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November 28, 2007

Filing 4

Ms. Reneé Jenkins Secretary, Public Utilities Commission of Ohio 180 East Broad Street, 13th Floor Columbus, Ohio 43215-3793

Re: Case No. 07-478-GA-UNC

Dear Ms. Jenkins:

Please find enclosed an electronic copy of the Surrebuttal Testimony of Timothy Phipps on behalf of Utility Service Partners, Inc. A copy of this Testimony is being served on all counsel of record via e-mail and via U.S. mail.

Thank you for your cooperation.

Sincerely yours,

/s/ Stephen M. Howard Attorneys for Utility Service Partners, Inc.

SMH/jab Enclosure

cc: All Counsel of record via e-mail and U.S. mail

513.723.4000

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval)	
of Tariffs to Recover Through An)	
Automatic Adjustment Clause Costs)	Casa No. 07 479 CA LINC
Associated with the Establishment of an)	Case No. 07-478-GA-UNC
Infrastructure Replacement Program)	
and for Approval of Certain Accounting)	
Treatment)	

SURREBUTTAL TESTIMONY OF TIMOTHY W. PHIPPS ON BEHALF OF UTILITY SERVICE PARTNERS, INC.

1	Q.1.	Please state your name and address.
2	A.1.	Timothy W. Phipps, 321 Hickory Way, Thornville, OH 43076.
3	Q.2.	Are you the same Timothy W. Phipps who previously presented direct
4		testimony in this proceeding?
5	A.2.	Yes.
6	Q.3.	What is the purpose of your surrebuttal testimony?
7	A.3.	I am filing testimony on behalf of Utility Service Partners, Inc.'s ("USP") in
8		response to rebuttal testimony filed by Columbia Gas of Ohio, Inc.
9	Q.4.	Is there value to the independent inspection of service line repairs and
10		replacements performed by Columbia employees under the current system?
11	A.4.	Absolutely. Today, as a DOT OQ plumber, I cannot turn on gas to a repaired or
12		replaced service line. Only Columbia can reestablish service after repairs and
13		proper testing are completed. Columbia inspects my work. Columbia verifies
14		that approved piping and fittings were installed, ensures that trenching is adequate
15		and inspects the fill to ensure that no sharp objects are in the fill that could abrade

the service line and lead to leaks. Columbia also performs a pressure test of the service line and riser which for plastic service lines is a five minute test held at 90 pounds per square inch. Without Columbia's independent inspection, there is the potential that a contractor may take shortcuts such as not doing the pressure test or simply using natural gas from the curb to perform the pressure test rather than inert gas which requires the contractor to carry a compressor. As well, a contractor may fail to use sand to pack around a plastic line when replacing a steel line because fill on older steel lines may contain sharp objects or rocks. There also is a possibility that a contractor may use an unapproved fitting because that was the only fitting available in his truck rather than return to the shop and pick up the proper fitting. Columbia's independent oversight helps prevent these types of shortcuts.

Even more important, while on-site, Columbia inspects the meter set. The meter set typically consists of a shut-off valve, followed by a pressure regulator to reduce the line pressure to a very low pressure for use in the house, followed by the meter and then followed by another shut-off valve. The meter set is a prefabricated assembly that is then installed in the field. In my experience, when a customer service line is replaced, both the riser and meter set are replaced. Although the DOT OQ plumber can install the meter set, under today's system, only Columbia can set, adjust and test the pressure regulator. This is a very important step because if it is not done properly, the potential exists for high pressure natural gas to pass into the house lines. Under the IRP, Columbia will not be onsite to perform independent inspections of all contractor installations.

1		And if Columbia is not onsite that means that the same contractor who installed
2		the meter set will inspect the meter set and adjust and test the pressure regulator
3		I am not aware of any specialized training offered under the OQ certification
4		process for inspecting and testing a meter set and it makes no sense to have
5		contractors assume this critical step in the start-up of a repaired service line.
6	Q.5.	Does this conclude your testimony?
7	A.5.	Yes, it does.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Surrebuttal Testimony of Timothy W. Phipps was served upon the following persons by electronic mail and by first class U.S. mail, postage prepaid this 28th day of November, 2007:

/s/ Stephen M. Howard

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Commission of Ohio Docketing Information System on

11/28/2007 4:44:04 PM

in

Case No(s). 07-0478-GA-UNC

Summary: Testimony Surrebuttal Testimony of Timothy W. Phipps on Behalf of Utility Service Partners, Inc. electronically filed by Howard Petricoff on behalf of Utility Service Partners, Inc.