

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clauses)	Case No. 12-209-GA-GCR
Contained Within the Rate Schedules of)	
Northeast Natural Gas Company.)	

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clauses)	Case No. 12-212-GA-GCR
Contained Within the Rate Schedules of)	
the Orwell Natural Gas Company and)	
Related Matters.)	

REBUTTAL TESTIMONY OF REBECCA HOWELL

On Behalf of Orwell Natural Gas Company and Northeast Natural Gas Company

July 17, 2013

REBUTTAL TESTIMONY OF REBECCA HOWELL

1 Introduction

2 **Q. Please state your name and business address.**

3 A. My name is Rebecca Howell and my business address is 8500 Station
4 Street, Ste. 300, Mentor, OH 44060.

5 **Q. By whom are you employed?**

6 A. I am currently employed by Gas Natural, Inc.

7 **Q. On whose behalf are you testifying in this proceeding?**

8 A. I am testifying on behalf of Northeast Ohio Natural Gas Corporation
9 ("Northeast") and Orwell Natural Gas Company ("Orwell").

10 **Q. Were you present at the Gas Cost Recovery hearing in the above**
11 **captioned case?**

12 A. Yes, I was present at the hearing held at the offices of the Public Utilities
13 Commission of Ohio ("PUCO") from July 8, 2013 through July 10, 2013.

14 **Q. Were you in the hearing room during the testimony of PUCO Staff**
15 **witness Heather Lipnis?**

16 A. Yes.

17 **Q. Are you familiar with Ms. Lipnis?**

18 A. Yes. When I was employed by Cobra Pipeline, I would periodically assist
19 and answer questions regarding Orwell and Northeast's GCR filings.
20 Although I was not employed by Orwell or Northeast, I would be
21 periodically asked to assist in various filings by Northeast management,

1 due to my experience with the filings. Ms. Lipnis also worked on the GCR
2 filings.

3 **Q. Did Ms. Lipnis make any statement during her testimony that you**
4 **wish to rebut?**

5 A. Yes, Ms. Lipnis stated that I told Dawn Opara (an accountant for the
6 Companies) to increase the GCR estimate for one month and then to
7 report inaccurate GCR numbers for the quarterly true-up for the Actual
8 Adjustment. This never occurred. If I was assisting with a review of the
9 Companies GCR, I would review the GCR estimates to the best of my
10 ability. I never advocated the reporting of any numbers that did not reflect
11 an accurate GCR estimate or Actual Adjustment. Our GCR estimates
12 were always trued-up during the next quarter's Actual Adjustment. I never
13 told anyone to provide false information in the GCR estimate or Actual
14 Adjustment. Furthermore, I understand that if a correction needed to be
15 made to an Actual Adjustment, the Companies would need to petition the
16 PUCO for a correction to the Actual Adjustment as evidenced in the
17 attached correspondence from Orwell to the PUCO (attached hereto as
18 Exhibit 1).

19 **Q. Are you aware of any time during the audit period when Northeast's**
20 **Actual Adjustment was incorrect?**

21 A. Yes, after Northeast filed the September 2011 Actual Adjustment, it was
22 brought to my attention that Northeast's Actual Adjustment was incorrect
23 (See Exhibit 2). The inaccuracy was brought to the attention of PUCO

1 Staff member Roger Sarver. (Exhibit 2). He instructed Northeast to not
2 file an Application to correct the error, and instead, the inaccuracy would
3 be corrected during the PUCO audit. (Exhibit 2).

4 **Q. Have you ever attempted to provide false information to the PUCO?**

5 **A. No.**

6 **Q. Did you ever attempt to have any other Northeast or Orwell employee**
7 **falsify information submitted to the PUCO?**

8 **A.** No. I would never personally report any false number, nor would I instruct
9 any employee to report any false number.

10 **Q. Does this conclude your testimony?**

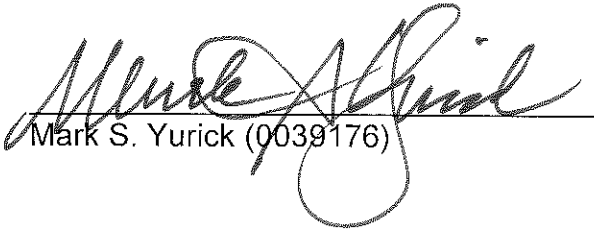
11 **A.** Yes it does.

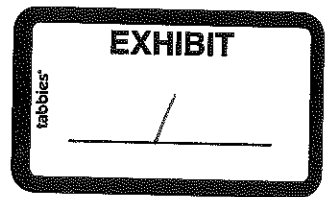
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 17th day of July, 2013 by electronic mail upon the following:

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Mark S. Yurick (0039176)



February 1, 2011

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Re: Error found on Schedule 3 of the January and February Orwell Natural Gas GCR filing.

