670
(m) 330-352-5734

Account # & Service Address:

Account #: 445
James and Elizabeth Dagley
180 Cheyenne Trail (Lot 445)
Malvern, OH 44644

Statement:

I, James F. Dagley, with a secondary residence at 180 Cheyenne Trail, Malvern, OH, am a water customer of Mohawk Utilities, Inc.

Name of Utility:

Mohawk Utilities, Inc
P.O. Box566
Malvern, OH 44644
1-800-332-0613

Summary of the facts which are the basis of the complaint:

In accordance with Ohio Revised Code Section 4905.26, Mohawk Utilities Inc., relying on a faulty measurement, provided an unjust and unreasonable charge for water for the period of February 1st, 2014 through March 1st, 2014. The water bill for this period claims a water usage of 645,100 gallons for a total bill of \$5,744.06. The house was unoccupied during this period, but did experience water damage during a 9 day window (Feb 21st – Mar 2nd) due to frozen pipes; however, it is physically impossible for that extreme amount of water (approximately 3 full water tower's capacity - or 46.7 gallons per minute) to have moved through the house in only 9 days for the following reasons: (1) the Hersey water meter in the house has a maximum capacity of 15 gallons per minute, (2) the Hersey water meter itself was damaged by the frozen pipes and several parts had to be replaced, so it cannot be relied upon for accuracy, (3) the water level in the basement never reached more than ½" deep. The only path for water to leave was via a drain in the basement floor connected to a grinder pump. The grinder

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pump has a maximum capacity of 10 gallons per minute *Please see "Detailed Facts and Information" and Exhibits for more specific details.*

What the Commission can do about this complaint:

It is obvious that some amount of water did flow through the house from Feb 21st – Mar 2nd. However, because of the damaged water meter, no one can know for certainty the exact amount. The best anyone can do is use reasonable engineering judgment based on the facts. If the amount of the leak somehow managed to match exactly the maximum capacity of the grinder pump, then the maximum the volume of water could have been is 138,000 gallons. With that in mind, I recommend that the Commission rule to have Mohawk Utilities charge me for half of the maximum possible amount, or 69,000 gallons (138,000 gallons/2), which at \$0.008851/gallon equates to \$610.75 (crediting \$5,133.31: \$5,744.06 - \$610.75).

Detailed Facts and Information:

- 1) The water leak only ran for 9.6 days – from Feb 21st – 2pm on Mar 2nd. This converts to a maximum possible time of 13,800 minutes (9 days x 24 x 60 plus 14 hours x 60). (The power was out until Feb 21st and leak was discovered on Mar 2nd – *see attached report from Carroll Electric- Exhibit A*)
- 2) The water level in the basement never reached more than 1/2" – *see picture taken immediately after water leak discovered – Exhibit B.*
- 3) The Mueller Systems Hersey Meter 430 5/8 water meter has a maximum capacity of 15 gallons per minute (*see attached data sheet – Exhibit C*), which translates into a max possible water flow of 207,000 gallons (13,800m x 15gpm).
- 4) The only possible path for water to leave the basement is through a drain connected to a grinder pump. There was absolutely no sign of water exiting the house (I have pictures to verify). The maximum capacity for the grinder pump is 10 gpm – the pump operates at 80 ft of head (*see attached 2HP Grinder Pump spec sheet – Exhibit D*). This translates into a max possible water flow of 138,000 gallons (13,800m x 10gpm).
- 5) The water meter plate itself was damaged during the freezing conditions and required three attempts to get a working replacement. Therefore, the meter reading cannot be assumed to be accurate.

