

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Christi Water System, Inc. for an	)	Case No. 24-798-WW-AIR
Increase in Rates and Charges	)	

**DIRECT TESTIMONY  
OF  
ANDREW R. TINKHAM**

**On Behalf of**

**Office of the Ohio Consumers' Counsel**  
*65 East State Street, Suite 700*  
*Columbus, Ohio 43215*

**May 14, 2025**

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## **LIST OF ATTACHMENTS**

Attachment ART-1	List of testimony submitted in previous cases.
Attachment ART-2	Christi Water Invoices from the City of Defiance, produced in response to OCC Request for Production RPD-OCC-03-001.

**I. INTRODUCTION**

***Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

***A1.*** My name is Andrew R. Tinkham. My business address is 65 East State Street, Suite 700, Columbus, Ohio 43215. I am a Utility Consumer Program Specialist with the Office of the Ohio Consumers' Counsel ("OCC").

***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.***

***A2.*** I am a 1996 graduate of Otterbein University (formally Otterbein College), in Westerville, Ohio, with a Bachelor of Arts degree in History. My professional experience includes six years in the telecom industry and 19 years of utility regulatory experience with OCC.

After joining OCC in 2002, I initially served as a Compliance Investigator. My duties included researching and resolving residential consumers' hotline inquiries and complaints involving Ohio regulated utilities. In 2006, I became a Senior Outreach and Education Specialist. My role included providing public presentations on utility assistance programs, energy choice, and consumers' rights. I also educated local agencies and organizations on utility rules.

After a brief period away starting in July 2011, I rejoined the OCC in May 2014 as a senior outreach and education specialist. My duties were similar to my role as

1 an outreach and education specialist. In 2022, I was promoted to my current  
2 position as a Utility Consumer Program Specialist.

3  
4 ***Q3. WHAT ARE YOUR RESPONSIBILITIES AS A UTILITY CONSUMER***  
5 ***PROGRAM SPECIALIST?***

6  
7 ***A3.*** As a Utility Consumer Program Specialist, I provide policy recommendations in  
8 cases and various rulemaking proceedings at the PUCO and the Ohio Department  
9 of Development. Those policy issues involve advocacy for consumer protections,  
10 affordability of utility rates, and reasonable access to essential utility services for  
11 residential consumers. Also, I represent the OCC on the Public Benefits Advisory  
12 Board ("PBAB").

13  
14 ***Q4. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***  
15 ***BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO?***

16  
17 ***A4.*** Yes. Please see Attachment ART-1 listing all the testimonies I have provided  
18 before the PUCO.

19  
20 ***II. PURPOSE/RECOMMENDATIONS***

21  
22 ***Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY?***

23 ***A5.*** I support OCC Objections Nos. 1 through 9 to the PUCO Staff Report of  
24 Investigation ("Staff Report") in this proceeding.



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1       Objection No. 1: The Staff Report erred and harmed consumers by proposing a  
2       range for the rate of return rather than selecting the lowest number within that  
3       range resulting in a rate of return that is higher than what is just and reasonable  
4       under R.C. 4905.22, 4909.15, 4909.154, 4909.17, and 4909.18.

5  
6       Objection No. 2: The Staff Report erred and harmed consumers by proposing a  
7       revenue requirement and proposed rates that are based upon hypothetical water  
8       purchase amounts that are inconsistent with Christi Water Company's ("Christi")  
9       sales figures and reported sales volumes. The Staff Report would result in  
10      consumers paying unjust, unreasonable, and unlawful rates under R.C. 4905.22,  
11      4909.15, 4909.154, 4909.17, and 4909.18.

12  
13      Objection No. 3: The Staff Report erred and harmed consumers by not requiring  
14      Christi , which has between a 30% and 48% unaccounted for water loss  
15      percentage, to establish a water loss remedial program in accordance with O.A.C.  
16      4901:1-15-20(5)(c)(i).

17  
18      Objection No. 4: The Staff Report erred and harmed consumers by not requiring  
19      Christi, which has more than a 30% unaccounted-for water loss percentage, to  
20      establish an economic level leakage and water loss remedial program in  
21      accordance with O.A. C. 4901:1-15-20(5)(c)(ii).

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1       Objection No. 5: The Staff Report erred and harmed consumers by not requiring  
2       Christi to establish an effective water loss control program meeting the minimum  
3       criteria outlined in O.A.C. 4901:1-15-20(C)(5), which is needed for consumer  
4       protection.

5  
6       Objection No. 6: The Staff Report erred and harmed consumers by not requiring  
7       Christi to address and resolve the PUCO Staff's concerns with Christi's lack of  
8       timely meter reads, deposit issues, financial responsibility issues, establishment of  
9       payment plans for consumers using medical certifications, and the need for Christi  
10      to update their tariff to reflect the current bill format.

11  
12      Objection No. 7: The Staff Report erred and harmed consumers by not requiring  
13      Christi to develop and implement plans required by the O.A.C. that would reverse  
14      the overall system degradation, where Christi has admitted that it has no program  
15      for infrastructure replacement and has unaccounted for water loss between 31%  
16      and 48%.

17  
18      Objection No. 8: The Staff Report erred and harmed consumers by not setting  
19      forth a mandatory time frame for Christi to implement the requirements adopted  
20      by the PUCO in its Finding and Order dated September 23, 2021, in Case No. 20-  
21      1428-WW-AIR, where the PUCO directed that Christi evaluate the accuracy and

location of existing meters, install new meters where needed, and replace meters that have exceeded their useful life.<sup>1</sup>

Objection No. 9: The Staff Report erred and harms consumers by failing to address concerns raised by affordability issues in violation of R.C. 4928.02(A) and (L), including a review and report on Christi's disconnection policies and budget billing options provided by Christi.

