

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Application )  
of Columbia Gas of Ohio, Inc. for an ) Case No. 16-2236-GA-RDR  
Adjustment to Rider IRP and Rider )  
DSM Rates. )

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**PREPARED DIRECT TESTIMONY  
OF JOHN A. LAVERTY  
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

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**COLUMBIA GAS OF OHIO, INC.**

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February 27, 2017

Attorneys for  
**COLUMBIA GAS OF OHIO, INC.**

**PREPARED DIRECT TESTIMONY  
OF JOHN A. LAVERTY**

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

2    A.    John A. Laverty, 290 West Nationwide Boulevard, Columbus, Ohio 43215.

3  
4   **Q.    By who are you employed?**

5    A.    I am employed by Columbia Gas of Ohio, Inc. ("Columbia").

6  
7   **Q.    Will you please state briefly your educational background and experi-**  
8       **ence?**

9    A.    I graduated from Ohio University in 1976 with a Bachelor of Arts in  
10       Government. I began my career in energy efficiency in 1979 and previous-  
11       ly worked for the former Ohio Department of Economic and Community  
12       Development, the Ohio Association of Community Action Agencies, and  
13       the Corporation for Ohio Appalachian Development where I worked on  
14       design, implementation, and evaluation of energy efficiency services and  
15       programs. I began my career with Columbia in 2003 as a manager of the  
16       WarmChoice® program, Columbia's low-income customer weatherization  
17       program. In 2009, I assumed my current position as Manager of Demand  
18       Side Management.

19  
20   **Q.    What are your job responsibilities as Manager of Demand Side Man-**  
21       **agement?**

22    A.    As Manager of Demand Side Management, my primary responsibilities  
23       include developing, administering, and evaluating energy efficiency pro-  
24       grams and services for Columbia customers, including low-income cus-  
25       tomers. Other responsibilities include the preparation and/or support of  
26       exhibits, proposed tariff changes and testimony filed by Columbia in sup-  
27       port of the Demand Side Management ("DSM") rider proposed by Co-  
28       lumbia in this case.

29  
30   **Q.    Have you previously testified before this Commission?**

31    A.    Yes.

32  
33   **Q.    What is the purpose of your testimony?**

34    A.    The purpose of my testimony is to support the reasonableness of Colum-  
35       bia's request for the proposed rate adjustments in Rider DSM. I provide

1 detailed explanation of the DSM programs and the schedules filed by Co-  
2 lumbia on February 27, 2017, in support of the proposed adjustments.

3

4 **Q. What schedules are you sponsoring in this proceeding?**

5 A. Following is a list and brief description of the schedules I am sponsoring  
6 in this proceeding, which are applicable to Rider DSM:

7

Schedule/Exhibit	Description
Schedule DSM-1	DSM Revenue Requirement Calculation
Schedule DSM-2	Detail of Deferred DSM Expenditures by Month
Schedule DSM-3	Detail of DSM Recoveries by Month
Schedule DSM-4	Computation of DSM Carrying Costs
Schedule DSM-5	Shared Savings Incentive
Schedule DSM-6	Computation of DSM Rate per Mcf

8

9 **EXPLANATION OF DSM SCHEDULES**

10

11 **Q. Are you familiar with Columbia's Application to Establish Demand**  
12 **Side Management Programs, Case No. 08-0833-GA-UNC, filed on July 1,**  
13 **2008 and approved by the Commission on July 23, 2008?**

14 A. Yes. Among other things, this Application defined the DSM program  
15 portfolio, program benefits, funding limits, customer base, program eval-  
16 uation plan, and program timeframes.

17

18 **Q. Are you familiar with Columbia's Application in Case No. 08-0072-GA-**  
19 **AIR, et al., filed on March 3, 2008, and approved by the Commission on**  
20 **December 3, 2008?**

21 A. Yes. Columbia's Application in these dockets requested authority to defer  
22 expenses incurred in the development and implementation of the DSM  
23 Program. Also, as part of its Alternative Regulation Plan filed in those  
24 dockets, Columbia requested approval of the proposed Rider DSM to re-  
25 cover DSM costs, including those deferred expenses incurred in the devel-  
26 opment and implementation of the DSM programs.

27

28 **Q. Are you familiar with Columbia's Application in Case No. 11-5028-GA-**  
29 **UNC, filed on September 9, 2011, and with the Commission Order dated**  
30 **December 14, 2011 which approved that Application?**

31 A. Yes. In that case, Columbia's Application sought continuation, expansion,  
32 and approval of various DSM programs through December 31, 2016. In its

Order, the Commission authorized Columbia to implement all of the proposed DSM programs. This filing is the last to be filed utilizing the authority granted in Case No. 11-5028-GA-UNC, et al.

On June 10, 2016, Columbia filed an application in Case No. 16-1309-GA-UNC, et al., to continue its demand side management Program with recovery to continue to be provided for through the use of accounting previously approved in Case Nos. 08-0072-GA-AIR, et al., and 11-5028-GA-UNC, et al., for an additional six years through December 31, 2022. This application was approved by the Commission's December 21, 2016 Opinion and Order in that proceeding.

**Q. Please describe Rider DSM.**

A. Rider DSM authorizes Columbia to recover the costs of implementing a comprehensive, ratepayer funded, cost-effective energy efficiency program made available to all residential customers during calendar years 2009-2011. This time period was extended in Case Nos. 11-5028-GA-UNC, et al., for program costs incurred in calendar years 2012-2016.

Rider DSM will be determined annually based on the actual cost of the program for the previous calendar year with rates to become effective the following May. The procedure for the filing of Rider DSM adjustments is identical to the filing procedure applicable to the Rider IRP, as set forth in the Order.

