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OCC EXHIBIT NO. \_\_\_\_\_

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East ) Case No. 07-829-GA-AIR  
Ohio for Authority to Increase Rates for its )  
Gas Distribution Service. )

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East ) Case No. 07-830-GA-ALT  
Ohio for Approval of an Alternative Rate )  
Plan for its Gas Distribution Service. )

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East ) Case No. 07-831-GA-AAM  
Ohio for Approval to Change Accounting )  
Methods. )

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East )  
Ohio for Approval of Tariffs to Recover )  
Certain Costs Associated with a Pipeline ) Case No. 08-169-GA-ALT  
Infrastructure Replacement Program )  
Through an Automatic Adjustment Clause )  
and for Certain Accounting Treatment. )

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East )  
Ohio for Approval of Tariffs to Recover ) Case No. 06-1453-GA-UNC  
Certain Costs Associated with Automated )  
Meter Reading and for Certain Accounting )  
Treatment. )

DIRECT TESTIMONY  
OF  
JAMES D. WILLIAMS

ON BEHALF OF THE  
OFFICE OF THE OHIO CONSUMERS' COUNSEL  
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June 23, 2008

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## TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION .....	1
II. PURPOSE OF TESTIMONY .....	3
III. LIMITED AMR DEPLOYMENT .....	4
IV. EXTENDED PAYMENT PLANS .....	9
V. ADJUSTED DUE DATES .....	13
VI. LONG BILL CYCLES .....	15
VII. COST TO PAY GAS BILLS.....	17
VIII. LIMIT REQUESTS FOR SOCIAL SECURITY NUMBERS .....	21
IX. BILL SECURITY DEPOSITS IN THREE INSTALLMENTS .....	22
X. INVESTIGATE SERVICE ISSUES CAUSED BY FREEZING GAS PIPES .....	24
XI. CONCLUSION.....	26

## ATTACHMENTS

JDW-1	DEO response to OCC Request for Production No. 241
JDW-2	DEO response to OCC Interrogatory No. 165
JDW-3	DEO response to OCC Interrogatory No. 149
JDW-4	DEO response to OCC Interrogatory No. 151
JDW-5	DEO response to OCC Interrogatory No. 146
JDW-6	DEO response to OCC Interrogatory No. 402
JDW-7	DEO response to OCC Interrogatory No. 154
JDW-8	Duke Energy response to OCC Interrogatory No. 66, and Vectren Energy response to OCC Interrogatory No. 230
JDW-9	DEO response to OCC Interrogatory No. 416
JDW-10	DEO response to OCC Interrogatory No. 157
JDW-11	DEO response to OCC Interrogatory No. 158
JDW-12	DEO response to OCC Interrogatory No. 161
JDW-13	DEO response to OCC Interrogatory No. 130
JDW-14	DEO response to OCC Interrogatory No. 390
JDW-15	DEO response to OCC Interrogatory No. 387
JDW-16	DEO response to OCC Interrogatory No. 132
JDW-17	DEO response to OCC Interrogatory No. 392
JDW-18	DEO response to OCC Interrogatory No. 196
JDW-19	DEO response to OCC Interrogatory No. 457

**1 I. INTRODUCTION**

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

3 A1. My name is James Williams. My business address is 10 West Broad Street, 18<sup>th</sup>  
4 Floor, Columbus, Ohio 43215-3485. I am employed by the Office of the Ohio  
5 Consumers' Counsel ("OCC") as the Manager, Consumer Services Division.

6  
7 **Q2. WOULD YOU PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND**  
8 **PROFESSIONAL EXPERIENCE?**

9 A2. I am a 1994 graduate of Webster University, St. Louis, Missouri with a Masters in  
10 Business Administration, and a 1978 graduate of Franklin University, Columbus,  
11 Ohio with a Bachelors in Science, Engineering Technology. My professional  
12 experience spans over twelve years at OCC and a sixteen-year career in the Air  
13 Force.

14  
15 Since joining OCC, I have been directly involved in a number of activities  
16 involving customer service, compliance, and the development of consumer  
17 protection standards. My role has evolved to the management of the agency  
18 consumer hotline and the direct service provided to consumers to resolve  
19 complaints and inquiries that involve the Ohio utilities. My experience with OCC  
20 has involved defining and recommending consumer protection standards in  
21 proposed legislation and rulemaking proceedings including the Electric Service  
22 and Safety Standards, Competitive Retail Electric Service Standards, Minimum  
23 Gas Service Standards and Minimum Water Standards. I have also been actively  
24 involved in many other regulatory proceedings.

1   **Q3.   WHAT ARE YOUR RESPONSIBILITIES AS MANAGER, CONSUMER**  
2       **SERVICES DIVISION?**

3   **A3.**   My duties include supervision and management of the OCC Compliance  
4       Investigators that are providing direct support to Ohio residential consumers.  
5       This responsibility includes the oversight of investigations and monitoring Ohio  
6       utilities' compliance with Ohio statutes and administrative rules as well as utility  
7       tariffs. I am involved in recommending consumer protection standards in both  
8       rulemaking and other proceedings that have evolved from the emergence of  
9       deregulation of the natural gas and electric industries. I frequently work with the  
10      public to address issues related to both regulated and deregulated services  
11      involving Ohio utilities. I also oversee the development of consumer trend data  
12      concerning quality of service issues from documentation obtained from the OCC  
13      hotline and recommend ways in which utility services can be improved.  
14      Furthermore, my responsibilities include identifying and analyzing customer  
15      service issues associated with applications filed for rate increases and other  
16      relevant proceedings. Finally, I am responsible for evaluating proposed changes  
17      in utility plans and procedures that might adversely affect residential consumers.

18  
19   **Q4.   HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
20       **COMMISSION?**

21   **A4.**   Yes. I testified in the following cases before the Public Utilities Commission of  
22       Ohio ("Commission" or "PUCO"): in Cincinnati Gas and Electric, Case No. 96-

1 0656-GA-AIR, and the Commission Ordered Investigation into Line Extension  
2 Policies and Procedures, Case No. 01-2709-EL-COI.

3  
4 **II. PURPOSE OF TESTIMONY**

5 ***Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***  
6 ***PROCEEDING?***

7 ***A5.*** My testimony will support certain OCC Objections to the Staff Report and  
8 address the issues raised by those objections as they relate to consumer service.  
9 Specifically, I will address the following issues:

- 10 1. Recommend using Automated Meter Reading ("AMR") technology as a  
11 way to ensure accurate billing when meters are difficult to access for  
12 obtaining actual meter reads; and
- 13 2. Recommend customer service improvements including additional  
14 extended payment plans, adjusted bill due dates, prevention of long billing  
15 cycles, reducing fees to pay gas bills, minimizing delays in posting  
16 customer payments, limiting requests for social security numbers, and  
17 billing security deposits with monthly installment payments. I also  
18 recommend that issues related to moisture in gas lines be addressed before  
19 the next winter heating season.

20

1   **Q6.   WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF**  
2       **YOUR TESTIMONY?**

3   **A6.**   I have reviewed the Dominion East Ohio ("DEO" or "the Company") Rate Case  
4       Application, proposed tariffs, pre-filed direct testimony of Company witnesses,  
5       responses to OCC discovery, the Minimum Gas Service Standards ("MGSS"),  
6       Chapter 49 of the Ohio Revised Code, DEO Customer Service Audit Report  
7       conducted by the Staff, and the Staff Report of Investigation ("Staff Report")  
8       regarding customer service issues.

9

10   **III   LIMITED AMR DEPLOYMENT**

11   **Q7.   HOW CAN AMR RESULT IN MORE ACCURATE CUSTOMER BILLING?**

12   **A7.**   AMR technology can provide the Company with electronic access to obtain meter  
13       reads rather than requiring Company personnel or agents to obtain physical access  
14       to the premise to read the meter. Given that DEO has over 500,000 inside  
15       residential meters,<sup>1</sup> AMR could help avoid any problems the Company may  
16       experience in gaining physical access to the home to read the meter. This could  
17       result in shorter time gaps between actual meter reads, and fewer errors in  
18       estimating usage during months in which the meter is not actually read.  
19       Furthermore, AMR could help the Company comply with metering requirements  
20       in the MGSS. My review of the PUCO Staff Customer Service Audit and OCC  
21       and Staff customer complaint data confirms that back billing and meter reading

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<sup>1</sup> DEO response to OCC Interrogatory No. 241 (Attachment JDW-1).

1 items are important issues for customers who want to ensure they are being billed  
2 accurately and fairly.

