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November 28, 2007

**Filing 1**

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

Re: Case No. 07-478-GA-UNC

Dear Ms. Jenkins:

Please find enclosed an electronic copy of the Surrebuttal Testimony of Carter Funk on behalf of Utility Service Partners, Inc. A copy of this Testimony is being served on all counsel of record via e-mail and via U.S. mail.

Thank you for your cooperation.

Sincerely yours,

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

SMH/jab  
Enclosure  
cc: All Counsel of record via e-mail and U.S. mail

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**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**

**SURREBUTTAL TESTIMONY OF CARTER T. FUNK ON BEHALF  
OF UTILITY SERVICE PARTNERS, INC.**

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

2   A.1.           My name is Carter T. Funk and I reside at 503 Turnberry Lane, St. Augustine,  
3                   Florida, 32080.

4   **Q.2.           Please describe your current position, your business and your educational**  
5                   **background.**

6   A.2.           I am currently President of CKF Enterprises, Inc. an energy consulting firm based  
7                   in North Canton, Ohio. I founded CKF Enterprises in February 2000. Prior to my  
8                   work at CKF Enterprises, I held many executive level positions at Consolidated  
9                   Natural Gas Company ("CNG") including serving as Vice President and General  
10                  Manager of West Ohio Gas Company, a subsidiary of CNG from 1989 to 1993. I  
11                  have held many positions in the natural gas industry, including positions in  
12                  engineering, corporate planning, operations and planning. I graduated from Case  
13                  Western Reserve University in 1972 with a Bachelor of Science degree in  
14                  Mechanical Engineering, received a Masters in Business Administration from the

1 West Virginia College of Graduate Studies in 1981 and was a Licensed  
2 Professional Engineer in Ohio for many years.

3 **Q.3. What is the purpose of your surrebuttal testimony?**

4 A.3. I am filing testimony on behalf of Utility Service Partners, Inc.'s ("USP") in  
5 response to rebuttal testimony filed by Columbia Gas of Ohio, Inc.

6 **Q.4. Do you agree with Mr. Ramsey's statement in his rebuttal testimony that**  
7 **bare steel service lines present a significant safety hazard?**

8 A.4. No, bare steel service lines alone do not present a safety hazard. In regard to  
9 leaking bare steel service lines, the degree of danger varies by incident. For  
10 example, a customer service line with a leak caused by corrosion and metal  
11 fatigue will typically start very small and increase over time until it is detected. A  
12 customer service line that is damaged by digging can result in substantial  
13 quantities of gas escaping and may pose an immediate danger to the person  
14 digging into the pipe as well as others nearby until the gas flow is stopped. In my  
15 experience, the bulk of customer service line leaks are caused by corrosion and  
16 not by digging.

17 **Q.5. Is there value to the independent inspection of service line repairs and**  
18 **replacements performed by Columbia employees under the current system?**

19 A.5. Definitely. Under today's system, Columbia is required to inspect every  
20 contractor repair and replacement of a customer service line before the line is put  
21 back in service. This independent third-party inspection is a significant safety  
22 feature that ensures that the person performing the work has not made mistakes or  
23 taken shortcuts. In my experience, the most dangerous mistakes are blind

1 mistakes. That is, mistakes that are made over and over because the individual  
2 does not realize he is making a mistake in repairing a gas line. Shortcuts are also  
3 an issue such as not digging the ditch deep enough, not using approved material,  
4 or not holding the pressure test for the required amount of time which could result  
5 in a slow leak not being detected. Under today's system, shortcuts and mistakes  
6 can be caught because Columbia, a party without a financial interest in the repair,  
7 inspects the entire repair or replacement prior to restoring service. As well,  
8 Columbia performs the actual pressure test, not the individual performing the  
9 repair or replacement.

10 Columbia's IRP will eliminate the independent oversight that exists today,  
11 allowing the individual performing the work to self-inspect his own work. And  
12 unlike its obligations under the existing system, Columbia has not committed to  
13 having independent daily on-site inspections of all repairs and replacements of  
14 customer service lines under the IRP. There is no doubt in my mind that the  
15 existing system for repairs and replacements of customer service lines is much  
16 safer than what Columbia proposes under the IRP. This is especially true as any  
17 mistakes or short-cuts that occur because of the IRP will be hidden underground.

18 **Q.6. Does this conclude your testimony?**

19 **A.6.** Yes, it does.

## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Surrebuttal Testimony of Carter T. Funk was served upon the following persons by electronic mail and by first class U.S. mail, postage prepaid this 28th day of November, 2007:

/s/

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**This foregoing document was electronically filed with the Public Utilities**

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

Summary: Testimony Surrebuttal Testimony of Carter Funk on behalf of Utility Service Partners, Inc. electronically filed by Stephen M Howard on behalf of Utility Service Partners, Inc.