

FILE

(#1) ✓

December 8, 2014

14  
RECEIVED-DOCKETING DIV  
2014 DEC 11 AM 11:45  
PUCO

**RESPONSE TO ANSWER TO COMPLAINT CASE NO. 14-1983-GA-CSS**

Regarding:

- PUCO Formal Complaint Document per/ORC Section 4905.26
- Case No. 14-1983-GA-CSS
- Pertaining to Respondent Answer/Affirmative Defenses and The East Ohio Gas Company D/B/A Dominion East Ohio (DEO) request for an order dismissing the Complaint and granting it all other necessary and proper relief.
- This letter serves as a response to the legal "Answer" I received on or about December 4<sup>th</sup> 2014 regarding my complaint against the Dominion East Ohio Company.

To whom it may concern:

The enclosed attachment is a copy of my original complaint against Dominion East Ohio and also a copy of the "Answer" from Dominion East Ohio Company.

I have received the "Answer" from Dominion East Ohio implying that the complaint has been resolved. See Affirmative Defenses.

To date I have been told that we have a main line extension already existing in front of our property ready to access at no charge. We have had a field technician out to verify that, then the meter technician was out to mark out where the meter would go, who asked that I get the "call before you dig" people out to mark the property in preparation for the gas pipe connection to the main line from the meter. Included is the email thread that I have also passed on to the PUCO.

The enclosed "Answer" from Dominion was sent out with the expectation that the complaint was satisfied.

This type of miscommunication by Dominion East Ohio underscores the problem that has created my complaint against the Dominion East Ohio Company. In a letter (email) from DEO, it was because of this type of debacle where they ran a mainline extension for over a half mile to my neighbors house 2 doors down at no cost to him. That would have been an approximate cost to that customer more than \$100,000. This also provided an approximate 14 homes in that half mile stretch free meter connection without paying for any gas line extension.

I was sent a letter in September of this year that it was going to cost me \$12,553 to have the gas line extension brought to my house just 2 properties over.

Then as you will read in my emails a week ago, I was told that the Gas line extension was already in front of my property and all I had to do was order the meter connection (which I did) and proceed at no cost to me. You will also see that I am now told that Dominion is not sure if there is a line there or not.

I am also enclosing the Dominion East Ohio field notes indicating that there is in fact a Main Line Extension in from of my property. This was obtained by the field inspector that came to my home over a week ago.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician AW Date Processed 12/11/14

The bottom line here is that I am waiting for a call or email from Cindy Smith of Dominion East Ohio to contact me on their next move. This complaint has not been satisfied in any way, from the day it was submitted.

Please call or email any responses you may have or for any information that you may need.

Patiently waiting for a response from DEO.

Respectfully,  
Benjamin P. Natali-Butcher  
4400 N. Park Ave.  
Warren, Ohio 44483  
330-507-8850  
Premo8850@yahoo.com

Enclosed:

1. Letter disagreeing with the Dominion East Ohio assumption that they have satisfied my Complaint
2. DEO "Answer" letter sent to me
3. Letter from DEO approving Gas Service Application
4. Email threads
5. Copy of the DEO Field Notes indicating that the main line extension service exists at 4400 N. Park Ave.

**#2 ANSWER**

WHITT STURTEVANT LLP

CHICAGO • COLUMBUS

GREGORY L. WILLIAMS  
The KeyBank Building  
88 East Broad Street, Suite 1590  
Columbus, Ohio 43215

Direct: 614.224.3946  
williams@whitt-sturtevant.com

December 1, 2014

Benjamin P. Natali-Butcher  
4400 North Park Avenue  
Warren, Ohio 44483

Re: *In re the Complaint of Benjamin P. Natali-Butcher*, Case No. 14-1983-GA-CSS

Dear Mr. Natali-Butcher:

Enclosed is your service copy of Dominion East Ohio's Answer to your Complaint, which was filed in this case today.

Respectfully yours,

/s/ Gregory L. Williams

One of the attorneys for  
The East Ohio Gas Company d/b/a  
Dominion East Ohio

Enclosure

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

BENJAMIN P. NATALI-BUTCHER,

Complainant,

v.

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

Respondent.

Case No. 14-1983-GA-CSS

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**ANSWER**

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In accordance with Ohio Adm. Code 4901-9-01(D) and 4901-9-01(F), The East Ohio Gas Company d/b/a Dominion East Ohio (DEO or the Company), for its Answer to the Complaint of Benjamin P. Natali-Butcher, states:

1. DEO admits that Mr. Natali-Butcher is a customer of the Company with Account No. 0795<sup>1</sup> for natural gas utility service consumed at 4400 North Park Avenue, Warren, Ohio 44483.