Sincerely,



James F. Dagley

BS, Mechanical Engineering & Material Science

Duke University, '89

Cell: 330-352-5734

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EXHIBIT A

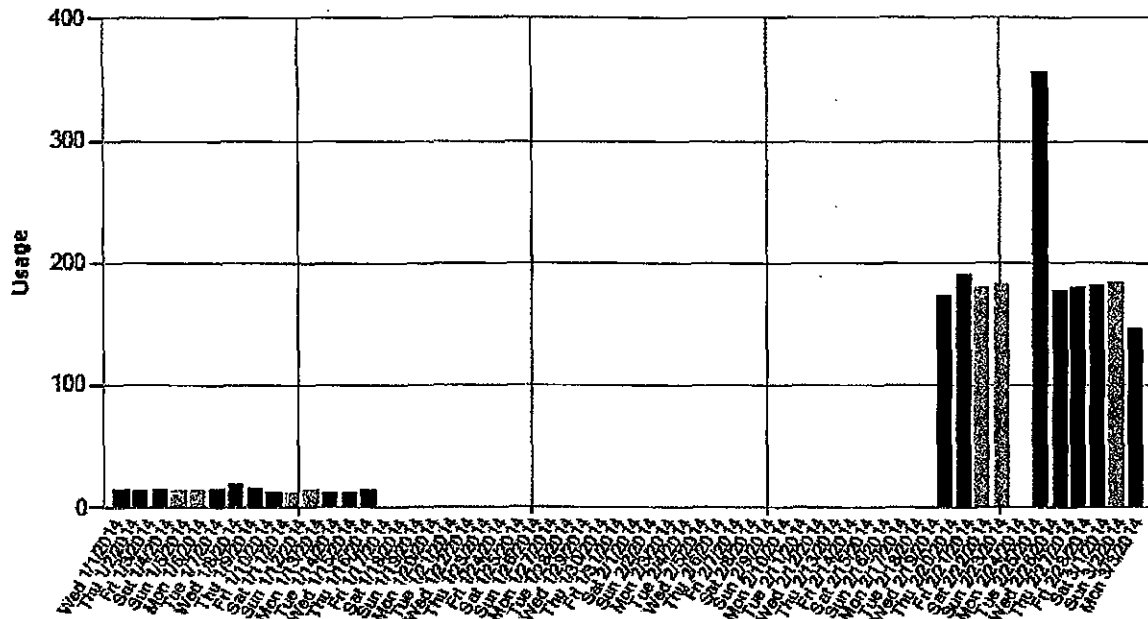
Service History for Meter # 52307232

Page 1 of 2

Account Information

Account Number	1564701	Recent Meter Read	44408
Service Location	00000445000102	Date of Recent Usage	3/3/2014
Customer ID		Date Range	1/1/2014 to 3/5/2014
Billing Cycle	Mohawk	Average Usage During This Period (kWh)	34.0
Grid Location		Average Usage 30 Days Prior to Date Range (kWh)	12.0
Meter Number	52307232	Average Usage During This Period Prior Year (kWh)	11.9
Address			

Usage Information



Date	Meter Reading	Usage (kWh)	Maximum Demand (kW)	Maximum Demand Time
1/1/2014 10:40 AM	42087	15	5.2344	1:28 AM
1/2/2014 1:53 PM	42100	13	5.1094	5:11 AM
1/3/2014 5:05 PM	42115	15	5.4063	6:53 PM
1/4/2014 8:20 PM	42130	15	5.4688	1:23 PM
1/5/2014 11:32 PM	42144	14	5.0938	2:50 AM
1/7/2014 2:47 AM	42159	15	6.1875	10:50 PM
1/8/2014 5:58 AM	42177	18	6.1094	3:16 AM
1/9/2014 9:11 AM	42193	16	5.5156	5:14 PM
1/10/2014 12:25 PM	42205	12	4.7344	8:28 PM
1/11/2014 3:33 PM	42217	12	4.9375	12:06 PM
1/12/2014 6:51 PM	42231	14	5.1719	2:09 AM
1/13/2014 10:06 PM	42243	12	5.1719	5:09 AM
1/15/2014 1:20 AM	42255	12	5.2188	8:23 AM
1/16/2014 4:33 AM	42269	14	4.9688	1:36 AM
2/19/2014 5:56 PM	42637	173	6.8594	5:29 PM
2/20/2014 9:03 PM	42827	190	7.6875	3:06 AM
2/22/2014 12:21 AM	43006	179	7.1094	3:39 AM
2/23/2014 3:35 AM	43188	182	7.1094	4:38 PM
2/25/2014 10:01 AM	43543	355	7.3281	5:49 AM
2/26/2014 1:16 PM	43720	177	7.7344	11:34 PM
2/27/2014 4:30 PM	43899	179	7.7656	3:03 AM
2/28/2014 7:43 PM	44080	181	7.8438	3:01 AM
3/1/2014 10:56 PM	44263	183	7.5469	1:44 AM