***Q6. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.***

***A6.*** Based on my review and analysis as discussed below, I recommend that the PUCO take the following action:

- I recommend the PUCO order 1) a Water Loss Study be completed, to determine the cause of Christi's excessive lost water issue and 2) necessary repairs as determined by that Study be completed within no more than 6 months of the PUCO's Opinion and Order in this matter.
- I recommend that the PUCO reject the PUCO Staff's proposed revenue requirement. I recommend that the PUCO mitigate a rate increase to Christi consumers by approving Staff's suggested fixed charged increase of \$6.73 (19.8%) and Christi's suggested volumetric charge increase of \$0.012583 (9.49%), or by rejecting Christi's application outright.

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<sup>1</sup> *In the Matter of the Application of Christi Water System, Inc. for An Increase in Rates and Charges*, Case No. 20-1428-WW-AIR, Finding and Order (Sept. 23, 2021) at 6.

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- 1       •       I recommend that the PUCO requires Christi to set the rate of return on the  
2               lowest end of the PUCO Staff's proposed range or the rate of return  
3               equivalent to the company's revenue request, whichever is lower.
- 4       •       I recommend that the PUCO consider affordability when considering  
5               Christi's proposed rate increase.
- 6       •       I recommend that the PUCO require Christi to abide by the water loss  
7               rules outlined in O.A.C. 4901:1-15-20(C).
- 8       •       I recommend that the PUCO require Christi to develop and implement a  
9               plan to reverse the overall system degradation as part of the remedial  
10              program.
- 11      •       I recommend that the PUCO require Christi to adhere to the PUCO Staff's  
12              recommendations that were made in the May 2021 Customer Service  
13              Audit, but have not been addressed, along with a mandatory time frame to  
14              comply.
- 15      •       I recommend that the PUCO require Christi to adhere to the PUCO's  
16              recommendations to address metering issues identified in Case No. 20-  
17              1428-WW-AIR, along with a mandatory time frame to comply.

18  
19   **III.   OBJECTION NOS. 1, 2, AND 9.**

20   ***Q7.   PLEASE PREVIEW THIS SECTION.***  
21

22   ***A7.***   This section supports OCC objections 1, 2, and 9 to the Staff Report, which  
23       concern unjust and unreasonable proposed rates. Critically, the PUCO Staff

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1 recommended increasing Christi's proposed revenue requirement, resulting in  
2 higher consumer bills than Christi requested.

3  
4 Now is not the time to approve generally higher rates for Christi's consumers.  
5 Consumers are already struggling with high inflation, rising energy costs, and a  
6 separate, recent water rate hike. Higher rates would significantly undermine  
7 consumers' ability to afford essential water service, forcing difficult choices  
8 between paying for utilities and other basic needs.

9

10 ***Q8. PLEASE EXPLAIN THE REASONS WHY THE PUCO STAFF'S***  
11 ***RECOMMENDATIONS CAUSED CHARGES TO INCREASE TO MOST***  
12 ***CONSUMERS COMPARED TO CHRISTI'S APPLICATION.***

13  
14 ***A8.*** The PUCO Staff lowered the fixed charge for consumers who use 0-50 c.f. of  
15 water and increased the volumetric charge per c.f. used after 50 c.f. of usage.  
16 Christi consumers who average over 350 c.f. will pay more than proposed by  
17 Christi.

18

19 ***Q9. PLEASE EXPLAIN THE DIFFERENCE BETWEEN CHRISTI'S AND THE***  
20 ***PUCO STAFF'S PROPOSED INCREASE.***

21  
22 ***A9.*** The PUCO Staff proposed a lower fixed charge compared to Christi's Application  
23 for any usage up to 50 c.f. But the PUCO Staff proposed a higher volumetric  
24 charge for each c.f. of water used over 50 c.f. Table I provides the proposed  
25 charges from Christi and the PUCO Staff:

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Table I<sup>2</sup>

Usage	Christi	PUCO Staff
0-50 c.f. (Fixed Rate)	\$ 45.43	\$ 41.54
Each c.f. over 50 c.f. (Volumetric Rate)	\$ 0.145153	\$ 0.158197

The PUCO Staff's proposed increase comes at a time when Christi consumers have seen several increases on the water bill since 2021.

***Q10. WHAT OTHER INCREASES HAVE CHRISTI CONSUMERS EXPERIENCED SINCE 2021?***

***A10.*** First, the PUCO approved a charge increase in Case No. 20-1428-WW-AIR.<sup>3</sup> A household who uses 600 c.f. of water a month saw a \$27.99 increase to its monthly water bill, a 37.8% increase.<sup>4</sup>

Christi consumers had their fixed charge for usage up to 50 c.f. increase from \$26.89 to \$34.34 a month, a 27.69% increase.<sup>5</sup> Also, Christi consumers had their volumetric charge increase by 38.13% for each c.f. of water between 51-310 c.f., 48.82% for each c.f. of water between 311-1500 c.f., and 52.50% of usage over 1,500 c.f.<sup>6</sup>

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<sup>2</sup> *Id.* at pages9-10.

<sup>3</sup> *In the Matter of the Application of Christi Water System, Inc. for an Increase in Rates and Charges*, Case No. 20-1428-WW-AIR, Entry (Nov. 3, 2021).