2. DEO is without sufficient knowledge or information to either admit or deny the remaining allegations in the complaint. DEO neither attests nor concedes to the authenticity of any document attached to the Complaint.

**AFFIRMATIVE DEFENSES**

3. The Company represents that this complaint has been resolved. In accordance with Ohio Adm. Code 4901-9-01(F), the Complainant has 20 days to file a written response agreeing or disagreeing with the Company's representation that this matter has been resolved. If

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<sup>1</sup> For ease of reference, only the last four numbers of the account is provided; the actual account number is longer.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer was served to the following person  
by U.S. mail on this 1st day of December 2014:

Benjamin P. Natali-Butcher  
4400 North Park Avenue  
Warren, Ohio 44483

/s/ Gregory L. Williams  
One of the attorneys for  
The East Ohio Gas Company d/b/a  
Dominion East Ohio

# #3

Letter of "Service Line" Approval After  
inspection verifying existence of Main Line  
Extension to 4400 N. Park Ave. (my address)

November 24, 2014

BENJAMIN P BUTCHER  
4400 N PARK AVE  
WARREN OH 44483

SERVICE ADDRESS:  
4400 N PARK AVE  
WARREN OH 44483  
Notification # 400073096

Contact Phone # 330-507-8850  
Billing Account #3500062360795

## IMPORTANT INFORMATION REGARDING YOUR GAS SERVICE APPLICATION

Welcome to Dominion East Ohio! Thank you for choosing us. Your request for natural gas service with Dominion has been approved and is valid for a period of one year from the date of this document. We look forward to serving your energy needs.

Enclosed with this letter, you will find the New Gas Service Line Installation Agreement, Service Installation Record and House Line Installation Record.

Please review and complete the New Service Line Installation Agreement. You have two options:

1. Have Dominion East Ohio install the gas service line at no cost to you. *Line to meter*
2. You may have an Independent Operator Qualified (IOQ) contractor install your gas service line. Installations will be reimbursed based on Dominion's calculation of reasonable costs.

**Regardless which option you choose, please bear in mind that we receive most requests to connect gas service between August and December each year. If you request gas service during this period, final connection may be delayed. Based on government statistics, there is a 10 percent chance that freezing temperatures will occur within Dominion East Ohio's territory as early as September 19<sup>th</sup>.**

In this document and in discussions with Dominion East Ohio, please note:

- The Gas Service Line is the piping that runs from the street to the outlet of the meter manifold.
- The Gas House Line is the piping that runs from the outlet of the meter manifold to your gas appliances (including any underground lines). The customer owns and is responsible for the cost of the installation and maintenance of the house line.

**(PLEASE NOTE THE FOLLOWING)** You must contact Dominion East Ohio if:

- The required service line length is 200 feet or greater. Prior authorization from Dominion required before installation begins.
- The required service line size is 2" in diameter or greater and / or your gas load will exceed 900,000 Btu. Dominion East Ohio must install the service line.

New Construction phone 1-888-619-0786; New Construction fax 1-866-757-6099  
New Construction e-mail address: Ohioconstructionsupport@dom.com

continued next page

#4

**Subject:** Re: Fw: 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

**From:** Benjamin Natali (premo8850@yahoo.com)

**To:** christine.pirik@puc.state.oh.us;

**Cc:** chardecor@aol.com;

**Date:** Friday, December 5, 2014 5:10 PM

Christine,

Today I received an official letter from Dominion East Ohio (DEO). It was a formal answer to case NO# 14-1983-GA-CSS. What I gather is that I have to answer in writing within 20 days as to whether DEO has satisfied the complaint or not. They are saying that "The Company (DEO) represents, that this complaint has been resolved".

To date there has been no resolution at all on this. DEO is aware of the continual non resolution and is working with their company to get this issuer resolved. As you know, I am working with Cindy L. Smith. Embedded below you will find Cindy's contact information.

I am looking for direction on what my next step would be as far as an answer goes. Please have someone contact me for that advise if you are not the person that handles that.

