

LARGE FILING SEPERATOR SHEET

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1 for it?

2 A. Is that a question?

3 Q. It is.

4 THE WITNESS: Could I have the question
5 read back?

6 (Question read.)

7 Q. I'll rephrase the question. Is there any
8 place that you can point to where Columbia is
9 indicating that it will show some deference to
10 residential property rights in the course of
11 executing or discharging its maintenance and
12 replacement and repair responsibilities under the IRP
13 proposal?

14 A. What do you mean by residential property
15 rights?

16 Q. Well, sir, to begin with, my ability to
17 keep you off my land with your backhoe.

18 A. With that clarification I don't think
19 there is anything in the IRP that would give the
20 residential property owner a veto over the
21 residential repair.

22 Q. There was testimony earlier Mr. Petricoff
23 asked you a hypothetical regarding contractor A, and
24 contractor B, contractor A was the contractor with a

1 green thumb that was particularly careful about your
2 Wisteria. Do you remember that hypothetical?

3 A. Yes, I do.

4 Q. And contractor B was cheaper but gave no
5 consideration to restoration but was cheaper. Do you
6 recall that?

7 A. Yes.

8 Q. The question was how do we know we will
9 get contractor A instead of contractor B; right?
10 That was the question posed to you?

11 A. Yes.

12 Q. You said Columbia was going to choose
13 contractor A as part of the process; right?

14 A. Yes.

15 Q. What if the property owner wants
16 contractor B? What if residential property owner
17 wants economy as opposed to the high end restoration?
18 Shouldn't they get to choose that option as well?

19 A. No.

20 Q. Why not?

21 A. Because the premise of the proposal that
22 we made is based on producing a uniform, consistent
23 implementation of measures to resolve problems with
24 the pipeline integrity.

1 Q. As a residential property owner, don't I
2 have the right to be able to choose that I value the
3 Wisteria over the incremental cost of replacing the
4 Wisteria or otherwise? Isn't that something I get to
5 do every day because it's my land?

6 MR. CREEKMUR: Objection, your Honor.
7 It's a compound question.

8 ATTORNEY EXAMINER KINGERY: Can you break
9 the question down into individual parts?

10 MR. AVENI: Yes, your Honor.

11 Q. Don't those property owners get to make
12 those decisions every day?

13 A. Yes.

14 Q. Is that one of the fundamental rights of
15 property ownership?

16 A. Yes.

17 Q. Isn't Columbia intruding on the right of
18 property ownership through the IRP?

19 A. No.

20 Q. Really? Columbia is not intruding upon
21 the landowner's decision-making process in terms of
22 deciding to value cost versus quality of improvement?

23 A. I don't believe so.

24 Q. Okay. As a landowner, do I get to choose

1 whether it's the backhoe or spade used in connection
2 with the IRP?

3 MR. CREEKMUR: Objection, asked and
4 answered.

5 ATTORNEY EXAMINER KINGERY: Sustained.

6 MR. AVENI: Thank you, your Honor.

7 Q. There was some testimony earlier about a
8 request for information that Columbia's put together
9 for Department of Transportation OQ certified
10 plumbers. Do you remember that testimony?

11 A. Yes, I do.

12 Q. And it was your testimony they were
13 gathering information good OQ specified plumbers and
14 sending out request for information to see who wished
15 to participate in the various programs.

16 A. Yes.

17 Q. Isn't that specifically in the context of
18 the riser replacement program, sir?

19 A. My understanding was it was not just
20 limited to the riser program.

21 Q. What is the basis for that understanding?

22 A. General communications with Columbia
23 people that have been involved in that process.

24 Q. You believe that the request for

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1 information that Columbia Gas has sent out to DOT OQ
2 certified plumbers in any way pertains to customer
3 service line maintenance and replacement?

4 A. That was my understanding.

5 Q. Can you point to any material that would
6 tend to support that understanding, sir, either
7 within the IRP or, frankly, anywhere else?

8 A. I don't believe there's anything -- no,
9 not at this time.

10 Q. There was some testimony earlier today
11 regarding when Columbia's taking ownership of the
12 various customer service line facilities incidental
13 to the IRP. You were present for that testimony,
14 were you not?

15 A. Yes, I was.

16 Q. And a distinction was drawn between the
17 maintenance and replacement responsibilities that
18 will come into place the moment the IRP is
19 instituted, on the one hand, and the ownership of the
20 facilities that only take place after the replacement
21 has taken place. Do you recall that testimony?

22 A. Yes.

23 Q. Would you agree with me, sir, that from
24 the landowner's perspective, Columbia is intruding

1 upon their ownership rights, the landowner's
2 ownership rights from the moment the IRP is put in
3 place rather than the later moment when the repair or
4 replacement is effected?

5 THE WITNESS: Could I have that read back
6 again, please?

7 (Question read.)

8 A. No.

9 Q. Isn't it true, sir, at the moment the IRP
10 is put into place the landowner no longer has the
11 discretion to choose any OQ certified plumber they
12 have to do any work they want to have done on their
13 service lines?

14 MR. CREEKMUR: Objection, asked and
15 answered, Your Honor.

16 ATTORNEY EXAMINER KINGERY: We have been
17 over this territory.

18 MR. AVENI: Yes, your Honor, I realize
19 that but this is linking up with the witness's last
20 answer, your Honor.

21 ATTORNEY EXAMINER KINGERY: You can
22 remind him of his prior answer but he will not
23 continue to answer that question over again.

24 MR. AVENI: Thank you, your Honor.

1 MR. CREEKMUR: Thank you, your Honor.

2 Q. Wouldn't you agree, sir, that the
3 inability of the landowner to choose the OQ certified
4 plumber of their choice is an intrusion upon their
5 ownership rights?

6 A. If it is, it's a justifiable intrusion.

7 Q. Would you agree with me, justifiable or
8 otherwise, it is, in fact, an intrusion?

9 A. Possibly.

10 Q. Thank you, sir. Sir, I'd like to turn
11 your attention, if I could, to page 3 of your
12 testimony. At line 9 you testified that: "Although
13 Columbia is not legally responsible for the repair or
14 replacement of customer-owned service lines, Columbia
15 recognizes that Ohio's natural gas companies are
16 facing an unusual, if not extraordinary, situation
17 because the prone to failure riser situation is one
18 clearly involving public safety and the costs to
19 remediate the concerns are likely to be substantial."
20 Do you see that?

21 A. Yes.

22 Q. And I read that correctly.

23 A. Yes.

24 Q. The usual, if not extraordinary,

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1 situation that you're referring to there is the prone
2 to failure type A riser that the design defect are
3 the prone to failure type A risers; right?

4 A. Yes.

5 Q. Nothing about customer service lines in
6 the extraordinary or unusual situation, are there,
7 sir?

8 A. Not in that sentence, that's correct.

9 Q. Okay. Because the prone to failure riser
10 situation is one clearly involving public safety. Is
11 there any situation currently as it exists right now
12 with the residential property owner owning and
13 maintaining their customer service lines that has
14 created a situation involving public safety?

15 A. I believe the answer to that question is
16 yes.

17 Q. Really? What's that?

18 A. I think the fact that Ohio, unlike other
19 states in the country, where the local distribution
20 companies do not own the facilities from the curb
21 valve to the meter, has contributed to the situation
22 we're facing today where we are having to go out and,
23 for example, do a survey of every customer service
24 line to determine what kind of risers are located on

1 our system and then begin -- have to file an
2 application to get approval of a mechanism to replace
3 those risers.

4 Q. I appreciate that, sir. We have been
5 talking about a dichotomy between risers on the one
6 hand and customer service lines on the other.
7 Focusing your attention specifically on customer
8 service lines, can you point to any report, any
9 study, any staff report, or anything else for that
10 matter that identifies an existing public safety
11 concern pertaining to customer service lines?

12 A. I would point to the comments submitted
13 by a number of parties in the docket, I don't
14 remember the case number, the investigation of risers
15 in which the chairman specifically asked for comments
16 on implications of the LDCs assuming ownership of
17 customer service lines.

18 Q. Yes, sir. I appreciate that. And maybe
19 I was unclear in my question. Are you aware of any
20 report or any study that identifies customer service
21 lines as being a matter of a safety concern to the
22 people of the state of Ohio as it currently exists?

23 A. No.

24 Q. Thank you, sir. Turn your attention to

1 the next page of your report, sir, page -- or page 4,
2 line 10.

3 A. I'm there.

4 Q. Thank you, sir. You testify "As detailed
5 in the testimony of Columbia witnesses Martin and
6 Ramsey, the cost of replacing all of the risers
7 identified as prone to failure on Columbia's system
8 is estimated to be approximately \$160 million." Do
9 you see that?

10 A. Yes.

11 Q. What is the cost to maintain, repair, and
12 replace customer service lines under the IRP?

13 A. I don't have that information with me.

14 Q. Has that information been tabulated, sir?

15 A. I believe that's a question that
16 Mr. Martin would have the answer to.

17 Q. You testified yourself with reference to
18 the cost of the riser replacement program; correct?

19 A. Yes, sir.

20 Q. And you have been presented to testify
21 regarding both the riser replacement program and the
22 regulatory impact or responsibilities of repairing
23 and replacing customer service lines; right?

24 A. That's correct, but I'm not the expert on

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1 the specific cost estimates for the service line,
2 repair and replacement.

3 MR. AVENI: If I could have one moment.

4 ATTORNEY EXAMINER KINGERY: You may.

5 MR. AVENI: I don't have any further
6 questions. Thank you for your time.

7 ATTORNEY EXAMINER KINGERY:

8 Ms. Hammerstein.

9 MS. HAMMERSTEIN: No questions.

10 ATTORNEY EXAMINER KINGERY: Mr. Serio.

11 MR. SERIO: Thank you, your Honor.

12 - - -

13 CROSS-EXAMINATION

14 By Mr. Serio:

15 Q. Good afternoon, Mr. Brown.

16 A. Good afternoon.

17 Q. Based on your testimony it's my
18 understanding that Columbia's position that
19 prone-to-leak natural gas risers that are leaking are
20 a safety issue; correct?

21 A. Correct.

22 Q. And they're a safety issue because of the
23 hazardous condition that it causes, the potential for
24 explosion?

1 A. Yes, sir.

2 Q. And it's also Columbia's position that
3 prone-to-leak risers that are not currently leaking
4 also create a safety issue; correct?

5 A. Yes, sir.

6 Q. Again, because of the hazardous
7 condition, possibility of explosion, correct?

8 A. Yes.

9 Q. And the company is in the process right
10 now of replacing prone-to-leak risers that actually
11 leak when they come upon them; correct?

12 A. Yes, sir.

13 Q. But the company does not replace
14 prone-to-leak risers that are not leaking unless they
15 would be disturbed by work on a service line or the
16 meter; correct?

17 A. Yes.

18 Q. Now, in the company's application the
19 company states they're willing to assume the
20 financial obligations of the replacement of the
21 prone-to-leak meters if and only if the costs of
22 doing so are funded through the proposed IRP rider.
23 Do you have a copy of the application?

24 A. No, I don't.

1 MR. SERIO: May I approach, your Honor?

2 ATTORNEY EXAMINER KINGERY: You may.

3 Q. I hand you a copy of the Columbia's
4 application. Do you have that?

5 A. Yes, I do.

6 Q. Would you turn the page 5, paragraph 14,
7 the fifth line down, last word in the sentence, see
8 where it says "if and only if"?

9 A. Yes.

10 Q. If you want to read that paragraph, I'll
11 give you a moment.

12 A. Okay.

13 Q. So it's the company's position that even
14 though the prone-to-leak risers create a safety
15 hazard, the company is only willing to take on that
16 responsibility if they get cost recovery and if it's
17 through the proposed IRP rider as spelled out by the
18 company in the application; correct?

19 A. Yes.

20 Q. On page 3 of your testimony, I believe
21 it's line 19, the beginning of the paragraph it says:
22 "In order to relieve individual customers of the
23 financial responsibility." What do you mean by
24 "relieving the individual customer of financial

1 responsibility"?

