

File

# PUCO EXHIBIT FILING

Date of Hearing: 2/1/16

Case No. 15-1288-GA-CSS

PUCO Case Caption: \_\_\_\_\_

In The Matter of The Complaint of Jaze E. Daniels  
VS Complainant  
The East Ohio Gas Company; d/b/a  
Dominion East Ohio, Respondent

List of exhibits being filed:

Complainant Ex. Nos 1-3

DEO Ex. No 1

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PUCO

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Reporter's Signature: Valerie J. Sloan  
Date Submitted: 2/15/16

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the	:	
Complaint of Faye E.	:	
Daniels,	:	
	:	
Complainant,	:	
	:	Case No. 15-1288-GA-CSS
vs.	:	
	:	
The East Ohio Gas Company,	:	
d/b/a Dominion East Ohio,	:	
	:	
Respondent.	:	

- - -

PROCEEDINGS

before Ms. Greta See, Attorney Examiner, at the  
Public Utilities Commission of Ohio, 180 East Broad  
Street, Room 11C, Columbus, Ohio, called at 12:31  
p.m. on Monday, February 1, 2016.

- - -

ARMSTRONG & OKEY, INC.  
222 East Town Street, Second Floor  
Columbus, Ohio 43215-4620  
(614) 224-9481 - (800) 223-9481  
Fax - (614) 224-5724

- - -



# Development Services Agency

Compl. Ex. 1

Mailing Date: Nov 19, 2015

Faye Daniels  
PO Box 1479  
Massillon, OH 44648

Please refer to the following number when making inquiries:

**Client No: 01117999**

Dear Faye Daniels:

Your Percentage of Income Payment Plan Plus (PIPP) application has been approved. Please be sure to make your PIPP Plus payments ON-TIME and IN-FULL to stay on the PIPP Plus program and get credits toward any past due balances on your account. If you have any changes to your household income, household size, or have a change of address before your next reverification date, please contact your local Community Action Agency to set up an appointment to report the changes.

<b>Action:</b>	Reverification Application
<b>Utility:</b>	Dominion East Ohio
<b>Payment:</b>	\$44.00
<b>Status:</b>	Accepted
<b>Arrearage Credit:</b>	\$191.00

You have the right to appeal the above PIPP Plus determination, in writing within 30 days of this notice if you believe it to be inaccurate. Your appeal must contain your name, address, social security number, telephone number, reason for appeal, and supporting information with your signature. Please forward your appeal to the address below.

If you move after submitting your application, are physically unable to reverify at your local HEAP provider, or you have any questions, please call the HEAP toll-free number (1-800-282-0880). Hearing impaired applicants should call 1-800-686-1557.

Sincerely,  
Office of Community Services

Website: [energyhelp.ohio.gov](http://energyhelp.ohio.gov)



**Development  
Services Agency**

Compl. Ex. 2

Mailing Date: 1/11/2016

Faye E Daniels -- HEAP  
PO Box 1479  
Massillon, OH 44648

Please refer to the following  
number when making  
inquiries:

**Client No: 01117999**

Dear Faye E Daniels,

The Home Energy Assistance Program (HEAP) has received your application and determined that your household is eligible for the 2015 - 2016 heating season. Your household will receive a one-time credit of \$334.00 **on your energy bill payable to Dominion East Ohio. If this is not your energy company, please contact us immediately.**

If you are a Natural Gas or Electric company customer, please allow 60 days for this credit to appear on your utility bill.

If you are a bulk fuel customer we will notify your fuel vendor of your HEAP benefit amount. After 14 days, you may contact your vendor to make arrangement for delivery.

Remember, it is up to you to see that the rest of your bill gets paid and fuel is delivered.

**Your right to an Agency Review**

If you disagree with this decision, you may ask for a HEAP agency review by contacting HEAP at the address listed below. HEAP must receive your request for an agency review within 90 days of the mailing date at the top of this page.

**If You Move**

It is important to notify HEAP of any changes of address. If you do not, your benefit could be delayed.

**In Case of Emergency**

If you are facing a disconnection or you have 25% or less of the fuel (propane, kerosene or fuel oil) capacity in your tank or less than a 10-day supply of coal, wood or pellets, please contact your local provider. They may be able to assist you.

**Please Keep This Letter**

This is your official HEAP notification letter. Many public assistance programs require proof of your HEAP application. This letter is proof of your application for HEAP.

**Contact Us**

If you have any questions about this letter please call us at 1-800-282-0880 or contact us at <http://development.ohio.gov/contactus/ContactInfo.aspx>.