<sup>4</sup> *Id.* at 12.

<sup>5</sup> *Id.* at 12.

<sup>6</sup> *Id.* at 12

1 Second, Christi filed a proposal to increase charges to consumers, in Case No. 24-  
2 232-WW-PWA, due to an increase in water charges from the City of Defiance.  
3 The City of Defiance supplies all the water to Christi for distribution to  
4 consumers. The PUCO approved the increase, which caused consumers' fixed  
5 charge to increase by \$0.47 and consumers' volumetric charge for usage over 50  
6 c.f. to increase to \$0.0095 per c.f. of water.<sup>7</sup>

7  
8 ***Q11. HOW MUCH WOULD A CHRISTI WATER BILL INCREASE AS***  
9 ***PROPOSED BY CHRISTI AND THE PUCO STAFF FOR A CONSUMER***  
10 ***USING 600 C.F. OF WATER?***

11  
12 ***A11.*** Consumers who use 600 c.f. of water would see their bill increase from a current  
13 rate of \$107.72 to \$125.26 under Christi's proposed charge increase.<sup>8</sup> Consumers  
14 using 600 c.f. would pay an additional \$17.54 a month and \$210.48 over a year.

15  
16 Consumers who use 600 c.f. of water would see a bill increase from the current  
17 charge of \$107.72 to \$128.55 under the PUCO Staff's proposal.<sup>9</sup> Consumers  
18 using 600 c.f. of water would see a monthly increase of \$20.82 and a yearly  
19 increase of \$249.84.<sup>10</sup>

20  

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<sup>7</sup> *In the Matter of the Application of Christi Water System, Inc. for a Purchased Water Adjustment to its Rates Under R.C. 4909.171*, Case No. 24-232-WW-PWA, Finding and Order (May 15, 2024).

<sup>8</sup> *In the Matter of the Application of Christi Water System, Inc. for an Increase in Rates and Charges*, Case No. 24-798-WW-AIR, Staff Report of Investigation (March 21, 2025) at 10.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

A Christi consumer using 600 c.f. of water would pay an additional \$3.28 a month and \$39.36 a year under the PUCO Staff's proposal.

**Q12. ARE CONSUMERS FACING HIGH INFLATION ON BASIC GOODS AND SERVICES?**

**A12.** Yes.

**Q13. PLEASE EXPLAIN.**

**A13.** Consumers continue to face rising prices on goods and services to meet basic needs. These basic needs include food, shelter, and transportation. Over the last twelve months, consumers have seen prices for these basic needs increase.<sup>11</sup> Table I provides a percentage increase for the following goods and services over the last twelve months according to the U.S. Bureau of Labor Statistics.<sup>12</sup>

**Table I<sup>13</sup>**

Items	Percent Increase
Food	2.8%
Shelter	4.2%
Transportation Services	6.0%
Medical Care Services	3.0%

To save money on food, consumers will likely eliminate eating out and make meals at home. But consumers are facing significant increases for basic food items at the grocery store. The U.S. Bureau of Labor Statistics "Consumer Price Index Summary" states:

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<sup>11</sup> Bureau of Labor Statistics, U.S. Department of Labor, *CPI for all items rise 0.2% in February; shelter up, gasoline declines* (March 12, 2025), <https://www.bls.gov/news.release/cpi.nr0.htm>.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*



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*The food at home index rose 1.9 percent over the last 12 months. The index for meats, poultry, fish, and eggs rose 7.7 percent over the last 12 months as the index for eggs increased 58.8 percent. The nonalcoholic beverages index increased 2.1 percent over the same period, while the dairy and related products index rose 0.8 percent, and the cereals and bakery products index increased 0.3 percent. The index for other food at home increased 0.1 percent over the year.*<sup>14</sup>

It becomes difficult for consumers to keep up with rising prices on basic needs, especially when the rising prices exceed increases to income. Unfortunately for consumers, that is what they are facing. The average hourly earnings from February 2024 to February 2025 increased by 1.2%.<sup>15</sup> This is obviously much less than the increased charges Christi and the PUCO Staff are recommending. When the cost of basic goods and services outpace income, consumers have less money to afford an increase to critical water service.

***Q14. DO THE PUCO STAFF'S PROPOSED CHARGES VIOLATE OHIO LAW?***

***A14.*** Yes. I am not an attorney, but it is my understanding that R.C. 4905.22, 4909.15, 4909.154, 4909.17, and 4909.18 require a utility's rates to be just and reasonable. The PUCO Staff proposed charge increase is not just or reasonable. Under the PUCO Staff proposal, Christi consumers would pay a higher bill for usage over 350 c.f. than proposed by Christi.

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<sup>14</sup> *Id.*

<sup>15</sup> Bureau of Labor Statistics, U.S. Department of Labor, *Real Earnings Summary* (March 12, 2025), <https://www.bls.gov/news.release/realer.nr0.htm>.

1 ***Q15. WHAT ARE YOUR RECOMMENDATIONS?***

2  
3 ***A15.*** To help consumers, the PUCO should reject the PUCO Staff's proposal to  
4 increase rates on Christi consumers. Consumers are already facing increases on  
5 basic goods and should not be burdened with the higher charges for essential  
6 water service proposed by the PUCO Staff.

7  
8 To keep Christi charges just and reasonable, the PUCO should reject the PUCO  
9 Staff's proposed revenue requirement of \$210,939<sup>16</sup>.