3  
4 **Q8. PLEASE DESCRIBE COMPLAINT TRENDS IN BACK BILLING AND**  
5 **METER READING ISSUES SINCE 2005 AND POSSIBLE REASONS FOR**  
6 **THE TRENDS.**

7 **A8.** There has been a decline in the number of back bill and meter reading issues  
8 being reported by the Staff since 2005 as shown in Table 1.<sup>2</sup> Back bill issues  
9 involve customers being billed for usage not previously billed because of  
10 metering problems, meter failures, or other meter related conditions. Meter  
11 reading issues involve problems such as lack of actual reads, how estimates are  
12 calculated and related conditions. I believe that the decline in back bill and meter  
13 reading issues indicates that fewer customers are experiencing metering problems,  
14 which may be attributed to the Company initiative to replace faulty Remote Meter  
15 Index ("RMI") devices with AMR devices and the Commission initiation of the  
16 MGSS. The decline in back bill and meter reading issues between 2005 and 2006  
17 is likely a result of the MGSS implementation and the increased Commission  
18 emphasis on metering standards. Between 2006 and now, the Company initiated  
19 a program to retrofit meters with AMR devices (installing 130,000 AMR devices  
20 in 2007)<sup>3</sup> and this likely contributed to the even further reduction in back bill and  
21 meter reading issues reported in 2007.

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<sup>2</sup> The Dominion East Ohio Gas Company Customer Service Audit Report, (August 7, 2007) at 10.

<sup>3</sup> Blue Ridge Report at 140, footnote 339.

**Table 1: PUCO Staff Contact Data**

Issue Type	2005	2006	2007	Total
Back Bill	300	242	81	623
Meter Reading	661	488	129	1,278

**Q9. DESCRIBE HOW THE MGSS AND THE INSTALLATION OF AMR'S MAY HAVE CONTRIBUTED TO THE DECLINE IN CUSTOMER CONTACTS.**

**A9.** The MGSS became effective in December 2006 and require a natural gas company to make reasonable attempts to obtain actual meter reads every other month and to obtain an actual meter read at least once every twelve months.<sup>4</sup> This is an important consumer protection that helps ensure residential customers are being billed in a timely manner for the natural gas they actually use. In addition, DEO initiated an AMR program to replace faulty RMI devices and to help secure the ability to comply with the MGSS meter reading requirements.

Table 2 indicates that the Company has already completed 244,816 AMR retrofits. (Attachment JDW-1).<sup>5</sup>

**Table 2: DEO AMR Retrofits (April 2008)**

RMI	Inside Meters with No RMI	AMR	Outside Meters	Total
274,433	134,246	244,816	653,974	1,307,469

<sup>4</sup> Ohio Admin. Code 4901:1-13-04 (G).

<sup>5</sup> DEO response to OCC Request for Production No. 241 (Attachment JDW-1).



1    ***Q10. DO YOU AGREE WITH THE STAFF RECOMMENDATION ON AMR***  
2        ***INSTALLATION?***

3    ***A10.*** No. The Staff recommendation accepted the Company's plan to install AMR  
4        devices for all 1.1 million residential customers in the DEO service territory.<sup>6</sup> My  
5        recommendation is to install AMR devices for only those premises where the  
6        Company already has plans to replace RMI devices, locations where obtaining  
7        access to perform an actual meter read to comply with the MGSS has proven to be  
8        an issue, and in locations where the economics of AMR deployment are proven  
9        on the record and authorized by the Commission. This should be a relatively  
10       smaller subset of the meters that Staff and DEO propose be installed with AMR  
11       devices, and is consistent with the cost effectiveness issues raised by OCC  
12       witness Trevor Roycroft. According to Table 2, DEO currently has  
13       approximately 134,000 inside meters that are not currently equipped with either  
14       RMI or AMR devices. Every inside meter does not have to be retrofitted with an  
15       AMR device for the Company to obtain access to obtain meter reads and to  
16       comply with the MGSS.

17  
18       Over half the meters that DEO and Staff recommend be retrofitted with AMR  
19       devices are outside meters, and installation of an AMR device would not solve  
20       any specific MGSS access issues raised by consumers or other back bill or meter  
21       reading issues. In addition, the declining trend in meter reading issues is an  
22       indication that the Company is already taking sufficient necessary action to obtain

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<sup>6</sup> Staff Report at 42.

1 meter reads without major obstacles.<sup>7</sup> Therefore, my recommendation is to limit  
2 the installation of AMR devices to those premises where the Company already  
3 has plans to replace faulty RMI devices, where access is an issue, or where the  
4 economics of the installation can be supported and proven on the record in these  
5 cases. As noted by OCC witness Trevor Roycroft, this approach provides a more  
6 cost-effective alternative for ensuring that customers with difficult to access  
7 meters are obtaining more accurate bills and the Company can be compliant with  
8 the MGSS.<sup>8</sup> This approach can result in even further reductions in calls to the  
9 PUCO involving back bill and meter reading issues without incurring the major  
10 expense proposed by the Company and supported by Staff.

11  
12 ***Q11. DO YOU HAVE OTHER RECOMMENDATIONS CONCERNING***  
13 ***METERING?***

14 ***A11.*** Yes, I have three other recommendations. First, in addition to limiting the  
15 installation of AMR devices to only difficult-to-access premises, I would like to  
16 ensure that the trend in declining numbers of back bill issues for customers  
17 continues. During the PUCO's Customer Service Audit, the Company reported  
18 that 18,971 customers were back billed for service between May 2005 and May  
19 2007.<sup>9</sup> The Company is already developing a program to automatically generate  
20 12-month payment plans and a letter to customers that explains the back bill.

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<sup>7</sup> See DEO response to OCC Interrogatory No. 165. (Attachment JDW-2).

<sup>8</sup> OCC Direct Testimony of Trevor Roycroft (June 23, 2008) at 34-36.

<sup>9</sup> DEO Customer Service Audit Report at 6.

1       However, the Company should also be required to provide monthly reports to the  
2       PUCO and OCC with the number of back bills that are issued along with an  
3       explanation of the causes for the back bills. This will help ensure adequate  
4       oversight as DEO addresses the back bill problems that so many customers have  
5       experienced.

6  
7       Second, the letter that is currently sent to customers should explain how the back  
8       bill was calculated. Also OCC and PUCO Staff should have an opportunity to  
9       review the overall methodology used by DEO to perform the calculations to  
10      ensure accuracy. Third, DEO's proposed late payment fee should specifically  
11      exempt charges that are being back billed. It is my understanding that the Ohio  
12      Revised Code specifically exempts recovery of interest charges, service charges,  
13      or fees to be assessed on back billed charges.<sup>10</sup> The tariff for the late payment  
14      charge should specifically exempt any charges that are being back billed if the  
15      Commission approves the proposed late payment charge.

16  
17   **IV.    EXTENDED PAYMENT PLANS**

18   ***Q12.   DOES DEO PROVIDE CUSTOMERS WITH EXTENDED PAYMENT***  
19   ***PLANS?***

20   ***A12.*** DEO currently provides customers with the one-sixth payment plan and/ or a one-  
21      third payment plan as required by Ohio Admin. Code 4901:1-18-04. A one-sixth  
22      payment plan requires customers to pay the past due balance in 6 installments

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<sup>10</sup> R.C. 4933.28 (B).

1 along with current charges. A one-third payment plan is required in the winter  
2 months and requires customers to pay one-third of the total bill (arrearages plus  
3 current charges).<sup>11</sup> In addition, DEO provides some short term payment  
4 extensions and twelve month payment plans on amounts that are being back billed  
5 pursuant to R. C. 4933.28.<sup>12</sup>

6  
7 ***Q13. ARE THESE PAYMENT PLANS EFFECTIVE AND SHOULD DEO BE***  
8 ***OFFERRING CUSTOMERS OTHER EXTENDED PAYMENT PLANS?***

9 ***A13.*** As currently designed by DEO and offered to customers, these payment plans are  
10 not very effective and may require customers to pay more than they can afford.  
11 Non-affordable payment plans defeat the very purpose of these plans -- to help  
12 customers avoid defaults, to minimize the need for large deposits, to help avoid  
13 the ultimate loss of gas service, and the imposition of reconnection charges.

14  
15 The economic conditions in Ohio and especially in the Greater Cleveland area  
16 indicate that more and different extended payment plans may be necessary in  
17 order to help customers retain their natural gas service. The Percentage of Income  
18 Payment Plan ("PIPP") is available as a payment plan option for low-income  
19 customers with incomes that are below 150 percent of the Federal Poverty Level.

