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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East Ohio :
Gas Company dba Dominion East Ohio for : Case No. 07-829-GA-AIR
Authority to Increase Rates for its Gas :
Distribution Service. :

In the Matter of the Application of The East Ohio :
Gas Company dba Dominion East Ohio for : Case No. 07-830-GA-ALT
Approval of an Alternative Rate Plan for its Gas :
Distribution Service. :

In the Matter of the Application of The East Ohio :
Gas Company dba Dominion East Ohio for : Case No. 07-831-GA-AAM
Approval to Change Accounting Methods. :

In the Matter of the Application of The East Ohio :
Gas Company dba Dominion East Ohio for : Case No. 08-169-GA-ALT
Approval of Tariffs to Recover Certain Costs :
Associated with a Pipeline Infrastructure :
Replacement Program Through an Automatic :
Adjustment Clause, and for Certain Accounting :
Treatment. :

In the Matter of the Application of The East Ohio :
Gas Company dba Dominion East Ohio for : Case No. 06-1453-GA-UNC
Approval of Tariffs to Recover Certain Costs :
Associated with Automated Meter Reading and :
for Certain Accounting Treatment. :

**PREFILED TESTIMONY
OF
BARBARA J. BOSSART
SERVICE MONITORING & ENFORCEMENT DEPARTMENT
INVESTIGATION & AUDIT DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO**

Staff Exhibit _____

July 31, 2008

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

2 A. My name is Barbara J. Bossart. My address is 180 E. Broad Street,
3 Columbus, Ohio 43215-3793.

4

5 2. Q. Who is your employer?

6 A. I am employed by the Public Utilities Commission of Ohio.

7

8 3. Q. What is your present position with the Public Utilities Commission of Ohio
9 and what are your duties?

10 A. I am a Utility Specialist 2 in the Reliability and Service Analysis Division
11 of the Service Monitoring and Enforcement Department. I am responsible
12 for analyzing service quality performance as well as recommending and
13 enforcing service-quality and consumer-protection policies and rules for
14 non-competitive gas and electric utilities.

15

16 4. Q. Would you briefly state your educational background and work history?

17 A. I have a bachelor's degree from Marshall University and I have been
18 employed by the Public Utilities Commission of Ohio since 1999. For six
19 years, I worked as an Investigator in the Investigation and Audits Division
20 of the Service Monitoring and Enforcement Department. As an
21 Investigator my duties included interacting with the consumers to investi-
22 gate their concerns about utility companies' policies and practices. I also

1 performed Customer Service Audits to identify customer service issues or
2 non-compliance with Commission rules. In May 2005 I was promoted to
3 my current position and duties.
4

5 5. Q. What is the purpose of your testimony in this case?

6 A. I will be addressing The Ohio Consumers' Counsel's (OCC's) filed objec-
7 tions (E) (1), (2), (4), (5), (6), (8) and Ohio Partners for Affordable
8 Energy's (OPAE) filed objection 1.
9

10 6. Q. What is OCC's objection (E) (1)?

11 A. OCC objected to staff failure to address DEO's back billing issues.
12

13 7. Q. How do you respond to this objection?

14 A. Staff investigated DEO's back billing issues in September 2005 and in
15 November of that year issued an enforcement letter concerning DEO's back
16 billing issues. DEO responded to the enforcement letter by taking steps to
17 improve its notice to customers about obtaining access to read meters,
18 improve its detection of malfunctioning meters and remote meters, and
19 provide customers a twelve month payment arrangement in compliance
20 with Section 4933.28 of the Ohio Revised Code (O.R.C.) Staff continued to
21 monitor DEO's action until March 2007, when staff was satisfied that
22 DEO's action had addressed its back billing issues.