10  
11 Second, the PUCO should require Christi to set the rate of return at the lowest end  
12 of Staff's proposed range, 8.76%, or the rate of return equivalent to the  
13 company's revenue request, whichever is lower..<sup>17</sup> Christi's non-compliance with  
14 PUCO reporting requirements<sup>18</sup> and failure to implement the PUCO's<sup>19</sup>  
15 recommendations in the previous base rate case should not be rewarded with  
16 higher profits.<sup>20</sup> Christi's failures include not following the Uniform System of  
17 Accounts and not implementing the PUCO Staff's recommendations from the  
18 May 2021 Customer Service Audit.<sup>21</sup>

19  

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<sup>16</sup> See Staff Report at Schedule A-1.

<sup>17</sup> Staff Report at 7.

<sup>18</sup> *Id.* at 5 (noting that Christi is "largely non-compliant with PUCO reporting requirements and has not been following the Uniform System of Accounts as required by Ohio Adm. Code 4901:1-15-32(D)(2).")

<sup>19</sup> *Id.* at 11 (stating that "Applicant has not updated notices, bills, and procedures noted in the audit.").

<sup>20</sup> *Id.* at 7

<sup>21</sup> *Id.* at 5 and 11.

1 Third, the PUCO should consider affordability in this case. This is especially so  
2 because Christi consumers have already experienced a recent charge increase (for  
3 base rates and purchased water). Allowing Christi to continue raising its rates and  
4 socializing the cost of its excessive unaccounted for water loss, while failing to  
5 address and resolve its water loss problem, is not cost effective or reasonable.

6  
7 **IV. OBJECTION NOS. 3, 4, AND 5.**

8  
9 ***Q16. PLEASE PREVIEW THIS SECTION.***

10  
11 ***A16.*** This section supports OCC objections 3, 4, and 5 to the Staff Report. It raises  
12 concerns with proposed rates that are unjust and unreasonable. The PUCO Staff  
13 failed to address the high percentage of water loss between the amount purchased  
14 through the City of Defiance and the amount supplied and billed to Christi  
15 consumers. The PUCO should require Christi to comply with water loss rules in  
16 the Ohio Administrative Code.

17  
18  
19 ***Q17. DID THE PUCO STAFF REPORT OR MAKE RECOMMENDATIONS ON***  
20 ***CHRISTI'S WATER LOSS?***

21  
22 ***A17.*** No.

1 **Q18. PLEASE EXPLAIN YOUR ANALYSIS OF CHRISTI'S WATER LOSS.**

2

3 **A18.** In 2023, Christi lost between approximately 31% to 48% of the water purchased  
4 from the City of Defiance. Christi purchased 1,286,867<sup>22</sup> c.f. of water from the  
5 City of Defiance in 2023. But the 2023 test year shows Christi only charged their  
6 consumers for 887,980<sup>23</sup> c.f., an approximately 31% water loss. Also, Christi  
7 reported that it sold 1,702,050 c.f. of water in 2023.<sup>24</sup> If Christi sold 1,702,050,  
8 but only billed for 887,980 c.f., then Christi lost 48% of its water.

9

10 **Q19. DID THE PUCO STAFF FAIL TO ADDRESS THE WATER LOSS IN THE**  
11 **STAFF REPORT?**

12

13 **A19.** Yes

14

15 **Q20. PLEASE EXPLAIN.**

16

17 **A20.** The PUCO Staff should have recommended that Christi abide by the rules in  
18 O.A.C. 4901:1-15-20(C)(5)(c) that addresses how a small water company should  
19 handle water loss above fifteen percent. To minimize water loss that becomes  
20 costly to Christi consumers, the PUCO should have recommended for consumer  
21 protection that Christi implement the following as outlined in O.A.C. 4901:1-15-  
22 20(C)(5)(c):

23 (c) When the water loss percentage is greater than fifteen  
24 per cent, the water company shall:

25 (i) Determine the economic level leakage and  
26 develop a water loss remedial program based on the

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<sup>22</sup> See Attachment ART-2.

<sup>23</sup> Staff Rate Design WP12 Monthly Average.

<sup>24</sup> PUCO-DR-7 Explanation of Rates Spreadsheet.

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1 economic level leakage to achieve a water loss  
2 equal to or less than fifteen per cent or shall justify  
3 for staff's approval a more economically realistic  
4 goal based on a cost/benefit analysis.  
5

6 (ii) Determine the economic level leakage and  
7 develop a water loss remedial program based on the  
8 economic level leakage to achieve a specific water  
9 loss volume per connection per day per psi for  
10 staff's review and approval.<sup>25</sup>  
11

12 It is important for the PUCO to require Christi to establish a remedial water loss  
13 program to reduce the amount of lost water, which is costly to consumers.  
14

15 ***Q21. WHAT IS YOUR RECOMMENDATION?***  
16

17 ***A21.*** Unaccounted for purchased water is costly to consumers. Christi should be  
18 required to address its continuing unaccounted-for water loss problem. A utility  
19 that purchases significant quantities of water, which it does not actually sell to its  
20 customers, is simply running up unreasonable and unnecessary charges, which  
21 will ultimately be passed on to consumers. Especially in a situation where the  
22 utility has provided no evidence that such excessive water purchases are  
23 necessary to reasonably serve its consumers.  
24

25 The PUCO should require Christi to abide by the rules in O.A.C. 4901:1-15-20(C)  
26 that address water loss. First, the PUCO should require Christi to determine the  
27 economic level leakage and develop a remedial program to achieve a water loss at  
28 15% or less. Second, the PUCO should require Christi to determine the economic

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<sup>25</sup> O.A.C. 4901:1-15-20(C)(5)(c).

