

FILE

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Columbia Exhibit No.

**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)
Infrastructure Replacement Program and for)
Approval of Certain Accounting Treatment)

Case No. 07-478-GA-UNC

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**PREPARED REBUTTAL TESTIMONY OF
THOMAS J. BROWN, JR.
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

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November 19, 2007

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PREPARED REBUTTAL TESTIMONY OF THOMAS J. BROWN, JR.

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

2 A. I am Thomas J. Brown, Jr. My business address is Post Office Box 117, 200 Civic Center
3 Drive, Columbus, Ohio 43216-0117.

4
5 **Q. Are you the same Thomas J. Brown, Jr. who previously presented direct testimony in
6 this proceeding?**

7 A. Yes.

8
9 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

10 A. This rebuttal testimony is submitted in response to testimony submitted by Utility Service
11 Partners witnesses Funk and Riley.

12
13 **Q. Did you review the Direct Testimony of Phillip Riley, Jr. filed on behalf of Utility
14 Service Partners, Inc. on October 23, 2007, in Case No. 07-478-GA-UNC?**

15 A. Yes.

16
17 **Q. Do you agree with the statements in Mr. Riley's testimony that Columbia's plan to
18 assume responsibility for the ongoing maintenance, repair and replacement of
19 customer-owned service lines will not generate cost efficiencies or result in improved
20 or more efficient service for customers?**

21 A. No. Mr. Riley's testimony largely consists of self-serving assertions that customers derive
22 some higher levels of service or benefits from the warranty services his company sells. He

1 has presented no substantive arguments for continuing the current anomalous system of
2 bifurcated company/customer responsibility for repair or replacement of jurisdictional
3 natural gas distribution facilities. His arguments in opposition to Columbia's proposal to
4 assume the responsibility for repair and replacement of customer service lines seem even
5 more specious because they would appear to contradict his statement that Utility Service
6 Partners does not object to Columbia proposals regarding replacement of a significant
7 portion of customers' service lines – i.e., the Type A Risers that are prone to failure.

8
9 **Q. Did you review the Direct Testimony of Carter T. Funk filed on behalf of Utility**
10 **Service Partners, Inc. on October 23, 2007, in Case No. 07-478-GA-UNC?**

11 A. Yes.

12
13 **Q. Do you agree with the statements in Mr. Funk's testimony that Columbia's plan to**
14 **assume responsibility for the ongoing maintenance, repair and replacement of**
15 **customer-owned service lines will not improve or promote customer service line**
16 **safety?**

17 A. No. Mr. Funk suggests that Columbia's proposal is inherently unreasonable because "the
18 LDC will still have the responsibility to make leaking and damaged customer service lines
19 safe" and because "Columbia would be inspecting its own work prior to restoring service,
20 eliminating the independent oversight which exists today." Mr. Funk has presented no
21 evidence whatsoever that supports his inference that Columbia's employees will use
22 anything less than their best judgment and experience to inspect all work done on customer
23 service lines and to maintain a safe and efficient gas distribution system. The USP testimony

1 does not support the rejection of Columbia's proposal to assume responsibility for repair and
2 replacement of customer service lines.

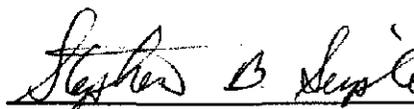
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4 **Q. Does this complete your Prepared Rebuttal Testimony?**

5 **A:** Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Prepared Rebuttal Testimony of Thomas J. Brown, Jr. was served upon all parties of record by electronic mail and regular U. S. mail this 19th day of November, 2007.



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