- 1 8. Q. Does Staff agree with OCC's recommendation that DEO send monthly
2 reports to the OCC and the PUCO to ensure adequate oversight of DEO's
3 back billing problems?
- 4 A. No, staff monitors customer contacts to our call center which would indi-
5 cate any resurgence in DEO's back billing issues. Staff continues to inves-
6 tigate any back billing complaints to make sure that DEO is continuing in
7 its efforts to comply with the back billing statute and the Minimum Gas
8 Service Standards. If contact trends or complaint investigations indicate a
9 need to take further action, staff will do so at such time.
- 10
- 11 9. Q. What is OCC's objection (E) (2)?
- 12 A. OCC objected to the staff report's failure to address the extended payment
13 plans that DEO offers to its residential customers.
- 14
- 15 10. Q. What is Staff's position regarding this objection?
- 16 A. Staff finds that DEO complies with Chapter 18 of the Ohio Administrative
17 Code (O.A.C.) when it offers extended payment plans. On June 25, 2008,
18 the Commission issued draft revised Disconnection rules for public com-
19 ment in Case No. 08-723-AU-ORD. Staff believes that any recommenda-
20 tion to require companies to offer more extended payment plans, should be
21 addressed in that proceeding to ensure that all gas companies in Ohio are
22 providing the same quality of service to their customers.

- 1 11. Q. What is OCC's objection (E) (4)?
- 2 A. OCC objected to Staff's failure to explore options for ensuring that pay-
3 ments post to accounts on the same day in which the payments are made.
4
- 5 12. Q. What is Staff's position regarding this objection?
- 6 A. Staff finds that DEO's payment methodology is consistent with Rule
7 4901:1-13-11 (E) (3) of the O.A.C. Staff believes that any changes to the
8 requirement on how companies must post payments should be addressed
9 during the next rule review of the Minimum Gas Service Standards in
10 Chapter 13 of the O.A.C.
11
- 12 13. Q. What is OCC's objection (E) (5)?
- 13 A. OCC objected to Staff's failure to address reasons why DEO is requiring
14 Social Security numbers?
15
- 16 14. Q. What is Staff's position regarding this objection?
- 17 A. Staff finds that DEO is currently in compliance with the Establishment of
18 Credits rules. Staff believes that this issue is best addressed during the cur-
19 rent proceeding in Case No. 08-723-AU-ORD to consider revisions to the
20 Deposit rules in Chapter 17 of the O.A.C., to ensure that all gas companies
21 in Ohio are providing the same quality of service to their customers.
22

- 1 15. Q. What is OCC's objection (E) (6)?
- 2 A. OCC objects to Staff's failure to address instances where DEO billing peri-
- 3 ods are longer than one month?
- 4
- 5 16. Q. What is Staff's position regarding this objection?
- 6 A. Staff understands that there may be situations, such as holidays, that may
- 7 prevent DEO from providing a bill within a 31 day billing cycle. Staff
- 8 expects DEO to offer payment arrangements to customers who indicate
- 9 they will not be able to pay the amount in full by the due date in those
- 10 instances. Staff believes this issue only affects a small percentage of
- 11 DEO's customers based on the number provided by DEO in response to
- 12 OCC's interrogatories.
- 13
- 14 17. Q. What is OCC's objection (E) (8)?
- 15 A. OCC objected that Staff failed to assess the impact that billing a security
- 16 deposit in a single payment, instead of installments, has on residential cus-
- 17 tomers' abilities to secure service?
- 18
- 19 18. Q. What is Staff's position regarding this objection?
- 20 A. O.R.C. Section 4933.17 allows gas companies an opportunity to collect a
- 21 security deposit in order to secure payment of bills for commodity fur-
- 22 nished and shall only be required if a customer can not establish credit-

1 worthiness. Chapter 17 of the O.A.C. outlines the requirements that gas
2 companies must follow to determine if a customer is creditworthy. Staff
3 believes that this issue is best addressed in the pending rule review process
4 of Chapter 17 of the O.A.C., to ensure that all gas companies in Ohio are
5 providing the same quality of service to their customers.

6
7 19. Q. Can you now address OPAE's objection 1, which maintains that DEO
8 should not charge deposits or late fees to customers participating in the Per-
9 centage Income Payment Plan (PIPP)?

10 A. Yes, Staff believes this issue is best addressed in the pending review of
11 Chapter 18 of the O.A.C., which addresses the administration of PIPP.

12
13 20. Q. Does this conclude your testimony?

14 A. Yes, it does.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Barbara J. Bossart, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 31st day of July, 2008.



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