20 However, there are a significant number of households that do not qualify for

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<sup>11</sup> Ohio Admin. Code 4901:1-18-05.

<sup>12</sup> R.C. 4933.28 allows, "Utilities to bill for usage during the twelve months prior to the date the meter inaccuracy was corrected and allows the utilities to bill the previous un-metered usage in twelve equal installments along with current charges."

PIPP, but where the household income is insufficient to pay high heating bills. Company Witness Murphy acknowledges the economic challenges within DEO's service territory, but the Company is unwilling to examine how other extended payment plans could help consumers, and instead asserts that the current payment plans are adequate.<sup>13</sup> The responses to OCC Interrogatory Nos. 149 and 151 (Attachment JDW-3 and Attachment JDW-4 respectively) as outlined in Table 3 indicate that the current payment plans are not very effective.

**Table 3: Payment Plan Defaults**

Year	Customers on Commission Required Payment Plan	Defaults	Default Percentage
2005	82,568	39,575	47.9
2006	119,213	61,341	51.5
2007	103,453	41,247	39.9

While there has been a decline in the payment plan default rate, the current 40 percent default rate for Commission-ordered payment plans is sufficient reason for the Company to seek other more affordable payment plan options that might be more responsive to the needs of their customers. The Company has acknowledged not considering options for other payment plans.<sup>14</sup> Moreover, the Staff Report acknowledged that most contacts to the Commission call center

<sup>13</sup> DEO response to OCC Interrogatory No. 146 (Attachment JDW-5).

<sup>14</sup> DEO response to OCC Interrogatory No. 402 (Attachment JDW-6).

1 involve disconnect issues; yet there is no mention or recommendation for the  
2 Company to consider other payment plans.<sup>15</sup>

3  
4 ***Q14. WHAT OTHER TYPE OF PAYMENT PLANS WOULD YOU***  
5 ***RECOMMEND?***

6 ***A14.*** I recommend the Company be required to work with customers that are behind in  
7 their gas payments to develop customized and affordable payment plans more  
8 responsive to the needs of the customer. This could include variations on the one-  
9 third payment plan, or twelve-month payment plans where the customer would be  
10 required to pay the default amount in equal installments along with current  
11 charges. The Commission-ordered payment plans should be a last resort of the  
12 options that are available for the customer.

13  
14 ***Q15. DO YOU HAVE OTHER CONCERNS WITH THE APPLICATION OF LATE***  
15 ***PAYMENT CHARGES TO PAYMENT PLAN AMOUNTS?***

16 ***A15.*** Yes. While OCC does not oppose the proposed late payment charge, any late  
17 payment charge should be applied consistently in a manner similar to how the  
18 charge is assessed by other large local distribution companies ("LDCs"). Staff  
19 recommended approval of the late payment charge, in part, as an industry  
20 standard.<sup>16</sup> The Company should not assess the proposed late payment charge on  
21 unpaid balances that are part of an extended payment plan. Imposing a late

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<sup>15</sup> Staff Report at 47.

<sup>16</sup> Staff Report at 26.

1 payment charge on unpaid balances under payment plans could cause customers  
2 to fall further behind in the amount that is owed the Company. In addition, DEO  
3 intends to assess the late payment charge if payment is not made by the due date  
4 on the bill.<sup>17</sup> Other similarly sized LDCs only assess the late payment charge if  
5 payment is not made when the next bill is rendered.<sup>18</sup> My recommendation is that  
6 if the Commission approves the proposed late payment charge, the charge should  
7 only be assessed if payment is not made by the time the next bill is rendered. This  
8 would be a more consistent application of the industry standard. In addition, the  
9 Company should be required to exempt unpaid balances that are owed under a  
10 payment plan if the customer pays the payment plan amount due each month.

11  
12 **V. ADJUSTED DUE DATES**

13 ***Q16. DOES DEO CURRENTLY PERMIT CUSTOMERS TO ADJUST BILL DUE***  
14 ***DATES?***

15 ***A16.*** No.<sup>19</sup>

16  
17 ***Q17. HOW CAN ADJUSTED DUE DATES HELP CUSTOMERS BETTER***  
18 ***MANAGE PAYMENT OF THEIR GAS BILL?***

19 ***A17.*** Adjusted due dates allow customers the option of having the due date on the bill  
20 coincide with the time when they are most capable to pay the bill. For many fixed

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<sup>17</sup> Proposed Tariff, first Revised Sheet No. 1-5, paragraph H.

<sup>18</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution Service*, Case No. 08-72-GA-AIR, Second Revised Sheet No. 13, paragraph 6d.

<sup>19</sup> DEO Response to OCC Interrogatory No. 154 (Attachment JDW-7).

1 income customers, this may be having the bill coincide with the time each month  
2 when pensions and/or other income are available to pay the bill.  
3

4 ***Q18. DO OTHER OHIO GAS UTILITIES PROVIDE CUSTOMERS THE OPTION***  
5 ***TO ADJUST DUE DATES?***

6 ***A18.*** Yes. Company responses to OCC discovery in other cases, indicate that Duke  
7 Energy of Ohio and Vectren Energy Delivery of Ohio permit customers to adjust  
8 the due dates for residential accounts. For Duke, this option is available for a  
9 limited basis (five to ten billing cycles) to residential customers that are current on  
10 their bill (Attachment JDW-8) Vectren offers a ten day extension to all eligible  
11 customers, and an optional program to recipients of Social Security benefits  
12 (Attachment JDW-8). Customers who receive Social Security benefits are  
13 afforded the opportunity to select a due date that coincides with the receipt of  
14 their pension. I recommend that DEO implement a program similar to what Duke  
15 Energy and Vectren offer to their customers to provide more flexibility to  
16 customers in using adjusted due dates as a tool to better manage utility payments.  
17 In the alternative, DEO could consider extending the time period before a late  
18 payment fee is assessed. I also recommend that DEO do a cost benefit analysis to  
19 determine if this charge would result in any additional costs or savings.  
20



1 VI. LONG BILL CYCLES

2 ***Q19. HOW FREQUENT ARE BILLS SUPPOSED TO BE RENDERED TO***  
3 ***RESIDENTIAL CUSTOMERS PURSUANT TO THE MGSS?***

4 ***A19.*** It is my understanding that pursuant to the MGSS "Bills issued by or for the gas  
5 or natural gas company shall be accurate and rendered at regular intervals and  
6 shall contain clear and understandable form and language."<sup>20</sup> According to the  
7 DEO tariff, "Bills ordinarily are rendered regularly at monthly intervals, but may  
8 be rendered more or less frequently at the Company's option."<sup>21</sup>

9  
10 ***Q20. DOES DEO RENDER BILLS FOR PERIODS OF TIME THAT ARE***  
11 ***GREATER THAN 30 DAYS AND HOW DOES THIS AFFECT***  
12 ***CUSTOMERS?***

13 ***A20.*** Yes. DEO's response to OCC Interrogatory No. 416 (Attachment JDW-9)  
14 indicates the Company issued over a million bills for a period greater than 1  
15 billing period for certain months of 2006 and 2007. According to DEO's  
16 response to OCC Interrogatory No. 157 (Attachment JDW-10), "One billing  
17 period is defined as 40 or more days because there are situations, especially over  
18 the holidays, where an estimated read in December to an actual read in January on  
19 the last day of the billing window will lead to a 39 day bill." The magnitude of  
20 this problem affected from 17,498 to 78,754 residential accounts per month  
21 during different months in 2006 and 2007.<sup>22</sup> The impact on customer bills is

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<sup>20</sup> Ohio Admin. Code 4901:1-13-11(B).

<sup>21</sup> Ohio Admin. Code. 4901:1-13.

<sup>22</sup> DEO response to OCC Interrogatory No. 157 (Attachment JDW10).

1 much greater on residential customers in the winter months when the longer  
2 billing period is exacerbated by the higher winter gas prices and greater usage.  
3 This may contribute to delinquent payments, needs for more payment plans and  
4 ultimately an impact on monthly customer budgets.

