

**FILE**

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**DEO EXHIBIT 3.0**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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 ) Case No. 08-169-GA-ALT  
Costs Associated with a Pipeline Infrastructure )  
Replacement Program Through an Automatic )  
Adjustment Clause, And for Certain )  
Accounting Treatment. )

**DIRECT TESTIMONY OF TIMOTHY C. MCNUTT ON BEHALF OF  
THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO  
IN SUPPORT OF MOTION TO MODIFY ORDER  
APPROVING ALTERNATIVE RATE PLAN**

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1 **I. INTRODUCTION**

2 **Q1. Please introduce yourself.**

3 A1. My name is Timothy C. McNutt. I am employed by The East Ohio Gas Company, d/b/a  
4 Dominion East Ohio ("DEO"), as its Director, Gas Operations — Planning & Asset Utilization.  
5 My business address is 7015 Freedom Avenue NW, North Canton, Ohio 44720.

6 **Q2. Please describe your educational background and work experience.**

7 A2. I graduated from the University of Akron in 1985 with a B.S. in Civil Engineering. I  
8 have worked for DEO for 25 years. During that period, I have been engaged in all aspects of  
9 engineering and operations for all phases of our gas system, from gathering to distribution to  
10 transmission and storage. Following a two-year training program, I began my engineering and  
11 operations career in 1988 being responsible for transmission design, construction, and  
12 compliance activities. I subsequently became responsible for corrosion compliance and design  
13 for DEO's transmission, storage and gathering systems throughout Ohio. In 1992, I assumed  
14 supervisory responsibility for distribution design, construction, and corrosion compliance. A  
15 series of promotions to supervisory and management positions followed in which I became  
16 responsible for the engineering, construction, corrosion and compliance functions first for  
17 distribution facilities in the Akron division of DEO, next for distribution facilities in the  
18 Youngstown division, and then for all gathering, storage and transmission facilities of DEO.  
19 Ultimately, in 1998, I became responsible for all design, construction, and corrosion functions  
20 for the transmission, distribution, gathering, and storage facilities of DEO.

21 After the acquisition of DEO by Dominion, I was briefly assigned to a position involving  
22 operations, and then undertook management roles for delivery system planning and reliability, as

1 well as centralized system facility records and mapping, and transmission pipeline integrity,  
2 among other functions.

3 In the course of my career, I have studied corrosion prevention practices in the industry  
4 and among DEO's peer companies. From 1989 through 1997, I was a member of the Eastern  
5 Ohio Corrosion Committee, serving as secretary, vice president, and president during my tenure.  
6 The Committee ensured that member companies were notified of new corrosion prevention  
7 activities undertaken by pipeline companies operating in the area that included the legacy DEO  
8 and River Gas systems. Persons reporting to me had similar roles on other corrosion committees  
9 which, together with the Eastern Ohio Corrosion Committee, covered the entire State of Ohio.

10 **Q3. What are your current job responsibilities as Director, Gas Operations -- Planning**  
11 **& Asset Utilization?**

12 A3. I am responsible for determining what DEO needs to do to maintain a safe and reliable  
13 system. In that regard, my present duties include management of the centralized planning group,  
14 project prioritization, and capital allocation and management.

15 **Q4. What is the purpose of your testimony?**

16 A4. My testimony explains the progress of the PIR Program to date, the need to accelerate the  
17 program and how DEO will manage the program on an accelerated basis.

## 18 **II. CURRENT PIR PROGRAM**

19 **Q5. Please briefly describe the current PIR Program.**

20 A5. The Commission's October 15, 2008 Opinion and Order ("2008 Order") in this  
21 proceeding approved DEO's PIR Program to replace approximately 4,122 miles of bare steel,  
22 cast iron, wrought iron and copper mainlines. Replacement of unspecified mileage of  
23 ineffectively coated steel pipe was also approved as part of the program scope. Costs associated

1 with the PIR Program investments are recovered through an annually-adjusted PIR Cost  
2 Recovery Charge. Although DEO estimated that it would take 25 years to complete the  
3 replacement of all in-scope pipeline, the Commission approved the program for an initial five-  
4 year period. Absent the PIR Cost Recovery Charge, it would take DEO approximately 89 years  
5 to complete the replacement of all pipelines within the original scope of the PIR Program.

