



Vorys, Sater, Seymour and Pease LLP

Legal Counsel

52 East Gay St.
PO Box 1008
Columbus, OH 43216-1008
614.464.6400

www.vorys.com

Founded 1909

Stephen M. Howard
Direct Dial (614) 464-5401
Facsimile (614) 719-4772
E-Mail: smhoward@vsssp.com

Attached Columbia Exhibit 4 is not in
electronic format/not a source
document.

November 13, 2007

Ms. Renee Jenkins
Secretary, Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215-3793

Re: Case No. 07-478-GA-UNC
Columbia Gas of Ohio
Columbia Exhibit 4

Dear Ms. Jenkins:

Pursuant to the Attorney Examiner's direction at Volume II, pp. 187-189 of the hearing transcript, counsel for both Utility Service Partners, Inc. ("USP") and Columbia Gas of Ohio, Inc. ("Columbia") agree that Columbia Exhibit 4 should consist of only Columbia's Interrogatories and USP's Responses to Nos. 13, 14, 16, 30, 31 and the letter contained in the "Attachment" which is marked "9M". A copy of the agreed upon "marked up" Columbia Exhibit 4 is attached to this letter.

A copy of this letter and attachment is being served upon Attorney Examiner Kingery and upon all counsel of record via e-mail.

Sincerely yours,

/s/

by SMH as per e-mail
authorization of 11/13/2007
Dan Creekmur
Attorney for Columbia Gas of Ohio, Inc.

/s/

Stephen M. Howard
Attorneys for Utility Service Partners, Inc.

SMH/jab

Enclosures

cc: Attorney Examiner Jeanne Kingery via e-mail
All Counsel of record via e-mail

WASHINGTON

1828 L St. NW
Eleventh Floor
Washington, DC 20036-5109
202.467.8800

CLEVELAND

1375 East Ninth St.
2100 One Cleveland Center
Cleveland, OH 44114-1724
216.479.6100

CINCINNATI

221 East Fourth St.
Suite 2000, Atrium Two
PO Box 0236
Cincinnati, OH 45201-0236
513.723.4000

ALEXANDRIA

277 South Washington St.
Suite 310
Alexandria, VA 22314
703.837.6999

AKRON

106 South Main St.
Suite 1100
Akron, OH 44308
330.208.1000

11/13/2007 10279954

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas)	
of Ohio, Inc. for Approval of Tariffs to Recover)	
Through an Automatic Adjustment Clause Costs)	Case No. 07-478-GA-UNC
Associated with the Establishment of an Infra-)	
structure Replacement Program and for Approval)	
of Certain Accounting Treatment)	

**UTILITY SERVICES PARTNERS, INC.'S RESPONSES TO
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF COLUMBIA GAS OF OHIO, INC.
FIRST SET
OCTOBER 8, 2007**

Pursuant to the September 13 Entry and Rules 4901-1-16, 4901-1-19, and 4901-1-20, Ohio Administrative Code, Utility Service Partners, Inc. ("USP") responds to these interrogatories and requests for production of documents.

GENERAL OBJECTIONS

1. USP objects to these interrogatories and requests for production of documents to the extent that they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this proceeding.
2. USP objects to these interrogatories and requests for production of documents to the extent that they are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

(13) Provide the number of gas service lines under warranty by USP today in Columbia Gas of Ohio's service territory.

RESPONSE:

Objection 1. Without waiving such objection; as of 9/30/07, USP has 103,092 active contracts for gas line warranties in Ohio.

(14) Provide the number of gas service lines USP has replaced or repaired for leaks each year for the past five years and the actual cost of the repair or replacement.

RESPONSE:

Objection 1. Without waiving such objection, the table below summarizes the claims experience for gas service lines in Ohio for USP from October 1, 2003 (date of acquisition of CSP from Columbia Energy Group) to August 31, 2007.

Year	Number	Amount
2003	312	\$ 355,272.55
2004	1,350	\$ 1,247,776.88
2005	1,401	\$ 1,128,593.46
2006	1,347	\$ 1,285,059.03
2007	1,116	\$ 1,015,551.26

(16) Provide the monthly and/or annual fee charged to customers for gas service line warranty service.

RESPONSE:

As of 8/31/07, the average monthly fee for gas line warranty provided by USP in Ohio is \$3.46.