Sincerely,  
Office of Community Assistance

Compl. Ex. 3

HOW WAS YOUR SHOPPING  
EXPERIENCE TODAY?  
¿Cómo fue su experiencia  
de compra hoy?

COAS

We're giving away \$80,000 worth of  
Walmart gift cards. You could win 1  
of 5 \$1000 Walmart gift cards or 1  
of 750 \$100 Walmart gift cards.  
Estamos regalando \$80,000 dólares en  
tarjetas de regalo de Walmart. Puedes  
ganar 1 de 5 \$1,000 tarjetas de  
regalo de Walmart o 1 de 750 \$100  
tarjetas de regalo de Walmart.

<http://www.survey.walmart.com>

You will need to enter the  
following online:

ID #: 7HXZMR1WL814

Just take this short online survey  
and let us know how we can better  
serve you.  
Solo tiene que llenar esta encuesta  
en línea y háganos saber cómo  
podemos servirle mejor

No purchase necessary. Open to  
legal residents of the 50 US, DC,  
or PR, 18 or older to enter.  
To enter without purchase and  
for complete official rules visit  
[www.entry.survey.walmart.com](http://www.entry.survey.walmart.com).  
Sweepstakes period is shown in  
the official rules. Survey  
must be taken within ONE week  
of today.

THANK YOU! WE VALUE YOUR OPINION!

**Walmart**   
Save money. Live better.

( 330 ) 479 - 9620  
MANAGER WILLIAM OBRIEN  
4004 TUSCARAWAS ST W  
CANTON OH 44708  
ST# 05410 OP# 002116 TEN 62 TR# 08179  
UTILITY BILL 060538887953 44.00 0  
PAYMENT FEE 068113107939 1.50 N  
TOTAL 45.50  
CASH TEND 50.00  
CHANGE DUE 4.50

Recipient Information  
Dominion East Ohio  
ACCOUNT # \*\*\*\*\*1881  
REFERENCE NUM 0H1913:2454:53  
PAYMENT 44.00  
FEE CHARGED 1.50  
TOTAL 45.50  
Bill payment service brought to you  
by CheckFreePay.

This is a non-refundable transaction.

Verify all account information is  
correct before leaving the payment  
location.

Keep your bill stub and receipt until  
the payment is applied to your  
account. The bill stub and receipt  
must be presented for any inquiry or  
change to the payment.  
Payment Receipt Number: 3380100531

# ITEMS SOLD 2

TC# 0275 3493 9261 8138 5887



Low Prices You Can Trust. Every Day.  
12/04/15 15:48:21

Savings Catcher! Scan with Walmart app



**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

1 **Direct Testimony of**  
2 **Margaret Callahan**

3 **I. INTRODUCTION**

4 **Q1. Please state your name, occupation and business address.**

5 A. My name is Margaret Callahan. I am employed by The East Ohio Gas Company d/b/a  
6 Dominion East Ohio (DEO or the Company) as Supervisor, Customer Service Center.  
7 My business address is 1201 E. 55th Street, Cleveland, Ohio 44103.

8 **Q2. Please describe your work history.**

9 A. I have been employed by DEO since 1990 in various positions related to customer  
10 service, including Call Center Representative, Meter Reader, Customer Relations  
11 Representative, and Supervisor, Customer Service Center.

12 **Q3. What are your responsibilities as Supervisor, Customer Service Center?**

13 A. I am responsible for the supervision of Customer Relations Representatives, handling  
14 escalated complaints, and ensuring compliance with the Commission's Minimum Gas  
15 Service Standards.

16 **Q4. What information have you reviewed to prepare your testimony?**

17 A. I have reviewed the Complaint, Ms. Faye Daniels' account history as documented in  
18 DEO's customer information system, and Ms. Daniels' billing statements.

19 **Q5. What is your understanding of the dispute giving rise to the Complaint?**

20 A. Ms. Daniels alleges that DEO unreasonably disconnected service after receiving energy  
21 assistance payments made on her behalf but before her next payment was due.

22 **Q6. What is the purpose of your testimony?**

23 A. My testimony explains Ms. Daniels' account history for natural gas at 2505 Crown Place  
24 NW, Canton, Ohio 44708 (the Premises). My testimony concludes that DEO acted

1 reasonably and that there is no validity to Ms. Daniels' complaint. In the time that Ms.  
2 Daniels has received service at the Premises, she has consistently failed to pay the  
3 amounts due for service. In one instance, she benefited from the unauthorized use of  
4 service, for which she also failed to pay. Ultimately, her failure to make payments has led  
5 to large unpaid arrearages and the repeated disconnection of her service.