5  
6 ***Q21. WHAT IS YOUR RECOMMENDATION FOR THIS ISSUE?***

7 ***A21.*** DEO has indicated that the issuance of bills for more than 31 days is particularly  
8 attributed to scheduled holidays. Therefore, DEO should be required to develop  
9 and communicate, through bill inserts and through customer service contacts, the  
10 availability of customized payment plans to customers who are affected by a  
11 billing cycle in excess of 31 days. DEO should allow customers that will be  
12 affected by long billing cycles the option to call-in a customer generated meter  
13 read or to request a special meter read. In addition, if the Commission approves  
14 the Company's proposal for a late payment charge, the late payment charge  
15 should be waived if the customer was billed for a period of time longer than 31  
16 days. These customers may struggle to pay the higher bill by the due date.  
17 Finally, the Commission should require the Company to evaluate and analyze the  
18 impact of revising its meter reading schedules so that customers are rendered bills  
19 for periods of time that are closer to a 30 days. This analysis should then be  
20 provided to Staff and OCC.

**1 VII. COST TO PAY GAS BILLS**

**2 Q22. WHAT ARE THE DIFFERENT CHARGES AND FEES THAT DEO**  
**3 CUSTOMERS MAY INCUR TO PAY GAS BILLS?**

**4 A22.** DEO accepts payments mailed by customers, made through authorized agents,  
**5** made by telephone, by credit card, and through the internet. With the exceptions  
**6** of mailing the payment and the Dominion eBill where customers can receive and  
**7** pay their bills electronically through their bank, there are no other options where  
**8** customers can pay their gas bill without also incurring a fee. The Company no  
**9** longer has payment centers and there are no one-stop, night drop, or lock-box  
**10** options for customers to make payments. In addition, customers without  
**11** checking accounts may have to purchase money orders or other financial  
**12** instruments to mail payments. The following table shows the different DEO  
**13** payment methods and associated fees.

**Table 4: Fee to Pay Gas Bills<sup>23</sup>**

<b>Payment Method</b>	<b>Fee</b>	<b>Comments</b>
Mail E-Bill Bank Drafts	None	Customers without checking accounts may have to purchase money orders.
Authorized Agents	\$.86	Agents may not be readily available for customers that do not have checking accounts.
Phone	\$3.95	Service through Bill Matrix for electronic checks, credit and debit card payments
Internet	\$3.95	Service through Bill Matrix for electronic checks, credit and debit card payments. Online payments can be made for a fee through a vendor Check Free.

**Q23. HOW DO THESE CHARGES AFFECT RESIDENTIAL CUSTOMERS?**

**A23.** The fees associated with paying utility bills can be a significant additional burden for customers that are already experiencing problems paying the bill. There has been a 60 percent increase in the number of customers that are paying by electronic check or credit card between 2004 and 2007.<sup>24</sup> Last year, customers paid approximately \$2 million in fees<sup>25</sup> just to make electronic check or credit card payments. In addition, while the exact number of customers who were in collection status at the time the payment was made is unknown, customers may be forced to incur further credit debt in order to retain utility service. Other

<sup>23</sup> DEO response to OCC Interrogatory No. 158 (Attachment JDW-11).

<sup>24</sup> DEO response to OCC Interrogatory No. 158 (Attachment JDW-11).

<sup>25</sup> DEO response to OCC Interrogatory No. 158 (Attachment JDW-11). [495,175-payments made in 2007 multiplied by a \$3.95 transaction charge for each totals \$1,955,941.]

1 collection options may have been available to enable customers to avoid the \$3.95  
2 fee. Over the last five years (2003-2007), there has been a 28 percent increase in  
3 the number of payments made at authorized agents of the Company.<sup>26</sup> This trend  
4 may indicate that more customers lack checking accounts and the ability to mail  
5 payments. In addition, low-income customers may have few options for payment  
6 except paying at authorized agents. Given the current level of fees for payments  
7 made to authorized agents, approximately \$475,000 was paid by customers last  
8 year.<sup>27</sup> Given the economic challenges in the Company's service territory, the  
9 \$2.5 million (\$2 million + \$475,000) paid by customers last year, just to be able  
10 to pay gas bills, could have been better applied towards the actual gas bills.

11  
12 ***Q24. DO YOU HAVE A RECOMMENDATION FOR HOW THESE CHARGES***  
13 ***SHOULD BE ADDRESSED?***

14 ***A24.*** I recommend the Commission require the Company to evaluate different options  
15 that would result in the elimination of fees, or at a minimum, in reduced fees for  
16 customers to pay gas bills. This could include evaluating the impact of absorbing  
17 the cost for payments made to authorized agents and determining the feasibility of  
18 accepting credit card payments directly from customers. Based on my discussions  
19 with PUCO Staff and LDC personnel, it is my understanding that as a matter of  
20 practice, all LDCs do not require customers to pay a fee to make payments at an  
21 authorized agent of the Company. I recommend that DEO adopt a similar

---

<sup>26</sup> DEO response to OCC Interrogatory No. 158 (Attachment JDW-11).

<sup>27</sup> Id.

1 practice. In addition, the Company could consider removing, or at a minimum,  
2 reducing fees for payments made via the internet. In the alternative, I recommend  
3 that DEO negotiate with alternative payment providers in order to reduce costs to  
4 customers to pay bills.

5  
6 ***Q25. DO YOU HAVE OTHER CONCERNS WITH THE WAY DEO ACCEPTS***  
7 ***CUSTOMER PAYMENTS?***

8 ***A25.*** Yes. I am concerned that payments made to authorized agents, via telephone or  
9 internet, may not post to the customer's account in sufficient time to prevent a  
10 disconnection. According to the Company response to OCC Interrogatory 161  
11 (Attachment JDW-12), payments made to an authorized agent after 4:30 p.m. do  
12 not post to the account until the next day. Customers are provided a receipt  
13 number and a notation is made to the account that payment was made; however,  
14 that does not assure that a disconnection will not occur. Payments made via credit  
15 card or electronic check post the same day if the payment is made before 3:00  
16 p.m. Payments made after 3:00 p.m. do not post until the next day. Payments  
17 made via E-bill/ E-pay post to the account the next business day. However,  
18 payments made after 5:00 p.m. do not post for two business days. Customers  
19 should not have to make subsequent contact with the Company after payment was  
20 made to assure that the service will not be disconnected. The potential for  
21 payment posting delay further supports my earlier recommendation that the  
22 proposed late payment charge only apply if payment is not made by the time the  
23 next bill is rendered.

**VIII. LIMIT REQUESTS FOR SOCIAL SECURITY NUMBERS**

**Q26. DOES THE COMPANY REQUEST SOCIAL SECURITY NUMBERS FROM NEW CUSTOMERS EVEN THOUGH THIS INFORMATION IS NOT NECESSARY TO OBTAIN SERVICE?**

**A26.** Yes. Despite the fact that Social Security numbers are not needed to obtain service, customers can believe that the Company requests for this information are a requirement. According to the Commission's Rules, there are several ways DEO can determine if customers are financially responsible without needing Social Security numbers.<sup>28</sup> According to the Company response to OCC Interrogatory No. 130 (Attachment JDW-13), DEO routinely requests Social Security numbers even when other means are available for the customer to demonstrate financial responsibility.<sup>29</sup> Based on the Company response to OCC Interrogatory No. 390 (Attachment JDW-14), customers must then refuse to provide the information before the Company continues with the application process to initiate new service.<sup>30</sup>

**Q27. WHAT IS THE POTENTIAL HARM IN DEO REQUESTING SOCIAL SECURITY NUMBERS FROM CUSTOMERS?**

**A27.** Identity theft is a large issue in this country and there are routinely reports of inadvertent disclosure of personal identity information that can potentially

---

<sup>28</sup> Ohio Admin. Code 4901:1-17-02.

<sup>29</sup> DEO response to OCC Interrogatory No. 130 (Attachment JDW-13).

<sup>30</sup> DEO response to OCC Interrogatory No. 390 (Attachment JDW-14).

1       jeopardize that person if the information is used for wrongful purposes. The  
2       Company response to OCC Interrogatory No. 387 (Attachment JDW-15) indicates  
3       that DEO has processes in place to prevent the inadvertent disclosure of Social  
4       Security numbers, including limiting access in the Customer Information System  
5       ("CIS"), masking displays, and limiting personnel access. However, the best  
6       protection against an inadvertent disclosure is to limit the amount of Social  
7       Security numbers the Company maintains within the CIS to those situations  
8       where this information is absolutely necessary.

9

10   ***Q28. WHAT IS YOUR RECOMMENDATION CONCERNING LIMITS ON WHEN***  
11   ***THE COMPANY CAN REQUEST SOCIAL SECURITY NUMBERS?***

12   ***A28.*** I recommend that DEO stop requesting Social Security numbers unless there are  
13       no other options for the customer to demonstrate financial responsibility.