6 **Q6. Of the approximately 4,122 miles of pipeline that will be replaced under the PIR**  
7 **Program, how much consists of bare steel pipe?**

8 A6. At the time DEO submitted its application for approval of the PIR Program, DEO had  
9 identified approximately 4,008 miles of bare steel pipeline.

10 **Q7. How does the amount of bare steel line in DEO's system compare to the amount of**  
11 **bare steel line in other companies' systems?**

12 A7. As discussed in a Black & Veatch report dated June 18, 2008, page 8, in 2006 DEO had  
13 more bare steel pipeline in service than any other gas distribution operator reporting to the U.S.  
14 Department of Transportation. The Black & Veatch report was admitted into the record in this  
15 proceeding as DEO Exhibit 11, and the Commission took administrative notice of this report in  
16 DEO's most recent PIR Cost Recovery Charge proceeding.

17 **Q8. What is ineffectively coated pipe?**

18 A8. Ineffectively coated pipe is pipe that was field-coated by hand with a tar-like substance  
19 to protect against corrosion, which despite the coating applied has experienced corrosion. Prior  
20 to August 1, 1971 there was no regulatory requirement to apply an external coating to steel  
21 pipelines at the time of construction as a first line of defense against corrosion. However, many  
22 companies, including DEO, applied different types of field coating by hand to steel pipelines  
23 during construction as far back as the 1910s. DEO continued the practice of hand applied field

1 coating into the mid-1950s. Although a proactive and state-of-the-art measure for its time, the  
2 field applied coating has proven not to be a failsafe method of preventing corrosion.

3 **Q9. How does DEO determine whether pipe that was hand-coated in the field is**  
4 **effectively coated?**

5 A9. Tests can be performed to determine if the hand-applied coating on a pipeline is effective,  
6 meaning that it has prevented corrosion. Based on current industry standards, a steel pipeline is  
7 determined to be ineffectively coated when the current requirements needed to achieve cathodic  
8 protection exceed 0.1 milliamps per square foot (See Appalachian Underground Corrosion Short  
9 Course, Advanced Course training manual, Table 5-3, copyright 2006).

10 **Q10. How much ineffectively coated steel pipe exists in DEO's system?**

11 A10. The amount of ineffectively coated steel pipe in DEO's system was not known at the time  
12 the PIR Program was approved. Since starting the program, however, DEO has identified  
13 approximately 1,450 miles of steel pipe installed before 1955 that was hand-coated in the field.  
14 Over 80% of that pipe was installed before 1940. Although DEO has not tested all 1,450 miles  
15 of pipe, the segments that have been tested have consistently shown that field coated pipe  
16 installed before 1955 is ineffectively coated. DEO therefore believes that all 1,450 miles of such  
17 hand-coated pipe will need to be replaced.

18 **Q11. Do potential hazards exist with ineffectively coated pipe?**

19 A11. Yes. Ineffectively coated steel pipe has the same operating characteristics as bare steel  
20 pipe, with leaks and the risk of rupture being the largest potential hazards. For all practical and  
21 operating purposes, ineffectively coated pipe must be managed in the same manner as bare steel.

1 **Q12. Has the magnitude of ineffectively coated pipe materially changed the scope of the**  
2 **PIR Program?**

3 A12. Definitely. Replacing approximately 1,450 miles of existing ineffectively coated pipeline  
4 exceeds the 4,122 miles of bare steel, cast iron, wrought iron and copper pipeline scope by 35%.

5 **Q13. Given the increased scope of the PIR Program, is it possible to complete the**  
6 **program within the 25-year time-frame described in the original PIR application?**

7 A13. No, it is not. DEO originally proposed a 25-year replacement program. The Commission  
8 did not give blanket approval for a 25-year program, but instead indicated that it would review  
9 the program after five years in order to evaluate its effectiveness and determine whether any  
10 changes should be made. The Commission authorized a maximum PIR Cost Recovery Charge  
11 of \$1.12 per month for the first year, with maximum increases of \$1 per month per year for the  
12 remaining four years. The maximum annual cost recovery approved by the Commission does  
13 not support a capital spending level adequate to complete the program in 25 years. At the current  
14 cost recovery level and 35% increase in the program scope due to the magnitude of ineffectively  
15 coated pipe, the time-frame required to complete the PIR Program will be well over 35 years.

16 **Q14. Is the PIR Cost Recovery Charge currently at the maximum level authorized by the**  
17 **Commission in the 2008 Order?**

18 A14. No. As explained previously, the Commission authorized a first year charge of up to  
19 \$1.12 per month. The \$1 per month cap effectively authorized a second year charge of up to  
20 \$2.12 per month. The actual charge for the first year was \$0.72 per month, which increased by  
21 \$0.86 after the second year for a current charge of \$1.58 per month.

1 **Q15. Why hasn't DEO invested at a level sufficient to reach the maximum charge**  
2 **authorized by the Commission?**

3 A15. The first cost recovery period for DEO's PIR Program was from July 1, 2008 to June 30,  
4 2009. However, DEO did not receive Commission approval for the PIR Program until October  
5 15, 2008 with the cost recovery being retroactive to July 1, 2008. That approval came well after  
6 the prime summer construction season, meaning that DEO had only a few months in which it  
7 could ramp up replacements rather than a full twelve months. Given the timing of the approval,  
8 DEO was fortunate to be able to design and complete as many projects as it did during the first  
9 program year. As parties to the case well know, the first PIR Cost Recovery Charge proceeding  
10 was litigated and remains the subject of an appeal before the Ohio Supreme Court. The  
11 unforeseen change in the scope of assets included in recovery and the new O&M cost savings  
12 methodology first introduced by Staff in that proceeding occurred well into the second program  
13 year. DEO had planned its capital spending on an understanding of a cost recovery process that  
14 DEO believes was substantially modified by the Commission in its December 16, 2009 Opinion  
15 and Order issued in Case No. 09-458-GA-RDR. That ruling was issued at the mid-point of the  
16 second program year, well beyond the time that DEO could react by adjusting its program  
17 spending for the year. Had DEO's understanding of the cost recovery process been upheld by  
18 the Commission, the rate increase for the second year of the program would have been very close  
19 to the \$1 cap. As it was, the combination of the scope changes and modified O&M savings  
20 calculation forced DEO to file for, and subsequently receive approval for, a much lower rate.  
21 Thus, the lower than permitted level of the PIR Cost Recovery Charge for the first two program  
22 years is directly attributable to factors over which DEO had no control.



1 **III. ACCELERATION OF THE PIR PROGRAM**

2 **Q16. Please summarize the work completed thus far under the PIR Program.**

3 A16. As of June 30, 2010, the end of the second fiscal period for the PIR Cost Recovery  
4 Charge, DEO has replaced approximately 33 miles of high pressure transmission pipeline, 11  
5 miles of high pressure distribution pipeline and 233 miles of lower pressure distribution pipeline.  
6 On a percent-complete basis, DEO has completed replacement of approximately 6.7% of the  
7 original in-scope pipeline. In addition, DEO has replaced approximately 24,600 steel service  
8 lines. PIR capital expenditures as of June 2010 approved for cost recovery totaled approximately  
9 \$175 million.