I am writing to request authorization to change the Current Quarterly Actual Adjustment for the March 2011 GCR filing. The adjustment is in effect for January through March, but carries forward an entire year. An error was found that would significantly reduce the adjustment from .5267 to .0972.

In the GCR filings for October through December 2010, the Schedule 3 imbalance amount correctly shows a reduction for gas purchases which were sold to an outside entity. When Schedule 3 was calculated for January through March 2011, the gas reduction mentioned above was inadvertently reversed resulting in an overstatement of the Current Quarterly Actual Adjustment.

Enclosed is the original Schedule 3 followed by the proposed, revised Schedule 3.

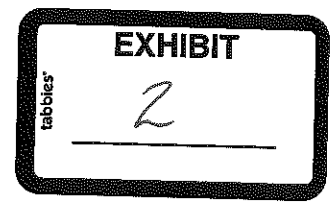
I respectfully request that this application be processed as expedient as possible to assure that the requested adjustment be implemented with the March 2011 Orwell GCR filing.

Please contact me with any questions.

Sincerely,

Dawn N. Opara
Orwell Natural Gas
Accountant

cc:



Becky Howell

From: Becky Howell
Sent: Thursday, July 11, 2013 12:21 AM
To: beckyrlh@yahoo.com
Subject: FW: GCR Schedule 3 Correction
Attachments: GCR Correction letter 2-01-11.doc; Schedule 3 samples.pdf

From: Dawn Opara [mailto:dopara@orwellgas.com]
Sent: Tuesday, February 01, 2011 11:16 AM
To: 'Becky Howell'
Subject: GCR Schedule 3 Correction

Hi, Becky.

Do you want to take a look at the letter I plan on sending to the PUC?
I'm open for comments if you think anything should be added or worded differently.

Thanks,

Dawn N. Opara
Orwell Natural Gas
(440) 974-3770

Becky Howell

From: Dawn Opara [dopara@orwellgas.com]
Sent: Tuesday, March 15, 2011 10:57 AM
To: 'Becky Howell'
Subject: RE: Orwells reported sales on GCR filings

* For NEO, in Sept., I used the sales accrual from Anita's sheets. After it was already filed, it was determined that it was incorrect, but I was told to leave it (as opposed to filing an Application to correct it as we just did for Orwell last month). He said that they would adjust for it in the next audit. The accrual was on Schedule 3 for three months and the next time that Schedule 3 was updated, I used the (as it stands now) "correct" way of reporting sales of Daily Invoicing by GCR rate codes less free gas.

For Orwell, I don't believe the sales accrual was ever used. NEO's Schedule 3 gets updated in Sept., Orwell's is updated in Oct. I was already instructed not to use the sales accrual by the time I filed the Oct. Schedule 3 for Orwell.

Dawn N. Opara
Orwell Natural Gas
(440) 974-3770

* **From:** Becky Howell [mailto:bhowell@cobrapipeline.com]
Sent: Tuesday, March 15, 2011 10:21 AM
To: 'Dawn Opara'
Subject: RE: Orwells reported sales on GCR filings

The other day on the phone you told me that Roger said to go ahead and leave the sales accrual that you put into the GCR filing in there, and correct it on the next filing, correct?

From: Dawn Opara [mailto:dopara@orwellgas.com]
Sent: Tuesday, March 15, 2011 9:02 AM
To: 'Becky Howell'
Subject: FW: Orwells reported sales on GCR filings

Becky,
For the audit, I ran the sales reports using <>T*. I have been using that since I started here. Since Nov. of last year, it has been changed to just choosing the GCR rate codes. As noted below, it may or may not cause a variance.

I have a folder called Orwell GCR Audit and I found these spreadsheets in it under Sales along with individually run Daily Invoicing Reports for each month.

I can send the individual months over to you from Navision, but it will be a slow process -- but let me know!

Dawn N. Opara
Orwell Natural Gas
(440) 974-3770

From: Becky Howell [mailto:bhowell@cobrapipeline.com]
Sent: Monday, November 29, 2010 1:41 PM
To: 'Dawn Opara'
Cc: 'Robyn Lojek'; 'Tom Smith'; 'Larry Brainard'; anoce@orwellgas.com
Subject: RE: Orwells reported sales on GCR filings

Dawn,

You cannot run a daily invoicing report with a filter <>t* on Orwell. This filter would include LGTS (may or may not have customers in this rate code, but regardless the filter needs changed). You will need to specify each GCR rate code that Orwell has for your filter (ie: SGS|GS|LGS|DEOGCR). I figured the main difference was the free gas.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/17/2013 2:08:21 PM

in

Case No(s). 12-0209-GA-GCR, 12-0212-GA-GCR

Summary: Testimony Rebuttal Testimony of Rebecca Howell electronically filed by Mark Yurick on behalf of Northeast Ohio Natural Gas Corporation and Orwell Natural Gas Company