14

15   ***IX. BILL SECURITY DEPOSITS IN THREE INSTALLMENTS***

16   ***Q29. WHAT IS DEO'S CURRENT BILLING PRACTICES FOR SECURITY***  
17   ***DEPOSITS?***

18   ***A29.*** According to the Company response to OCC Interrogatory No. 132 (Attachment  
19       JDW-16), DEO bills security deposits in one installment and the payment is due  
20       within 10 days. The Company also indicates that they will work with customers  
21       on a case by case basis. However, the criteria used to determine if exceptions can  
22       be made are subjective and would not necessarily apply to new residential  
23       accounts since there is no pre-existing information upon which the Company can



1       make an assessment.<sup>31</sup> There is no indication that exceptions are made to allow  
2       payment of bill deposits in multiple installments, instead of a single payment.  
3

4       ***Q30. HOW CAN BILLING DEPOSITS IN ONE INSTALLMENT AFFECT***  
5       ***RESIDENTIAL CUSTOMERS?***

6       ***A30.*** It is my understanding that the Ohio Admin. Code (O.A.C. 4901:1-17-05) limits  
7       the amount of deposits to an average annual monthly bill plus 30 percent. For  
8       many customers, the deposit can be as large as \$150 to \$200, or more. This can  
9       be a significant financial burden at the same time customers are shouldering the  
10      expense for moving into a new dwelling. Based on my discussions with PUCO  
11      Staff and LDC personnel, it is my understanding that the Commission rules do not  
12      preclude utilities from billing deposits in multiple installments and at least two  
13      other large Ohio gas companies (Vectren and Duke Energy Ohio) currently  
14      provide this option. DEO should provide a similar security deposit billing option  
15      for customers within its service territory.  
16

17      ***Q31. WHAT RECOMMENDATIONS DO YOU HAVE FOR BILLING DEPOSITS?***

18      ***A31.*** I recommend that DEO offer customers the option to have deposits billed in a  
19      minimum of three equal installments, similar to other LDCs, to be paid concurrent  
20      with the monthly gas bill.  
21  
22

---

<sup>31</sup> DEO response to OCC Interrogatory No. 392 (Attachment JDW-17).

1    **X.     INVESTIGATE SERVICE ISSUES CAUSED BY FREEZING GAS PIPES**

2    **Q32.   WHAT COMPLAINTS ARE YOU AWARE OF WHERE CUSTOMERS HAVE**  
3        **ENCOUNTERED SERVICE PROBLEMS AS A RESULT OF FREEZING**  
4        **PIPES AND/ OR METERS?**

5    **A32.** In one instance, a DEO customer reported to OCC that the furnace and gas  
6        appliances will not work due to water that enters the service line and freezes it.<sup>32</sup>  
7        According to the customer, DEO resolved the situation by placing a heat tape on  
8        the meter and assuring the customer that they were “aware of the problem and are  
9        monitoring the situation.”<sup>33</sup> Another DEO customer reported to the OCC that  
10       during several winters, water seeps into her service line and then freezes. In this  
11       instance, DEO confirmed that “drips that are in the area around that house are  
12       blowing dry.”<sup>34</sup> However, there was uncertainty regarding where the moisture  
13       was coming from, or where responsibility resides for correcting the problem.  
14       DEO also verified that due to “previous moisture problems/frozen meter last year  
15       it would be a good idea to have a heat cable installed this year.”<sup>35</sup>

---

<sup>32</sup> OCC Data base record 150240414.

<sup>33</sup> Id.

<sup>34</sup> OCC Data base record 150241870.

<sup>35</sup> Id.

1   ***Q33. IS DEO ADDRESSING THESE SERVICE PROBLEMS AND HAS THE***  
2                   ***COMPANY PROVIDED A PERMANENT FIX TO FUTURE SERVICE***  
3                   ***ISSUES CAUSED BY MOISTURE FREEZING IN PIPES?***

4   ***A33.*** DEO is addressing these specific cases, but it is uncertain whether the Company is  
5           providing a permanent fix to these issues. Based on the response the Company  
6           contacts provided to OCC, the Company addresses these issues by placing a heat  
7           cable on the meter and assuring the customer that the Company will continue to  
8           monitor the situation. Based on the Company response to OCC Interrogatory 457  
9           (Attachment JDW-19), the only verification DEO is willing to provide on this  
10          issue is that the company received 26 calls in 2006; 76 calls in 2007; and 56 calls  
11          (as of 2/26/08) from customers regarding water in their lines.<sup>36</sup> The OCC  
12          attempted to obtain additional information in order to further assess these issues,  
13          but DEO objected and stated that OCC's requests "would subject DEO to  
14          annoyance, oppression, and undue burden or expense."<sup>37</sup>

15  
16   ***Q34. WHAT IS YOUR RECOMMENDATION FOR ADDRESSING THIS ISSUE?***

17   ***A34.*** DEO should investigate and report to the PUCO and OCC the number of potential  
18          locations where moisture in the gas pipes may result in freezing pipes and  
19          potential loss of service based on previous service inquiries and address any cost  
20          issues. To the extent that moisture is present in the gas being procured by DEO,  
21          the Company should monitor the quality of natural gas that is delivered to

---

<sup>36</sup> DEO response to OCC Interrogatory No. 196 (Attachment JDW-18).

<sup>37</sup> DEO response to OCC Interrogatory No. 457 (Attachment JDW-19).

1 customers and force suppliers to meet the proper standards that need to be met.

2 DEO should also consider installing equipment that will remove water from

3 service line or install gas drips to catch liquid found in low pressure systems.

4 These issues should be addressed prior to the next winter heating season.

5

6 **XI. CONCLUSION**

7 ***Q35. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?***

8 ***A35.*** Yes. However, I reserve the right to incorporate new information that may

9 subsequently become available. I also reserve the right to supplement my

10 testimony in the event the PUCO Staff fails to support the recommendations made

11 in the Staff Report and/or changes positions made in the Staff Report.

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Request to Produce - 11th Set

---

**Question Number:**

241

---

**Subpart:**

---

**Request Date:**

04/23/2008

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**Due Date:**

05/09/2008

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**Topic:**

Section E - Rates and Tariffs

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**Question:**

Please provide copies of all communications, workpapers, data, source documents, and/or other information relating to the Company's response and the matters identified in OCC Interrogatory No. 359 regarding residential accounts that have inside meters equipped with RMI devices.

---

**Answer:**

Please see the attached file.

---

**Preparer Of Response:**

William Armstrong

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**Date Prepared:**

04/28/2008 09:06:49 AM EDT

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**Attachments:**

Yes

---

**Attachment Names:**

OCC-RFP-241 Remote Devices.doc

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# DOMINION EAST OHIO

## All Billing Active & Inactive At-Premise Account Summary \*

Meter Counts by Location (Inside or Outside) and Remote Device Type

Run Date: 9/4/2008  
Time: 07:56:56 AM

As of Apr 2008

Meters

FMS Area	Local Office	ROM American	ROM Badger	Hex Gen 1	Hex Gen 2	Hex Gen 3	Hex Gen 4	Inside - Ho Remote	AMR	Outside Meters	Total Meters	% AMR
FMS North	ASHTABULA	4	1	859	374	228	712	189	13,423	26,854	42,655	31.5%
	EASTERN	3,258	1,606	7,983	9,514	4,074	14,559	28,801	37,500	85,840	201,715	18.6%
	NORTHEAST	2,413	1,386	10,998	10,806	4,561	12,764	28,825	48,532	90,015	210,310	23.1%
	WESTERN	2,064	1,159	15,168	17,856	5,485	18,334	35,110	31,483	38,241	166,900	18.8%
		Sum:	1,778	34,986	38,550	13,348	47,369	92,625	130,938	172,950	675,500	21.1%
FMS South	AKRON	2,755	1,288	13,425	9,361	7,944	15,787	19,303	38,930	152,741	281,472	14.9%
	COLEGATE			10	13	124	50	62	6,935	14,442	21,636	32.1%
	NEW PHILADELPHIA	1	1	1,342	1,015	738	1,925	19	3,528	12,768	21,337	16.5%
	PERRY YARD	881	580	7,429	7,357	4,480	12,701	324	21,273	65,948	120,973	17.6%
	WEST OHIO	12	670	4			2	8,346	13,867	47,567	70,568	19.8%
	WOODSTER	7		840	651	623	1,607	30	4,095	13,878	21,729	18.8%
		Sum:	6,997	29,638	22,748	13,809	31,072	44,333	71,773	207,104	465,109	18.7%
Total Meters:		Sum:	13,636	7,398	55,101	65,108	31,153	92,037	244,816	653,874	1,307,489	18.7%

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

165

---

**Subpart:**

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**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

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**Question:**

Referring to Schedule E-1 of the Application, No. K 5, item 19, page 45, explain the "reasonable efforts" the Company makes to obtain access to a customer's premise for purposes of obtaining an actual meter reading?