(30) How many service lines under warranty per year (excluding repair of service lines associated with prone to failure risers) does USP anticipate will need repair or replacement?

RESPONSE:

Objection 1. Without waiving such objection, several. The risk with a Design-A riser is much different than a service line leak. Design-A risers were found to be a safety risk because of possible instantaneous failures if installed improperly. By contrast, outdoor service line leaks are a chronic problem, primarily associated with older steel lines. Service line safety is maintained by periodic surveys of service lines conducted by the applicable LDC. This is required by federal law and in fact, each year an LDC must inspect one-third of all service lines in its service area. This means that all service lines are inspected for leaks every three years in Ohio. Upon discovering a leak, the LDC makes the situation safe to allow for the repair, including disconnecting the gas service as necessary. The existing system for monitoring and maintaining service lines has worked effectively and safely for years in Ohio. Approximately 1,500 gas service lines under a USP warranty in Ohio will need to be replaced annually.

(31) Under current USP consumer contracts, does USP assure customers that their service line leak will be repaired within a specified time period? If so, what is the maximum amount of time a customer waits between a report of the service line leak and repair? Please explain how that time estimate was determined.

RESPONSE:

Objection 1. Without waiving such objection, USP promises the customer that a qualified contractor will contact them within one hour to schedule a time to begin the repair, and that the repair will then be completed as quickly as possible. 64% (637 out of 997) of all gas line claims in Ohio from 1/1/07 through 9/30/07 were repaired within two days of the report of the service leak. 81% were completed within five days. This is based on the work being reported completed in the USP information system for claims. A work order with a status of completed means the line was replaced, holes were filled, trench was mounded, grassy area reseeded, and gas service restored by the utility. For the remaining 19%, the line was repaired and gas service restored, but landscaping was not completed because the customer requested that the reseeded grassy areas not be done until spring. As a result, the work order remained open until that work was completed.

ATTACHMENT

Utility Service Partners
Response to Columbia Interrogatories
And Request for Production
First Set
October 8, 2007

Interrogatory No. 29 and Request for Production Nos. 1 and 2

Customer Name
Customer Address
Customer City, State, Zip Code

Account number

Dear:

As a valued customer of Columbia Service Partners, we wanted to let you know that The Public Utilities Commission of Ohio is considering ruling on a request from Columbia Gas of Ohio that would make Columbia Gas responsible for the maintenance and repair of all external gas lines in their service territory. We do not know what the Commission's final decision will be, or, when to expect its decision.

However, in reviewing your account, we noticed that you are not currently protected against costly and inconvenient in-home water and in-home sewer line repairs. If your in-home water or in-home sewer lines were broken or leaking – who would you call? How long would it take to get a plumber on the job? Who can you trust to do the work?

If The Public Utilities Commission of Ohio decides in favor of Columbia Gas of Ohio's request, you will be notified. Should you receive this notice, rest assured that Columbia Service Partners is still committed to providing you the best utility line protection available – at the best value. At that time, we'll simply convert your warranty coverage to protect your in-home water lines and in-home sewer lines with generous repair coverage – at the same price you enjoy today.

We've enclosed the terms and conditions describing this great value for your safe keeping should The Public Utilities Commission of Ohio decide in favor of Columbia Gas of Ohio's request.

In the event you are no longer responsible for your external gas line, we know you will appreciate the benefits of this enhanced coverage, which will provide you with the same service you've come to expect from Columbia Service Partners: a 24-hour repair hotline – even available on weekends and holidays; expert repair service, guaranteed satisfaction.

To enjoy this benefit, no further action is required on your part. We know you don't want to take your chances with an expensive and inconvenient in-home water line or in-home sewer line repair, but if you wish to cancel your coverage, or have other questions, please call us toll free at 866-420-7238.

If we don't hear from you, we will determine that you have agreed to the change in service and your coverage will automatically be converted to in-home water line and in-home sewer line coverage, if The Public Utilities Commission of Ohio decides in favor of Columbia Gas of Ohio's request.

Sincerely,

Tru Dee Bamberg

9M

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/13/2007 1:43:30 PM

in

Case No(s). 07-0478-GA-UNC

Summary: Exhibit Exhibit and cover letter on behalf of Columbia Gas of Ohio, Inc. and Utility Service Partners, Inc. electronically filed by Stephen M Howard on behalf of Utility Service Partners, Inc.