1 level leakage and develop a remedial program based on the economic level  
2 leakage to achieve a specific water loss per connection, per day, per psi. Due to  
3 the high percentage of water loss, Christi should file biannual reports on how the  
4 remedial program is reducing water loss.

5

6 **V. OBJECTION NOS. 6, 7, AND 8.**

7

8 ***Q22. PLEASE PREVIEW THIS SECTION.***

9

10 **A22.** This section supports OCC objections 6, 7, and 8. The objections relate to the  
11 PUCO Staff's failure to require Christi to address and resolve issues previously  
12 identified by the PUCO Staff. Christi failed to implement the PUCO Staff's  
13 recommendations identified in the May 2021 Customer Service Audit.

14

15

16 ***Q23. PLEASE EXPLAIN CONCERNS RAISED IN THE MAY 2021 PUCO STAFF***  
17 ***CUSTOMER SERVICE AUDIT.***

18

19 **A23.** In the PUCO Staff Report, the PUCO Staff identified issues that Christi did not  
20 address that were identified for probable non-compliance in the May 2021  
21 Customer Service Audit.<sup>26</sup>The Staff Report stated:

22

23

24

25

26

27

28

Staff identified a lack of timely meter reads, deposit concerns, and financial responsibility concerns. Staff also recommended that the Applicant add estimated outage duration to their planned outage notice, set up payment plans for customers using medical certifications, and that the Applicant should update their tariff to reflect the current bill format.<sup>27</sup>

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<sup>26</sup> Staff Report at 11.

<sup>27</sup> *Id.*

1 Even though Christi had approximately four years to correct these issues, the  
2 PUCO Staff states Christi has not updated “notices, bills, and procedures noted in  
3 the audit.”<sup>28</sup> To resolve any remaining issues, the PUCO Staff recommended  
4 working with Christi to make sure Christi’s billing and customer standards come  
5 into compliance.<sup>29</sup>

6  
7 ***Q24. PLEASE EXPLAIN THE FACILITIES REVIEW RECOMMENDATION?***

8  
9 ***A24.*** To control lost revenue due to inaccurate or absent meters, the PUCO Staff  
10 recommended that Christi evaluate the accuracy and location of existing meters.<sup>30</sup>  
11 As part of the evaluation, the PUCO Staff recommended replacing meters that  
12 have reached their useful life and install new meters where needed.<sup>31</sup>

13  
14 The PUCO Staff raised similar concerns in Christi’s previous rate case. In Case  
15 No.20-1428-WW-AIR, the Staff Report stated:

16 Inaccurate or absent meters result in a loss of  
17 revenue. As such, Staff recommends the Company  
18 evaluate the accuracy and location of existing  
19 meters, install new meters where needed and  
20 replace those that have exceeded their useful life.<sup>32</sup>  
21

22  

---

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* at 12.

<sup>31</sup> *Id.*

<sup>32</sup> *In the Matter of the Application of Christi Water System, Inc. for An Increase in Rates and Charges*, Case No. 20-1428-WW-AIR, Staff Report (April 7, 2021) at 17.

1 **Q25. WHAT ARE YOUR CONCERNS WITH CHRISTI NOT ADHERING TO THE**  
2 **PUCO'S RECOMMENDATION?**

3  
4 **A25.** I am concerned Christi's failure to evaluate the accuracy of existing meters, install  
5 new meters where needed, and replace meters past their useful life may be related  
6 to a high percentage of water loss. Water loss is the difference between the  
7 amount of water Christi purchases from the City of Defiance and the amount  
8 billed to all Christi water consumers.

9  
10 As I mentioned earlier, Christi's unaccounted water loss is between 31% and  
11 48%,<sup>33</sup> which is ultimately paid for by Christi's consumers. If Christi had  
12 followed through on the PUCO Staff's recommendations, the water loss  
13 percentage could have been much lower and would be less of a financial burden  
14 to consumers.

15  
16 **Q26. WHAT ARE YOUR RECOMMENDATIONS.**

17  
18 **A26.** The PUCO should set mandatory time frames for Christi to adhere to the  
19 recommendations made in the May 2021 Customer Service Audit. Also, the  
20 PUCO should set a mandatory time frame for Christi to address the evaluation of  
21 meters that were outlined in Case No. 20-1428-WW-AIR.<sup>34</sup> Since Christi has  
22 failed to adhere to the May 2021 Customer Service Audit, along with the metering

---

<sup>33</sup> 2023 City Water Bills. Staff Rate Design WP12 Monthly Average. PUCO-DR-7 Explanation of Rates Spreadsheet.

<sup>34</sup> *In the Matter of the Application of Christi Water System, Inc. for An Increase in Rates and Charges*, Case No. 20-1428-WW-AIR, Finding and Order (Sept. 23, 2021) at 6.



1 recommendation, it is imperative that the PUCO set firm dates to adhere to these  
2 recommendations.