Info:	DEO Rep, Contact Info:	Atty. for DEO, Contact
	<i>Cindy L. Smith</i>	<i>Whitt Strutevant</i>
<i>LLP</i>	<i>Dominion East Ohio</i>	<i>Atty Gregory L.</i>
<i>Williams</i>	<i>Coordinator of Engineering</i>	<i>614-224-3946</i>
	<i>330-664-2487</i>	
	<i>330-664-2689 (fax)</i>	

Thanks So Much.....bn

Benjamin Premo Natali

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**From:** Benjamin Natali <premo8850@yahoo.com>  
**To:** Christine Pirik <christine.pirik@puc.state.oh.us>  
**Cc:** Charlene Butcher <chardecor@aol.com>  
**Sent:** Thursday, December 4, 2014 4:49 PM  
**Subject:** Re: Fw: 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Hello Christine,

Yesterday the DEOG meter field Eng. (Jeffery) was out to mark the meter location and supply pipeline to our house. Upon arrival he discovered that the field notes and accompanying map did not agree with each other. Jeffery's opinion

was to have OUPS, (Call b4 digging) come out. They came today Thursday (12/4/14). The outcome was not good. The OUPS said that it appears that the mainline connection is terminated 2 properties north of me where it seems obvious to us who live here but not the gas company. I spoke to Cindy (At DEOG ) regarding This outcome today. She said that she will make a few calls and figure this out. So I am waiting on her call or em.  
Tnx.....bn  
Benjamin Premo Natali

Benjamin Premo Natali  
From:"Benjamin Natali" <premo8850@yahoo.com>  
Date:Wed, Dec 3, 2014 at 1:08 PM  
Subject:Fw: 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Apparently nobody knows if there is a main line extension in front of my house. I have been told no, yes and no again. Hopefully we get an answer on Friday. It does not look good. In that case this could be a problem :(

thanks.....bn

Benjamin Premo Natali

----- Forwarded Message -----

**From:** Benjamin Natali <premo8850@yahoo.com>  
**To:** Cindy L Smith (Energy - 5) <cindy.l.smith@dom.com>; Charlene Butcher <chardecor@aol.com>  
**Sent:** Wednesday, December 3, 2014 1:04 PM  
**Subject:** Re: 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Hello Cindy,

Jeff Brandon was out here (Field Services B) to locate where the meter will go. He is saying that the Gas Mainline is not available but is not positive since the field notes say yes but the map says no. He asked that I have the OUPS (call b4 you dig) out and mark the property. I have made an appointment to have that done on this Friday December 5th by 1pm. If we could get Jeff back out there later that day it will be great. They said that it will be marked out by 1pm. Please let me know if it is possible to get Jeff back out here. Thanks.....bn

Jeff Brandon's Number is 330-718-3282 (Field Service B Tech)

thanks much.....bn

Benjamin Premo Natali

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**From:** Benjamin Natali <premo8850@yahoo.com>  
**To:** Cindy L Smith (Energy - 5) <cindy.l.smith@dom.com>; Charlene Butcher <chardecor@aol.com>  
**Sent:** Wednesday, December 3, 2014 11:10 AM  
**Subject:** 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS



Getting a little worried Cindy. Have not heard from the Meter Field Tech yet.....bn

Benjamin Premo Natali

From:"Cindy L Smith (Energy - 5)" <cindy.l.smith@dom.com>

Date:Wed, Nov 26, 2014 at 9:45 AM

Subject:RE: RE: RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Thank you very much for the paperwork. The HIR form needs to be completed by your installer of your houseline's, what fuel source are you currently using?

The appointment is for Wednesday, December 3<sup>rd</sup> for the AM. The notes on the order say to call 1<sup>st</sup>, not sure what time he will be out there.

*Cindy L. Smith*

*Dominion East Ohio*

*Coordinator of Engineering*

330-664-2487

330-664-2689 (fax)

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**From:** Benjamin Natali [mailto:premo8850@yahoo.com]

**Sent:** Wednesday, November 26, 2014 9:10 AM

**To:** Cindy L Smith (Energy - 5); Charlene Butcher

**Subject:** Re: RE: RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Good morning Cindy.....

Here is the application document. Please review information.

Can you verify the date the meter field tech is coming out? You said Tuesday Dec. 4th and Tuesday Dec. 3rd..... but I believed it to be Wed. Dec 3rd about 8am.

Thanks Cindy....

Best Regards,

Benjamin Premo Natali

From:"Cindy L Smith (Energy - 5)" <cindy.l.smith@dom.com>

Date:Tue, Nov 25, 2014 at 7:22 AM

Subject:RE: RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Good morning. Thank you for the clarification. So, yes, if you are choosing option 1 all you have to do is make an X by Option 1, sign & date the form and return to me. Once I have the field report from our tech (probably Wednesday morning), then we will send the job to our contractor for the installation & tie of the service.

