

FILE

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of)
Cameron Creek Apartments,)
)
Complainant,)
)
v.) Case No. 08-1091-GA-CSS
)
Columbia Gas of Ohio, Inc.,)
)
Respondent.)

**DIRECT TESTIMONY OF
DAWN BASS
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Dawn Bass and my business address is 1600 Dublin Road EW2, Columbus,
3 OH 43215.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by NiSource Corporate Services. I have been a Program Specialist since
6 April of this year.

7 **Q. WHAT ARE YOUR JOB RESPONSIBILITIES AS PROGRAM SPECIALIST?**

8 A. As a Program Specialist, I oversee the OQ (operator qualification) programs for
9 contractors for all of the Columbia distribution companies.

10 **Q. WHAT IS YOUR PRIOR EMPLOYMENT HISTORY WITH COLUMBIA OR**
11 **NISOURCE?**

12 A. I have been with the NiSource companies since February 12, 1990. From December of
13 1993 to February of 2006, I was a service technician. In February of 2006, I became a
14 support specialist. In approximately September of 2006, my title was changed to
15 technical trainer. And in November of 2007, I took a technical support position but I
16 continued to conduct technical training.

17 **Q. WHAT WERE YOUR JOB RESPONSIBILITIES AS A SERVICE TECHNICIAN?**

18 A. As a service technician, it was my responsibility to turn on gas service, inspect new
19 installations and new service, set meters, and respond to "priority calls" – gas leaks, gas
20 odors, fires, and carbon monoxide calls.

1 **Q. WHAT WERE YOUR JOB RESPONSIBILITIES AS A SUPPORT SPECIALIST?**

2 A. My group would review any changes to Columbia's policy and procedure manual or
3 Ohio's minimum gas service standards and change Columbia's training materials to
4 reflect those changes. We would also write newsletters for field personnel to explain
5 Columbia's policies and procedures and update personnel on any changes. We were also
6 responsible for training and qualifying Columbia field employees.

7 **Q. WHAT WERE YOUR JOB RESPONSIBILITIES AS A TECHNICAL TRAINER?**

8 A. For new employees or employees doing a new specific task for the first time, I would
9 conduct classroom training to qualify them to perform those tasks, as well as skill and
10 ability hands-on training. I would train new service technicians. And I would also
11 perform field evaluations for new service technicians. I would shadow the service
12 technicians for the day to ensure that they were doing their jobs in accordance with
13 Columbia policy and procedure and the National Fuel Gas Code.

14 **Q. DID YOU EVER RECEIVE TRAINING FROM COLUMBIA ON THE**
15 **NATIONAL FUEL GAS CODE?**

16 A. Yes. I was first trained in the requirements of the National Fuel Gas Code when I went
17 into service training as a new service technician in December 1993.

18 **Q. WHAT DID THAT TRAINING CONSIST OF?**

19 A. We studied and reviewed the National Fuel Gas Code. We also went through worksheets
20 on topics such as how to size house lines, how to size service lines, and how to calculate
21 combustion/ventilation air.

1 **Q. ON WHICH EDITION OF THE NATIONAL FUEL GAS CODE WERE YOU**
2 **TRAINED?**

3 A. The edition that was current when I became a service technician in 1993. When
4 Columbia trains new service technicians, it trains them on whatever edition of the
5 National Fuel Gas Code is in effect at that time.

6 **Q. DID THE NATIONAL FUEL GAS CODE TRAINING YOU WENT THROUGH**
7 **AS A NEW SERVICE TECHNICIAN IN DECEMBER 1993 DIFFER FROM THE**
8 **TRAINING YOU CONDUCTED AS A TECHNICAL TRAINER FROM 2006 TO**
9 **2009?**

10 A. The training has not changed substantially. The materials have been updated to reflect
11 changes in the National Fuel Gas Code. And the training technology has changed –
12 rather than using overheads, we are now using PowerPoints. But the fundamentals have
13 not really changed.

14 **Q. DO COLUMBIA'S SERVICE TECHNICIANS RECEIVE ANY FOLLOW-UP OR**
15 **CONTINUING TRAINING ON THE NATIONAL FUEL GAS CODE AFTER**
16 **THEIR INITIAL TRAINING?**

17 A. Any time a new edition of the National Fuel Gas Code is released, service technicians
18 receive a summary and explanation of the differences between the prior edition and the
19 new edition. If the changes are more than minor editorial changes, field personnel are
20 brought in for a one-day review of the changes to the Code. Also, if the Training
21 department (or prior to that, the Regulatory Compliance and Training department) notices
22 an increase in tech line calls or service tech inquiries regarding a particular topic, the
23 department will issue a newsletter to address that topic.

Q. IN WHAT SITUATIONS DO COLUMBIA'S SERVICE TECHNICIANS APPLY THE NATIONAL FUEL GAS CODE IN THE FIELD?

A. Columbia service technicians apply the National Fuel Gas Code any time they are establishing/re-establishing gas service. This would include when they are inspecting new installations prior to setting the meter, responding to priority orders, restoring gas service after work had been performed on jurisdictional pipe (main, service line, meter setting), or restoring service when the gas had been turned off (non-pay, disconnect per customer request, etc.). Before service technicians can put gas into any dwelling they are required to perform testing and inspections. Those inspections include the appliances and piping inside the dwelling as well as inspections and testing of the facilities installed outside the dwelling.