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<https://carroll.commandcentermsp.com/servicehistory.aspx?meterId=12352&start=1/1/2014...> 3/5/2014

Date	Meter Reading	Usage (kWh)	Maximum Demand (kW)	Maximum Demand Time
3/3/2014 2:10 AM	44408	145	7.7969	9:58 AM
Grand Total		2141		



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Exhibit B – Copy of the Water Bill from Mohawk Utilities



This is a picture of the water level in the basement. As confirmed in this picture and by water marks on the furniture, the water level was never higher than $\frac{1}{2}$ ". If over 46 gallons per minute were flowing in the house, the water level would have quickly reached the ceiling.

Mueller SYSTEMS**400 Series IIS**

Magnetic Drive Positive Displacement Disc Meters

Sizes 5/8" - 3/4" - 1"

400 Series IIS

Meter Registration

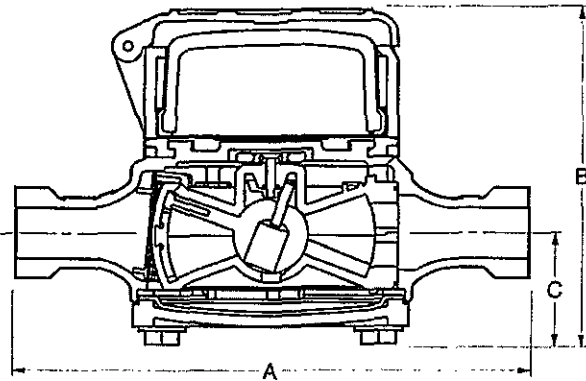
Meter Size	Initial Dial*	Capacity	Initial Dial*	Capacity
5/8"	10 Gallons	10 Million	1 Cubic Feet	1 Million
3/4"	10 Gallons	10 Million	1 Cubic Feet	1 Million
1"	10 Gallons	10 Million	1 Cubic Feet	1 Million

*Registration equal to one full revolution of the sweep hand.

Flow Characteristics

Meter Size	Typical Low Flow (95% Minimum)	Typical Operating Range (100% \pm 1.5%)	Maximum Continuous Operation
5/8"	1/4 GPM	1/2 to 25 GPM	15 GPM
3/4"	1/2 GPM	3/4 to 35 GPM	25 GPM
1"	3/4 GPM	2 to 50 GPM	35 GPM

NOTE: Performance curves are typical only and NOT a guarantee of performance.

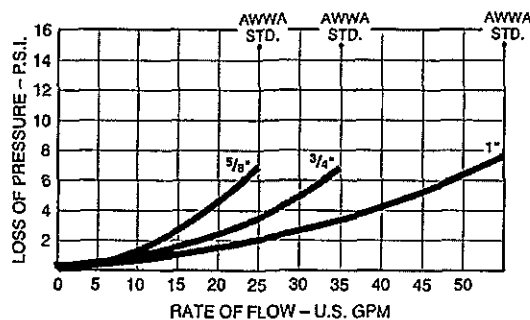
Dimensions and Weights

Meter Size	5/8"	3/4"	3/4" Short	3/4" x 1"	1"
Ends External (NPSM) straight pipe threads					
Model	430	442	442	442	452
Dimensions					
A	7-1/2"	9"	7-1/2"	9"	10-3/4"
B	4-15/16"	5-11/16"	5-11/16"	5-11/16"	6-5/8"
C	1-5/8"	1-15/16"	1-15/16"	1-15/16"	2-1/8"
Width	4.25"	6.39"	6.39"	6.39"	7.22"
inlet & outlet	1/2" or 3/4"	3/4"	3/4"	1"	1"
Net weight	4-1/2	8-1/2	8	9	11

Performance

HEAD LOSS - 5/8", 3/4" AND 1"

(Figure 1)

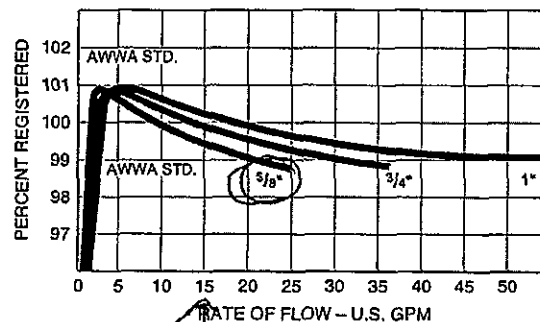


NOTE: Performance curves are typical only and NOT a guarantee of performance.

