**DEO EXHIBIT 1.0**

**before**

**the public utilities commission of ohio**

|  |  |  |
| --- | --- | --- |
| JUDY ALEXANDER, Complainant, v.THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO,Respondent. | )))))))))) | Case No. 11-5601-GA-CSS |

**DIRECT TESTIMONY OF**

**ROXIE A. EDWARDS**

**ON BEHALF OF THE EAST OHIO GAS COMPANY**

**D/B/A DOMINION EAST OHIO**

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## Direct Testimony of

## Roxie A. Edwards

## I. INTRODUCTION

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

A1. My name is Roxie A. Edwards. I am employed by The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO" or "Company") as a Customer Relations Support Manager. My business address is 1201 E. 55th Street, Cleveland, Ohio 44103.

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

A2. I have been employed by DEO since 1978 in various positions related to customer service, including call center representative and representative in the consumer affairs, billing and customer relations departments.

## Q3. What are your responsibilities as a Customer Relations Support Manager?

A3. I am responsible for responding to general billing inquiries, administering payment plans and options for repayment of delinquent accounts, and handling customer-billing disputes.

## Q4. What is the purpose of your testimony?

A4. My testimony explains Judy Alexander's account history for natural gas service at 8207 and 8209 Beman Avenue, Cleveland, Ohio 44105. My testimony concludes that DEO properly measured and billed gas service provided to this residence.

**Q5. What information have you reviewed to prepare your testimony?**

 A5. I have reviewed the Complaint, Ms. Alexander’s account history as documented in DEO's customer information system and Ms. Alexander’s billing statements. The billing statements for Ms. Alexander’s account at 8207 Beman Avenue, Unit D ending with number 3872 (“Downstairs Account”) are attached to my testimony as DEO Exhibit 1.1. The billing statements for Ms. Alexander’s account at 8209 Beman Avenue, Unit U ending with numbers 9512 (“Upstairs Account”) are attached to my testimony as DEO Exhibit 1.2.

**Q6. What is your understanding of the dispute giving rise to Ms. Alexander's Complaint?**

A6. Ms. Alexander alleges that DEO improperly billed her for the gas consumption it measured at her premises.

**II. ACCOUNT HISTORY – DOWNSTAIRS ACCOUNT**

**Q7. When did Ms. Alexander establish service to 8207 Beman Avenue, Unit D?**

A7. November 19, 2010.

**Q8. When did DEO disconnect Ms. Alexander?**

A8. DEO disconnected Ms. Alexander’s service to the Downstairs Account, per her request, on May 5, 2011.

**Q9. Has Ms. Alexander paid anything on her balance?**

A9. No. Ms. Alexander did not pay DEO for any of the charges incurred by her on this account. Since DEO disconnected the Downstairs Account, Ms. Alexander has not paid anything towards the arrearage on the account. Currently, Ms. Alexander owes $803.19 for gas service on the Downstairs Account.

**Q10. Did DEO send Ms. Alexander billing statements?**

A10. Yes. DEO sent billing statements to Ms. Alexander at the 8207 Beman Avenue address. Per Ms. Alexander’s request in April 2011, DEO switched the billing address to 4391 E. 86th Street, Cleveland, Ohio 44105. Her last two billing statements were sent to this address.

**Q11. Between November 19, 2010, and May 5, 2011, how much gas did Ms. Alexander consume on the Downstairs Account?**

A11. Ms. Alexander consumed 77.6 Mcf of natural gas. To explain Ms. Alexander's gas consumption, below is Table 1 showing her usage on a month-by-month basis.

**Table 1 – Downstairs Account Usage**

|  |  |  |
| --- | --- | --- |
| **Month** | **Consumption** | **Actual or Estimated?** |
| November | 10.1 Mcf | Estimated |
| December | 29.9 Mcf | Actual |
| January | 27.8 Mcf | Estimated |
| February | 5.2 Mcf | Actual |
| March/April | 4.6 Mcf | Actual |
| May | 0 Mcf | Actual |
| **Total** | 77.6 Mcf |  |

**Q12. Why does the table show March and April together?**

A12. The chart shows March and April together to reflect the actual usage on the account. On March 7, 2011, DEO obtained an actual meter reading on the Downstairs Account meter of 407.1. On April 5, 2011, DEO estimated Ms. Alexander’s meter reading to be 424.6, with an estimated March usage of 17.5 Mcf. On May 4, 2011, DEO obtained an actual meter reading of 411.7. Therefore, because DEO overestimated Ms. Alexander’s March usage, DEO rebilled Ms. Alexander on May 4, 2011 for her actual consumption of 4.6 Mcf for both March and April 2011.