Q. IN WHAT SITUATIONS, THEN, IF ANY, DO COLUMBIA'S SERVICE TECHNICIANS NOT APPLY THE NATIONAL FUEL GAS CODE IN THE FIELD?

A. Any time gas service is disconnected due to non-pay or customer request, or when we are reading a meter.

Q. WHICH VERSION OF THE NATIONAL FUEL GAS CODE DO COLUMBIA'S SERVICE TECHNICIANS APPLY IN THE FIELD?

A. Columbia's service technicians generally apply the version of the Code that is in effect at the time. If the service technician is inspecting a newly constructed building or a newly installed appliance, the service technician would apply the current National Fuel Gas Code. If the service technician were to see that an existing appliance or installation was in violation of the current National Fuel Gas Code, but the resident or owner could

1 demonstrate that the appliance or installation was in compliance with the National Fuel
2 Gas Code at the time it was installed, Columbia would apply the National Fuel Gas Code
3 that was in effect at the time of installation.

4 **Q. AS A RECENT TECHNICAL TRAINER AND LONG-TIME SERVICE**
5 **TECHNICIAN FOR COLUMBIA, ARE YOU GENERALLY FAMILIAR WITH**
6 **COLUMBIA'S POLICIES AND PROCEDURES?**

7 A. Yes, I am.

8 **Q. UNDER COLUMBIA'S POLICIES AND PROCEDURES, WHAT ARE**
9 **COLUMBIA'S SERVICE TECHNICIANS SUPPOSED TO DO IF THEY**
10 **DISCOVER THAT AN APPLIANCE IS IN VIOLATION OF THE NATIONAL**
11 **FUEL GAS CODE?**

12 A. They are supposed to red-tag the appliance, meaning they will turn off the gas to that
13 particular appliance.

14 **Q. WHAT ARE COLUMBIA'S SERVICE TECHNICIANS SUPPOSED TO DO IF**
15 **THEY HAVE VISITED THE SAME RESIDENCE MULTIPLE TIMES AND**
16 **KEEP FINDING THE SAME NATIONAL FUEL GAS CODE VIOLATION,**
17 **INDICATING THAT THE RESIDENT IS NOT RESOLVING THE VIOLATION?**

18 A. At that point, Columbia will disconnect gas service to the residence.

19 **Q. WHEN YOU WERE A SERVICE TECHNICIAN, DID YOU RED-TAG**
20 **APPLIANCES FOR VIOLATIONS OF THE NATIONAL FUEL GAS CODE?**

21 A. Yes, I did.

22 **Q. APPROXIMATELY HOW MANY TIMES A MONTH DID YOU RED-TAG**
23 **APPLIANCES FOR VIOLATIONS OF THE NATIONAL FUEL GAS CODE**
24 **WHEN YOU WERE A SERVICE TECHNICIAN?**

25 A. I couldn't say exactly, but I red-tagged hundreds of appliances for National Fuel Gas
26 Code violations each month.

1 **Q. DID YOU EVER RED-TAG A GAS-FIRED WATER HEATER BECAUSE IT**
2 **WAS LOCATED IN A BATHROOM BUT WAS NOT IN A CLOSET WITH A**
3 **SELF-CLOSING DEVICE AND WEATHER-STRIPPING ON THE DOOR AND**
4 **DID NOT HAVE A SUPPLY OF COMBUSTION AIR FROM THE OUTDOORS?**

5 **A. Yes, more than once.**

6 **Q. CAMERON CREEK APARTMENTS, THE COMPLAINANT IN THIS CASE,**
7 **HAS ARGUED THAT COLUMBIA SHOULD NOT BE PERMITTED TO APPLY**
8 **THE NATIONAL FUEL GAS CODE, BUT INSTEAD SHOULD APPLY**
9 **WHICHEVER BUILDING CODE APPLIED AT EACH PARTICULAR**
10 **RESIDENCE WHEN THAT RESIDENCE WAS PERMITTED FOR**
11 **CONSTRUCTION. WHAT IS YOUR RESPONSE TO THAT POSITION?**

12 **A. It would make it very difficult for a service technician to establish gas service. Before**
13 **establishing service, Columbia would have to determine when each residence was**
14 **permitted for construction and what the applicable building code was at the time of**
15 **permitting. They would need to review the building code that applied at the time of**
16 **permitting and ensure that the residence was built according to that code. They would**
17 **then need to determine whether the appliance installation or venting had been modified**
18 **since the original permit was issued. I am not sure how Columbia could gather, store, or**
19 **disseminate that information to the service technicians.**

20 **It would also make it very difficult for a service technician to disconnect gas service to an**
21 **appliance, because a service technician would have to perform the same kinds of research**
22 **before red-tagging an appliance.**

23 **And, it would increase the record-keeping burden on the service technician and on**
24 **Columbia in general. For each customer a service technician visited, Columbia would**
25 **have to maintain records regarding the building's permitting dates, applicable building**

code, and code requirements to ensure that the next service technician would not red-tag an appliance that had previously been found to be in compliance with the building code that applied at the time of permitting.