6 **II. DEO ACCOUNTS AND RECORDS**

7 **Q7. Do you have knowledge of the history of Ms. Daniels' various accounts with DEO?**

8 A. Yes. I am familiar with the accounts and records pertaining to the service accounts  
9 referenced in Ms. Daniels' complaint. And I have personal knowledge of DEO's  
10 practices of acquiring and maintaining this information. DEO maintains numerous types  
11 of information regarding each customer's account, including meter readings, billing and  
12 payment history, dates of initiation and disconnection of service, and communications to  
13 and from customers. All such information is recorded at or near the time by a person with  
14 knowledge, or from information transmitted by a person with knowledge, and all such  
15 information is recorded and maintained in the course of DEO's regularly conducted  
16 business activity. It is DEO's regular practice in the course of its business activity to  
17 record and keep the sorts of information I relied upon in preparing this testimony.

18 **III. ACCOUNT HISTORY - 2014**

19 **Q8. How many accounts has Ms. Daniels established with DEO over the years?**

20 A. Since 2001, Ms. Daniels has had at least 11 different accounts with DEO, at various  
21 addresses. Her most recent account prior to establishing service at the Premises was for  
22 service to 1341 20th Street NE, Canton, Ohio 44714.

23 **Q9. When did Ms. Daniels establish service at the Premises?**

24 A. March 14, 2014.

1 **Q10. Did Ms. Daniels participate in the Percentage of Income Payment Plan program?**

2 A. Yes. For brevity's sake, I will refer to the program both as "PIPP Plus" or "PIPP" in this  
3 testimony, although the formal title is PIPP Plus. On her first bill, DEO sought to collect  
4 a PIPP default amount from a prior account of \$206.50 plus her current PIPP payment of  
5 \$43.00. The bill informed her that payment of this amount was required to remain on  
6 PIPP Plus. This was also explained to Ms. Daniels over the phone when she contacted the  
7 Company on April 4, 2014.

8 **Q11. What payments were made on this bill?**

9 A. In addition to a payment of \$87.50 that DEO received from Stark County Community  
10 Action (which had already been applied to Ms. Daniels' PIPP default amount at the time  
11 it was pledged), DEO received a total of \$256.00: a cash payment of \$23.00; and a  
12 payment from the Home Energy Assistance Program (HEAP) of \$233.00.

13 **Q12. Did Ms. Daniels remain on PIPP Plus?**

14 A. No. As DEO understands the PIPP rules, "Money provided from HEAP, or a similar  
15 program, shall not be counted as part of the monies paid by the customer to meet the  
16 monthly PIPP income-based payment requirement." Ohio Adm. Code 4901:1-18-  
17 13(C)(1). Thus, only \$23.00 applied towards the \$206.50 PIPP default amount, which  
18 was insufficient to cure the default. Accordingly, Ms. Daniels' April 24, 2014 bill  
19 informed her that she had been removed from PIPP Plus. Due to the HEAP credit, and the  
20 elimination of the PIPP default amount, that bill actually showed a credit balance.

21 **Q13. What happened on Ms. Daniels' account after that?**

22 A. The next month, on May 13, 2014, Ms. Daniels filed an informal complaint at the PUCO,  
23 disputing how her payments had been applied. In the course of investigating this  
24 complaint, DEO discovered an outstanding debt for which Ms. Daniels was responsible,

1 associated with service received at the 20th Street address. The final balance for that  
2 account was \$4,503.18, and this amount was transferred to Ms. Daniels' active account at  
3 the Premises.

4 **Q14. Why does DEO believe that the prior balance is Ms. Daniels' responsibility?**

5 A. The balance was incurred under Ms. Daniels' name and under the same social security  
6 number.

7 **Q15. Did Ms. Daniels pay the amount due?**

8 A. No. Although she continued to consume service, Ms. Daniels made no payments  
9 following the April bill. On June 25, having been given notice, her service was  
10 disconnected.

11 **Q16. At the time Ms. Daniels was disconnected, how much did she owe?**

12 A. Ms. Daniels' final bill issued on July 7, 2014, with an outstanding balance of \$4,490.46.

13 **IV. UNAUTHORIZED USAGE - 2014**

14 **Q17. Did Ms. Daniels reestablish service in 2014?**

15 A. No. In August 2014, however, DEO detected unauthorized usage on her meter. A  
16 Revenue Protection Investigator observed that someone had turned service back on at the  
17 curb box serving the Premises. The investigator again disconnected service. Ms. Daniels  
18 was billed \$177.49, which included the gas consumed and an investigation fee.