2 A. That in the absence of our proposed IRP
3 program, individual customers would be responsible
4 for the full cost of replacing the customer risers.

5 Q. Would you agree with me it would be more
6 accurate to say instead of relieving the individual
7 customer of financial responsibility, you're
8 lessening the individual customer's financial
9 responsibility?

10 A. Yes.

11 Q. And you're familiar with the fact that
12 the company has an approved materials list; correct?

13 A. That's my understanding.

14 Q. Would you agree with me that the company
15 has an approved materials list because they want to
16 make sure that these materials that are used are
17 appropriate and safe materials?

18 A. Yes.

19 Q. Would you agree with me to the extent the
20 company has responsibility, the responsibility also
21 leads to some liability?

22 A. Not necessarily.

23 Q. If the company put a piece of equipment
24 on its approved materials list and the company knew

1 that it was unsafe, would the company be liable for
2 any damage caused by that piece of material?

3 A. I'm not sure I could answer that in the
4 abstract.

5 Q. So if I have an approved materials list
6 and the company has approved a riser and the company
7 knows that the riser is defective and put on the
8 approved materials list, the defective riser is
9 installed, would the company be liable for damage
10 caused by that defective riser?

11 A. Probably.

12 Q. And the reason that the company has an
13 approved materials list is to provide some assurance
14 to homeowners who lack the company's expertise that
15 the materials being used are of a sufficient quality
16 in order to provide some level of security to the
17 homeowner; isn't that correct?

18 A. I would say yes, and that would be part
19 of our overall responsibilities to maintain a safe
20 system and provide adequate service.

21 Q. So to the extent that the company has a
22 responsibility there, the balance of that
23 responsibility is potentially there's liability in
24 the event the responsibility is not carried out

1 properly; correct?

2 A. Perhaps.

3 Q. And the company has the responsibility of
4 inspecting risers before gas is turned on to the
5 home; is that correct?

6 A. Yes.

7 Q. And does the company have a
8 responsibility to ensure that the riser is properly
9 assembled and installed prior to turning on the gas?

10 THE WITNESS: Would you read the question
11 back, please?

12 (Question read.)

13 A. No.

14 Q. Yet the company does an inspection for
15 the express purpose of making sure that the riser is
16 properly assembled and properly installed; correct?

17 A. Yes.

18 Q. Are you aware, did the company get any
19 preapproval or assurances that it would be reimbursed
20 for the costs of the survey that it took on as a
21 result of the staff report and investigation in the
22 05-463 docket?

23 A. My recollection is that the Commission
24 issued an entry early in the investigation docket

1 indicating that -- I believe the language was it
2 would entertain requests or applications for approval
3 to recover -- defer and I think recover costs
4 associated with the investigation. Other than that,
5 I can't recall anything specific.

6 Q. Were you familiar with the two letters
7 that the chairman sent to the company in the generic
8 docket?

9 A. Yes.

10 Q. At this point did the company consider
11 those letters to be any type of preapproval or
12 assurance they would get cost recovery for the survey
13 costs?

14 A. I don't believe so.

15 Q. Did the company ever consider the letters
16 from the chairman to be preapproval or assurances
17 they would be reimbursed with the costs associated
18 with replacing prone-to-leak risers that are actually
19 leaking?

20 A. I don't believe so.

21 Q. Did the company consider the letters from
22 the chairman to be preapproval or assurance that they
23 would be reimbursed for the cost associated with
24 prone-to-leak risers that are not actually leaking at

1 the time?

2 A. I don't believe so.

3 MR. CREEKMUR: Your Honor, if I may,
4 Columbia would move to admit the two letters by the
5 chairman dated January 1, 2007, and I'm not sure of
6 the second date.

7 ATTORNEY EXAMINER KINGERY: You want us
8 to take administrative notice of those?

9 MR. CREEKMUR: Yes, your Honor.

10 ATTORNEY EXAMINER KINGERY: Any
11 objections?

12 MR. SERIO: No, your Honor.

13 ATTORNEY EXAMINER KINGERY: We will take
14 administrative notice.

15 Q. Mr. Brown, were you in the room when I
16 asked Mr. Martin how the IRP rider may be used to
17 recover costs other than service lines and risers?

18 A. Yes.

19 Q. And you heard him say although he's not a
20 lawyer, he didn't think it could be used for such
21 purposes unless it was amended; correct?

22 A. Yes.

23 Q. Is it your opinion that the company could
24 include other costs such as mains or distribution

1 lines under the IRP as it's currently designed?

2 A. No.

3 Q. So it's your belief also that the company
4 would have to file an amended application.

5 A. Yes.

6 Q. And just so we're clear that's based on
7 your understanding not only as Columbia's regulatory
8 affairs person but as an attorney?

9 A. Yes, sir.

10 Q. And does Columbia have any plans to use
11 the IRP rider to the best of your knowledge to
12 collect anything other than the risers or service
13 line costs?

14 A. Our intention as regarding cost to be
15 recovered through the rider are stated in the
16 application and the testimony in this case.

17 Q. Would you agree it's the company's
18 position that public safety hazard requires the
19 prone-to-leak natural gas risers be removed as
20 expeditiously as possible?

21 A. Yes.

22 Q. Yet the company also believes that unless
23 it gets cost recovery -- strike that.

24 MR. SERIO: That's all I have, your

1 Honor. Thank you.

2 ATTORNEY EXAMINER KINGERY: Any redirect?

3 MR. CREEKMUR: No redirect. Thank you.

4 ATTORNEY EXAMINER KINGERY: You may step
5 down.

6 (Witness excused.)

7 (Discussion off the record.)

8 ATTORNEY EXAMINER KINGERY: While we were
9 off the record we discussed the order of witnesses
10 for the next two days, and I would also clarify that
11 the two letters from the chairman of which we have
12 taken administrative notice were dated January 2 and
13 January 23 of 2007.

14 We will reconvene tomorrow morning at
15 9 o'clock.

16 MR. PETRICOFF: Before we go off the
17 record I would like to move for the admission of USP
18 Exhibit No. 1.

19 ATTORNEY EXAMINER KINGERY: Any
20 objections?

21 (No response.)

22 ATTORNEY EXAMINER KINGERY: Hearing none,
23 it will admitted.

24 (EXHIBIT ADMITTED INTO EVIDENCE.)

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1 ATTORNEY EXAMINER KINGERY: I believe we
2 have also have Mr. Brown's testimony.

3 MR. CREEKMUR: Yes, your Honor, thank
4 you.

5 ATTORNEY EXAMINER KINGERY: Any
6 objections?

7 MR. SERIO: No objection.

8 ATTORNEY EXAMINER KINGERY: Mr. Brown's
9 testimony will also be admitted.

10 (EXHIBIT ADMITTED INTO EVIDENCE.)

11 ATTORNEY EXAMINER KINGERY: I believe
12 that gets us current.

13 ATTORNEY EXAMINER KINGERY: Thank you.

14 (Thereupon, the hearing was adjourned at
15 4:40 p.m.)

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CERTIFICATE

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I do hereby certify that the foregoing is
a true and correct transcript of the proceedings
taken by me in this matter on Monday, October 29,
2007, and carefully compared with my original
stenographic notes.

Karen Sue Gibson

Karen Sue Gibson, Registered
Merit Reporter.

Rosemary F. Anderson

Rosemary F. Anderson, Professional
Reporter.

(KSG-5792)

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1920 55:17	26:12 219:13	43215-5201 1:22	42:7 55:4	
1980s 14:13	231 7:13	43216-1008 2:9	800 1:22	
1994 130:13	25 134:14	45 162:13 163:8	82 5:16	
146:12	26 43:20	45839 7:14	83 5:17	
	260 79:10,14,18	45839-1793 2:17	84 5:18	
2	81:5	4901:1-16 10:18	85 5:19	
25:6,15 38:17	28 146:2	4905.93 10:14	88 5:20 82:3	
73:15 80:7,10	29 1:17 6:2			9
101:11 102:4	122:1 221:4	5	9 5:22 26:11	
121:14 122:11		52:16 5:18 84:9	27:4 78:20	
160:19 169:1		85:12 159:21	100:3 123:11	
219:12		161:18 212:6	156:9 157:2,13	
2,710,381 158:8	3 5:8,16 24:19	5th 12:14 123:11	161:7,9 206:12	
2.7 157:12 161:2	24:23 39:13	5,000 73:16,23	219:15	
161:3	43:18 44:3	74:1,3,4,12	9th 3:10	
2:00 121:17	82:4,15,23	5,482,000 123:12	90 14:23 41:20	
20 23:13 38:3	83:3 103:9,10	123:15		
121:13	103:14,14,24	5-year 106:22		
200 2:3 6:19	169:13 206:11	50 57:4		
159:20	212:20	50,000-foot		
	3-year 106:21			

EXHIBIT

Case Number 07-478-GA-VNC

The following exhibit(s) were prefiled and can be located with the pleadings:

Exhibits

Date Filed

Tent. of Larry N. Martin

10-15-07

OCC EX 1

RECEIVED-DOCKETING DIV

2007 NOV 14 AM 11:51

PUCO Case No. 07-748-GA-UNC
OCC Interrogatory No. 009
Respondent: Michael Ramsey

PUCO

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC INTERROGATORIES**

Interrogatory No. 009

Referring to the response to OCC Interrogatory No. 2, please detail the cost associated with each different procedure or process actually used by COH to replace defective or prone to leak natural gas risers.

RESPONSE:

Columbia has partial cost data on 260 riser replacements of defective or leaking prone to leak natural gas risers. The average cost per riser replacement is \$354 with \$274 of labor, negligible material cost and \$77 of other cost. Please note that these figures are preliminary because riser materials are being charged to a blanket account and will be charged back to the appropriate account numbers, and that other overhead charges have not yet hit all of these accounts.

PUCO Case No. 07-748-GA-UNC
OCC Interrogatory No. 017
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC INTERROGATORIES**

Interrogatory No. 017

Referring to the response to OCC Interrogatory No. 2, how many instances of each different procedure or process has COH actually used to replace defective or prone to leak natural gas risers?

RESPONSE:

Columbia has replaced approximately 360 risers.

PUCO Case No. 07-748-GA-UNC
OCC Interrogatory No. 088
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC INTERROGATORIES**

Interrogatory No. 88

Please provide a breakdown of the Company estimate of \$500 for each riser that it plans to replace.

Response:

The \$500 cost is an estimate and includes: estimated averages of \$268 for Labor & Vehicles; \$100 for Materials; \$81 for Surface Restoration; and, \$18 for Damages for a total of \$467. For planning purposes this estimate was rounded to \$500 per riser replacement.

PUCO Case No. 07-478-GA-UNC
OCC Interrogatory No. 111
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC INTERROGATORIES**

Interrogatory No. 111

Referring to the response to OCC Interrogatory No. 9, specify the items that make up the \$77 of "other" costs.

Response:

Other can include costs for vehicles, heavy equipment, right of way, special backfill/paving material, permit costs and miscellaneous supplies.

PUCO Case No. 07-478-GA-UNC
OCC Interrogatory No. 162
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC INTERROGATORIES**

Interrogatory No. 162

Referring to the response to OCC Interrogatory No. 88, please provide an explanation of what constitutes:

- a. Labor and Vehicles;
- b. Materials;
- c. Surface Restoration; and
- d. Damages.

Response:

- a. Labor costs are the estimated labor costs incurred in the replacement of a riser prone to failure based on an estimated replacement time four hours per riser. Vehicle costs are costs directly related to vehicles used by crews in the replacement of risers prone to failure. Vehicle costs include lease costs; gasoline; insurance; maintenance costs and other miscellaneous costs.
- b. Materials costs are comprised of the cost of the replacement riser and other materials used in the replacement of a riser identified as prone to failure riser.
- c. Surface restoration costs include backfill; grading; paving; and concrete finishing costs incurred in the restoration of the property to the owner's satisfaction.
- d. Damages include costs incurred through the restoration of the property to the satisfaction of the property owner. These include such costs related to seeding; replacement of shrubs; mulch; and flowers or items damaged during the replacement of risers prone to failure.