10 **Q17. Please discuss service line replacements performed under the PIR Program.**

11 A17. In approving the PIR Program, the Commission required DEO to assume responsibility  
12 and ownership of curb-to-meter service lines, which formerly were the responsibility of  
13 individual customers. DEO replaces steel service lines as part of planned PIR projects, and also  
14 when individual steel service lines are found to be leaking or are severely corroded. Non-leaking  
15 steel services on planned PIR projects are proactively replaced because it is most cost effective  
16 to do so in conjunction with a mainline replacement and because they will eventually leak at  
17 some point in the future. The cost of these service line replacements is lower because crews and  
18 equipment are already present at the location and the associated mainline and main-to-curb  
19 connections are exposed for replacement. Many of these curb-to-meter replacements are  
20 accomplished by sliding a smaller diameter plastic pipe through the existing steel service line. In  
21 calendar year 2009, DEO replaced over 15,300 curb-to-meter service lines, of which 10,800  
22 were due to leaking steel service lines and 4,500 were part of planned PIR projects. As

1 explained in the testimony of Company Witness Jeffrey A. Murphy, DEO's replacement of  
2 leaking curb-to-meter service lines resulted in a significant cost savings for customers.

3 **Q18. Why is DEO seeking to further accelerate the PIR Program?**

4 A18. As of 2006, DEO had more bare steel pipe in service than any other gas distribution  
5 operator reporting to the U.S. Department of Transportation, and with the clarity around the  
6 additional amount of ineffectively coated steel pipe in DEO's system, the dubious distinction of  
7 being first in those categories was only solidified. As Company Witness Eric Hall discusses, the  
8 gas industry has recently experienced a series of serious pipeline incidents (several of which  
9 involved pipelines over 70 years old) that are currently under investigation. These incidents call  
10 into question the assumption that DEO can replace its aging infrastructure over 25 years and still  
11 maintain a safe and reliable system. Regardless of the final conclusions from the investigation of  
12 these incidents, a significant acceleration of DEO's program would greatly reduce the risks  
13 posed by DEO's aging infrastructure. The increased capital investment will enable DEO to  
14 continue with planned PIR projects, the focus of which shifted from a safety-based prioritization  
15 approach to a focus on the replacement of lower-pressure distribution systems that may generate  
16 more O&M cost savings as a result of Commission Staff and OCC opposition. With the  
17 increased capital, DEO can maintain the focus on planned PIR projects, and at the same time,  
18 proactively replace high pressure distribution pipelines. Increased PIR spending would allow  
19 DEO to accomplish both low-pressure replacements that are more likely to generate O&M  
20 savings and replacements of high pressure lines that result in limited O&M savings but pose a  
21 greater risk to public safety if a failure occurs. By further accelerating the PIR Program, DEO  
22 will be better able to manage the risk associated with aging infrastructure, and will continue to  
23 provide customers with a safe system that can be operated at a lower cost. If the inevitable need

1 to accelerate the PIR Program is delayed, increased safety and cost-savings opportunities for  
2 customers will also be delayed.

3 **Q19. Has the scope of the PIR Program approved by the Commission changed with**  
4 **regard to meter relocations?**

5 A19. Yes. In the 2008 Order which authorized DEO's PIR Program, DEO was only approved  
6 to recover the costs of relocating inside meters to outside locations after a specific Meter  
7 Relocation Plan was submitted to, and approved by, the Commission Staff. In comments filed in  
8 the 2010 PIR Cost Recovery Charge proceeding, the Commission Staff supported a change in the  
9 cost recovery process for meter relocations, stating it did not object to meter relocations "when  
10 conducted in conjunction with PIR-related construction in order to foster operational efficiencies  
11 and enhance safety, and Staff supports the capitalization of meter move-out costs." (Case No. 10-  
12 733-GA-RDR, Staff Comments and Recommendations, at 9.) Accordingly, DEO no longer  
13 needs to submit a specific Meter Relocation Plan for approval and can capitalize the cost of  
14 moving inside meters to outside locations for cost recovery through the PIR Cost Recovery  
15 Charge if the meters relocated are part of a PIR replacement project. Staff subsequently  
16 informed DEO that there must be a plan to upgrade the pipeline system in question to regulated  
17 pressure in order to include such cost in the PIR Cost Recovery Charge. Both the change in the  
18 handling of meter relocations for purposes of cost recovery and the subsequent clarification  
19 regarding the need for such relocations to include a plan to upgrade the system to regulated  
20 pressure are different from what the Commission approved in its 2008 Order and should be  
21 formally incorporated into the further acceleration of the PIR Program.