19 **III. ACCOUNT HISTORY - 2015**

20 **Q18. Was service restored to the Premises?**

21 A. Yes. Ms. Daniels utilized the winter reconnect order, and service was restored to the  
22 Premises on January 8, 2015.

1 **Q19. When Ms. Daniels was reconnected in January 2015, did she reenroll in PIPP Plus?**

2 A. She attempted to reenroll in PIPP, but she again failed to pay the PIPP default amount  
3 required under her initial bill and was removed from the program. On January 26, 2015,  
4 Ms. Daniels was billed a PIPP default amount of \$783.13, which was due February 11.  
5 Ms. Daniels failed to pay this amount. By the due date, DEO had received two cash  
6 payments totaling \$69.00; a payment from Stark County Community Action of \$175.00;  
7 and a \$342.00 payment from HEAP. As noted, HEAP payments do not apply to the PIPP  
8 default amount, and even if they did, the amount paid was less than the amount due. Ms.  
9 Daniels was accordingly removed from the PIPP program.

10 **Q20. In reviewing this bill after the fact, did you observe any issues?**

11 A. In preparing this testimony, I observed that the calculation of the PIPP default amount  
12 due on her January 26 bill overstated the amount due by \$36.00. DEO has made  
13 appropriate adjustments on her account to eliminate this issue.

14 **Q21. What happened after Ms. Daniels was removed from the PIPP program?**

15 A. Once again, Ms. Daniels failed to pay the amount due for service. In addition to being  
16 responsible for an outstanding balance of over \$4,000, she continued to consume service.  
17 She was automatically placed on the one-sixth payment plan, but she made no payments  
18 as required under the plan. In fact, from February through June 2015, she made only a  
19 single payment of \$44.00, which was received on March 6. After providing a  
20 disconnection notice on May 26, DEO disconnected service to the Premises on June 23,  
21 2015.

1   **Q22. At the time Ms. Daniels was disconnected, how much did she owe?**

2   A. After service was disconnected in June 2015, her final bill issued on July 6, 2015, with a  
3   balance of \$4,359.39. This was the last bill issued on the account before the complaint  
4   was filed, at which time no other payments had been received since March 6, 2015.

5   **IV. RESPONSE TO MS. DANIELS' ALLEGATIONS**

6   **Q23. Ms. Daniels claims that DEO "has turned off [her] gas in the dead of winter."  
7   (Complaint at 1.) Is this true?**

8   A. No. Service has been disconnected to the Premises only in warm weather months: June  
9   25, 2014; August 7, 2014; and June 23, 2015.

10   **Q24. Ms. Daniels claims that after DEO has received HEAP payments made on her  
11   behalf, the Company waits until her first PIPP payment is due and then shuts off  
12   service. Is this true?**

13   A. No. In 2014, service was restored to Ms. Daniels on March 14, 2014, the HEAP payment  
14   was made in April, and service was not disconnected until June 25. She maintained  
15   service for a total of 103 days. Similarly, in 2015, service was restored to Ms. Daniels on  
16   January 8, the HEAP payment was made in February, and service was not disconnected  
17   until June 23. She maintained service for a total of 166 days. In this entire period of time,  
18   not including energy-assistance payments, DEO has received only \$136.00 in payments  
19   on Ms. Daniels' account.

20   **Q25. Ms. Daniels also suggests that DEO has acted with a bad motive towards her. Is that  
21   true?**

22   A. No. DEO has not treated Ms. Daniels any differently than it would treat any other  
23   customer in similar circumstances. It has attempted to apply the Commission's rules to  
24   her accurately and fairly. Unfortunately, when a customer repeatedly fails to pay the  
25   amount due for service, it can result in large unpaid balances, which can then result in the  
26   disconnection of service. That is what has happened here.

1    **Q26. Does this conclude your direct testimony?**

2    A.    Yes, it does.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Direct Testimony of Margaret Callahan on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio was served by regular U.S. mail this 3rd day of November, 2015, to the following:

Faye Daniels  
2505 Crown Place NW  
Canton, Ohio 44708

/s/ Rebekah J. Glover  
One of the Attorneys for The East Ohio Gas  
Company d/b/a Dominion East Ohio