PUCO Case No. 07-748-GA-UNC
OCC Request to Produce No. 004
Respondent: Michael Ramsey

COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC REQUESTS TO PRODUCE

Request to Produce No. 4

Please provide copies of all workpapers, data, source documents, and/or other information COH relied upon in responding to OCC Interrogatory Nos. 46 and 47 pertaining to the cost estimates to repair or replace defective or prone to leak natural gas risers

Response:

See attached.

Riser Replacement Cost Estimate

• LABOR/VEHICLES -	\$268
○ 2 person crew/2hrs @ \$67/per hr/PP	
• MATERIALS -	\$100
○ Risers in sizes from $\frac{1}{2}$ " to 2"	
○ Couplings and pipe $\frac{1}{2}$ " to 2"	
○ Risers 99% - < 2" @ \$65	
○ Other materials 99% < 2" @ \$25	
○ Risers 1% > 2" @ \$200	
○ Other materials 1% > 2" @ \$80	
• RESTORATION -	\$81
○ Mulch 70% @ \$3	
○ Grass seed 10% @ \$1	
○ Concrete 10% @ \$300	
○ Asphalt 10% @ \$200	
○ Shrubs 5% @ \$30	
• DAMAGES -	\$18
○ Drain tile 30% @ \$10	
○ CATV 5% @ \$100	
○ Electric .3% @ \$500	
○ Phone .3% @ \$500	
○ Other .3% @ \$500	
TOTAL	\$467

RISER TRACKING INFORMATION

OP-CENTER ID	TOTAL SERVICE LINES	SURVEYS COMPLETE/ UPLOADED	SURVEYS NOT UPLOADED	PERCENT SURVEYS COMP ONLY	RISERS IDENTIFIED PRONE TO FAILURE ONLY	PERCENT RISERS PTF/ UPLOADED ONLY	LEAKS			LEAKS ON NON- INC PTF RISERS	LEAKS ON INC PTF RISERS	LEAKS ON METERS	TOTAL LEAKS	LEAK INC	ATM CORR YES	ATM INC	Projected leaks through completion of survey
							RISERS	LEAKS ON PTF	LEAK PTF								
SPRINGFIELD 0600	50818	49559	0	97.52%	14862	30.03%	33	0.22%	23	0.07%	612	248	916	1.85%	60	0.12%	938
OHIO VALLEY 0700	46199	35991	10007	99.56%	8669	24.64%	5	0.06%	15	0.06%	110	58	188	0.52%	274	0.76%	241
COLUMBUS 08001300	397314	197679	101772	76.37%	39139	19.80%	50	0.13%	182	0.12%	3136	489	3867	1.06%	1438	0.73%	7772
GREAT TRAILS 0900	46003	35628	2828	83.59%	6821	19.15%	26	0.38%	57	0.20%	660	454	1197	3.36%	138	0.39%	1546
LAKE ERIE 1000	108640	63019	35879	91.12%	15261	24.22%	23	0.15%	89	0.19%	547	86	745	1.18%	193	0.31%	1284
TOLEDO 1100	167176	163531	0	97.82%	25658	15.68%	42	0.16%	133	0.10%	692	216	1063	0.66%	150	0.09%	1107
NORTH POINTE 1200	232490	113071	108537	95.33%	44185	39.08%	20	0.05%	29	0.04%	466	195	710	0.63%	882	0.78%	1480
MUSK. VALLEY 1400	67807	47948	11109	87.10%	14185	29.68%	36	0.25%	54	0.16%	586	247	923	1.93%	1117	2.33%	1305
THREE RIVERS 1500	64588	36192	26680	97.35%	11715	32.37%	29	0.25%	58	0.24%	616	80	793	2.18%	223	0.62%	1415
HEARTLAND 1700	95526	84207	6448	94.90%	17603	20.90%	17	0.10%	50	0.08%	278	292	637	0.76%	26	0.03%	723
FRONTON 1900	12850	12830	0	99.84%	4531	35.32%	2	0.04%	5	0.06%	269	156	432	3.37%	6	0.05%	433
TOTAL	1289409	839665	303390	88.65%	202850	24.16%	283	0.14%	705	0.11%	7972	2531	11491	1.37%	4508	0.54%	17646

		TOTAL RISERS IDENTIFIED BY MANUFACTURER (OH)	Columbus East and West	Lake Erie and Heartland	North Pointe and Great Trail	Ohio Valley and Muskingum Valley	Springfield/ Three Rivers/ Ironton	Toledo	PERCENT	STUDY PROJECTED
A	Continental	3407				3269	138	1.32%	0.06%	
B	ECSI	82				64	18	0.03%	N/A	
C	RW Lyall	803				748	57	0.31%	N/A	
D	Normac	51065				26581	24484	19.74%	30.85%	
E	Perfection Corp.	42580				12758	29822	16.46%	28.15%	
F	Uponor	1401				1245	156	0.54%	1.55%	
G	Rob Roy	3747				2686	1061	1.45%	0.95%	
H	Central Plastics	46				42	4	0.02%	1.10%	
I	Bare Steel	56194				25168	31026	21.72%	35.35%	
	Coated Steel (Plus Manufacturer with Second letter A - See Jerry or Tonya)									
J		8244				7047	1197	3.19%	Incl above	
K	US Poly	435				411	24	0.17%	N/A	
L	Wayne	283				271	12	0.11%	N/A	
M	Dresser	458				400	58	0.18%	N/A	
N	Chicago	1				0	1	0.00%	N/A	
P	Inner Tite	1				1	0	0.00%	N/A	
Z (except ZZ99) ZZ99 only	Other	78375				14040	65335	30.88%	0.40%	
	Total	258697		0	0	0	95213	163484	100.00%	

PUCO Case No. 07-748-GA-UNC
OCC Request to Produce No. 005
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC REQUESTS TO PRODUCE**

Request to Produce No. 5

Please provide copies of all workpapers, data, source documents, and/or other information COH relied upon in responding to OCC Interrogatory Nos. 50 and 51 pertaining to the cost estimates for repair or replacement of defective or prone to leak natural gas risers.

Response:

See the response to OCC Request to Produce number 4.

PUCO Case No. 07-748-GA-UNC
USP Interrogatory No. 011
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO USP INTERROGATORIES**

Interrogatory No. 011

- 1) How many Design-A risers in the Columbia Service territory have been inspected since January 1, 2005 and how many were found to be actually leaking?

Response:

Risers are part of the customer-owned service line and as such Columbia does not have records that indicate the number of Design-A risers inspected annually. From January 1, 2005, through August 31, 2007, Columbia reported 684 leaks on Design-A risers to the PUCO as part of its on-going investigation of risers.

PUCO Case No. 07-748-GA-UNC
USP Interrogatory No. 36
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO USP INTERROGATORIES**

Interrogatory No. 36

Assuming Columbia were to use independent contractors, how much would Columbia incur in the way of expenses regarding:

- a. Inspection, repair, replacement, and maintenance of Design-A risers by independent contractors?
- b. Inspection, repair, replacement, and maintenance of gas service lines connected to Design-A risers?
- c. Inspection, repair, replacement, and maintenance of all other gas service lines that are not connected to Design-A risers?

Response:

(a)-(c) Columbia is in the process of planning all these processes and the mix of Columbia and contractor resources and has not been determined yet.

PUCO Case No. 07-748-GA-UNC
USP Interrogatory No. 35
Respondents: C. McCreery, S. Seiple and Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO USP INTERROGATORIES**

Interrogatory No. 35

Please provide the name of the riser that Columbia selected as a replacement for the Design A risers, and

- a. Explain why the selected riser was chosen over other options.
- b. What warranties or guarantees will Columbia provide the property owner against design and product defects or faulty installation of the Design A replacement riser?

Response:

Columbia has not selected a riser for the replacement of Design A risers.

- (a) Not applicable.
- (b) Objection. Columbia does not design or manufacture the selected replacement riser, thus any such warranty or guarantee would be provided by the manufacturer. Liability for faulty installation, if any, would be a matter of established Ohio law, thus any such warranties are unnecessary. Without waiving its objection, Columbia also notes that no riser has been selected for the replacement of Design A risers.

PUCO Case No. 07-748-GA-UNC
OCC Request to Produce No. 006
Respondent: Michael Ramsey

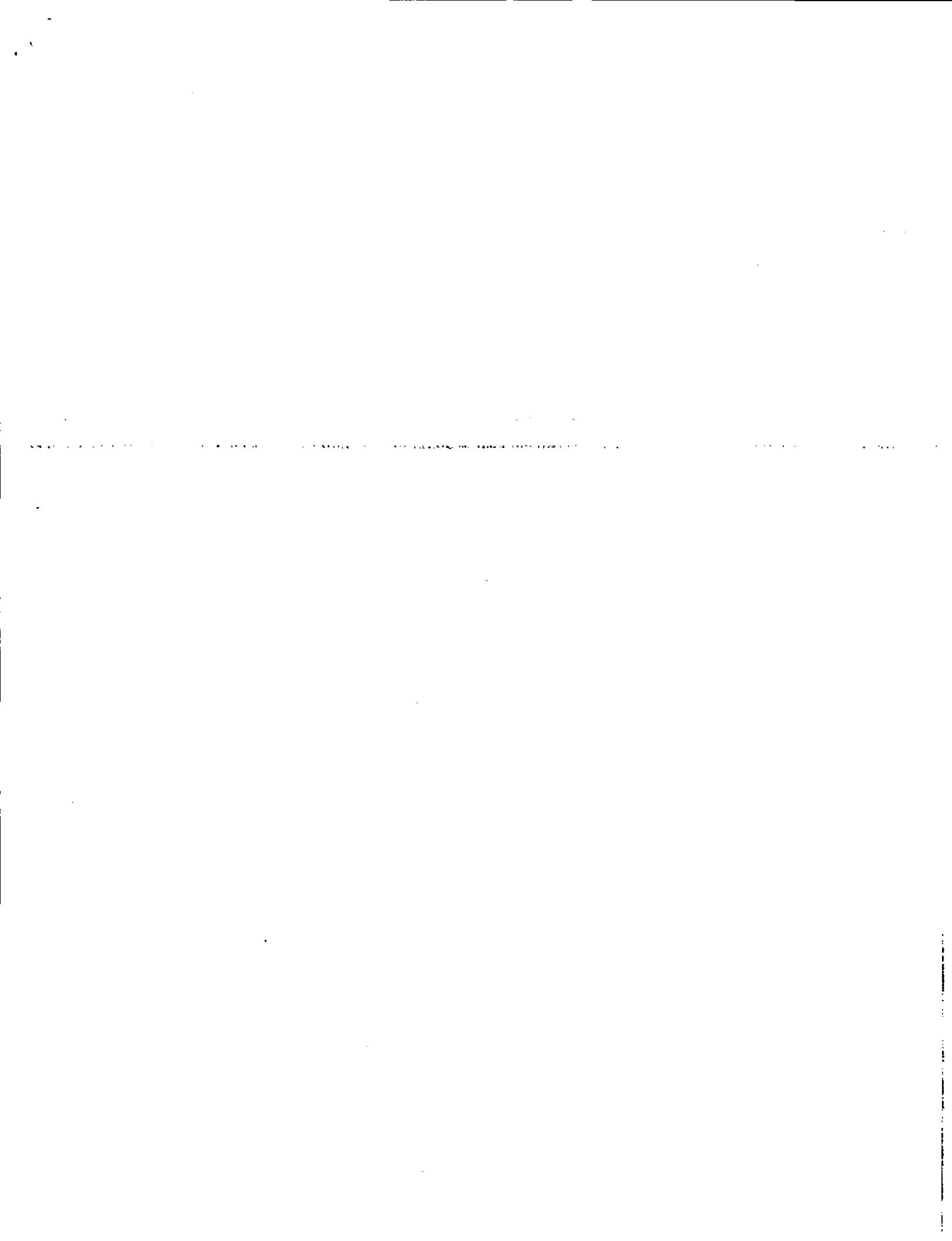
**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC REQUESTS TO PRODUCE**

Request to Produce No. 6

Please provide copies of all workpapers, data, source documents, and/or other information COH relied upon in responding to OCC Interrogatory No. 70 pertaining to the reportable incidents related to the repair or replacement of defective or prone to leak natural gas risers over the past 5, 10, and 20 years.

