

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Christi	:	
Water Inc. for an Increase in Rates	:	Case No. 24-798-WW-AIR

PREFILED TESTIMONY
OF

ANNIE BAAS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO
RATES AND ANALYSIS DEPARTMENT
REGULATORY UTILITY SERVICES DIVISION

STAFF EX. ____

May 14, 2025

1 1. Q. Please state your name and business address.

2 A. My name is Annie Baas. My business address is 180 East Broad Street,
3 Columbus, Ohio 43215.
4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission).
8

9 3. Q. What is your current position with the PUCO?

10 A. My current position is a Public Utility Administrator in the Regulatory
11 Utility Services Division of the Rates and Analysis Department.
12

13 4. Q. Would you briefly state your professional and educational background?

14 A. I earned an Associate of Science in Accounting from Columbus State
15 Community College and a Bachelor of Science in Accounting from
16 Franklin University. I joined the PUCO in May of 2016 in the Rates and
17 Analysis Department. I have also attended various rate case training
18 programs sponsored by this Commission.
19
20

1 5. Q. Have you testified in previous cases before the PUCO?

2 A. Yes, I previously testified in Case Nos. 21-887-EL-AIR, 23-301-EL-SSO,
3 and 23-894-GA-AIR.

4
5 6. Q. What is the purpose of your testimony in this case?

6 A. The purpose of my testimony is to support the Joint Stipulation and
7 Recommendation (“Stipulation”) filed in this case on May 14, 2025. The
8 Stipulation seeks to resolve all issues in this rate case proceeding. My
9 testimony demonstrates that the Stipulation is reasonable and should be
10 adopted without modification because it passes the Commission’s three-part
11 test for evaluating stipulations.

12
13 7. Q. What is the Commission’s three-part test for evaluating stipulations?

14 A. In considering the reasonableness of a stipulation, the Commission uses the
15 following criteria: (1) Is the stipulation the product of serious bargaining
16 among capable, knowledgeable parties? (2) Does the stipulation, as a
17 package, benefit ratepayers and the public interest? (3) Does the stipulation
18 violate any important regulatory principles or practices?

19
20 8. Q. Is the Stipulation the product of serious bargaining among capable and
21 knowledgeable parties?

1 A. Yes. The Stipulation was the product of serious negotiations among Christi
2 Water System Inc. (“Christi” or “Company”), PUCO Staff (“Staff”), and
3 Ohio Consumers’ Counsel (“OCC”), all of whom are capable and
4 knowledgeable parties.

5 The Signatory Parties are Staff and Christi.

6 The Stipulation was seriously negotiated through settlement meetings in
7 which all parties were invited to participate, as well as through email
8 communications among parties. Through these various channels, parties
9 had many opportunities to share their perspectives, ask questions, advocate
10 on behalf of their positions, and engage in productive discussions about
11 issues. No party was excluded from settlement negotiations or
12 communications, and all parties’ positions were carefully considered in
13 reaching the final Stipulation.

14
15 9. Q. Does the Stipulation, as a package, benefit ratepayers and the public
16 interest?

17 A. Yes. Adoption of the Stipulation in its entirety and without modification
18 would benefit ratepayers and public interest. The following are some of the
19 key benefits under the Stipulation.

20
21 At section E, the Stipulation provides requirements regarding Christi’s
22 customer service compliance. These requirements will provide benefits to

1 ratepayers such as ensuring all customers are on the correct billing format
2 to streamline billing, reduce printing and mailing costs, and enhance
3 customer understanding, lowering billing disputes and associated costs.
4 Section E also requires updates to all customer notices and revises policies.
5 These updates and revisions will prioritize clarity and minimize customer
6 confusion, thereby reducing future service inquiries and administrative
7 overhead, and balance customer protection with efficient debt recovery to
8 reduce uncollectible accounts and improve revenue collection. Finally,
9 Section E requires the Company to develop and implement a tampering
10 response plan which can deter tampering, protect infrastructure
11 investments, and minimize revenue losses.

12
13 At section F, the Stipulation lays out a plan for how the Company will start
14 the process of replacing meters. This plan will accelerate the pace at which
15 outdated and inefficient meters are replaced, prioritizing the most outdated
16 or inaccurate meters first for replacement. Further, the Stipulation requires
17 the Company to provide Signatory Parties with quarterly updates, including
18 documentation detailing the progress of meter replacements. The
19 Stipulation also requires Christi to obtain multiple estimates for meter
20 replacement, allowing the Company to select a cost-effective approach,
21 which ultimately benefits ratepayers.

1 At section G, the Stipulation will also assist in monitoring the amount of
2 unaccounted-for water within the Company's system. By requiring Christi
3 to provide Signatory Parties with quarterly water volume reports, the
4 Signatory Parties will be able to track progress on reducing unaccounted-
5 for water. The Stipulation's requirement for Christi to provide annual usage
6 data at a meter level will enable Christi to target areas for necessary
7 infrastructure improvements.
8

9 10. Q. Does the Stipulation violate important regulatory principles and practices?

10 A. No. To the contrary, the Stipulation supports important regulatory policies
11 and principles, including the facilitation of just and reasonable rates, and
12 the promotion of investments in the utility's system designed to provide
13 safe and reliable service to customers.
14

15 11. Q. Does this conclude your testimony?

16 A. Yes. However, I reserve the right to submit supplemental testimony as new
17 information subsequently becomes available or in response to positions
18 taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Annie Baas** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 14th day of May 2025.

/s/ Thomas Lindgren

Thomas Lindgren

Assistant Attorney General

Parties of Record:

kent@bci-tax.com

Donald.kral@occ.ohio.gov

John.steinhardt@occ.ohio.gov

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/14/2025 4:40:08 PM

in

Case No(s). 24-0798-WW-AIR

Summary: Testimony Prefiled Tesimony of Annie Baas Submitted on Behalf of the Staff of the Public Utilities Commission of Ohio, Rates and Analysis Department electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO.