

**FILE**

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Increase Rates for its Gas Distribution Service.

Case No. 07-829-GA-AIR

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Alternative Rate Plan for its Gas Distribution Service

Case No. 07-830-GA-ALT

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Change Accounting Methods

Case No. 07-831-GA-AAM

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with a Pipeline Infrastructure Replacement Program Through an Automatic Adjustment Clause, And for Certain Accounting Treatment

Case No. 08-169-GA-ALT

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with Automated Meter Reading Deployment Through an Automatic Adjustment Clause, and for Certain Accounting Treatment

Case No. 06-1453-GA-UNC

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INTERSTATE GAS SUPPLY, INC. RESPONSES TO THE  
EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO'S  
FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS

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Pursuant to Rules 4901-1-16, 4901-1-19 and 4901-1-20 of the Ohio Administrative Code, Interstate Gas Supply, Inc. submits these responses to the First Set of Interrogatories and Requests

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for Production of Documents of The East Ohio Gas Company d/b/a Dominion East Ohio (“DEO” or “Company”).

These interrogatories and requests for production of documents are governed by the following Instructions and Definitions:

### INSTRUCTIONS

1. You are required to choose one or more of Your employees, officers or agents to answer the following interrogatories and to respond to the following requests for production, who shall furnish all such information which is known or available to You.

2. Where an interrogatory calls for an answer in more than one part, the parts should be presented in the answer in a manner which is clearly understandable.

3. You are under a continuing duty to supplement Your responses pursuant to Rule 4901-1-16(D) of the Commission’s Rules of Practice as to expert witnesses and the subject matter of their testimony, responses discovered to be incorrect or materially deficient, and where the initial response indicated that the information sought was unknown or nonexistent but such information subsequently becomes known or existent.

4. If You claim any form of privilege as a ground for not completely answering any interrogatory, state the nature of the privilege and the general subject of the information withheld.

5. For any document that You decline to produce because of a claim of privilege or any other reason, provide the date, author, and type of document, the name of each person to whom the document was sent or shown, a summary of the contents of the document, and a detailed description of the grounds for the claim of privilege or objection to producing the document. If a claim of privilege is made only to certain portions of a document, please provide that portion of the document for which no claim of privilege is made.

6. If any document responsive to a request for production of documents is no longer in Your possession or control, please state why the document is no longer in Your possession or control, explain the circumstances surrounding the disposition of the document, identify the individual responsible for the disposition of the document, and state whether the document or copies thereof still exist.

7. Please identify all responses to requests for production of documents by the number of the request.

8. Where an interrogatory requests that a date be given, but You cannot recall the specific date, please respond by giving an approximate date or time frame, indicating that the date or time frame is approximate.

### DEFINITIONS

1. "Communication" is used herein in its broadest possible sense and means any occurrence in which information is related between persons by means or an oral or written statement, including, without limitation, any, meeting, conversation, correspondence, memoranda, discussion, negotiation, telephone conversation, voicemail message, electronic mail message, proposal, or presentation, in whatever form.

2. "Document" is used herein in its broadest possible sense and means any information memorialized in any way, however stored, including, but not limited to, bills, correspondence, electronic mail, memoranda, notes, writings, meeting minutes, spreadsheets, graphs, charts, and drafts of any of the foregoing, and computer files, audio recordings, and photographs, in whatever form.

3. "DEO" means The East Ohio Gas Company d/b/a Dominion East Ohio.

4. "Identify" means:

a. When used in reference to a natural person, to state the full name, the present or last-known address, and the present or last-known employer or business affiliation of the person;

b. When used in reference to an entity, department, or division, to state the full name of the entity, department, or division, the present or last-known address of the entity, department, or division, and to identify the natural person or persons who represent such entity, department, and division, in connection with the above-captioned proceeding;

c. When used in reference to a document, to state the date, author, addressor, addressee, type of document, title, if any, or some other means of identifying the document, a general description of its subject matter, and its present or last known location and custodian.

d. When used in reference to a communication, to state all persons involved in the communication, the time, date, and location of the communication, a general description of the subject matter of the communication, and the nature of the communication (e.g., telephone, e-mail, in person).

5. "You" or "Your" refers to Interstate Gas Supply, Inc.
6. "Case" or "Cases" means any or all of the above-captioned cases, depending on the context.

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify each person whom You intend to call as a witness at the hearing in these Cases.

**RESPONSE:**

**Interstate Gas Supply, Inc. (hereinafter "IGS") does not intend to call a witness at this time.**

**INTERROGATORY NO. 2:** For each person whom You intend to call as a witness at the hearing in these Cases:

- a. State the substance of each opinion on which the witness will testify;
- b. State all facts which provide the basis for each opinion on which the witness will testify;
- c. Provide a summary of the witness's background and qualifications;
- d. Identify each document supplied to, reviewed by, relied on, or prepared by the witness in connection with his or her testimony in these Cases; and
- e. Identify by caption, agency or court, case name, and case number all other proceedings in which the witness has testified on the same or a similar topic in the past ten years.

**RESPONSE:**

N/A

**INTERROGATORY NO. 3:** Identify each and every document, exhibit or other thing You intend to introduce into evidence or otherwise display at the hearing in these Cases.

**RESPONSE:**

**IGS does not intend to introduce any exhibits at this time.**

**INTERROGATORY NO. 4:** Identify each and every adjustment, modification, or change to DEO's proposed rate base in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

IGS's current understanding of the proposal by Staff is that payments will continue to occur every two weeks, but that the payments will be on a 30 day delay instead of a 14 day delay (and that as a result essentially only 1 payment will be interrupted so as to convert from a 14 day delay to 30). If this understanding is correct, IGS does not intend to oppose the proposed change in the purchase of receivables proposed by the Staff.

**INTERROGATORY NO. 5:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 4, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A.

**INTERROGATORY NO. 6:** Identify each and every adjustment, modification, or change to DEO's proposed test year operating expenses in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

None.

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**INTERROGATORY NO. 7:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 6, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A

**INTERROGATORY NO. 8:** Identify each and every adjustment, modification, or change to DEO's proposed rate design in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

N/A

**INTERROGATORY NO. 9:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 8, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A

**INTERROGATORY NO. 10:** Identify each and every adjustment, modification, or change to DEO's proposed rate of return in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

N/A

**INTERROGATORY NO. 11:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 10, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A

**INTERROGATORY NO. 12:** Identify each and every adjustment, modification, or change to DEO's proposed tariffs in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

N/A

**INTERROGATORY NO. 13:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 12, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A

**INTERROGATORY NO. 14:** Identify each and every adjustment, modification, or change to DEO's proposed PIR Cost Recovery Charge in this Case that You propose or support or intend to propose or support.

**RESPONSE:**

N/A

**INTERROGATORY NO. 15:** For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 14, Identify the following:

- a. All facts relied on by You that support the proposed adjustment.
- b. All documents referring to, reflecting, or relating to the adjustment.

**RESPONSE:**

N/A

**INTERROGATORY NO. 16:** Identify all communications concerning DEO's applications, schedules, or proposals in these Cases that You have had with any party or any representative of any party to any of these Cases or any third party.

**RESPONSE:**

**Objection.** To the extent that any such communications occurred, they are protected by the attorney/client privilege.

**INTERROGATORY NO. 17:** Identify all internal communications (including but not limited to communications involving Your consultants) concerning DEO's applications, schedules, or proposals in these Cases.

**RESPONSE:**

None.

**INTERROGATORY NO. 18:** Identify all documents You have generated, produced, or distributed (including but not limited to documents generated or produced by Your consultants) concerning DEO's applications, schedules, or proposals in these Cases.

**RESPONSE:**

None.

**INTERROGATORY NO. 19:** For each adjustment, modification or change identified in Your responses to Interrogatory Nos. 4, 6, 8, 10, 12, and 14, Identify all internal communications made by You in the last five years (including but not limited to communications involving Your consultants) in connection with any case or proceeding other than these Cases before any court or agency (including but not limited to the Public Utilities Commission of Ohio) that relate to any similar adjustment, modification, or change proposed or supported by You in those cases or proceedings.

**RESPONSE:**

N/A

**INTERROGATORY NO. 20:** For each adjustment, modification or change identified in Your responses to Interrogatory Nos. 4, 6, 8, 10, 12, and 14, Identify all documents You have generated, produced, or distributed in the last five years in connection with any case or proceeding other than these Cases before any court or agency (including but not limited to the Public Utilities Commission of Ohio) that relate to any similar adjustment, modification, or change proposed or supported by You in those cases or proceedings.

**RESPONSE:**

N/A

**INTERROGATORY NO. 21:** For each adjustment, modification or change identified in Your responses to Interrogatory Nos. 4, 6, 8, 10, 12, and 14, Identify all testimony filed or sponsored by You in the last five years in any case or proceeding other than these Cases before any court or agency (including but not limited to the Public Utilities Commission of Ohio) that relate to any



similar adjustment, modification, or change proposed or supported by You in those cases or proceedings.

**RESPONSE:**

N/A

**INTERROGATORY NO. 22:** Regarding any and all Objections to the Staff Report in these Cases that You make, intend to make, or have made, Identify:

All facts relied on by You that support each Objection.

- a. All facts relied on by You that support each Objection.
- b. Each person that has knowledge of each fact identified in subpart (a) of this Interrogatory and/or that may testify about that fact.
- c. All documents referring to, reflecting, or relating to each Objection.

**RESPONSE:**

**Objection – this interrogatory is overly broad and the response requested would be unduly burdensome.**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1:** All documents and things identified in response to DEO's First Set of Interrogatories.

**RESPONSE:**

None.

**REQUEST FOR PRODUCTION NO. 2:** All documents and things that reflect, refer to, or relate to any communication identified in response to DEO's First Set of Interrogatories.

**RESPONSE:**

None.

**REQUEST FOR PRODUCTION NO. 3:** A curriculum vitae for each witness.

**RESPONSE:**

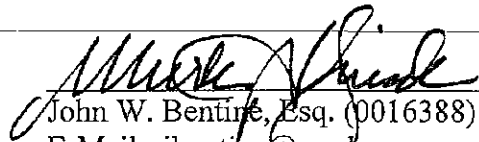
N/A

**REQUEST FOR PRODUCTION NO. 4:** All exhibits You intend to introduce at hearing.

**RESPONSE:**

None.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that a copy of Interstate Gas Supply, Inc.'s *Responses to DEO's First Set of Interrogatories and Requests for Production of Documents to Interstate Gas Supply, Inc.* was delivered to the following persons by Email and regular U.S. mail, this 9th day of July, 2008:

  
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