Response:

See the response to OCC Interrogatory number 83. See also the attachment hereto.



Columbia Gas
of Ohio

200 Civic Center Drive
Columbus, OH 43215
Mailing:
PO Box 117
Columbus, OH 43216-0117
(614) 460-4500

January 11, 2001

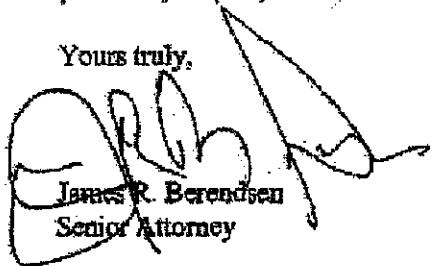
Information Systems Manager (DMT-63)
Materials Transportation Bureau
Department of Transportation
400 Seventh Street S. W.
Washington, D.C. 20590

To Whom It May Concern:

Please find enclosed an original and one copy of the incident report from Columbia Gas of Ohio associated with an incident which occurred in Medina, Ohio, Medina County on December 16, 2000.

Should you have any questions or require additional information, please contact me personally at (614) 460-4550.

Yours truly,



James R. Berendsen
Senior Attorney

Enclosure

cc: Edward M. Steele
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

R. Carter
A. Sonderman
M. Brant
D. Monte
L. Reynolds

NOTICE: This report is required by 46 CFR Part 191. Failure to report can result in a civil penalty not to exceed \$1,000 for each violation. Penalties for each day that such violation persists exceed that the maximum civil penalty shall not exceed \$20,000 as provided in 46 USC 1078. Form Approved OMB No. 2137-0527

INCIDENT REPORT - GAS DISTRIBUTION SYSTEM				Report Date	12/22/00	
				No.	(RS/PA)	
PART ONE: GENERAL INFORMATION						
SEE INSTRUCTIONS						
1. a. Operator's 5 digit identification number		4. Reason for reporting				
1 1 2 1 5 / 9 1 6 / 1		<input type="checkbox"/> Fatality Number 1 / 1 / 1 persons <input type="checkbox"/> Injury requiring hospitalization Number 1 / 1 / 1 persons <input type="checkbox"/> Property damage/loss Estimate \$400,000 <input type="checkbox"/> Operator judgment/emergency action				
b. Name of Operator <u>Columbia Gas of Ohio, Inc.</u>		5. Elapsed time until area was made safe				
c. <u>200 Civic Center Drive, P.O. Box 117</u> Number and Street		min. <u>418.0</u>				
d. <u>Columbus, Ohio 43218-0117</u> City, County, State and Zip Code		6. Telephone Report				
e. Location of Incident		<input type="checkbox"/> 1 / 1 / mo. <input type="checkbox"/> 1 / 1 / day. <input type="checkbox"/> 1 / 1 / yr. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
a. <u>1469 Wilbur Road</u> Number and Street		7. a. Estimated pressure at point and time of incident <u>(PSIG) 60</u>				
b. <u>Medina, Medina County</u> City and County		b. Maximum allowable operating pressure <u>(MAOP) (PSIG) 60</u>				
c. <u>Ohio 44256</u> State and Zip Code		c. MAOP established by (1) Test pressure <u>(PSIG)</u> (2) 46 CFR § 192.699 (4)(3)				
d. Class location: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 4						
e. Incident on Federal land <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
3. Time and date of incident <u>12/11/14 / hr. 11/2 / mo. 11/08 / day</u> <u>1990 / yr.</u>						
PART TWO: INCIDENT CAUSE						
Corrosion (Continue in Part A)		Damage by Outside Forces (Continue in Part B)		Construction/Operating error (Continue in Part C)		% Other <u>Under investigation</u>
- Accidentally caused by operator (Continue in Parts B and/or C)						
Cause not yet determined. Observed leakage at the first portion of the customer owned service line at the site. The condition of the line will be investigated by further examination and testing in a laboratory setting.						(Please attach additional sheet if necessary)
PART THREE: INCIDENT DETAILS						
4. Part of system where incident occurred		2. Component which failed				
<input type="checkbox"/> Main <input checked="" type="checkbox"/> Meter Set Assembly <input type="checkbox"/> Service Line <input checked="" type="checkbox"/> Other <u>Under investigation</u>		<input type="checkbox"/> Flange <input type="checkbox"/> Body of pipe <input type="checkbox"/> Joint type <input type="checkbox"/> Valve <input type="checkbox"/> Fitting <input type="checkbox"/> Regulator/meter <input type="checkbox"/> Drip/Drain <input checked="" type="checkbox"/> Other <u>Under investigation</u> <input type="checkbox"/> Wall thickness <input type="checkbox"/> Weld Specified <input type="checkbox"/> Mfg. <input type="checkbox"/> Installed				
3. Material involved:						
<input type="checkbox"/> Steel <input type="checkbox"/> Cast iron <input type="checkbox"/> Polyethylene plastic <input type="checkbox"/> Other plastic: _____ <input type="checkbox"/> Other						
Nominal pipe size (NPS)		3. Wall thickness:				
4. Specification		4. Mfg. <input type="checkbox"/> Installed				
PART FOUR: ENVIRONMENTAL						
Area of incident						
Within/Under bldg <input type="checkbox"/> Under pavement <input type="checkbox"/> Above ground <input type="checkbox"/> Under ground or Under water		<input checked="" type="checkbox"/> Other <u>Under investigation</u>				
PART FIVE: RECORDS AND SIGNATURES						
J. M. Young, Operations Center Manager/R. A. Wilbert, Senior Engineer Type or print Prepared by Name and Title						440-891-2457/440-891-2454 Area Code and Telephone Number
<i>J. M. Young</i>						Officer: <u>614-459-6713</u> Date: Area Code and Telephone Number
Authorized Signature						

10. CORROSION INFORMATION

1. Where did corrosion occur?
 Internally
 Externally
2. Visual description
 Localized pitting
 General corrosion
 Other _____
3. Cause
 Galvanic
 Other _____
4. Pipe coating information
 Bare
 Coated
5. Was corroded part of pipeline considered to be under cathodic protection prior to discovering incident?
 Yes Year protection started _____
 No
6. Additional information:

N/A - Plastic main and service

11. SHALLOW DAMAGE BY OUTSIDE THIRD PARTY

1. Primary cause of incident
 Damage resulted from action of operator or his agent.
 Damage resulted from action by outside party/third party.
 Damage by earth movement
 Subsidence
 Landslide/washout
 Frost
 Other _____
2. Locating information (for damage resulting from action of outside party/third party)
 a. Did operator get prior notification that equipment would be used in the area?
 Yes Date received - / / mo. / / day / / yr.
 No
- b. Was pipeline location marked either as a result of notification or by markings already in place?
 Yes Specify type of marking _____
 No
- c. Does statute or ordinance require the outside party to determine whether underground facility (s) exist?
 Yes
 No

3. Additional Information:

Under Investigation

12. LEAKS DUE TO INTERNAL TEST PRESSURE

1. Cause of defect
 Construction " Material (describe in C.4 below)
2. Description of component other than pipe
3. Latest test date
 a. Was part which leaked pressure tested before incident occurred?
 Yes Date of test / / mo. / / day / / yr.
 No
- b. Test medium " Water " Gas " Other _____
- c. Time held at test pressure / / hr.
- d. Estimated test pressure at point of incident (PSIG) _____
4. Additional information:

Under Investigation

PUCO Case No. 07-748-GA-UNC
USP Interrogatory No. 019
Respondent: Michael Ramsey

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO USP INTERROGATORIES**

Interrogatory No. 019

List and describe all natural gas leaks in the Columbia service area which resulted in injuries or property damage from a fire, explosion or asphyxiation caused by a leak in the riser or service line since 1997?

Response:

Columbia has experienced three reportable incidents, as defined under Ohio Administrative Code § 4901:1-16-01(l), related to a leak in a riser or a service line since 1997.

- In 2000, in Medina, Ohio, a leak in a natural gas riser caused an explosion and fire which resulted in a fatality and an injury.
- In 2003, in Avon, Ohio, a leak in a natural gas riser caused an explosion and fire, which did not result in any injuries.
- In 2004, in Fairborn, Ohio, a leak in a customer service line caused an explosion and fire which resulted in two fatalities.

See attached incident reports.

Goldie PIS file
in attachment

RECEIVED

FEB 1 2005

DAVID G. KEENAN

VIA FAX: 202-366-4566 and Regular Mail

January 25, 2005

Information Resources Manager
Office of Pipeline Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street S.W. - Room 7128
Washington, DC 20590

RE: Incident Location: Dryden Road, Fairborn, Clark County, Ohio 45324
Date of Incident: December 31, 2004
RSPA Incident Report No: 745848

To whom it may concern:

Enclosed is an Incident Report – Gas Distribution System for the above referenced incident, which was called into the DOT on December 31, 2004 by Columbia Gas of Ohio, Inc. (“Columbia”). Columbia also reported this matter to the Public Utilities Commission of Ohio (“PUCO”) and by copy of this letter to the PUCO, hereby provides the Service Failure Report required by Ohio Administrative Code Section 4901:1-16-05 concerning the referenced matter. The final report as required by Section 4901:1-16-05(C) will be provided upon the completion of the investigation.

Should you have any questions or require additional information, please do not hesitate to contact me personally at (937) 327-7105.

Very truly yours,

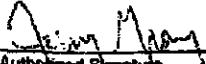
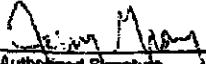


Jerry Gray
Manager, Springfield Operations Center
Columbia Gas of Ohio, Inc.

Enclosures

cc: Edward M. Steele (Via Fax: 614-752-8351)
Chief, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Mark Wyckoff	Tonya Anderson
Debbie Burke	David Keenan
Chuck McCreery	

U.S. Department of Transportation Research and Special Programs Administration		INCIDENT REPORT - GAS DISTRIBUTION SYSTEM		Report Date No. _____ (DOT Use Only)
INSTRUCTIONS		Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the Office Of Pipeline Safety Web Page at http://ops.dot.gov .		
PART A - GENERAL REPORT INFORMATION		Check: <input checked="" type="checkbox"/> Original Report <input type="checkbox"/> Supplemental Report <input type="checkbox"/> Final Report		
<p>1. Operator Name and Address</p> <p>a. Operator's 5-digit Identification Number <u>10121510161</u></p> <p>b. If Operator does not own the pipeline, enter Owner's 5-digit Identification Number <u> </u></p> <p>c. Name of Operator <u>Columbia Gas Of Ohio, Inc.</u></p> <p>d. Operator street address <u>200 Civic Center Drive</u></p> <p>e. Operator address <u>Columbus, Franklin County, Ohio 43215</u> City, County or Parish, State and Zip Code</p>				
<p>2. Time and date of the incident</p> <p><u>11/11/5/61</u> <u>11/21</u> <u>13/11</u> <u>10/14</u> hr. month day year</p> <p>3. Incident Location</p> <p>a. <u>5322 Dryden Road</u> Street or nearest street or road</p> <p>b. <u>Fairborn, Clark County</u> City and County or Parish</p> <p>c. <u>OHIO 45324</u> State and Zip Code</p> <p>d. Latitude: <u>43°01'18.5"</u> Longitude: <u>83°31'19.8"</u> (if not available, see instructions for how to provide specific location)</p> <p>e. Class location description <input type="radio"/> Class 1 <input type="radio"/> Class 2 <input checked="" type="radio"/> Class 3 <input type="radio"/> Class 4 </p> <p>f. Incident on Federal Land <input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>4. Type of leak or rupture</p> <p><input type="radio"/> Leak <input checked="" type="radio"/> Pinhole <input type="radio"/> Connection Failure (complete sec. F5) <input type="radio"/> Puncture, diameter or cross section (inches) _____</p> <p><input type="radio"/> Rupture (if applicable): <input type="radio"/> Circumferential - Separation <input type="radio"/> Longitudinal - Tear/Crack, length (inches) _____ - Propagation Length, total, both sides (feet) _____</p> <p><input type="radio"/> N/A <input checked="" type="radio"/> Other: <u>Leak caused by a longitudinal crack on pipe body</u></p>				
<p>5. Consequences (check and complete all that apply)</p> <p>a. <input checked="" type="checkbox"/> Fatality Total number of people: <u>1010121</u> Employees: <u>1010101</u> General Public: <u>1010121</u> Non-employee Contractors: <u>1010101</u></p> <p>b. <input type="checkbox"/> Injury requiring inpatient hospitalization Total number of people: <u>1010101</u> Employees: <u>1010101</u> General Public: <u>1010121</u> Non-employee Contractors: <u>1010101</u></p> <p>c. <input checked="" type="checkbox"/> Property damage/loss (estimated) Total \$ <u>200,000</u> Gas loss \$ <u>0</u> Operator damage \$ <u>0</u> Public/private property damage \$ <u>200,000</u></p> <p>d. <input checked="" type="checkbox"/> Gas Ignited <input type="radio"/> Explosion <input type="radio"/> No Explosion</p> <p>e. <input type="checkbox"/> Gas did not ignite <input type="radio"/> Explosion <input type="radio"/> No Explosion</p> <p>f. <input checked="" type="checkbox"/> Evacuation (general public only) <u>111161</u> people Evacuation Reason: <input type="radio"/> Unknown <input type="radio"/> Emergency worker or public official ordered, precautionary <input type="radio"/> Threat to the public <input type="radio"/> Company policy</p> <p>6. Elapsed time until area was made safe: <u>10101</u> hr. <u>14141</u> min.</p> <p>7. Telephone Report <u>1714151814181</u> <u>1121</u> <u>1311</u> <u>1014</u> NRC Report Number month day year</p> <p>8. a. Estimated pressure at point and time of incident: <u>43</u> PSIG</p> <p>b. Max. allowable operating pressure (MAOP): <u>60</u> PSIG</p> <p>c. MAOP established by: <input type="radio"/> Test Pressure <u> </u> psig <input type="radio"/> 49 CFR § 192.619 (a)(3)</p>				
PART B - PREPARER AND AUTHORIZED SIGNATURE				
Andrew Watson - Senior Engineer (type or print) Preparer's Name and Title			(614) 460-2121 Area Code and Telephone Number	
Awatson@rjsource.com Preparer's E-mail Address			(614) 365-3406 Area Code and Facsimile Number	
 Jerry Gray Springfield Operations Center Manager			(937) 327-7105 Area Code and Telephone Number	
Authorized Signature 			Date	Area Code and Telephone Number

PART C - ORIGIN OF THE INCIDENT

1. Incident occurred on
 - Main Meter Set
 - Service Line Other: _____
 - Pressure Limiting and Regulating Facility

2. Failure occurred on
 - Body of pipe Pipe Seam
 - Joint Component
 - Other: _____

3. Material involved (pipe, fitting, or other component)
 - Steel
 - Cast/Wrought Iron
 - Polyethylene Plastic (complete all items that apply in a-c)
 - Other Plastic (complete all items that apply in a-c)
 - Plastic failure was: a. ductile b. brittle c. joint failure
 - Other material: _____

4. Year the pipe or component which failed was installed: / 1 / 0 / 7 / 0 /

PART D - MATERIAL SPECIFICATION (if applicable)

1. Nominal pipe size (NPS) / 0 / 0 / 0 / 1 / in.
2. Wall thickness ~~3/8"~~ / .1 / 1 / 9 / in.
3. Specification ASTM D2513 SMYS / N / A / / / / /
4. Seam type N/A
5. Valve type N/A
6. Pipe or valve manufactured by Celanese

PART E - ENVIRONMENT

1. Area of incident
 - In open ditch
 - Under pavement
 - Under ground
 - Inside/under building
 - Above ground
 - Under water
 - Other: _____

2. Depth of cover: 33 inches

PART F - APPARENT CAUSE

Important: There are 25 numbered causes in this section. Check the box to the left of the primary cause of the incident. Check one circle in each of the supplemental items to the right of or below the cause you indicate. See the instructions for this form for guidance.

F1 - CORROSION

1. External Corrosion

If either F1 (1) External Corrosion, or F1 (2) Internal Corrosion is checked, complete all subparts a - e.

- a. Pipe Coating
 - Bare
 - Coated
 - Unknown
- b. Visual Examination
 - Localized Pitting
 - General Corrosion
 - Other: _____
- c. Cause of Corrosion
 - Galvanic
 - Stray Current
 - Improper Cathodic Protection
 - Microbiological
 - Other: _____

- d. Was corroded part of pipeline considered to be under cathodic protection prior to discovering incident?
 - No
 - Yes
 - Unknown
- Year Protection Started: / / / /

- e. Was pipe previously damaged in the area of corrosion?
 - No
 - Yes
 - Unknown
- How long prior to incident: / / / years / / / months

F2 - NATURAL FORCES

3. Earth Movement => Earthquake Subsidence Landslide Other: _____
4. Lightning
5. Heavy Rains/Floods => Washouts Flootation Mudslide Scouring Other: _____
6. Temperature => Thermal stress Frost heave Frozen components Other: _____
7. High Winds

F3 - EXCAVATION

8. Operator Excavation Damage (including their contractors) / Not Third Party
9. Third Party Excavation Damage (complete a-d)
 - a. Excavator group
 - General Public
 - Government
 - Excavator other than Operator/subcontractor
 - b. Type: Road Work Pipeline Water Electric Sewer Phone/Cable/Fiber Landowner Railroad
 - c. Building Construction Other: _____
 - d. Did operator get prior notification of excavation activity?
 - No
 - Yes: Date received: / / / mo. / / / day / / / yr.
- Notification received from: One Call System Excavator General Contractor Landowner
- d. Was pipeline marked?
 - No
 - Yes (If Yes, check applicable items i - iv)
 - i. Temporary markings: Flags Stakes Paint
 - ii. Permanent markings: Yes No
 - iii. Marks were (check one) Accurate Not Accurate
 - iv. Were marks made within required time? Yes No

F4 - OTHER OUTSIDE FORCE DAMAGE

10. Fire/Explosion as primary cause of failure => Fire/Explosion cause: Man made Natural *Describe in Part G*
11. Car, truck or other vehicle not relating to excavation activity damaging pipe
12. Rupture of Previously Damaged Pipe
13. Vandalism

F5 - MATERIAL OR WELDS**Material**

14. Body of Pipe => Dent Gouge Wrinkle Bend Arc Burn Other: _____
 15. Component => Valve Fitting Vessel Extruded Outlet Other: _____
 16. Joint => Gasket O-Ring Threads Fusion Other: _____

Weld

17. Butt => Pipe Fabrication Other: _____
 18. Fillet => Branch Hot Tap Fitting Repair Sleeve Other: _____
 19. Pipe Seam => LF ERW DSAW Seamless Flash Weld
 HF ERW SAW Spiral Other: _____

Complete a-f if you indicate any cause in part F5.



a. Type of failure:

- Construction Defect => Poor Workmanship Procedure not followed Poor Construction Procedures
 Material Defect

b. Was failure due to pipe damage sustained in transportation to the construction or fabrication site?

 Yes Noc. Was part which leaked pressure tested before incident occurred? Yes, complete d-f, if known Nod. Date of test: 15 mo. 129 day 1970 yr.e. Time held at test pressure: 5 min. / hr.f. Estimated test pressure at point of incident: 100 PSIG**F6 - EQUIPMENT OR OPERATIONS**

20. Malfunction of Control/Relief Equipment => Valve Instrumentation Pressure Regulator Other: _____
 21. Threads Stripped, Broken Pipe Coupling => Nipples Valve Threads Mechanical Couplings Other: _____
 22. Leaking Seals

23. Incorrect Operationa. Type: Inadequate Procedures Inadequate Safety Practices Failure to Follow Procedures Other: _____b. Number of employees involved in incident who failed post-incident drug test: 1 / 1 Alcohol test: 1 / 1c. Was person involved in incident qualified per OQ rule? Yes No d. Hours on duty for person involved: 1 / 1**F7 - OTHER**

24. Miscellaneous, describe: _____
25. Unknown
 Investigation Complete Still Under Investigation (submit a supplemental report when investigation is complete)

PART G - NARRATIVE DESCRIPTION OF FACTORS CONTRIBUTING TO THE EVENT (Attach additional sheets as necessary)

The customer's service line failed the COH pressure test, dropping from line pressure to zero in approximately 3-4 seconds. COH excavated the service line and discovered large rocks and gravel surrounding it in the trench. Cracks in the line were observed at 2 locations and these were believed to have been caused by abrasion from the rocky backfill above and below. The damaged sections were removed and the line passed pressure testing from that point to the meter and company curb valve. Neighbors and family members both reported to investigators that they have smelled gas in the area prior to the incident but did not call the gas company.

Columbia Gas of Ohio

200 Clark Center Drive
Columbus OH 43215

Mailing:
P.O. Box 117
Columbus, OH 43216-0117
(614) 460-6000

January 11, 2001

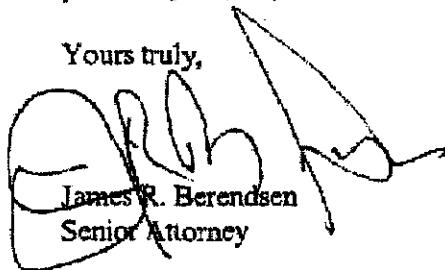
Information Systems Manager (DMT-63)
Materials Transportation Bureau
Department of Transportation
400 Seventh Street S. W.
Washington, D.C. 20590

To Whom It May Concern:

Please find enclosed an original and one copy of the incident report from Columbia Gas of Ohio associated with an incident which occurred in Medina, Ohio, Medina County on December 16, 2000.

Should you have any questions or require additional information, please contact me personally at (614) 460-4650.