---

**Answer:**

The Meter Reading Department makes an attempt to read every meter on a bi-monthly schedule. If there is "No Access" to the meter, a door-hanger is left that explains why the company could not read the meter (examples: dog prevented access, meter obstructed, no access to inside meter, etc.). The door-hanger instructs the customer to call to schedule an appointment to have their meter read and also offers the customer the option of using the automated voice response system to call-in their meter reading.

In accordance with the meter reading plan developed to comply with the minimum gas service standards and the related waivers granted to DEO in Case No. 06-1452-GA-WVR, the company is currently revising the existing process of contacting customers who have had multiple consecutive estimated bills due to "No Access" to the meter. This process includes two versions of doorhangers, automated outbound telephone calling that begins after 5 consecutive estimates, letters with increasingly urgent calls to action and a termination notice that will be printed on page 1 of the bill once a customer is scheduled for disconnection as a result of failing to provide access to the meter.

---

**Preparer Of Response:**

Joe Patten

---

**Date Prepared:**

01/18/2008 10:00:45 AM EST

---

**Attachments:**

No

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

149

---

**Subpart:**

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**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Please identify the total number of accounts that were placed on a 1/6 payment plan to avoid disconnection in 2005, 2006, and 2007?

---

**Answer:**

2005: 82,568

2006: 119,213

2007: 103,453

---

**Preparer Of Response:**

David Holt

---

**Date Prepared:**

01/18/2008 09:17:17 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

151

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**Subpart:**

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**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Please identify the total number of residential accounts that were established on either of the 1/3 or 1/6 payment plans and the customer defaulted on the payment plan in 2005, 2006, and 2007?

---

**Answer:**

2005: 39,575

2006: 61,341

2007: 41,247

---

**Preparer Of Response:**

David Holt

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**Date Prepared:**

01/18/2008 09:19:08 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

146

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**Subpart:**

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**Request Date:**

01/17/2008

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**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

If the response to OCC Interrogatory No. 145 is negative, please explain why not?

---

**Answer:**

The payment plans already offered provide adequate methods for customers to pay past-due balances. In addition, customers are allowed to maintain a payment plan when they have failed to make payments by paying an amount equal to the missed payments ("catch-up") as long as this is done before service is terminated and the account has been issued a final bill.

---

**Preparer Of Response:**

David Holt

---

**Date Prepared:**

01/18/2008 09:13:52 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 11th Set

---

**Question Number:**

402

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**Subpart:**

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**Request Date:**

04/23/2008

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**Due Date:**

05/09/2008

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**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to the Company response to OCC Interrogatory No. 146, explain how the Company determined that the current extended payment plans are adequate.

---

**Answer:**

Dominion East Ohio compared its extended payment plans to applicable rules and regulations and determined that the plans were compliant.

---

**Preparer Of Response:**

David Holt

---

**Date Prepared:**

04/25/2008 11:05:50 AM EDT

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

154

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**Subpart:**

---

**Request Date:**

01/17/2008

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**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to Schedule E-1 of the Application, Sheet No. K 4, item 13, page 44,  
does DEO provide adjusted bill due dates for residential customers?

---

**Answer:**

No.

---

**Preparer Of Response:**

Becky Merritt

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**Date Prepared:**

01/18/2008 09:29:14 AM EST

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**Attachments:**

No

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PUCO Case No. 07-590-GA-ALT  
PUCO Case No. 07-591-GA-AAM  
Date Received: August 29, 2007  
Response Due: September 18, 2007

OCC-INT-04-066

**REQUEST:**

66. Referring to Schedule E-1, Tariff Sheet No. 24.8, page 1 and 2, item 1, does DE-Ohio provide adjusted due dates to customers? If so, please provide the Company's policy on providing adjusted due dates.

**RESPONSE:**

The Company provides adjusted due dates to residential customers upon request. Commercial master-metered accounts are not eligible for adjusted due dates. Due dates can be adjusted forward five to ten billing cycles.

**Ohio Consumers' Counsel  
Fifth Set Interrogatories  
Vectren Delivery of Ohio.  
PUCO Case No. 07-1080-GA-AIR  
PUCO Case No. 07-1081-GA-ALT**

229. Referring to Schedule E-1, Sheet No. 62, Paragraph 4, does the Company offer adjusted due dates to customers?

**RESPONSE:**

**Responder: William Doty**

**Yes, on a limited basis.**

230. If the response to OCC Interrogatory No. 229 is affirmative, please explain the adjusted due date procedures.

**RESPONSE:**

**Responder: William Doty**

**Vectren does have an optional program to Social Security and Pension recipients which allows customers to select the due date for the monthly statement.**

**Customers receiving Social Security benefits may contact our Contact Center and request a change in due date to correspond with receipt of their monthly check. The Vectren representative reviews the requested date to validate if it would be after the meter is read. If so, the due date is changed. Customers may also request an extension on a monthly bill if they cannot pay by the due date. This plan allows the customer's due date to be extended up to 10 days past the normal due date. Customers interested in an extension of their due date may contact a customer service representative, the automated IVR (Interactive Voice Response), or utilize vectren.com to make the request.**

**The pay date must be prior to the next scheduled read. Customers may request an extension as many times as they wish, as long as they have kept prior agreements and have met the conditions described in the next paragraph.**

**The requirements for the Extended Due Date Plan are that the bill must be current, the account cannot have two disconnect notices in the past twelve months, the customer cannot be on bank draft, and the customer must agree to pay their current bills on time.**

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

---

**Data Request Set:**

Interrogatories - 11th Set

---

**Question Number:**

416

---

**Subpart:**

---

**Request Date:**

04/23/2008

---

**Due Date:**

05/09/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to the Company's response to OCC Interrogatory No. 157, explain why there are a larger number of accounts that include a period greater than 1 billing period during the non-winter heating months than during the winter heating months in 2006 and 2007?

---

**Answer:**

DEO objects to this request because it improperly seeks a detailed, narrative response. Under the applicable Commission rules and Ohio Civil Rules, "[a]n interrogatory seeks an admission or it seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a function reserved by the rules for deposition." Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971). DEO also objects on the grounds that the request is overbroad. Subject to and without waiving this objection, DEO states as follows:

DEO does not know why there are a larger number of accounts that include a period greater than one billing period during the non-winter heating months than during the winter heating months in 2006 and 2007 and expects that many factors outside DEO's personal knowledge may explain this. DEO has observed that, historically, access is granted to our meters more often in the non-heating months than in the heating months, which may be a factor explaining why there are more cancels/rebills covering more than one billing period.

---

**Preparer Of Response:**

Becky Merritt

---

**Date Prepared:**

04/25/2008 12:30:05 PM EDT

---

**Attachments:**

No



**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

---

**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

157

---

**Subpart:**

---

**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to Schedule E-1 of the Application, Sheet No. K 6, item 15, page 45, for each month of 2006 and 2007, please identify the number of bills that were sent to residential customers that included charges for a period of time longer than thirty days?

---

**Answer:**

The attached document contains the number of accounts that billed for a period greater than 1 billing period for each month of 2006 and 2007. One billing period is defined as 40 or more days because there are situations, especially over the holidays, where an estimated read in December to an actual read in January on the last day of the billing window will lead to a 39 day bill.

---

**Preparer Of Response:**

Becky Merritt

---

**Date Prepared:**

01/18/2008 09:32:21 AM EST

---

**Attachments:**

Yes

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**Attachment Names:**

Number DEO bills GT one month - 2006-2007.xls

Revenue Month	# Of Accounts
---------------	---------------

200601	31,139
200602	31,219
200603	32,117
200604	52,733
200605	49,253
200606	78,754
200607	72,321
200608	68,468
200609	52,584
200610	36,456
200611	25,242
200612	26,577
200701	21,246
200702	18,367
200703	35,776
200704	44,611
200705	53,432
200706	62,204
200707	53,085
200708	58,635
200709	46,121
200710	43,162
200711	20,030
200712	17,498

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

158

---

**Subpart:**

---

**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to Schedule E-1, No. K 5 of the Application, item 16, page 45, please identify:

- a. How many residential customers paid through the online website every month for each of the last five years;
- b. How many residential customers paid by bank drafted automated withdrawals every month for each of the last five years;
- c. How many residential customers paid by credit card or electronic check every month for each of the last five years;
- d. How many residential customers paid at an authorized agent every month for each of the last five years;
- e. How many residential customers paid by U.S. mail every month for each of the last five years;
- f. How many residential customers paid through an electronic data interface ("EDI") every month for each of the last five years; and
- g. How many residential customers paid through an automated clearing house ("ACH") through the online website every month for each of the last five years?