Once you have your houseline (gas lines after our meter) stubbed out, have your installer of those lines complete the HIR. Once we have that form then we can schedule a meter set.

Hopefully, I have explained myself well enough but if you have any questions what so ever, please let me know. Thanks.

*Cindy L. Smith*  
*Dominion East Ohio*  
*Coordinator of Engineering*  
330-664-2487  
330-664-2689 (fax)

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**From:** Benjamin Natali [mailto:premo8850@yahoo.com]  
**Sent:** Monday, November 24, 2014 6:58 PM  
**To:** Benjamin Natali; Cindy L Smith (Energy - 5); Charlene Butcher  
**Subject:** Re: RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Below: I meant "if the above is true then yes option #1 (not 2) is what I will send in" on my paperwork. Thank you and sorry for the error i my email.....bn

Benjamin Premo Natali

From:"Benjamin Natali" <premo8850@yahoo.com>

Date:Mon, Nov 24, 2014 at 4:39 PM

Subject:Re: RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Hey Cindy,

From my understanding, I would be choosing option #1. It appears that it would be the easiest with no delay on my part. It also appears that it is free to us as part of your service.

If all the above is true then yes option #2 is what I will send in.

Thank You.....bn

Benjamin Premo Natali

From:"Cindy L Smith (Energy - 5)" <cindy.l.smith@dom.com>

Date:Mon, Nov 24, 2014 at 3:23 PM

Subject:RE: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Once we have all the appropriate paperwork turned in we send the job to our contractor and we have 20 business days to get the service line installed, tied and a meter set completed.

Since your home is a conversion, we will need our techs report, which is scheduled for Tuesday 12/4. Once we have the field report from the tech and the appropriate paperwork from you, we can then send the job to our contractor.

Do you know which option you will be choosing for the installation of the service line?

*Cindy L. Smith*  
*Dominion East Ohio*  
*Coordinator of Engineering*  
330-664-2487  
330-664-2689 (fax)

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**From:** Benjamin Natali [mailto:premo8850@yahoo.com]  
**Sent:** Monday, November 24, 2014 3:09 PM  
**To:** Cindy L Smith (Energy - 5); Charlene Butcher  
**Subject:** Re: RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Wildly good news Cindy. How long usually b4 digging? (Winter is upon us, lol) Thank you so much for such quick action.....bn

Benjamin Premo Natali

From:"Cindy L Smith (Energy - 5)" <cindy.l.smith@dom.com>

Date:Mon, Nov 24, 2014 at 2:14 PM

Subject:RE: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Benjamin,

Attached is your welcome packet for natural gas service. We received the notes back from the inspector and your house is covered by our gas main.

I see that the call center has scheduled a meter spot with you for Tuesday, December 3<sup>rd</sup>. This is to spot where the service line can be ran and where you will need to have your houseline stubbed out of the house.

Any questions, please feel free to give me a call.

*Cindy L. Smith*

*Dominion East Ohio*

*Coordinator of Engineering*

*330-664-2487*

*330-664-2689 (fax)*

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**From:** Benjamin Natali [mailto:premo8850@yahoo.com]

**Sent:** Monday, November 17, 2014 5:19 PM

**To:** Cindy L Smith (Energy - 5); Charlene Butcher

**Subject:** Re: RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

That is great Cindy..... thanks so much....bn

Benjamin Premo Natali

From:"Cindy L Smith (Energy - 5)" <cindy.l.smith@dom.com>

Date:Mon, Nov 17, 2014 at 4:17 PM

Subject:RE: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

You are right, I did say that I would come out. Unfortunately, my schedule for today & tomorrow will not allow me to get away from the office. My supervisor took your paperwork down to our inspection group today and the supervisor down there said that he would have someone out within a couple of days. They have your name & number and I have advised that you would like to be there to talk with them.

*Cindy L. Smith*

*Dominion East Ohio*

*Coordinator of Engineering*

*330-664-2487*

*330-664-2689 (fax)*

**From:** Benjamin Natali [mailto:premo8850@yahoo.com]  
**Sent:** Monday, November 17, 2014 3:53 PM  
**To:** Cindy L Smith (Energy - 5); Charlene Butcher  
**Subject:** Re: Touching Base ..... 4400 N. Park Ave./PUCO Case#14-1983-GA-CSS

Thanks Cindy,  
I thought that you were planning on coming out yourself, as I thought you said. It is not important that you show, but it does outline some of my frustration that has brought us to this point. As I stated in our conversation on Friday November 14, 2014. I will be looking forward to hearing from you or a field engineer soon. I would like to meet whoever comes to assess our situation.