Q. CAMERON CREEK HAS ALSO SUGGESTED THAT COLUMBIA SHOULD BE REQUIRED TO OBTAIN APPROVAL FROM THE LOCAL BUILDING AUTHORITY, IF ANY, BEFORE RED-TAGGING AN APPLIANCE FOR A SAFETY VIOLATION. WHAT WOULD BE THE EFFECT ON COLUMBIA'S SERVICE TECHNICIANS IF THE PUBLIC UTILITIES COMMISSION ADOPTED SUCH A RULE?

A. It would greatly increase the record-keeping burden on the service technicians. Service technicians would have to catalogue the status of each of their proposed red-tags and whether it had been approved or disapproved by the local building authority. A service technician would also have to return to each residence after the local building authority had approved the red-tag to actually turn off gas service to the appliance.

If the service technician were responding to a priority call outside normal business hours, Cameron Creek's proposed rule could mean a substantial delay in addressing serious safety hazards. Columbia has service technicians who are on-call twenty-four hours a day, seven days a week. Our service technicians could be responding to priority calls at one o'clock in the morning. The local building department is probably not going to have a person available to answer calls from Columbia service technicians at that time of night.

1 **Q. CAMERON CREEK HAS ALSO ASSERTED THAT COLUMBIA SHOULD NOT**
2 **BE PERMITTED TO RED-TAG AN APPLIANCE FOR A SAFETY VIOLATION**
3 **IF FIXING THE VIOLATION WOULD “[R]EQUIRE EXPENSIVE REMEDIAL**
4 **CONSTRUCTION.” WHAT IS YOUR RESPONSE TO THAT POSITION?**

5 A. As a practical matter, it would be impossible to put such a rule into practice. Columbia’s
6 service technicians may not know what specifically will be required to fix a given
7 violation of the National Fuel Gas Code. Even if a technician knows what will be
8 required to fix a particular violation, he or she would not be in a position to calculate the
9 cost of that remediation. The rule also does not make any sense. A safety hazard is a
10 safety hazard, regardless of how much it costs to fix.

11 **Q. FINALLY, CAMERON CREEK HAS ASSERTED THAT ITS “APARTMENT**
12 **COMPLEX HAS OPERATED SAFELY OVER THE PAST 10 YEARS.” EVEN**
13 **ASSUMING THIS IS ACCURATE, WOULD THE LACK OF A HAZARDOUS**
14 **CARBON MONOXIDE INCIDENT IN THE PAST MEAN THAT A PRESENT**
15 **VIOLATION OF THE NATIONAL FUEL GAS CODE IS NOT REALLY**
16 **HAZARDOUS?**

17 A. No. Even if there has never been a carbon monoxide incident in the past, a violation of
18 the National Fuel Gas Code could cause a carbon monoxide incident in the future.
19 Conditions change in a home.

20 **Q. CAN YOU PROVIDE AN EXAMPLE, FROM YOUR OWN EXPERIENCE AS A**
21 **SERVICE TECHNICIAN, OF A SITUATION WHERE A VIOLATION OF THE**
22 **NATIONAL FUEL GAS CODE EXISTED FOR SEVERAL YEARS BEFORE IT**
23 **CAUSED A CARBON MONOXIDE INCIDENT?**

24 A. Yes. When I was a service technician, I had an instance where I got a carbon monoxide
25 reading of 1300 parts per million in a residence. The next day, we returned to the
26 building to determine the source of the carbon monoxide. The building had its furnace in
27 the basement. The building was air-tight, and the basement was not big enough by itself

1 to supply the volume of combustion, dilution, and ventilation air required by the National
2 Fuel Gas Code. With the basement door closed, there wasn't sufficient combustion air
3 downstairs. The only place for the furnace to get additional air for combustion was from
4 the flue. As a result, the furnace's blower was sucking the flue gases back out of the flue
5 and circulating them into the ambient air of the residence, causing the high carbon
6 monoxide readings.

7 The prior residents had lived there for thirteen years without any carbon monoxide
8 incidents. But the prior residents had kept their basement door propped open with a
9 brick, because they had a cat. The new residents did not have a cat, so they kept the
10 basement door shut. If the prior residents had fixed the National Fuel Gas Code
11 violation, the carbon monoxide incident could have been prevented for the next residents.
12 I believe the new residents solved the problem by installing a 6" vent to the outside
13 directly into the combustion chamber of the furnace.

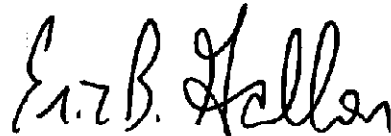
14 **Q. DOES THIS COMPLETE YOUR PREPARED DIRECT TESTIMONY?**

15 **A.** Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Direct Testimony of Dawn Bass was served via e-mail and U.S. mail on the 1st day of July, 2009, upon the following counsel for Complainant Cameron Creek Apartments:

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A handwritten signature in black ink, appearing to read "Eric B. Gallon", written over a horizontal line.

Eric B. Gallon