**Q13. Does the May 4, 2011 billing statement credit Ms. Alexander for the estimated amounts billed on the April 7, 2011 billing statement?**

A13. Yes. DEO credited Ms. Alexander for both the DEO Distribution Charges of $64.75 and the gas commodity charges of $125.58. Both of these credits are shown on the May 4, 2011 billing statement in the Credits And Charges Since Your Last Bill section on Page 2 of 3.

**III.**  **ACCOUNT HISTORY – UPSTAIRS ACCOUNT**

**Q14. When did Ms. Alexander establish service to 8209 Beman Avenue, Unit U?**

A14. January 6, 2011.

**Q15. When did DEO disconnect Ms. Alexander?**

A15. DEO disconnected Ms. Alexander’s service to the Upstairs Account, per her request, on May 5, 2011.

**Q16. Has Ms. Alexander paid anything on her balance?**

A16. No. Ms. Alexander did not pay DEO for any of the charges incurred by her on this account. Since DEO disconnected the Upstairs Account, Ms. Alexander has not paid anything towards the arrearage on the account. Currently, Ms. Alexander owes $397.88 for gas service on the Upstairs Account.

**Q17. Did DEO send Ms. Alexander billing statements?**

A17. Yes. DEO sent billing statements to Ms. Alexander at the 8209 Beman Avenue address. Per Ms. Alexander’s request in April 2011, DEO switched the billing address to 4391 E. 86th Street, Cleveland, Ohio 44105. Her last two billing statements were sent to this address.

**Q18. Between January 6, 2011, and May 5, 2011, how much gas did Ms. Alexander consume on the Upstairs Account?**

A18. Ms. Alexander consumed 53.7 Mcf of natural gas. To explain Ms. Alexander's gas consumption, below is Table 2 showing her usage on a month-by-month basis.

**Table 2 – Upstairs Account Usage**

|  |  |  |
| --- | --- | --- |
| **Month** | **Consumption** | **Actual or Estimated?** |
| January | 39.9 Mcf | Estimated |
| February | .7 Mcf | Actual |
| March/April | 13.1 Mcf | Actual |
| May | 0 Mcf | Actual |
| **Total** | 53.7 Mcf |  |

**Q19. Why does the table show March and April together?**

A19. The chart shows March and April together to reflect the actual usage on the account. On March 7, 2011, DEO obtained an actual meter reading on the Upstairs Account meter of 501.0. On April 5, 2011, DEO estimated Ms. Alexander’s meter reading to be 526.5, with an estimated March usage of 25.5 Mcf. On May 4, 2011, DEO obtained an actual meter reading of 514.1. Therefore, because DEO overestimated Ms. Alexander’s March usage, DEO rebilled Ms. Alexander on May 4, 2011 for her actual consumption of 13.1 Mcf for March and April 2011.

**Q20. Does the May 4, 2011 billing statement credit Ms. Alexander for the estimated amounts billed on the April 7, 2011 billing statement?**

A20. Yes. DEO credited Ms. Alexander for both the DEO Distribution Charges of $84.95 and the gas commodity charges of $137.19. Both of these credits are shown on the May 4, 2011 billing statement in the Credits And Charges Since Your Last Bill section on Page 3 of 4.

**IV. DEO BILLING STATEMENT REVIEW**

**Q21. Do the bills rendered on Ms. Alexander's account accurately reflect the charges from DEO and Ms. Alexander's gas supplier?**

A21. Yes. The billing statements attached to my testimony as DEO Exhibits 1.1 and 1.2 accurately reflect the charges assessed to Ms. Alexander based upon the gas readings from the meters at her premises. The only adjustments to Ms. Alexander’s accounts are the two adjustments described above when DEO overestimated her usage in March 2011 for the Downstairs and Upstairs Accounts.

**Q22. How were these meter readings obtained?**

A22. DEO obtained actual readings from Ms. Alexander’s meter using an Automated Meter Reading ("AMR") device.

**Q23. Based on her measured consumption, did DEO properly bill Ms. Alexander?**

A23. DEO properly billed Ms. Alexander for her gas service for both the Downstairs and Upstairs Accounts. All of the charges applied to Ms. Alexander’s account for her usage comply with DEO's tariff.

**Q24. Does this conclude your testimony?**

A24. Yes.

**CERTIFICATE OF SERVICE**

 I hereby certify that a copy of the foregoing Direct Testimony of Roxie A. Edwards on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio was served by regular U.S. mail to the following person on this 1st day of May, 2012:

Ms. Judy Alexander

4391 East 86th Street

Cleveland, Ohio 44105

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 Attorney for The East Ohio Gas Company d/b/a Dominion East Ohio

**DEO EXHIBIT 1.1**

**Billing Statements for**

**Downstairs Account**

**8207 Beman Avenue, Unit D**

**Cleveland, Ohio 44105**

**DEO EXHIBIT 1.2**

**Billing Statements for**

**Upstairs Account**

**8209 Beman Avenue, Unit U**

**Cleveland, Ohio 44105**