---

**Answer:**

See responses on attached document.

---

**Preparer Of Response:**

Becky Merritt

---

**Date Prepared:**

01/18/2008 09:33:09 AM EST

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**Attachments:**

Yes

---

**Attachment Names:**Response to #158.xls

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**158. How many residential customers paid through these methods every month for each of the last five years:**

<b>158.a.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
ONLINE WEBSITE - 2007	80,626	81,109	92,484	84,356	89,685	82,644	84,006	90,501	77,212	92,757	91,542	86,378
ONLINE WEBSITE - 2006	72,272	76,139	87,948	74,610	81,812	77,653	72,313	83,731	73,038	78,038	77,179	73,528
ONLINE WEBSITE - 2005	65,706	70,069	79,387	73,970	74,567	74,647	71,632	76,551	70,578	75,160	68,714	66,778
ONLINE WEBSITE - 2004	19,207	36,227	57,919	55,455	53,366	56,040	54,701	57,144	57,912	59,585	63,205	62,297
ONLINE WEBSITE - 2003	11,573	14,135	15,847	16,712	16,065	15,966	16,774	16,148	16,532	18,282	16,131	18,987
<b>158.b.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
BANK DRAFT - 2007	98,452	101,811	111,857	104,071	119,638	102,303	107,463	118,525	98,186	122,138	115,491	101,079
BANK DRAFT - 2006	94,481	96,919	112,504	101,820	109,094	103,043	97,677	113,797	97,427	112,203	111,953	96,099
BANK DRAFT - 2005	91,557	91,578	102,585	96,596	96,998	96,790	94,894	101,313	98,486	102,572	109,286	96,103
BANK DRAFT - 2004	20,579	74,251	102,346	98,014	94,940	97,961	96,344	99,132	98,326	97,327	100,262	94,391
BANK DRAFT - 2003	17,633	20,924	23,784	23,869	23,132	22,065	23,622	22,631	22,493	23,377	19,800	23,445
<b>158.c.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
CRED/DEBIT CARD, ECHECK - 2007	44,821	47,986	52,168	49,506	44,405	40,150	40,059	37,854	31,143	37,004	35,515	34,565
CRED/DEBIT CARD, ECHECK - 2006	43,508	41,774	53,298	43,224	43,584	35,954	36,157	37,071	33,884	36,691	33,451	33,647
CRED/DEBIT CARD, ECHECK - 2005	31,932	36,749	41,634	39,167	34,455	31,219	28,509	28,334	27,284	30,727	28,731	32,207
CRED/DEBIT CARD, ECHECK - 2004	11,845	23,666	34,567	31,135	26,726	28,176	24,612	23,232	21,886	21,179	25,378	23,849
CRED/DEBIT CARD, ECHECK - 2003	0	0	0	0	0	0	0	0	0	0	0	6,907
<b>158.d.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
AUTHORIZED AGENT - 2007	47,832	45,952	48,999	47,853	45,448	42,022	43,948	42,268	38,498	46,742	42,763	30,905
AUTHORIZED AGENT - 2006	50,216	46,555	52,507	44,845	48,149	42,651	41,700	42,436	40,575	46,540	41,343	37,560
AUTHORIZED AGENT - 2005	48,957	52,133	54,808	49,883	46,356	42,898	39,775	42,686	39,233	45,945	42,082	38,303
AUTHORIZED AGENT - 2004	36,645	73,385	93,898	46,981	43,110	44,216	39,991	41,466	39,504	42,436	47,750	39,622
AUTHORIZED AGENT - 2003	27,821	36,448	41,141	38,755	33,498	33,891	31,226	29,981	32,494	35,416	32,164	34,682
<b>158.e.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
US MAIL - 2007	565,468	545,035	611,737	548,999	595,441	538,226	552,581	577,597	494,517	585,062	537,565	491,675
US MAIL - 2006	593,815	599,403	679,243	563,804	624,370	593,678	555,694	601,613	538,748	601,574	578,444	531,969
US MAIL - 2005	600,233	607,828	842,494	591,486	601,363	577,396	556,718	600,480	564,510	637,550	582,904	619,918
US MAIL - 2004	194,891	200,715	673,859	657,124	641,500	664,426	625,453	683,696	602,254	602,624	619,769	590,648
US MAIL - 2003	Data not available											
<b>158.f.&amp;g.</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
EDI/ACH - 2007	80,295	76,842	84,359	80,173	89,529	79,598	85,355	87,325	77,679	94,221	87,450	88,977
EDI/ACH - 2006	62,652	65,372	71,779	61,403	70,730	65,378	62,450	72,215	65,896	81,179	77,064	70,719
EDI/ACH - 2005	36,909	38,207	41,412	38,802	38,638	38,555	37,628	40,976	39,423	50,052	64,180	59,840
EDI/ACH - 2004	2,722	7,904	11,322	35,666	33,732	35,032	33,725	35,732	34,279	34,983	36,744	35,057
EDI/ACH - 2003	0	0	0	114	309	783	1,320	1,306	1,447	1,620	2,162	2,702

**Note:** Although some older data may still exist, in general data that is over 4 years old is in the process of being purged.

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

161

---

**Subpart:**

---

**Request Date:**

01/17/2008

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**Due Date:**

01/23/2008

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**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to Schedule E-1 of the Application, No. K 5, item 16, page 45:

- a. Is there a lag time for payments to post to accounts for payments made through the online website;
  - b. If the response to OCC Interrogatory No. 161 (a) is affirmative, what is the lag time;
  - c. Is there a lag time for payments to post to accounts for payments made through bank drafted automated withdrawals;
  - d. If the response to OCC Interrogatory No. 161 (c) is affirmative, what is the lag time;
  - e. Is there a lag time for payments to post to accounts for payments made by a credit card or electronic check;
  - f. If the response to OCC Interrogatory No. 161 (e) is affirmative, what is the lag time;
  - g. Is there a lag time for payments to post to accounts for payments made at an authorized agent;
  - h. If the response to OCC Interrogatory No. 161 (g) is affirmative, what is the lag time;
  - i. Is there a lag time for payments to post to accounts for payments made by U.S. mail;
  - j. If the response to OCC Interrogatory No. 161 (i) is affirmative, what is the lag time;
  - k. Is there a lag time for payments to post to accounts for payments made through EDI;
  - l. If the response to OCC Interrogatory No. 161 (k) is affirmative, what is the lag time;
  - m. Is there a lag time for payments to post to accounts for payments made through ACH; and
  - n. If the response to OCC Interrogatory No. 161 (m) is affirmative, what is the lag time?
-

**Answer:**

- a. It depends upon when the payment is made.
- b. If payment is made before 4:30 p.m. Monday - Friday, it will post the same night. If payment is made after 4:30 p.m. Monday - Friday or on the weekend, it will post the next business night.
- c. No.
- d. Not applicable.
- e. It depends upon when the payment is made.
- f. If payment is made before 4:30 p.m. Monday - Friday, it will post the same night. If payment is made after 4:30 p.m. Monday - Friday or on the weekend, it will post the next business night.
- g. It depends upon when the payment is made.
- h. If payment is made before 4:30 p.m. Monday - Friday, it will post the same night. If payment is made after 4:30 p.m. Monday - Friday or on the weekend, it will post the next business night.
- i. Dominion's goal is to post 96% of payments received within 24 hours.
- j. See above.
- k. No, payments are posted the same business day that they are received.
- l. Not applicable.
- m. It depends upon when the payment is made.
- n. If payment is made before 4:30 p.m. Monday - Friday, it will post the same night. If payment is made after 4:30 p.m. Monday - Friday or on the weekend, it will post the next business night.