3  
4 **VI. RECOMMENDATION SUMMARY**

5  
6 ***Q27. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.***

7 ***A27.*** Based on my review and analysis as discussed above, I recommend that the  
8 PUCO take the following action:

- 9 • I recommend the PUCO order 1.) a Water Loss Study be completed, to  
10 determine the cause of Christi's excessive lost water issue and 2.)  
11 necessary repairs as determined by that Study be completed within no  
12 more than 6 months of the PUCO's Opinion and Order in this matter.
- 13 • I recommend that the PUCO reject the PUCO Staff's proposed revenue  
14 requirement. I recommend that the PUCO mitigate a rate increase to  
15 Christi consumers by approving Staff's suggested fixed charged increase  
16 of \$6.73 (19.8%) and Christi's suggested volumetric charge increase of  
17 \$0.012583 (9.49%), or by rejecting Christi's application outright.
- 18 • I recommend that the PUCO require Christi to set the rate of return on the  
19 lowest end of Staff's proposed range or the rate of return equivalent to the  
20 company's revenue request, whichever is lower.
- 21 • I recommend that the PUCO consider affordability when considering  
22 Christi's proposed rate increase.

- 1       •       I recommend that PUCO require Christi to abide by the water loss rules  
2               outlined in O.A.C. 4901:1-15-20.
- 3       •       I recommend that the PUCO requires Christi to develop and implement a  
4               plan to reverse the overall system degradation as part of the remedial  
5               program.
- 6       •       I recommend that the PUCO requires Christi to adhere to Staff's  
7               recommendations that were made in the May 2021 Customer Service  
8               Audit, but have not been addressed, along with setting a mandatory time  
9               frame to comply.
- 10      •       I recommend that the PUCO requires Christi to adhere to the PUCO's  
11              recommendations to address metering issues identified in case no. 20-  
12              1428-WW-AIR, along with a mandatory time frame to comply.

13  
14   **VII. CONCLUSION**

15  
16   ***Q28. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?***

17   ***A28.*** Yes. However, I reserve the right to incorporate new information that may  
18       subsequently become available.

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Direct Testimony of Andrew R. Tinkham on Behalf of the Office of the Ohio Consumers' Counsel was served on the persons stated below via electronic transmission, this 14<sup>th</sup> day of May 2025.

/s/ John Steinhart

John Steinhart

Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

### **SERVICE LIST**

[kentbeilharz@gmail.com](mailto:kentbeilharz@gmail.com)

[kent@bci-tax.com](mailto:kent@bci-tax.com)

[Thomas.lindgren@ohioago.gov](mailto:Thomas.lindgren@ohioago.gov)

[robert.eubanks@ohioago.gov](mailto:robert.eubanks@ohioago.gov)

[Jay.agranoff@puco.ohio.gov](mailto:Jay.agranoff@puco.ohio.gov)

[Ian.kieffer@puco.ohio.gov](mailto:Ian.kieffer@puco.ohio.gov)

**Testimony of Andrew R. Tinkham**  
**Filed at the Public Utilities Commission of Ohio**

1. *In the Matter of The Commission's Investigation into AES Ohio's Compliance with the Ohio Administrative Code and Potential Remedial Action*, Case No. 21-1220-EL-UNC (May 16, 2024).
2. *In the Matter of the Application for Approval of Tariff Revisions and Carbon Offset Program*, Case No. 22-179-GA-ATA (June 21, 2023).
3. *In the Matter of the Application of Aqua Ohio, Inc to Increase Rates and Charges for its Waterworks Service*, Case No. 22-1094-WW-AIR (August 16, 2023).
4. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer, and Application of Ohio Power Company for Approval of Certain Accounting Authority*, Case No. 23-23-EL-SSO (June 9, 2023) and (September 20, 2023).
5. *In the Matter of the Application of Northeast Ohio Natural Gas Corp. for Increase in Gas Distribution Rates*, Case No. 23-154-GA-AIR (November 3, 2023).
6. *In the Matter of Inspire Energy Holdings, LLC*, Case No. 23-720-GE-UNC (May 10, 2024).
7. *In the Matter of the Application of the East Ohio Gas Company D/B/A Dominion Energy Ohio for Approval to Increase Natural Gas Rates*. Case No. 23-894-GA-AIR (August 9, 2024).
8. In the Matter of the Commission's Investigation into AES's Compliance with the Ohio Administrative Code and Potential Remedial Action, Case No. 24-7-EL-UNC (August, 12, 2024).
9. *In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer Pursuant to Ohio Revised Code Section 4928.143 in the Form of an Electric Security Plan*, Case No. 24-278-EL-SSO (October 30, 2024)
10. *In the Matter of the Application for Authority to Adjust its Distribution Replacement Rider Charges*. Case No. 24-720-GA-RDR (July 23, 2024).
11. *In the Matter of the Application of Ohio Power Company to Initiate its gridSMART Phase 3 DACR Project*. Case No. 24-787-EL-RDR (January 24, 2025).



**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512



209 1 AV 0.498  
BEILHARZ, TERRY 3 16  
200 PERRY ST.  
DEFIANCE OH 43512-2118

NNNNN



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	12/28/2023

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	11/17/2023	12/19/2023	4196979	4307790	110811	5,417.55
WATER READINESS-TO-SERVE	11/17/2023	12/19/2023				1,995.96
<div style="text-align: right;"> <i>31 day CP 1 day</i>  <i>3575</i> </div>						
We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilities">www.cityofdefiance.com/divisions/utilities</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4						BALANCE FORWARD
						CURRENT BILLING
						DUE DATE CURRENT BILLING
						01/12/2024
						AMOUNT DUE
						7,413.51
						AMOUNT AFTER DUE DATE
						\$8,154.86



**CITY OF DEFIANCE**  
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DEFIANCE OHIO 43512



209 1 AV 0.498  
BEILHARZ, TERRY 3 17  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	11/30/2023



