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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio American Water)
Company for Authority to Increase its Rates For Water and) Case No. 03-2390-WS-AIR
Sewer Service Provided to its Entire Service Area)

In the Matter of the Application of Ohio American Water)
Company for Approval of Accounting Changes with Respect) Case No. 04-339-WW-AAM
to Deferral of Security Costs Incurred in the Wake of)
September 11, 2001)

OHIO AMERICAN WATER COMPANY'S
MOTION TO STRIKE
THE JOINT OBJECTIONS OF THE CITIES OF TIFFIN AND MARION

Pursuant to Ohio Administrative Code ("OAC") Rule 4901-1-28(B) and the Attorney
Examiner's Entry dated October 8, 2004, Ohio American Water Company ("Ohio American")
hereby moves to strike certain of the Joint Objections to the Staff Report of the Cities of Tiffin and
Marion ("Cities") filed with the Public Utilities Commission of Ohio ("Commission") on November
1, 2004, for the reasons set forth in the attached Memorandum in Support.

MEMORANDUM IN SUPPORT

Paragraph 6 of the Joint Objections states:

Cities object to Staff's recommendation that the Reconnection Charge
be increased from \$31.50 for Ohio-American service districts and
\$10.00 for Former Citizens Utilities ("FCU") district to \$39.00.
(citation omitted) This increase of \$7.50 or 23.8% for Ohio-
American and \$29.00 or 290% for FCU is not being requested by the
Company.

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The portion of this objection pertaining to the FCU should be stricken, as the Cities lack the requisite standing to advocate this portion of their objection. The Cities do not represent either the customers of the FCU systems, or the governmental entities within whose jurisdiction the FCU systems reside. Further, irrespective of the fact that the Cities and their constituents are not directly affected by the FCU Reconnection Charge, the Staff's proposed modification to the FCU Reconnection Charge can only indirectly serve to ensure that Cities and their constituents do not subsidize the cost of customer reconnection on the FCU systems. Thus, The Staff's proposed change to the FCU Reconnection Charge cannot even adversely impact indirectly the interests of the Cities and their constituents. Longstanding Commission precedent dictates that this portion of the Cities' Joint Objections be stricken. See, *In the Matter of the Investigation Into the Perry Nuclear Power Station*, *In the Matter of the Investigation into the Beaver Valley Nuclear Power Station*, 85-521-EL-COI, (Phase II); 87-1777-EL-COI, Opinion and Order, March 7, 1989, p. 8; 1989 Ohio PUC LEXIS 196, p. 3.; *In the Matter of the Application of Columbia Gas of Ohio, Inc. for an Increase in the Rates To Be Charged and Collected for Gas Service in the Village of New Boston, Ohio*; *In the Matter of the Application of Columbia Gas Company of Ohio, Inc. for an Increase in the Rates To Be Charged and Collected for Gas Service in the Village of South Point, Ohio*; *In the Matter of the Application of Columbia Gas of Ohio, Inc. for an Increase in the Rate To Be Charged and Collected for Gas Service in the City of Port Clinton, Ohio*, 82-191-GA-AIR; 82-206-GA-AIR; 82-234-GA-AIR, Opinion and Order, February 9, 1983, pp. 5-6; 1983 Ohio PUC LEXIS 90, p. 2.

For the reasons discussed above, Ohio American respectfully requests the Commission to strike the portion of the Cities' objections to the Staff Report relative to the FCU Reconnection Charge.

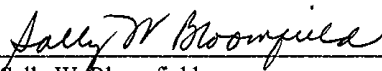
Respectfully submitted on behalf of
OHIO AMERICAN WATER COMPANY



Sally W. Bloomfield
Thomas J. O'Brien
Amy S. Bartemes
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
(614) 227-2300
FAX: (614) 227-2390

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the MOTION TO STRIKE was served by regular
U.S. Mail this 8th day of November, 2004.


Sally W. Bloomfield

Ann Hotz, Esq.
Office of Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215

Lisa McAlister, Esq.
Samuel C. Randazzo, Esq.
McNees Wallace & Nurick
Fifth Third Center
21 East State Street, 17th Floor
Columbus, OH 43215-4228