1 **Q20. What criteria does DEO use to determine when a lower-pressure system can be**  
2 **converted to regulated pressure?**

3 A20. There are three key criteria used when evaluating the potential to upgrade a low-pressure  
4 system to regulated pressure: (1) the ability to move inside meters to outside locations, (2) the  
5 availability of higher pressure supply gas to reliably feed the new proposed regulated pressure  
6 system and (3) the operational impact on the customer to complete the upgrade. Low-pressure  
7 system upgrades and the required replacement of old leaking pipe eliminate the operational and  
8 customer problems associated with water entering old low-pressure pipes. A regulated pressure  
9 system is inherently more flexible in providing gas service to customers.

10 **Q21. What are the benefits of moving inside meters to outside locations?**

11 A21. The relocation of inside meters to outside locations provides many safety, customer, and  
12 operational benefits. Outside meters reduce the need for DEO to access a customer's home for  
13 service and eliminates the need for customer appointments for gas turn-offs, meter maintenance  
14 and DEO-initiated meter orders. In addition, outside meters help address the growing problem  
15 and risk associated with the theft of copper pipe and other materials from vacant dwellings. An  
16 outside meter reduces the opportunity for the theft of gas, provides for more timely credit turn-  
17 offs for non-payment and reduces DEO's operational costs associated with curb box,  
18 atmospheric corrosion and leak survey inspections and maintenance.

19 **Q22. How does DEO propose to modify the program scope with regard to pipeline**  
20 **relocation projects?**

21 A22. The scope of the PIR Program approved by the 2008 Order includes investment in  
22 ongoing pipeline infrastructure expenditures, among which are pipeline relocations (that are not  
23 billable to a third party). However, in the first two proceedings to adjust the PIR Cost Recovery

1 Charge, the Commission Staff expressed concern for the inclusion of pipeline relocations that  
2 involve replacement of a portion of plastic pipe. In the most recent PIR Cost Recovery  
3 proceeding, Staff recommended the disallowance of such relocations in which the majority of the  
4 pipe replaced as part of the relocation was plastic pipe. In order to clarify this change in scope  
5 from the 2008 Order, DEO proposes to exclude from accelerated PIR Program cost recovery all  
6 non-billable relocation projects in which the amount of plastic pipe replaced on that project is  
7 more than 25% of the total pipe replaced.

8 **Q23. If the Commission approves DEO's proposal to accelerate the PIR Program, what**  
9 **will the Company do to ensure that it has sufficient resources?**

10 A23. Approval of an accelerated PIR Program will provide DEO with the certainty needed to  
11 aggressively move forward in securing both the internal and external resources required to  
12 execute the expanded PIR Program. With a significant increase in PIR Program scope and  
13 spending, DEO estimates it will require an approximate 12-month ramp-up period to hire  
14 additional internal personnel and secure the additional contractor resources necessary to  
15 complete the proposed work. DEO also anticipates it will take a period time to communicate the  
16 additional PIR project scope with local governments to ensure proper coordination. DEO is  
17 prepared to ramp up its resource levels required to accomplish the accelerated PIR scope once  
18 approval is granted.