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TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	10/23/2023	11/17/2023	4107018	4196979	89961	4,398.19
WATER READINESS-TO-SERVE	10/23/2023	11/17/2023				1,995.96
We accept credit card payments. To pay online go to www.cityofdefiance.com/divisions/utilities at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4						0.00
BALANCE FORWARD						6,394.15
CURRENT BILLING						12/15/2023
DUE DATE CURRENT BILLING						6,394.15
AMOUNT DUE						\$7,033.57
AMOUNT AFTER DUE DATE						





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SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	10/31/2023



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206 1 AV 0.498  
BEILHARZ, TERRY 3 16  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	09/20/2023	10/23/2023	3980251	4107018	126767	6,197.64
WATER READINESS-TO-SERVE	09/20/2023	10/23/2023				1,995.96
We accept credit card payments. To pay online go to www.cityofdefiance.com/divisions/utilites at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4						
BALANCE FORWARD						0.00
CURRENT BILLING						8,193.60
DUE DATE CURRENT BILLING						<b>11/15/2023</b>
AMOUNT DUE						8,193.60
AMOUNT AFTER DUE DATE						\$9,012.96

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

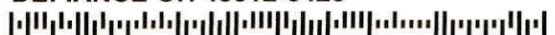
ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	11/15/2023
AMOUNT DUE	<b>8,193.60</b>
AMOUNT AFTER DUE DATE	\$9,012.96

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY

SERVICE ADDRESS: CHRISTY MEADOWS

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UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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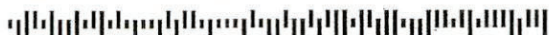


**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	09/29/2023

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207 1 AV 0.498  
BEILHARZ, TERRY 3 16  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	08/21/2023	09/20/2023	3863616	3980251	116635	5,702.29
WATER READINESS-TO-SERVE	08/21/2023	09/20/2023				1,995.96
<p>29 day 4022 / day \$ 66.00 / KCF B .066 / CF</p>						
<p>The Water Division will be conducting its semi-annual water main flushing from October 15 through October 22. The schedule of flushing, including streets and times, is available on the City of Defiance website at <a href="http://www.cityofdefiance.com/water/reports.html">http://www.cityofdefiance.com/water/reports.html</a> To make debit/credit card payments, please go online at <a href="http://www.officialpayments.com">www.officialpayments.com</a> or call 1-800-487-4567, option 4.</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		7,698.25	
			DUE DATE CURRENT BILLING		10/16/2023	
			AMOUNT DUE		7,698.25	
			AMOUNT AFTER DUE DATE		\$8,468.08	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	10/16/2023
AMOUNT DUE	7,698.25
AMOUNT AFTER DUE DATE	\$8,468.08

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

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PO BOX 425  
DEFIANCE OH 43512-0425



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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	08/31/2023

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BEILHARZ, TERRY 317  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	07/21/2023	08/21/2023	3770292	3863616	93324	4,562.61
WATER READINESS-TO-SERVE	07/21/2023	08/21/2023				1,995.96
<p>30 days 3111/day 70321 CF 10703 / CF</p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		6,558.57	
			DUE DATE CURRENT BILLING		09/15/2023	
			AMOUNT DUE		6,558.57	
			AMOUNT AFTER DUE DATE		\$7,214.43	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

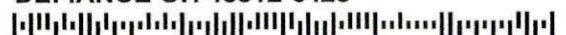
\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	09/15/2023
AMOUNT DUE	6,558.57
AMOUNT AFTER DUE DATE	\$7,214.43

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

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UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	07/31/2023



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BEILHARZ, TERRY 3 18  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	06/20/2023	07/21/2023	3650238	3770292	120054	5,869.44
WATER READINESS-TO-SERVE	06/20/2023	07/21/2023				1,995.96
<p>30 days 4001 / day 6136 / KCF 1,06136 / CF</p>						
We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4			BALANCE FORWARD		0.00	
			CURRENT BILLING		7,865.40	
			DUE DATE CURRENT BILLING		08/15/2023	
			AMOUNT DUE		7,865.40	
			AMOUNT AFTER DUE DATE		\$8,651.94	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	08/15/2023
AMOUNT DUE	7,865.40
AMOUNT AFTER DUE DATE	\$8,651.94

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

**CITY OF DEFIANCE**  
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DEFIANCE OH 43512-0425

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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	06/30/2023



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208 1 AV 0.471  
BEILHARZ, TERRY 321  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	05/22/2023	06/20/2023	3540389	3650238	109849	5,370.52
WATER READINESS-TO-SERVE	05/22/2023	06/20/2023				1,995.96
<p><i>29 days</i> <i>3788 / day</i> <i>6706 / KCF</i> <i>, 06706 / CF</i></p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		7,366.48	
			DUE DATE CURRENT BILLING		07/17/2023	
			AMOUNT DUE		7,366.48	
			AMOUNT AFTER DUE DATE		\$8,103.13	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	07/17/2023
AMOUNT DUE	7,366.48
AMOUNT AFTER DUE DATE	\$8,103.13

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	05/31/2023

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BEILHARZ, TERRY 321  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	04/21/2023	05/22/2023	3438305	3540389	102084	4,990.89
WATER READINESS-TO-SERVE	04/21/2023	05/22/2023				1,995.96
<p>30 days 3403/day 6844/KCF .06844/cf</p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		6,986.85	
			DUE DATE CURRENT BILLING		06/15/2023	
			AMOUNT DUE		6,986.85	
			AMOUNT AFTER DUE DATE		\$7,685.54	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	06/15/2023
AMOUNT DUE	6,986.85
AMOUNT AFTER DUE DATE	\$7,685.54