Yours truly,

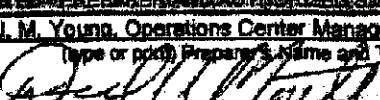


James R. Berendsen
Senior Attorney

Enclosure

cc: Edward M. Steele
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

R. Carter
A. Sonderman
M. Brant
D. Monte
L. Reynolds

U.S. Department of Transportation Research and Special Programs Administration		INCIDENT REPORT - GAS DISTRIBUTION SYSTEM		Report Date <u>12/22/00</u>
				No. <u>IR-SP-1</u>
GENERAL INFORMATION		REPORTING INFORMATION		
1. a. Operator's 5 digit Identification Number <u>1 1 2 1 5 / 9 / 6 /</u>		4. Reason for reporting		
b. Name of Operator <u>Columbia Gas of Ohio, Inc.</u>		"Fatality" Number <u>1 / 1 / 1 /</u> persons		
c. <u>200 Civic Center Drive, P.O. Box 117</u> Number and Street		"Injury requiring Inpatient hospitalization" Number <u>1 / 1 / 1 /</u> persons		
d. <u>Columbus, Ohio 43216-0117</u> City, County, State and Zip Code		"Property damage/loss" Estimate <u>\$400,000</u>		
2. Location of Incident		"Operator judgment/emergency action"		
a. <u>1469 Wilbur Road</u> Number and Street		"Supplemental Report"		
b. <u>Medina, Medina County</u> City and County		5. Elapsed time until area was made safe <u>1 / hr. 14:16 /</u>		
c. <u>Ohio 44258</u> State and Zip Code		min.		
d. Class location " 1 " 2 " 3 X 4		6. Telephone Report <u>1 / mo. 1 / day 1 / yr.</u>		
e. Incident on Federal land Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		7. a. Estimated pressure at point and time of incident (PSIG) <u>50</u>		
3. Time and date of incident <u>12/11/14 / hr. 11:2 / mo. 11/16 / day</u> <u>10/10 / yr.</u>		b. Maximum allowable operating pressure (MAOP) <u>PSIG 60</u>		
		c. MAOP established by:		
		(1) Test pressure <u>PSIG</u>		
		(2) 49 CFR § 192.818 (a)(3)		
CAUSE OF INCIDENT		INCIDENT RESULTS		
"Corrosion (Continue in Part A)"		"Damage by Outside Forces (Continue in Part B)"		"Construction/Operating error (Continue in Part C)"
"Accidentally caused by operator (Continue in Parts B and/or C)"		<input checked="" type="checkbox"/> Other <u>Under investigation</u>		
(Attach additional sheet(s) as necessary)				
Causes not yet determined. Observed leakage at the river portion of the customer owned service line at the site. The condition of the river will be investigated by further examination and testing in a laboratory setting.				
SYSTEM AND MATERIAL INVOLVED		COMPONENTS		
1. Part of system where incident occurred " Main " Meter Set Assembly		2. Component which failed a. Part		
" Service Line " <input checked="" type="checkbox"/> Other <u>Under investigation</u>		" Body of pipe " Valve		
3. Material involved: " Steel " Cast Iron		" Joint type " Regulator/ometer		
" Polyethylene plastic " Other plastic: _____		" Fitting "		
" Other _____		" Drip/Riser "		
Nominal pipe size (NPS) <u>1 / 1 / 1 /</u> in.		" Wall thickness " <u>1 / 1 / 1 /</u> in.		
4. Specification _____ Manufacturer _____		Yr Manufactured <u>1 / 1 / 1 /</u> Yr Installed <u>1 / 1 / 1 /</u>		
ENVIRONMENT				
Area of Incident "Within/Under bldg" "Under pavement" "Above ground"		"Under ground or Under water" <input checked="" type="checkbox"/> Other <u>Under investigation</u>		
APPROPRIATE SIGNATURE				
J. M. Young, Operations Center Manager/R. A. Wilbert, Senior Engineer (Type or print) Prepared's Name and Title		440-891-2452/440-891-2454 Area Code and Telephone Number		
		01-09-01 614-460-6213 Data Area Code and Telephone Number		
Authorized Signature				

PART A: CORROSION

- | | | |
|--|-----------------------|---------------|
| 1. Where did corrosion occur? | 2. Visual description | 3. Cause |
| " Internally | " Localized pitting | " Galvanic |
| " Externally | " General corrosion | " Other _____ |
| 4. Pipe coating information | Other _____ | " Other _____ |
| " Bare | | |
| " Coated | | |
| 5. Was corroded part of pipeline considered to be under cathodic protection prior to discovering incident? | | |
| " Yes Year protection started / / / / | | |
| " No | | |
| 6. Additional information: | | |

N/A - Plastic main and service

PART B: DAMAGE BY OUTSIDE SOURCE

1. Primary cause of incident
 - " Damage resulted from action of operator or his agent.
 - " Damage resulted from action by outside party/third party.
 - " Damage by earth movement
 - " Subsidence
 - " Landslide/Washout
 - " Frost
 - " Other _____
2. Locating Information (for damage resulting from action of outside party/third party)
 - a. Did operator get prior notification that equipment would be used in the area?
 - " Yes Date received / / / mo. / / / day / / / yr.
 - " No
 - b. Was pipeline location marked either as a result of notification or by markers already in place?
 - " Yes Specify type of marking _____
 - " No
 - c. Does statute or ordinance require the outside party to determine whether underground facility (yes) exist?
 - " Yes
 - " No
3. Additional Information:

Under investigation

PART C: CONSTRUCTION OR MATERIAL DEFECTS

1. Cause of defect
 - " Construction " Material (describe in C-4 below)
2. Description of component other than pipe
3. Latest test data
 - a. Was part which leaked pressure tested before incident occurred?
 - " Yes Date of test / / / mo. / / / day / / / yr.
 - " No
 - b. Test medium " Water " Gas " Other _____
 - c. Time held at test pressure / / / hr.
 - d. Estimated test pressure at point of incident (PSIG) _____
4. Additional Information:

Under investigation



August 4, 2003

BY FAX (752-8351) AND REGULAR MAIL

920 W. Goodale Blvd.
Columbus, OH 43212

Mr. Edward M. Steele
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

RECEIVED

AUG 5 2003
DAVID C. KEENAN

RE: Incident at 36036 Caronia Cr., Avon, OH – Lorain County
Date of Incident: May 5, 2003
Incident Number: 644065

Dear Ed:

This letter is in follow-up to my letters to the PUCO and the Office of Pipeline Safety dated May 30, 2003 and June 24, 2003 regarding the initial report of the above referenced incident and is the final report as required by 4906:1-16-05 (C) (2).

Should you have any questions or require additional information, please do not hesitate to contact me personally at (614) 460-6311.

Yours truly,

Kevin D. Swiger
Kevin Swiger
Manager, Engineering Services
Columbia Gas of Ohio, Inc.

cc: Information Resources Manager
Office of Pipeline Safety
Research & Special Programs Administrator
U.S. Department of Transportation
400 Seventh Street S.W., Room 7128
Washington, D.C. 20590

Ken Lockhart
Mike Ramsey
Mike Schwieterman
David Keenan

COLUMBIA GAS OF OHIO, INC.

Final Report

Incident Number assigned by RSPA/DOT: 644065

Location of Incident: 36036 Caronia Cr., Avon, Ohio (Lorain County)

Date of Incident: May 5, 2003

Description of Incident:

On Monday, May 5, 2003, at 11:25 a.m. Columbia Gas of Ohio, Inc. (Columbia) Logistic Center received a phone call from the City of Avon Fire Department. The Avon Fire Department reported that they were working a fire after an explosion at 36036 Caronia Circle. A Columbia Service Technician was dispatched at 11:27 a.m. and arrived at the scene at 11:37 a.m. Natural gas service to this residence was turned off at the curb valve at 11:45 a.m.

Cause:

Initial investigation revealed a fairly substantial leak on the customer service line. This leak was isolated to the area of the customer service riser upstream of the house regulator and meter. Investigation also revealed that some of the house lines, particularly to the hot water heater and furnace, leaked as well.

The customer service riser, which was determined to be manufactured by Norton McMurray Mfg. Co. was removed for further examination in a laboratory setting. The examination of the riser, which included x-rays and disassembly, confirmed leakage on the riser and also indicated that the riser was not installed properly, to wit: the compression nut was not torqued (tightened) to manufacturer's specifications by the installer.

Actions taken to prevent recurrence:

The leakage identified was not reported to Columbia prior to the explosion and fire. The riser on the customer owned service line was not installed by Columbia. Columbia records do not indicate that any prior leakage had been reported at this location. Columbia has been in communication with PUCO regarding addressing potential concerns with service head adapter risers, such as the one identified at this location, and continues to take action in that regard.

For further information contact
Mike Sucharski
Columbia Gas of Ohio, Inc.
614-460-2064


Mike Sucharski
Project Engineer
Columbia Gas of Ohio, Inc.

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)
Associated with the Establishment of an Infra-)
structure Replacement Program and for Approval)
of Certain Accounting Treatment)

Case No. 07-478-GA-UNC

PUCO

RECEIVED-DOCKETING DIV
2007 OCT 15 PM 3:29

PREPARED DIRECT TESTIMONY OF
MICHAEL RAMSEY
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.

Mark R. Kempic, Assistant General Counsel
Kenneth W. Christman, Associate General Counsel
Stephen B. Seiple, Lead Counsel
Daniel A. Creekmur, Attorney
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117
Telephone: (614) 460-4648
Fax: (614) 460-6986
Email: sseiple@nisource.com

Attorneys for
COLUMBIA GAS OF OHIO, INC.

October 15, 2007

PREPARED DIRECT TESTIMONY OF MICHAEL RAMSEY]

1 Q: Please state your name and business address.

2 A: My name is Michael Ramsey and my business address is 200 Civic Center Drive, Colum-
3 bus, Ohio 43215.

4

5 Q: By whom are you employed and in what capacity?

6 A: I am employed by NiSource Corporate Services. My current title is Operations Compliance
7 Manager for Ohio, Kentucky and Indiana.

8

9 Q: What are your responsibilities as Operations Compliance Manager?

10 A: As Operations Compliance Manager, my principal responsibilities include assuring compli-
11 ance with state and federal pipeline safety regulation, providing staff support on pipeline
12 safety matters and acting as the primary contact with the Commission pipeline safety staff.

13

14 Q: What is your educational background?

15 A: I received a Bachelors of Science degree in Civil Engineering from Virginia Tech in
16 1980.

17

18 Q: What are your professional credentials?

19 A: I am a registered Professional Engineer in the State of Ohio.

20

21 Q: Please briefly describe your professional experience.

1 A: I started with the Columbia Gas System in 1980 as a Corrosion Engineer. From 1985 to
2 1988 I was a Division Operations Engineer, from 1988 to 1992 I was a Division Plant
3 Supervisor/Engineer, from 1992 to 1994 I was a District Supervisory Engineer, from
4 1994 to 1996 I was a District Operations Manager, from 1996 to 2000 I was a Regional
5 Training and Technical Support Manager, from 2000 to 2002 I was the Director of Regu-
6 latory Compliance and Training for Ohio, from 2002 to 2006 I was the Ohio and Ken-
7 tucky Operations Support Manager and from 2006 to present I have been the Operations
8 Compliance Manager for Ohio, Kentucky and Indiana.

9

10 Q: Have you previously testified before?

11 A: No.

12

13 Q: What is the purpose of your testimony in this proceeding?

14 A: The purpose of my testimony is to support Columbia Gas of Ohio, Inc.'s ("Columbia" or
15 "the Company") application in this proceeding, in which the Columbia is seeking Com-
16 mission authority to implement an Infrastructure Replacement Program ("IRP"). Under
17 the IRP Columbia will replace those natural gas risers that the Commission Staff has
18 identified as prone to failure. Columbia's IRP also addresses assuming responsibility for
19 maintenance, repairs and replacement of customer-owned service lines on a prospective
20 basis. I will explain the need for, and the nature of, the IRP program.

21

22 Q: Does Columbia currently own customer service lines?

1 A: No, Columbia's tariff provides that customers own their own service lines. Our research
2 shows that with respect to Columbia, and its predecessor companies, the customers have
3 owned their own service lines at least as far back as the 1930s. Beyond that we have been
4 unable to find any records. Ohio is one of the few states in the country where the custom-
5 ers own their customer service lines and are responsible for all required repairs and or
6 maintenance.

7

8 **Q:** **What is a customer service line?**

9 A: The customer service line is defined as the pipe from the outlet of the curb valve or if
10 there is not curb valve, from the property or lot line, to and including the meter connec-
11 tion. Columbia owns and is responsible for repairs and maintenance of the service line
12 from the connection to the main line to the curb valve or property line or lot line. Both
13 the company service line and the customer service line are illustrated on Attachment 1
14 hereto.

15

16 **Q:** **What is a natural gas riser?**

17 A: A natural gas riser is the vertical portion of a customer service line that connects the bal-
18 ance of the customer service line to the meter setting. (See Attachment 1.)

19

20 **Q:** **Why have risers become an issue in this and other regulatory proceedings?**

21 A: Since 2000, there have been four "incidents," as that term is defined by Ohio Administra-
22 tive Code Rule 4901:1-16-02(J)(3), related to natural gas risers. These events led the
23 Commission to initiate a Commission-ordered investigation in PUCO Case No. 05-463-

1 GA-COI. In various entries issued in that docket the Commission directed the state's four
2 large Local Distribution Companies ("LDCs"), including Columbia, to identify a sample
3 number of installed risers, and to remove a number of risers for submission to a testing
4 laboratory selected by the Commission.

