

FILE

16

DEO EXHIBIT 1

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

TODD PEARSON,)	
)	
Complainant,)	
)	Case No. 11-286-GA-CSS
v.)	
)	
THE EAST OHIO GAS COMPANY D/B/A)	
DOMINION EAST OHIO,)	
)	
Respondent.)	

DIRECT TESTIMONY OF
DALE ANDES
ON BEHALF OF THE EAST OHIO GAS COMPANY
D/B/A DOMINION EAST OHIO

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	INITIATING SERVICE IN NOVEMBER 2009.....	2
III.	SERVICE CALL IN SEPTEMBER 2010.....	3

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.

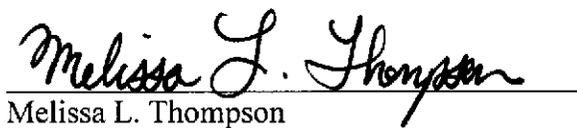
4 **Q21. Does this conclude your testimony?**

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

RemarksHist | AppDetail | FinalBillInfo | OrderErrors | AuditDetails | Completion
 PendingOrders | Initiate Detail | Initiate Basic | Scheduling | AccTransfer | ServiceCharges

Select
 Current History

Services
 Electric Gas Lights Default Printer/ Acclaim

Pending Orders

Full Name	Utility	Order Type	Work Type	Status

Completed Orders in the Last Month

Name	Utility	Order Type	Work Type	Date Complet	Completion	S
PEARSON, TODD C	GAS	MTR MAINTENANCE	REREAD & INVESTIGATE	09/27/2010	COMPLETE	P
BROOKS, ROBERT L	GAS	TON/CUST CHG-1	TURN ON GAS	11/16/2009	COMPLETE	P
PEARSON, TODD C	GAS	TON/CUST CHG-1		11/16/2009		P

PendingOrders | Initiate Detail | Initiate Basic | Scheduling | AcctTransfe | 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
 ANDES DALE 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: Water Change Unmetered Appliances Service Charges: \$ 00

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

Select: Current History

Services: Electric Gas Lights Default Printer/ Acclaim

Pending Orders

Full Name	Utility	Order Type	Work Type	Status

Completed Orders in the Last Month

Name	Utility	Order Type	Work Type	Date Completed	Comple
PEARSON, TODD C	GAS	MTR MAINTENANCE	PEREAD & 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 | Soft 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	18312987	INSIDE	ACTIVE

Appliance Emergency

Phone: () | Gas Remarks: PREM/HCC
 Ext:

Default Prints /
 Acclaim

Service Orders - PEARSON, TODD C:968 FERN ST/5001/2110520

Order Type: MTR MAINTENANCE Order Status: POSTED Order State: POSTED
 No of Steps: 1 Sched Date: 09/27/2010 Sched Time: AM Arrival: 09/27/2010 Comp: 09/27/2010
 PIR Number: 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:

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	2813	M0287.7		ACTUAL	AC

Select:
 Meter Charge
 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"/>	

PendingOrders | Initiate Detail | Initiate Basic | Scheduling | Acct Transfer | Service Charges
 RemarksHist | App/Detail | FinalBillInfo | OrderErrors | AuditDetails | Completion

Remark Type	Remark Date	Remark Time	Employee	Pt
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.	PF

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.