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425

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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	04/28/2023

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205 1 AV 0.471  
BEILHARZ, TERRY 3 22  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	03/22/2023	04/21/2023	3349577	3438305	88728	4,337.91
WATER READINESS-TO-SERVE	03/22/2023	04/21/2023				1,995.96
<p>29 days 3060/day 7139/kcf 07139/cf</p>						
<p>The Water Division will be conducting its semi-annual water main flushing from May 14 through May 23 . The schedule of flushing, including streets and times, is available on the City of Defiance website at <a href="http://www.cityofdefiance.com/water/reports.html">http://www.cityofdefiance.com/water/reports.html</a></p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		6,333.87	
			DUE DATE CURRENT BILLING		05/16/2023	
			AMOUNT DUE		6,333.87	
			AMOUNT AFTER DUE DATE		\$6,967.26	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	05/16/2023
AMOUNT DUE	6,333.87
AMOUNT AFTER DUE DATE	\$6,967.26

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	03/31/2023

YNNNN

205 1 AV 0.471  
BEILHARZ, TERRY 323  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	02/20/2023	03/22/2023	3256965	3349577	92612	4,527.80
WATER READINESS-TO-SERVE	02/20/2023	03/22/2023				1,995.96
<p><i>30 days</i> <i>3087 / day</i> <i>70.42 / KCF</i> <i>1,07042 / CF</i></p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		6,523.76	
			DUE DATE CURRENT BILLING		04/17/2023	
			AMOUNT DUE		6,523.76	
			AMOUNT AFTER DUE DATE		\$7,176.14	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	04/17/2023
AMOUNT DUE	6,523.76
AMOUNT AFTER DUE DATE	\$7,176.14

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425

4868750300

4868750300065237607176142





**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	02/28/2023



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203 1 AV 0.471  
BEILHARZ, TERRY 3 22  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	01/24/2023	02/20/2023	3161616	3256965	95349	4,661.61
WATER READINESS-TO-SERVE	01/24/2023	02/20/2023				1,995.96
<p><i>26 days</i> <i>3667 / day CF</i> <i>69 82 / K</i> <i>.06982 / CF</i></p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		6,657.57	
			DUE DATE CURRENT BILLING		03/15/2023	
			AMOUNT DUE		6,657.57	
			AMOUNT AFTER DUE DATE		\$7,323.33	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	03/15/2023
AMOUNT DUE	6,657.57
AMOUNT AFTER DUE DATE	\$7,323.33

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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**CITY OF DEFIANCE**  
UTILITIES BILLING OFFICE  
631 PERRY STREET  
DEFIANCE OHIO 43512

SERVICE ADDRESS:	CHRISTY MEADOWS
ACCOUNT NUMBER:	486-87503-00
READING TYPE:	ACTUAL
BILLING DATE:	01/31/2023



YNNNN

202 1 AV 0.471  
BEILHARZ, TERRY 3 21  
200 PERRY ST.  
DEFIANCE OH 43512-2118



OFFICE HOURS  
MONDAY - FRIDAY 8:00 AM - 4:30 PM  
BILLING AND SERVICE INQUIRIES: 419-782-1946

TYPE OF SERVICE	SERVICE PERIOD		METER READING		USAGE	AMOUNT
	FROM	TO	PREVIOUS	CURRENT		
WATER	12/21/2022	01/24/2023	3020923	3161616	140693	6,878.48
WATER READINESS-TO-SERVE	12/21/2022	01/24/2023				1,995.96
<p><i>33 day</i> <i>4263/day</i> <i>6307/K CF</i> <i>06307/GF</i></p>						
<p>We accept credit card payments. To pay online go to <a href="http://www.cityofdefiance.com/divisions/utilites">www.cityofdefiance.com/divisions/utilites</a> at the top of the page and scroll down the page to find the payment section or call OFFICIAL PAYMENTS 1-800-487-4567, OPTION 4</p>			BALANCE FORWARD		0.00	
			CURRENT BILLING		8,874.44	
			DUE DATE CURRENT BILLING		02/15/2023	
			AMOUNT DUE		8,874.44	
			AMOUNT AFTER DUE DATE		\$9,761.88	

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE TO INSURE PROPER CREDIT

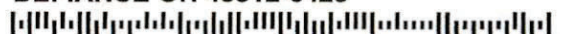
\$30.00 RETURN CHECK CHARGE  
PLEASE WRITE ACCOUNT NUMBER ON CHECK

ACCOUNT NUMBER	486-87503-00
DUE DATE CURRENT BILLING	02/15/2023
AMOUNT DUE	8,874.44
AMOUNT AFTER DUE DATE	\$9,761.88

MAKE CHECKS PAYABLE AND REMIT TO:

CUSTOMER NAME: BEILHARZ, TERRY  
SERVICE ADDRESS: CHRISTY MEADOWS

CITY OF DEFIANCE  
UTILITIES BILLING OFFICE  
PO BOX 425  
DEFIANCE OH 43512-0425



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

**5/14/2025 4:46:36 PM**

**in**

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

Summary: Testimony Direct Testimony of Andrew R. Tinkham on Behalf of Office of the Ohio Consumers' Counsel electronically filed by Denise Walters on behalf of Steinhart, John.