

FILE

16

DEO EXHIBIT 1

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

TODD PEARSON,

Complainant,

v.

THE EAST OHIO GAS COMPANY D/B/A  
DOMINION EAST OHIO,

Respondent.

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)  
)  
) Case No. 11-286-GA-CSS  
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**DIRECT TESTIMONY OF  
DALE ANDES  
ON BEHALF OF THE EAST OHIO GAS COMPANY  
D/B/A DOMINION EAST OHIO**

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1 **Direct Testimony of**

2 **Dale Andes**

3 **I. INTRODUCTION**

4 **Q1. Please state your name, occupation and business address.**

5 A1. My name is Dale Andes. I am employed by The East Ohio Gas Company d/b/a  
6 Dominion East Ohio ("DEO" or "Company") as a Contact/Service Technician. My  
7 business address is 1201 E. 55th Street, Cleveland, Ohio 44103.

8 **Q2. Please describe your work history.**

9 A2. I have been employed by DEO since 1983. During that time I have served as a Field  
10 Service Technician.

11 **Q3. What are your responsibilities as a Service Technician?**

12 A3. I am responsible for inspecting and testing meters and service lines, initiating service,  
13 install and remove gas meters and regulators, investigating gas service inquiries, reading  
14 meters, locating and repairing curb boxes, testing houselines, checking gas appliances for  
15 safe operation, and responding to abnormal operating conditions.

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

17 A4. My testimony explains the two service calls I responded to at Todd Pearson's residence at  
18 968 Fern Street, Conneaut, Ohio 44030.

19 **Q5. What information have you reviewed to prepare your testimony?**

20 A5. I reviewed DEO's service records for both of the service calls I responded to Mr.  
21 Pearson's home. These records are attached to my testimony as DEO Exhibit 1.1 and  
22 Exhibit 1.2.

1       **Q6. What is your understanding of the dispute giving rise to Mr. Pearson's**  
2       **Complaint?**

3    A6. Mr. Pearson alleges that DEO left a burner tube lit on his furnace when his natural gas  
4       service was initiated on November 16, 2009. Mr. Pearson alleges that the lit burner tube  
5       caused excessive consumption of natural gas from November 16, 2009 to September 27,  
6       2010.

7    **II. INITIATING SERVICE IN NOVEMBER 2009**

8    **Q7. Have you been to Mr. Pearson's residence?**

9    A7. Yes. I was dispatched to initiate natural gas service at 968 Fern Street, Conneaut, Ohio  
10       44030 on November 16, 2009.

11   **Q8. Was Mr. Pearson present when you arrived at his residence?**

12   A8. No. Mr. Pearson was not present. Mr. Pearson's landlord, Robert Brooks, let me into the  
13       residence and explained that he wanted the gas turned on for a new tenant. He then  
14       accompanied me to the basement, where the meter is located.

15   **Q9. Did you perform any inspections?**

16   A9. Yes. Before turning on any new service, the Company inspects all gas appliances to  
17       make sure that gas can be turned on to the appliance safely and in accordance with  
18       applicable codes and regulations. Mr. Pearson's residence had a gas hot water heater,  
19       range, and gas fired furnace. I inspected all appliances.

20   **Q10. What did you discover when you inspected the hot water heater?**

21   A10. The hot water heater failed to meet the gas piping code because it did not have a drip leg  
22       to catch debris coming through the gas line into the water heater. I explained to Mr.  
23       Brooks that the drip leg would need to be installed by a contractor before gas could be

1 turned on to the hot water heater. I red tagged the hot water heater and shut off the gas  
2 valve to that appliance.

3 **Q11. What did you discover when you inspected the furnace?**

4 A11. The furnace was an older, coal conversion furnace, but it met the gas safety standards. I  
5 mentioned to Mr. Brooks that he should clean the burner, heat exchanger, and pilot  
6 assembly of the furnace to improve its efficiency.

7 **Q12. How does this type of furnace work?**

8 A12. The furnace has two small valves for the pilot assembly – one to the pilot light and the  
9 other to a burner tube. The burner tube is used to light the pilot light located deep inside  
10 the furnace. Once the pilot light is lit, the gas to the burner tube is turned off.

11 **Q13. Did you light the furnace?**

12 A13. Yes. I turned on gas to the burner tube and lit the tube. The lit burner tube then lit the  
13 pilot light. Once the pilot was lit, I turned off the burner tube.

14 **Q14. Did you complete any paperwork to document the work you did that day?**

15 A14. Yes. The service order from DEO's customer information system is attached as Exhibit  
16 1.1 to my testimony.

17 **III. SERVICE CALL IN SEPTEMBER 2010**

18 **Q15. When did you next visit Mr. Pearson's residence?**

19 A15. I went to Mr. Pearson's residence on September 27, 2010, after he called DEO  
20 complaining of high gas bills.

21 **Q16. Was Mr. Pearson home that day?**

22 A16. Yes, Mr. Pearson answered the door and showed me into the house.

1 **Q17. What did you do to investigate his complaint?**

2 A17. I asked Mr. Pearson whether he had any new appliances or additional gas lines installed.  
3 He said he did not. Mr. Pearson and I went to his basement to confirm the meter reading  
4 and search for gas leaks. In order to test for leaks, I turned off the gas to all appliances in  
5 the house.

6 **Q18. When you turned off the gas to the furnace, did you notice anything out of the**  
7 **ordinary?**

8 A18. Yes. I noticed the burner tube was on, despite the fact that I turned it off after lighting  
9 the furnace in November 2009. When I explained to Mr. Pearson that the burner tube  
10 was on, he asked what a burner tube was. After explaining the purpose of the burner  
11 tube, Mr. Pearson said that the burner tube was supposed to be on for the furnace to  
12 operate properly. I explained to him that he was mistaken; the burner tube should be  
13 turned off after the pilot light is lit. Mr. Pearson asked me if I knew who left the burner  
14 tube on, and I told him I didn't know. Mr. Pearson also asked whether I left the burner  
15 tube on when I lit the furnace the previous November. I explained to him that I  
16 specifically remembered turning it off.

17 **Q19. Did you perform any tests to determine how much gas the burner tube used?**

18 A19. Yes. I performed a field test by turning off gas to all appliances except for the burner  
19 tube. I measured the gas flowing through the burner tube for one minute with the test  
20 hands on Mr. Pearson's gas meter. I extrapolated the consumption over 30 days to  
21 estimate a monthly consumption of approximately 7.8 Mcf. I called my supervisor, Rick  
22 Salberg, to explain what I had found and how it was affecting the customer's billing.

1    **Q20. Did you re-light the furnace after finishing your test?**

2    A20. Yes. Just as I had done previously, I lit the burner tube, lit the furnace pilot light, and  
3       turned off the burner tube.


4    **Q21. Does this conclude your testimony?**

5    A21. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Direct Testimony of Dale Andes on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio was served by regular U.S. mail to the following person on this 5th day of July 2011:

Todd Pearson  
968 Fern Street  
Conneaut, Ohio 44030-2112

  
\_\_\_\_\_  
Melissa L. Thompson

Attorney for The East Ohio Gas Company  
d/b/a Dominion East Ohio



## **DEO EXHIBIT 1.1**

**SERVICE RECORDS**  
**November 16, 2009**



PendingOrders | Initiate Detail | Initiate Basic | Scheduling | AcctTransfer | ServiceCharges

RemarksHist | ApplDetail | FinalBillInfo | OrderErrors | AuditDetails | Completion

Order Type: TCN/CUST CHG-1 Order Status: POSTED Order State: POSTED

No of Stops: 1 Sched Date: 11/16/2009 Sched Time: AM Arrival: 11/16/2009 Comp: 11/16/2009

Time: 10:58:03 Time: 11:24:03

PIR Number: 0 Agmt Amt: \$ 00 Paymt Amt: \$ 00

Completion: TALKED TO ROBERT Collection Amt: \$ 00 Ltrs Sent: 1

Prorate Date: 00/00/0000 Rework Required: ☐

New Dial Read	Meter Found Status	Meter Left Status	Lock Type	Destination	Lo
000.0	OFF AT CURE	ON			

Select: ☐ Meter Change ☐ Unmetered ☒ Appliances Service Charges: \$ 00

Appliance Code	No Action	Red Tag	Status Found	Status Left	Cycle Ind	Tag Reason Text
FURNACE-FORCED	<input type="checkbox"/>	<input type="checkbox"/>	OFF	ON	<input checked="" type="checkbox"/>	
WATER HEATER-GAS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	OFF	OFF	<input type="checkbox"/>	LEAK IN LINE TO APPLIA
RANGE-GAS PILOT	<input type="checkbox"/>	<input type="checkbox"/>	OFF	ON	<input checked="" type="checkbox"/>	

## **DEO EXHIBIT 1.2**

### **SERVICE RECORDS**

**September 27, 2010**

### Pending Orders

\_\_\_\_\_

Name	Utility	Order Type	Work Type	Date Completed	Complete
PEARSON TODD C	GAS	MTR MAINTENANCE	PREPARE & INVESTIGATE	09/27/2010	COMPL
BROOKS ROBERT L	GAS	TON/CUST CHG-I	TURN ON GAS	11/16/2009	COMPL
PEARSON TODD C	GAS	TON/CUST CHG-I		11/16/2009	

\_\_\_\_\_

RemarksHist	AppDetail	FinalBillInfo	OrderErrors	AuditDetails	Completion
PendingOrders	Initiate Detail	Initiate Basic	Scheduling	AcctTransfer	ServiceCharges
Order	MTR MAINTENANCE	Original Date	09/27/2010	Sched Date	09/27/2010
				Sched Time	AM
Requested By	TODD	Self Close		Work Area	ASH-51 (1101) UTL-FA Call
				Min Before Work	
Utility Type	Rate Desc	Work Type	Meter No	Meter Loc	Mtr Status
GAS	FV-ENERGY CHOICE	REREAD & INVESTIGATE	19312987	INSIDE	ACTIVE
<input type="checkbox"/> Appliance <input checked="" type="checkbox"/> Emergency					
Phone	( ) -	Gas Remarks	PREM/HBC		
Ext					

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Acklaim

Pending Orders	Initiate Detail	Initiate Basic	Scheduling	Acct Transfer	Service Charges
Remarks Hist	Appl Detail	Final Bill Info	Order Errors	Audit Details	Completion

Order Type: MTR MAINTENANCE    Order Status: POSTED    Order State: POSTED

No of Stops: 1    Sched Date: 09/27/2010    Sched Time: AM    Arrival: 09/27/2010    Comp: 09/27/2010

PIR Number: 0    Agmt Amt: \$0.00    Paymt Amt: \$0.00

Completion: CHCKD LINES FOR LEAKS. FOUND NONE    Collection Amt: \$0.00    Ltrs Sent: 0

F-185,000 BTU, WH-40,000 BTU, FOUND    Prorate Date: 09/30/2010    Rework Required: ☐

LIGHTER TUBE TO PILOT LEFT ON AND

T	Meter No	Work Type	Completion C	Last Read Date	Last Read	Re Current	Re Current	Read Type	Cur
G	19912987	REPEAT & INVESTIGATE	COMPLETE	09/02/2010	281.3	M	287.7	ACTUAL	AC

Select: ☐ Meter Change    ☐ Unmetered    ☒ Appliances    Service Charges: \$0.00

Appliance Code	No Action	Red Tag	Status Found	Status Left	Cycle Ind	Tag Reason Text
FURNACE-FORCED	<input type="checkbox"/>	<input type="checkbox"/>	ON	ON	<input checked="" type="checkbox"/>	
WATER HEATER-GA	<input type="checkbox"/>	<input type="checkbox"/>	ON	ON	<input checked="" type="checkbox"/>	

Pending Orders Initiate Detail Initiate Basic Scheduling Acct Transfer Service Charges  
 Remarks Hist Appl Detail Final Bill Info Order Errors Audit Details Completion

Remark Type	Remark Date	Remark Time	Employee	Rt
COMPLETION	9/27/2010	9:53 AM	ACCLAIM, ACCLAIM	C
COMPLETION	9/27/2010	9:53 AM	ACCLAIM, ACCLAIM	T
GAS	9/24/2010	6:23 PM	IVERSON, FREDDIE L	PR

Remarks

CHCKD LINES FOR LEAKS. FOUND NONE. F-185,000 BTU/WH-40,000 BTU/ FOUND LIGHTER TUBE  
 TO PILOT LEFT ON AND BURNING USING APPROX 7.8 MCF PER MONTH. ADVSD CUST. TURNED  
 BURNER TUBE OFF.