5

6 **Q:** Please describe Columbia's efforts to conduct the riser sampling program required
7 by the Commission.

8 A: The Columbia riser sampling program had three phases: (1) a statistically valid sampling
9 study to estimate the riser inventory; (2) the collection and submission of non-leaking
10 non-metallic risers for testing to the Akron Rubber and Development Laboratory,
11 ("ARDL"); and, (3) the collection and submission of leaking non-metallic risers to the
12 ARDL for testing.

13 In the initial phase, Columbia hired a consultant to design and complete the statis-
14 tical analysis of the riser inventory. Columbia employees surveyed 1,288 risers across
15 eight of Columbia's twelve Operating Centers in accordance with the consultant's work
16 plan. The final report was submitted to the Commission Staff for review and approval in
17 late June 2005. Expenses for the statistical analysis included the riser survey cost and
18 consultant fees.

19 The second phase of the sampling program began in August 2005 and included
20 the removal and submission of non-leaking non-metallic risers. Columbia used the Com-
21 mission's removal protocols as the basis for training its field employees. The protocols
22 included securing the risers to prevent movement during removal, attaching the removed
23 riser to a board for shipping and documentation requirements. Columbia employees re-

1 moved and submitted 19 non-leaking risers for testing by the ARDL. Expenses incurred
2 for this phase of the sampling program included removal of non-leaking risers, shipping
3 the risers to ARDL for evaluation and the replacement of the customers' risers.

4 The final phase of the sampling program ran from September 15, 2005 through
5 March 14, 2006. During this time Columbia employees removed and submitted 209 leaking
6 non-metallic risers to the ARDL for testing, following the Commission provided pro-
7 tocols. Expenses incurred for this phase of the sampling program included removal of
8 leaking risers, shipping the risers to ARDL for evaluation and the replacement of the cus-
9 tomers' risers.

10 The total cost of the riser sampling program was \$227,635. Columbia witness
11 Martin further addresses all of the expenses.

12

13 **Q: What happened after Columbia submitted its risers to the Commission-designated**
14 **testing laboratory?**

15 A: Laboratory tests were performed by ARDL under the direction of consultants from the
16 University of Akron. ARDL sent its report to the Commission on May 31, 2006, and the
17 University of Akron's final report was sent on June 30, 2006. On November 24, 2006, the
18 Commission Staff filed its Staff Report of Investigation in Case No. 05-463-GA-COI.
19 The report discussed the findings of the University of Akron consultants and the test re-
20 sults of ARDL's laboratory investigation, which concluded that certain types of field as-
21 sembled, or Design A risers, were more prone to leakage failure if not assembled and in-
22 stalled properly. The report detailed specific conditions which increase the likelihood that
23 certain Design A risers would fail, however the report did not determine how to predict

1 the future failures of Design A risers. The Staff Report found that failures of natural gas
2 risers present a significant public safety hazard and because these future failures can not
3 be predicted the Staff recommended that all risers identified as prone to failure should be
4 replaced. The Staff also recommended that LDCs conduct a riser inventory of their sys-
5 tem so that they would have knowledge of the types and locations of risers in their sys-
6 tems.

7

8 **Q:** **Was Columbia provided an opportunity to comment on the Staff Report?**

9 A: Yes, the Commission provided Columbia and all interested parties with an opportunity to
10 comment on the Staff Report. Columbia filed its Comments on February 2, 2007 in PUCO
11 Case No. 05-463-GA-COI. Among other things, Columbia commented that it agreed with
12 the Staff recommendation to conduct a riser survey.

13

14 **Q:** **Why did Columbia believe a riser survey was appropriate?**

15 A: Columbia's tariff defines customer service lines, including the risers, as the property of
16 the customer. Service lines and risers are installed by a plumber or contractor hired by the
17 customer. Columbia does not own these facilities and as a result does not have detailed
18 records of the material installed or the specific date of installation for customer-owned
19 facilities such as risers. Therefore, Columbia believed it appropriate to conduct a riser
20 survey in order to determine how many prone to failure risers had been installed by cus-
21 tomers, and where those risers were located.

22

23 **Q:** **Please describe Columbia's riser identification survey process?**

1 A: The Columbia riser identification survey will identify all natural gas risers in Columbia's
2 system, and will include a leakage survey of all 1,300,000 customer service lines along
3 with an inspection of each meter setting for atmospheric corrosion. In early January 2007,
4 in accordance with the recommendations in the Staff Report in Case No. 05-463-GA-COI
5 and a January 2, 2007 letter from the Commission Chairman, Columbia began the plan-
6 ning process for the riser identification survey. The planning included development of:
7 (1) a riser database; (2) inspection protocols and training materials; (3) communications
8 materials for customers; and, (4) the outsourcing of the riser identification survey.

9 The riser database is used to generate the field survey documents, upload the re-
10 sults of the survey into our customer information system and to generate notifications to
11 customers with prone to failure risers. The riser database was completed and put into
12 production in late July 2007.

13 The inspection protocols and training materials were developed by Columbia in
14 January and February of 2007, and included a detailed training aid for the identification
15 of risers. Training was conducted for all Columbia Operations Centers in early March,
16 2007.

17 Customer communications included door tags, customer notification letters, and
18 updates to Columbia's Customer Call Center scripts and website, and automated voice
19 response system messages. The door tags and letters were developed by Columbia. The
20 Customer Call Center updates were jointly developed by Columbia and the Customer
21 Call Center staff and implemented by the Customer Call Center staff.

22 The Operations Center Managers evaluated their staffing levels, existing work
23 load and available out-source opportunities and made the initial decision on conducting

1 the study with Columbia employees or using contractors. Columbia put together a bid
2 package and invited to the bid meeting companies that had Columbia-approved Operator
3 Qualification plans. The contracts were awarded to two companies for the majority of the
4 inspections. In April 2007, after a re-evaluation of the riser identification survey labor re-
5 quirements Columbia conducted another bid session and awarded further survey work to
6 contractors.

7 The riser identification survey was managed using the riser database. In early
8 March 2007, information needed for the survey was down loaded to the database. The
9 down loaded data included meter reading route information, customer contact informa-
10 tion and curb box and meter location. The riser database was used to create the field sur-
11 vey sheets using the meter reading route information. The surveys were completed by the
12 field and returned to the Operations Center for processing. The Operations Center per-
13 formed a quality check of the data and then uploaded the data to the riser data base. The
14 riser type and inspection date was then uploaded into the Columbia's customer informa-
15 tion system. Once the survey information was processed the Operations Center created
16 follow up orders to address any issues identified by the survey including inaccessible ser-
17 vice lines and meter settings and buried risers.

18

19 **Q: What is the status of the riser identification survey?**

20 A: The survey was started in March 2007, and as of October 12, 2007, the initial attempt to
21 survey each account was 96% complete. We anticipate the initial pass will be completed
22 by in mid-October 2007. Once we have completed the initial attempt to survey each riser,
23 we will revisit those premises where the risers or service lines were inaccessible and

1 where the risers were buried. The survey of inaccessible risers and service lines and bur-
2 ied risers is to be performed by Columbia and will cover an estimated 60,000 customers.
3 At this time Columbia projects the completion of the second survey for approximately
4 one-half of those customers with risers covered by soil and approximately ten-percent of
5 those customers with risers covered by hard surfaces during the calendar year 2007 with
6 balance of the second survey to be completed during the calendar year 2008.

7

8 **Q:** **What are the results of the survey to date?**

9 A: As of October 12, 2007, Columbia has completed 96% of the survey and estimates that
10 the survey will identify 320,000 prone to failure risers and over 17,600 leaks on customer
11 service lines, risers and meter settings.

12

13 **Q:** **What is Columbia requesting in its Application?**

14 A: Columbia is requesting approval to assume responsibility for: 1) the future maintenance,
15 repair and replacement of customer-owned service lines; and the orderly and systematic
16 replacement, over a period of approximately three years, of all risers identified as prone
17 to failure. In addition to assuming responsibility for maintenance, repairs and replace-
18 ment of customer-owned service lines on a prospective basis, Columbia proposed to as-
19 sume ownership of any new risers and any service lines constructed or installed by Co-
20 lumbia as risers or service lines are replaced, and, such accounting authority as may be
21 required to permit capitalization of Columbia's investment in customer-owned service
22 lines and risers through the assumption of financial responsibility for these facilities and

1 the deferral of related costs for subsequent recovery through the automatic adjustment
2 mechanism.

3

4 **Q:** Why is Columbia making this request?

5 A: First, the Staff Report has clearly identified a situation involving the public safety. Sec-
6 ond, the cost of correcting this situation across the state is likely to be substantial. Co-
7 lumbia believes that the situation identified in the Staff Report can best be addressed
8 through the replacement of all Design-A risers that are prone to failure if not correctly as-
9 sembled and installed, whether or not those risers are currently exhibiting any signs of
10 leakage.¹ In addition, the leak survey process itself is likely to identify numerous leaks in
11 customers' service lines, and the additional cost of replacing those lines, while difficult to
12 predict, will undoubtedly be substantial.

13 Third, a situation in which thousands of customers need to make similar repairs
14 within a very short time could well lead to rapid increases in the price of such work, as
15 well as difficulties in finding available contractors. Finally, many customers, when faced
16 with a potential expenditure that could exceed several hundred dollars, may simply de-
17 cide not to replace a riser which may be prone to failure, but has not yet actually failed.
18 This would present an ongoing safety risk for such customers and those in close prox-
19 imity to them.

¹ Specifically, Columbia recommends the replacement of the three types of risers, identified in the table on page 9 of the Staff Report, with gaskets whose average CSR (compression stress retained) % force retained values (%FR) fell below the top of the Report's estimated range of the threshold value necessary to result in a leak (85.3% to 77.9%). In addition, each of these three types of risers had at least one sample that fell below the bottom of the Report's estimated threshold range, and all three share common design characteristics.

1 In view of those concerns, including the potential magnitude of the costs and their
2 resulting impact upon individual customers, Columbia believes that the best solution
3 would be for the Company to assume responsibility for: (1) the future maintenance, re-
4 pair, and replacement of customer service lines; and, (2) the orderly and systematic re-
5 placement, over a period of approximately three years, of all Design-A risers that are
6 prone to failure if not properly assembled and installed.²

7 Columbia cannot, however, commit to undertake such a program, and to raise the
8 significant amounts of incremental capital required to assume these obligations of the
9 customer, without some type of accelerated cost recovery, as explained by Columbia wit-
10 nesses Brown and Martin.

11
12 **Q:** How does Columbia's proposal benefit customers?

13 A: Columbia's program will directly and promptly resolve a significant safety issue that af-
14 fects a large number of the Company's customers. The centralized management and op-
15 eration of the replacement program will result in economies of scale, as well as the coor-
16 dination of work between Columbia and outside plumbers and contractors. The work will
17 be accomplished in an expeditious but orderly manner, and would avoid the potential
18 chaos that could result if thousands of customers simultaneously sought to arrange such
19 repairs on their own. The cost impact of a significant, safety-related project would be
20 spread over the entire customer base and over the life of the assets, so as to minimize the

² Columbia is not proposing to assume "ownership" of existing customer service lines. Those facilities are currently owned by the customer. Instead, Columbia is proposing to assume responsibility for the maintenance, repair, and replacement of customer service lines on a prospective basis. Any new facilities installed by Columbia would become the property of the Company, and would thereafter be included in the Company's rate base.