19 **Q24. How will DEO prioritize work for an accelerated PIR Program?**

20 A24. In June 2009, DEO implemented a system using the Optimain software to rank and  
21 prioritize all pipe replacements. DEO will continue to use this system under a further accelerated  
22 PIR Program. Optimain assists in prioritizing projects according to pipe characteristics such as  
23 age, material type, operating pressure, leak history and outage history. DEO uses this

1 information to scope and develop planned PIR projects. In addition to planned PIR projects,  
2 DEO will continue to identify more immediate pipeline replacement projects that address active  
3 leaks, which are more likely to produce O&M cost savings as the replacements are completed.  
4 Accelerating the program will position DEO to achieve more savings than has been the case to  
5 date. DEO's initial focus on transmission and high-pressure distribution lines was driven by  
6 safety concerns and, because they cost significantly more to replace, diverted resources from  
7 low-pressure replacements. As a result, through June 30, 2010, DEO has replaced only 6% of its  
8 low-pressure bare steel pipeline and only 5% of the entire low-pressure pipeline scope, including  
9 ineffectively coated pipe. As those figures begin to increase more meaningfully under an  
10 accelerated program, the associated leak repair O&M savings will increase as well.

11 **Q25. Is DEO also proposing a change in the PIR Program fiscal year?**

12 **A25. Yes.** Under the current PIR Program, the fiscal year used to calculate the PIR Cost  
13 Recovery charge is the 12-month period ending in June. DEO proposes to change the current  
14 July to June fiscal year to a 12-month calendar year. DEO's capital budget is prepared on a  
15 calendar year basis. Almost 57% of DEO's total 2011 capital budget is PIR eligible. If  
16 acceleration of the PIR Program is approved, that figure will jump to over 70% in 2012. PIR  
17 construction work reaches its peak level in mid-Summer, so a fiscal year ending in June does not  
18 coincide with DEO's traditional construction schedule. Typically in December, end of the year  
19 weather and the holiday season create a natural construction slow down. In addition, forecasting  
20 and managing two separate budgeting years (the fiscal year for PIR cost recovery and the annual  
21 Dominion capital budget) along with associated project reporting has proven to be  
22 administratively burdensome. Establishing a calendar year PIR cost recovery cycle will  
23 synchronize the PIR cost recovery process with DEO's construction schedule and the capital

1 budget planning process, resulting in greater efficiencies in the overall PIR Program  
2 management.

3 **Q26. What will happen if the Commission does not approve acceleration of the PIR  
4 Program?**

5 A26. DEO currently operates and maintains a safe and reliable pipeline system, and will  
6 continue to do so. However, each day the risks associated with DEO's old pipe increase. Black  
7 & Veatch advise that DEO can expect leak rates on both bare and ineffectively coated steel pipe  
8 to increase exponentially over time. Mr. Hall discusses what can happen when pipelines leak  
9 and fail catastrophically. Hoping that a catastrophic failure will never happen on DEO's system  
10 is not a sufficient response for dealing with the risks associated with aging infrastructure. DEO  
11 must take action to manage the system it has. The best way to cost-effectively mitigate the  
12 hazards of bare and ineffectively coated pipe is to replace it. With the addition of the  
13 ineffectively coated pipe to the PIR scope, at current replacement and cost recovery levels it will  
14 take DEO well over 35 years to complete the program. The risks associated with bare steel and  
15 ineffectively coated pipelines should not be allowed to persist on DEO's system for a period of  
16 over 35 years, especially when it is technically feasible and cost effective to mitigate these risks  
17 much sooner. If the PIR Program is not accelerated, the total O&M and capital cost of operating  
18 DEO's system – and ultimately the cost to ratepayers – will be higher because leaks that could be  
19 avoided by replacing pipelines earlier will instead continue to occur at an exponentially  
20 increasing rate and the eventual cost of replacing the pipelines will be higher as inflation takes its  
21 toll on labor and material costs.

22 **Q27. Does this conclude your testimony?**

23 A27. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Direct Testimony of Timothy C. McNutt was served by U.S. Mail to the following on this 31<sup>st</sup> day of March, 2011:

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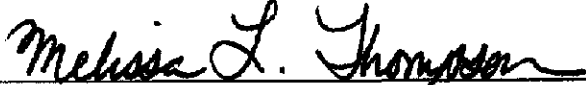


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