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**Preparer Of Response:**

Becky Merritt

**Date Prepared:**

01/18/2008 09:43:53 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

130

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**Subpart:**

---

**Request Date:**

01/17/2008

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**Due Date:**

01/23/2008

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**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to Schedule E-1 of the Application, Sheet No. K 1, item 3, page 41:

- a. What are the criteria used by the Company to determine when a residential customer must pay a security deposit for installation of new service;
- b. Please explain all the options that are available to residential customers for paying the deposit;
- c. Does DEO explain the options that are available to residential customers to demonstrate financial responsibility;
- d. If the response to OCC Interrogatory No. 130 is affirmative, how does DEO explain the options that are available to residential customers to demonstrate financial responsibility;
- e. Are customer service representatives trained to explain the options that are available to residential customers to demonstrate financial responsibility
- f. If the response to OCC Interrogatory No. 130 is affirmative, please describe the training for customer service representatives to explain the options that are available to residential customers to demonstrate financial responsibility;
- g. Does the Company use scripts to help customer service representatives explain the different options; and
- h. Please describe any situations where customers are requested to provide social security numbers before service will be provided?

---

**Answer:**

- a. If a customer is determined to be a credit risk under OAC 4901:1-17-04 Re: Establishment of Credit (residential) or under OAC 4901:1-13-08 (A) (small commercial gas service), a deposit is requested.
- b. Dominion eBill – Free service which allows customer to view and pay their monthly Dominion bill (including security deposit) online from their bank account. Enrollment required.  
 Bank Draft – Free service which allows customer's bill payment to be automatically deducted from the customer's bank account. Enrollment required.  
 Credit/Debit Card or Electronic Check – Payment option available by phone

(toll free) or online (www.dom.com) via Dominion's third party vendor

BillMatrix. Fees apply.

MyCheckFree.com – Online payment option which allows a customer the ability to view and pay bill via third party vendor CheckFree. Fees apply.

Authorized Payment Centers – Authorized local business contracted through Dominion's service area which allows a customer to make a payment in person. Some locations offer evening and weekend hours. Fees apply.

U.S. Mail – Payment directed to Dominion's Customer Payment Services in Richmond, VA. Postage required.

c. Yes

d. Customer service representatives explain options available to demonstrate financial responsibility by phone. Information regarding the residential Guarantor option is included on the bill and available on Dominion's internet website.

e. Yes

f. Customer service representatives are verbally trained by instructors in a classroom setting on the options available to demonstrate financial responsibility. In addition, job aids are available to the customer service representatives through DEO's Customer Information System.

g. The company relies on jobs aids accessed through the Customer Information System rather than on scripts.

h. Requesting the Social Security number is part of the application for service process; however, it is not required for connection of service.

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**Preparer Of Response:**

David Holt

**Date Prepared:**

01/18/2008 08:47:08 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 11th Set

---

**Question Number:**

390

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**Subpart:**

---

**Request Date:**

04/23/2008

---

**Due Date:**

05/09/2008

---

**Topic:**

Section E - Rates and Tariffs

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**Question:**

Referring to the Company's response to OCC Interrogatory No. 130(h), what information must a residential customer provide if the customer refuses to provide their social security number to establish service?

---

**Answer:**

If a customer refuses to provide their social security number, no additional information will be required from the customer to establish an account in their name at the requested premise.

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**Preparer Of Response:**

David Holt

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**Date Prepared:**

04/25/2008 09:06:17 AM EDT

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

---

**Data Request Set:**

Interrogatories - 11th Set

---

**Question Number:**

387

---

**Subpart:**

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**Request Date:**

04/23/2008

---

**Due Date:**

05/09/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to the Company's response to OCC Interrogatory No. 129, describe how the Company protects social security numbers against inadvertent disclosure?

---

**Answer:**

DEO objects to this request because it improperly seeks a detailed, narrative response. Under the applicable Commission rules and Ohio Civil Rules, "[a]n interrogatory seeks an admission or it seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a function reserved by the rules for deposition." Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971). DEO also objects on the grounds that Interrogatory No. 129 did not reference social security numbers and that DEO therefore does not understand the question. Subject to and without waiving these objections, DEO states as follows:

Measures taken by DEO to prevent the inadvertent disclosure of social security numbers include the following: Only appropriately trained personnel and having a legitimate business need are allowed access to the Customer Information System (CIS). Further, programming has been implemented in the Company's CIS to mask a customer's social security number when account information is displayed. This protected information is only available to employees with the additional security clearances. Access to phone centers is restricted to personnel that have authorization. Such authorization is coded into the employees' access cards/IDs.

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**Preparer Of Response:**

David Holt

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**Date Prepared:**

04/25/2008 09:03:23 AM EDT

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 3rd Set

---

**Question Number:**

132

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**Subpart:**

---

**Request Date:**

01/17/2008

---

**Due Date:**

01/23/2008

---

**Topic:**

Section E - Rates and Tariffs

---

**Question:**

If deposits are billed to customers, please explain how the billing process works, including the number of months customers have to pay the deposit?

---

**Answer:**

A deposit is billed in one installment and due in 10 days. However, we will work with the customer on a case-by-case basis.

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**Preparer Of Response:**

David Holt

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**Date Prepared:**

01/18/2008 08:55:55 AM EST

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**Attachments:**

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

---

**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 11th Set

---

**Question Number:**

392

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**Subpart:**

---

**Request Date:**

04/23/2008

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**Due Date:**

05/09/2008

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**Topic:**

Section E - Rates and Tariffs

---

**Question:**

Referring to the Company's response to OCC Interrogatory No. 391, what criteria is used by the Company to determine when to provide alternative methods for billing deposits and when not to provide alternatives?

---

**Answer:**

DEO objects to this request because it improperly seeks a detailed, narrative response. Under the applicable Commission rules and Ohio Civil Rules, "[a]n interrogatory seeks an admission or it seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a function reserved by the rules for deposition." Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971). Subject to and without waiving this objection, DEO responds as follows:

CSC agents will review the account history and, if applicable, other or prior accounts that the customer may have or had. In this review, the agent may consider factors such as overall payment history, successful completion of any payment plans granted, or the successful completion of other extensions granted.

---

**Preparer Of Response:**

David Holt

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**Date Prepared:**

04/25/2008 09:11:12 AM EDT

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**Attachments:**

No

**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

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**Data Request Set:**

Interrogatories - 6th Set

---

**Question Number:**

196

---

**Subpart:**

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**Request Date:**

02/25/2008

---

**Due Date:**

03/18/2008

---

**Topic:**

General

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**Question:**

For the years 2006, 2007 and 2008 – to present, how many complaints has the Company received, each year, from customers about water in the customer's gas line?

---

**Answer:**

DEO objects to this interrogatory on the ground that the term "complaint" is vague and undefined. Subject to and without waiving this objection, DEO answers as follows: The Company has received the following customer complaints regarding water in the gas lines:

Received through Claims

Received through Customer Relations

2006

16

10

2007

61

15

2008 to Date

57

9

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**Preparer Of Response:**

Vicki Friscie

---

**Date Prepared:**

02/26/2008 07:40:46 AM EST

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**Attachments:**

0 0 0

No

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**The East Ohio Gas Company d/b/a Dominion East Ohio**  
**Case No. 07-0829-GA-AIR**  
**Response to Data Requests**

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**Requesting Party:**

OCC

---

**Data Request Set:**

Interrogatories - 12th Set

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**Question Number:**

457

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**Subpart:**

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**Request Date:**

05/14/2008

---

**Due Date:**

06/03/2008

---

**Topic:**

General

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**Question:**

Referring to the Company's response to OCC Interrogatory No. 196, what action did the Company take to correct the problem of water in the line?

---

**Answer:**

DEO objects to the general request to continually review and supplement all responses to OCC's first, second, third, fourth, fifth, sixth, seventh, eighth, ninth, tenth, eleventh, and twelfth sets of discovery with subsequently acquired information. Commission Rule 4901-1-16(D) provides that responses which are complete when made need not be supplemented with subsequently acquired information. DEO also objects to this request because it assumes a fact not in evidence, namely, that DEO's response to Interrogatory No. 196 established that there was a problem of water in a line. DEO also objects to this request on the grounds that the terms "action," "correct," and "problem" are vague and undefined. DEO also objects to this request on the grounds that it would subject DEO to annoyance, oppression, and undue burden or expense. Subject to and without waiving these objections, DEO responds as follows:

Please see DEO's response to OCC Request for Production of Documents No. 120.

---

**Preparer Of Response:**

Vicki Friscie

---

**Date Prepared:**

05/16/2008 11:13:15 AM EDT

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**Attachments:**

No

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**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing the *Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel* has been served via First Class US Mail (electronically upon DEO & DEO Counsel), this 23<sup>rd</sup> day of June, 2008.



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Assistant Consumers Counsel

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