1 cost borne by each individual customer. Finally, the ongoing repair and replacement of
2 customer service lines by Columbia will result in improved and more efficient operations.
3

4 **Q: In what ways does Columbia's proposal promote improved and more efficient op-**
5 **erations?**

6 A: Columbia taking sole responsibility for all service line, riser and meter repairs and re-
7 placements will provide all customers with the following benefits:

- 8 a. Customers will have a single point of contact for all concerns about service lines, ris-
9 ers and meter settings.
- 10 b. The proposal will promote fairness in that the program provides for the continued
11 protection of customers through Columbia's assumption of financial responsibility for
12 repair and replacement of all customer-owned service lines.
- 13 c. Customers will not have to make decisions about repair or replacement of service
14 lines, risers or meter settings for which they have limited knowledge as consumers.

15 Normally customers have a very limited amount time to find a qualified individual to
16 perform the repair or replacement work. There are few resources available to custom-
17 ers to evaluate and compare the price and quality of a plumber's or contractor's work.

- 18 d. Customer confusion about who is responsible for what types of repairs will be elimi-
19 nated, because Columbia will be responsible for any necessary replacement of the
20 prone to failure riser and for repair and replacement of service lines. Customers will
21 not need to make decisions about whether or not they are responsible for a gas leak
22 depending on whether or not they have a prone to failure riser.

1 e. Customers will be provided timely restoration of gas service when service has been
2 disrupted to complete repairs or replacements of service lines, risers or meter settings.
3 Columbia is proposing restoration of gas service within three working days in the
4 non-heating season and by the end of the next day during the heating season.

5

6 **Q: What is Columbia's plan to replace prone to failure risers?**

7 A: Columbia's is proposing an orderly and systematic replacement, over a period of ap-
8 proximately three years, of all Design A risers that have been identified as prone to fail-
9 ure. Columbia estimates that the project will replace approximately 320,000 natural gas
10 risers at an estimated cost of \$160 million dollars. Columbia currently is in the planning
11 stages of the replacement program and is targeting a March 1, 2008 start date. Columbia
12 sent out a "Request For Information" ("RFI") to pipeline contractors and all companies
13 listed in its database of plumbers who are operator-qualified under the Department of
14 Transportation's section 192 ("OQ plumbers"). The RFI provides OQ plumbers and con-
15 tractors with information pertaining to the contract and work requirements of the pro-
16 gram. All parties that complete the RFI will be provided an opportunity to submit a pro-
17 posal for participation in the replacement program. Columbia plans to outsource the ma-
18 jority (80% to 90%) of the replacement of prone to failure risers to OQ plumbers and
19 contractors. Columbia will add staff to manage the outsourced prone to failure riser re-
20 placement program.

21

22 **Q: What is Columbia currently doing to address leaking prone to failure risers?**

1 A: Columbia employees are replacing all leaking prone to failure risers and any prone to
2 failure riser that would be disturbed by the repair or replacement of a meter setting or ser-
3 vice line.

4

5 Q: **What are Columbia's plans for addressing all other leakage on customer owned fa-**
6 **cilities?**

7 A: Columbia is in the planning stages of a program to address leakage on prone to failure
8 risers and customer service lines. Columbia has not determined the mix of Columbia and
9 OQ plumber/contractor employees to be used to address leakage on customer service
10 lines, risers and meter settings. All Columbia OQ plumbers will be invited to participate
11 in the bid process for the leakage work that is outsourced. We anticipate full implementa-
12 tion of the program by March 1, 2008, assuming we have the regulatory approvals needed
13 to proceed on that time frame.

14

15 Q: **How will the program work for the reimbursement of customers for risers and or**
16 **service lines that they have paid plumbers to replace?**

17 A: Columbia will reimburse those customers who repair or replace a prone to failure natural
18 gas riser or a customer service line with a customer service line leak using the services of
19 a DOT Operator Qualified plumber between November 24, 2006 and March 1, 2008. Re-
20 imbursement will be at actual cost incurred by the customer as proven by the customer
21 provided receipt, with the maximum reimbursement for a natural gas riser being \$500 and
22 the maximum reimbursement for a customer service line being \$1,000. Those customers

1 who have a gas line warranty will be reimbursed up to the amount of their deductible af-
2 ter the warranty company has arranged for the replacement of a prone to failure riser.

3

4 **Q: How will Columbia process customer requests for reimbursement for repaired or**
5 **replaced natural gas risers and service lines?**

6 A: Columbia is still developing reimbursement guidelines, and the guidelines cannot be fi-
7 nished until after the Commission issues its final order in this case. However, the follow-
8 ing provides high level details on Columbia's proposed processing of requests for reim-
9 bursment for replaced natural gas risers and repaired or replaced service lines:

- 10 a) Columbia will send all customers a notification providing details of the reimburse-
11 ment process and the required documentation.
- 12 b) Customers will mail receipts and documentation to the address provided by Colum-
13 bia. Columbia will send a post card acknowledging receipt of the documentation for
14 reimbursement.
- 15 c) Columbia will review internal records to verify that the customer service line and or
16 riser were replaced and met the criteria of the program.
- 17 d) Once Columbia has verified the customer-provided documentation and the repair or
18 replacement work, the request will be processed for payment.
- 19 e) If the initial review of the reimbursement request does not meet the criteria for reim-
20 bursment, Columbia's Operations Centers will conduct a field investigation. The
21 Operations Center will contact the customer and plumber to attempt to verify that the
22 repair and or replacement were performed within the requirements of the program.

- 1 f) If the Operations Center can verify that the reimbursement request is valid, the re-
2 quest will be forward to be processed for payment. If the reimbursement can not be
3 verified the customer will receive a notification that reimbursement will not be made.
4 g) For a customer with a past due arrearage on their account which exceeds the amount
5 of the reimbursement, the account will be credited with the full amount of the reim-
6 bursement. If the amount of the reimbursement exceeds the past due arrearage a
7 check for the full reimbursement amount will be sent to the customer.

8

9 **Q:** **What roles will the plumbers have if Columbia's proposals are approved?**

10 A: All plumbing companies on Columbia's DOT OQ list will have an opportunity to partici-
11 pate in the bidding of the riser replacement program and the program to repair and or re-
12 place leaks on customer service lines, risers and meter settings. The planning for the riser
13 replacement program and the program to address leaking customer service lines, risers and
14 meter settings has not been completed and the extent of the OQ Plumbers participation
15 remains uncertain at this time.

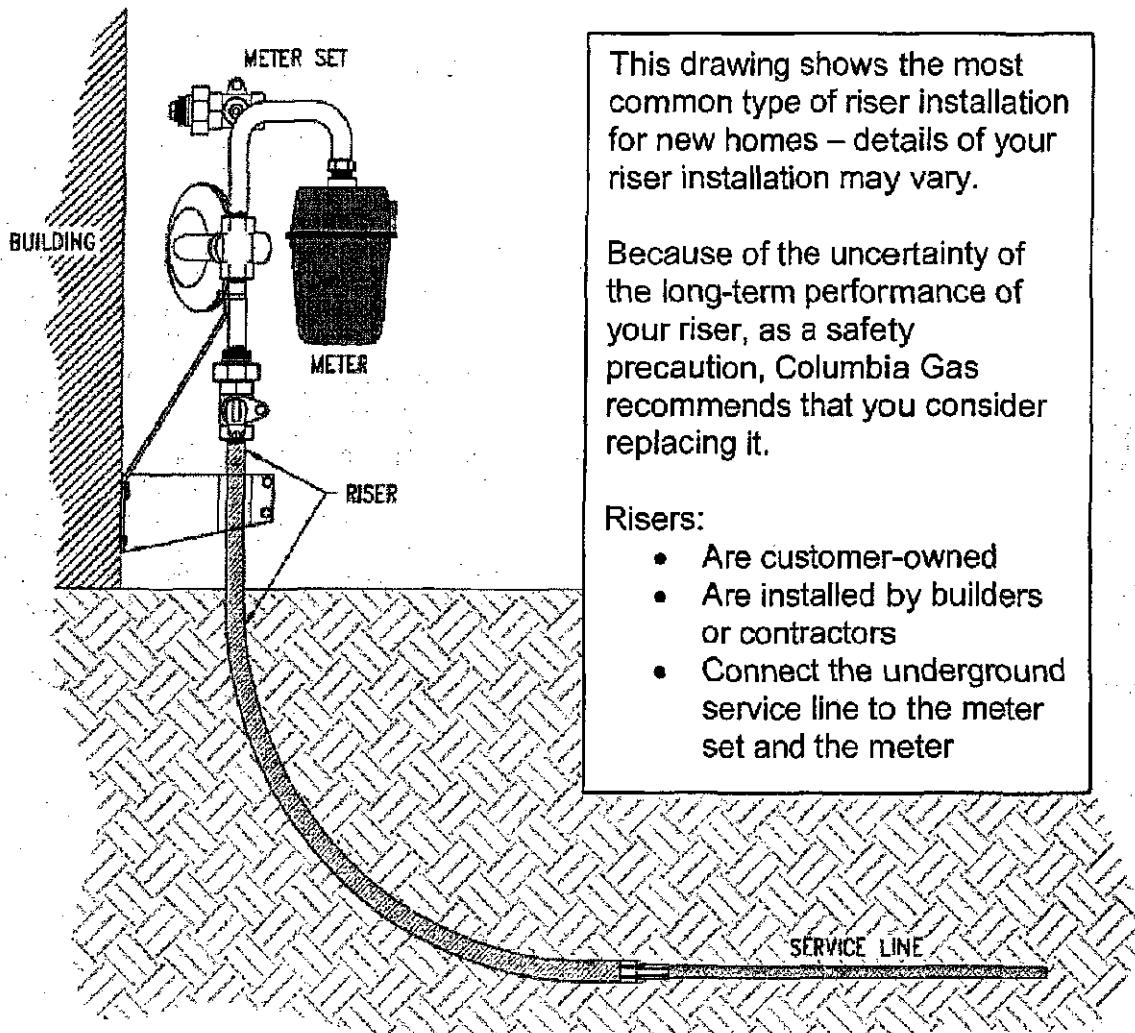
16

17 **Q:** **Does this complete your Prepared Direct Testimony?**

18 A: Yes, it does.

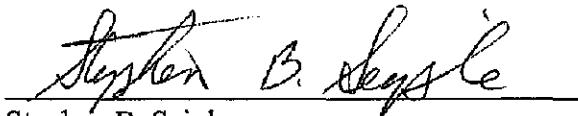
ATTACHMENT 1

A Typical Riser Installation



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Prepared Direct Testimony of Michael Ramsey was served upon all parties of record by electronic mail and regular U. S. mail this 15th day of October 2007.



Stephen B. Seiple
Attorney for
COLUMBIA GAS OF OHIO, INC.

SERVICE LIST

David C. Rinebolt
Ohio Partners for Affordable Energy
231 West Lima St., P.O. Box 1793
Findlay, OH 45839-1793
E-Mail: drinebolt@aol.com

Joseph P. Serio
Associate Consumers' Counsel
10 W. Broad St., Suite 1800
Columbus, OH 43215
E-Mail: serio@occ.state.oh.us

Vincent A. Parisi
5020 Bradenton Avenue
Dublin, Ohio 43017
E-Mail: vparisi@igsenergy.com

Duane L. Luckey
Assistant Attorney General
Chief, Public Utilities Section
180 E. Broad St., 9th Floor
Columbus, OH 43215-3793
E-Mail: duane.luckey@puc.state.oh.us

Carl A. Aveni, II
Joseph M. Patchen
Carlile, Patchen & Murphy LLP
366 E. Broad St.
Columbus, OH 43215
E-Mail: caa@cpmlaw.com

Joseph M. Clark
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
E-Mail: jclark@mwncmh.com

M. Howard Petricoff
Stephen M. Howard
Vorys Sater Seymour and Pease LLP
52 East Gay Street, P.O. Box 1008
Columbus, OH 43216-1008
E-Mail: mhpetricoff@vssp.com

John W. Bentine
Chester, Willcox & Saxbe LLP
65 East State Street, Suite 1000
Columbus, OH 43215-4213
E-Mail: jbentine@cswlaw.com

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