Thanks so much .....bn

Benjamin Premo Natali  
PUCO Case #14-1983-GA-CSS

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**From:** Cindy L Smith (Energy - 5) <cindy.l.smith@dom.com>  
**To:** Benjamin Natali <premo8850@yahoo.com>  
**Sent:** Monday, November 17, 2014 1:07 PM  
**Subject:** RE: Touching Base ..... 4400 N. Park Ave.

Good morning. They will not be out this morning, I will get all the paperwork to the construction department tomorrow so it will probably be Wednesday or Thursday before they can get someone out.

*Cindy L. Smith*  
*Dominion East Ohio*  
*Coordinator of Engineering*  
330-664-2487  
330-664-2689 (fax)

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**From:** Benjamin Natali [mailto:premo8850@yahoo.com]  
**Sent:** Monday, November 17, 2014 9:08 AM  
**To:** Cindy L Smith (Energy - 5)  
**Subject:** Touching Base ..... 4400 N. Park Ave.

Good Morning Cindy,  
I just wanted to see if you or someone was coming to assess my location today or tomorrow  
Benjamin Premo Natali/Butcher  
4400 N. Park Ave.  
Warren, Ohio 44483  
Ph: 330.507.8850  
Email: premo8850@yahoo.com

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**CONFIDENTIALITY NOTICE:** This electronic message contains information which may be legally

#5



Dominion

P 80647

## Engineering Notes

Street <i>N. PARK AVE.</i>	Side <i>E</i>	FB. <i>734</i>	Sheet <i>17</i>
Line No. <i>27777</i>	Operating Pressure <i>MP</i>	PL. <i>160'</i>	Rd. <i>18'</i>
Project No. (10 Digit) <i>24C 7373390</i>	Started <i>7-20-11</i>	Completed <i>8-3-11</i>	
Investment Division No. <i>963</i>	Municipality <i>CHAMPION TWP "Warren"</i>		
Tax Dist. Name <i>CHAMPION LSD</i>	Tax District Number <i>OH-14815</i>		
Contractor <i>ACE PIPELINE</i>	Foreman <i>MC ELRATH</i>	Inspector <i>HERNANDEZ</i>	

Description of Work

4" Mainline Extension off of Champion

Station	Offset	Baseline		Direction	Depth
		BEAM	Notes		
0+00			NPL CHAMPION AVE →	S	
	0+00		E N. PARK		
2	27	EE	loc. 4" STL 17 1/2" INSTALL 4" WCCO LET 0-5 36"		
			R- PFE (17" A) TUB B- TUBER LN MARK		
3	"	"	INSTALL EXIST TOE N. PARK		
4	"	"	E 4" WCCO 6' 1" No. 129		
5	"	"	E 4x7 PM 30' IN DEEP. LAY		
30	"	"	E CHAMPION AVE		
60	"	"	SPL CHAMPION AVE		
#1 150	"	"	N. B. WALL # 4864		
230	"	"	TR. BX LN MARKER (COE 4)		
42860	"	"	N. B. WALL # 4792		
			(TR. BX) LN. MARKER (COE 4)		

734/18

Station	Offset		Notes	Depth
1195	"	"	N B WALL # 4758	36"
1260	"	"	(TR BX) LW. MARKER (COE 4)	
1445	"	"	N B WALL # 4634	
1690	"	"	(TR. BX) LW. MARKER (COE 4)	
1880	"	"	N B WALL # 4596	
2120	"	"	(TR BX) LW. MARKER (COE 4)	
2200	"	"	IP. NPL 4554	
2550	"	"	(TR. BX) LW. MARKER (COE 4)	
2715	"	"	N B WALL # 4468	
2985	"	"	N B WALL # 4400	
3040	"	"	(TR. BX) SB WALL LW. MARK (END)	
			4x2 ROCE 2" P/PCAP	END
			(MATERIAL USED)	
			3035 PIM 4 2006/2708 MD 13.5	YR 2011
			6 - COE 4H	
			8 - LINE MARKERS	
			1 - 4x4 WELCOCKET	
			1 - 4x12 TOE NIPPLE	
			1 - 4 WLD GATE (LEAK TEST)	
			1 - 4x7 PH 7H DR W/INSECT	
			1 - 17# A	
			1 - TUR R/R	
			1 - 4x2 ROCE	
			1 - 2" P/PCAP	