Performance

ACCURACY - 5/8", 3/4", AND 1"

(Figure 2)

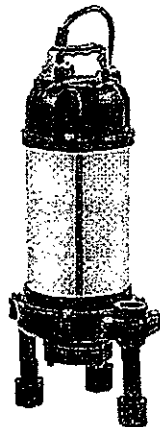


4/23/2014

DAYTON Grinder Pump, 2 HP, 230 Volts, 11 Amps, SS - Grinder Pumps - 11A345| 11A345 - Grainger Industrial Supply

GRAINGER

FOR THE QUES WHO GET IT DONE



Grinder Pump, 2 HP, 230 Volts, 11 Amps, SS

DAYTON

Price: \$1,306.00 / each

Typically in Stock

☐ Add Repair & Replacement Coverage for \$199.00 each.

Item # 11A345

Mfr. Model # 11A345

UNSPSC # 40151517

Catalog Page # 3679

Shipping Weight 81.05

lbs.

Country of Origin Taiwan Country of Origin is subject to change.

Repair Parts Available for this item

click to chat

Technical Specs

Item	Grinder Pump	Max. Dia. Solids (in.)	0.12
Type	Submersible	RPM	2900
HP	2	Motor Type	1-Phase
Voltage	230	Bearing Type	Upper and Lower Ball
Amps	11	Impeller Material	Ductile Iron
Height (in.)	21.23	Base Material	Cast Iron
Dia. (in.)	9.31	GPM of Water @ 10 Ft. of Head	42
Cord Length (ft.)	16.4	GPM of Water @ 15 Ft. of Head	41
Discharge NPT (in.)	1-1/4	GPM of Water @ 25 Ft. of Head	41
Shaft Seal	CRB/CMC/SS/ST	GPM of Water @ 30 Ft. of Head	38
GPM of Water @ 5 Ft. of Head	42	GPM of Water @ 40 Ft. of Head	38
GPM of Water @ 20 Ft. of Head	40	GPM of Water @ 60 Ft. of Head	25
GPM of Water @ 50 Ft. of Head	33	GPM of Water @ 90 Ft. of Head	5
GPM of Water @ 70 Ft. of Head	16	Shaft Material	410 SS
GPM of Water @ 80 Ft. of Head	10	Thermal Protection	Yes
Max. Head (ft.)	98	Standards	CSA C105
Max. Temp. (F)	104 F	Includes	Chrome Steel Cutter and Cutter Ring
Phase	1		

Compliance and Restrictions

None

Documentation

11A345 Technical Data Sheet

Repair Parts

Displaying repair parts for model: 11A345

2 Parts Available

Mfr. Part#	Part Description	Brand	Item#	Availability	Price	Qty
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http://www.grainger.com/product/DAYTON-Grinder-Pump-11A345?s_pp=false

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Exhibit E – Copy of the Water Bill from Mohawk Utilities

MOHAWK UTILITIES, INC.
P.O. BOX 566 • MALVERN, OH 44644
330-863-0613
1-800-330-0613
OFFICE HOURS: 8:00A M. - 4:30 P.M. (M-F)

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
CARROLLTON OH 44615
PERMIT NO. 202

TYPE OF SERVICE	METER READING		VOLUME USED	CHARGE
	PRESENT	PREVIOUS		
Water	1065500	420400	645,100	\$5,710.24
Adjustments				33.30
SUPPLEMENTAL WATER				0.52

DATE OF SERVICE
2/1 - 3/1

STANDARD
445

NOTE
 445 - Assumption For 1000
 447 - Estimate
 1000 - Meter
 44 - Each of these

3/25/2014

PAID TO THE CITY BY DATE
5,744.06

3/4/14

PAID TO THE CITY BY DATE
287.20

PAID TO THE CITY BY DATE
5,744.06

PAID TO THE CITY BY DATE
287.20

DAULEY, JAMES & ELIZABH
 6525 WESTPOINTE DR.
 MARIETTA OH 44236