**Q. What are the customer benefits of the DSM programs?**

A. The primary customer benefits of the DSM programs are lower natural gas usage and bills as a result of the implementation of energy efficiency measures. Other customer benefits include improved health, safety, housing affordability and building durability, as well as reduced greenhouse gas emissions, moderation of Percentage of Income Payment Plan arrearages, water savings, and job creation and economic development.

**Q. Please provide a brief description of each of the DSM programs for which Columbia has incurred costs during 2016.**

A. Columbia incurred costs for most of its DSM programs during 2016.

Columbia's income eligible customer home weatherization program, WarmChoice®, served 1,820 households in 2016 through a network of four

community based providers and their subcontractors. Customers receive a diagnostic energy and safety inspection and installation of attic, wall, floor, duct and pipe insulation, air leakage sealing, and replacement of defective natural gas fueled water and/or space heating appliances, when needed. During 2016, participating customers received the following services: 1,366 customers received attic insulation, 751 customers received wall insulation, 312 customers received floor insulation, and 618 customers received a heating system replacement. All customers who received services through WarmChoice received a quality assurance inspection by their WarmChoice provider after all heating work was completed, and again after all weatherization work was completed. Additionally, eight percent of homes that received WarmChoice services in 2016 had a quality assurance inspection completed by Columbia staff which included a complete inspection of all heating and weatherization work completed at the home.

The Home Performance Solutions program provides low-cost energy audits, programmable thermostats and high-performance, energy-efficient showerheads installed during the energy audit (if needed), and rebates for high-efficiency gas furnaces and boilers, air sealing, and attic and wall insulation targeted to customers with higher than average natural gas usage. CLEAResult is Columbia's implementation contractor for this program. CLEAResult has on-staff and independent energy auditors located strategically throughout Columbia's service territory to perform the residential customer energy audits and install the programmable thermostat and energy-efficient showerheads at the time of the energy audit, if needed. CLEAResult also recruits, manages, and trains the HVAC and insulation contractor network, processes rebates, maintains a database of customers served and transactions processed, and performs quality assurance inspections of completed work. CLEAResult performed energy audits for 3,031 customers, and installed 722 programmable thermostats and 1,523 showerheads. CLEAResult's customer contact center handled 19,011 calls from customers during 2016.

Customers completing work in the Home Performance Solutions program in 2016 totaled 1,164, although energy audits that were completed late in the year will result in work being completed in 2017. The following rebates were paid to customers in 2016: 1,055 air sealing; 986 attic insulation; 595 wall insulation; and, 97 high efficiency furnaces. The percentage of en-

1 ergy audits resulting in work from program inception through December  
2 31, 2016 averaged 48%. We attribute the high conversion rate to the re-  
3 bates that provide incentive for customers to have energy efficiency im-  
4 provements installed, and the customers' perceived value of the program,  
5 including from a comfort, health, and safety standpoint.

6  
7 Columbia continued its contract with MaGrann Associates, Inc. ("Ma-  
8 Grann") in 2016 to implement the EfficiencyCrafted® Homes program.  
9 This program provides incentives to builders to construct homes to a  
10 higher energy efficiency standard than Ohio's building energy code. Co-  
11 lumbia collaborated with American Electric Power - Ohio ("AEP"), which  
12 also used MaGrann as its implementation contractor, to combine resources  
13 and incentives for a standardized program in the counties that both utili-  
14 ties share. MaGrann recruited and trained home energy raters and home-  
15 builders to participate in the program. Columbia also offered the program  
16 in counties that are not shared with AEP. Thirteen new Ohio homebuild-  
17 ers and two new home energy rating firms enrolled in the program in  
18 2016 in addition to the previous one hundred twenty homebuilders and  
19 twenty-seven home energy rating firms who enrolled in the program prior  
20 to 2016. In 2016, 2,028 homes with an average Home Energy Rating Sys-  
21 tem ("HERS") score of 57 were built to program standards (606 were  
22 ENERGY STAR® Certified) and received incentives. During 2016, 2,074  
23 homes enrolled in the program. We expect that approximately 60% of  
24 those homes not completed in 2016 to be completed in 2017. This program  
25 received the United States Environmental Protection Agency ENERGY  
26 STAR® Sustained Excellence Partner of the Year award in 2016, the Central  
27 Ohio Building Industry Association Most Successful One-Time Event  
28 award from the 29<sup>th</sup> Annual Marketing and Merchandising Excellence, a  
29 2015 Service Industry Advertising Silver Award, and a 2016 ENERGY  
30 STAR® Certified Homes Market Leader Award.

31  
32 The Simple Energy Solutions program provides rebates to customers who  
33 purchase programmable thermostats; high-performance, energy-efficient  
34 showerheads; and/or energy-efficient faucet aerators. Customers may  
35 purchase eligible products from our E-Store, operated by Energy Federa-  
36 tion, Inc., and have the rebates applied automatically to the purchase  
37 price. Customers also may purchase products at a hardware or home im-  
38 provement store and mail in a rebate form with the UPC and receipt to re-  
39 ceive their rebate by mail. Customers obtained 1,437 programmable ther-

1 mostats, 2,096 energy-efficient showerheads and 1,522 energy-efficient  
2 faucet aerators through the program in 2016.

3  
4 Columbia re-contracted with the Ohio Energy Project (“OEP”) in 2016 to  
5 operate the Student Energy Efficiency Education program, known as “e<sup>3</sup>  
6 smart”. OEP provided program orientation to schoolteachers throughout  
7 Columbia’s service territory to offer a curriculum on energy efficiency to  
8 students in grades 4 to 12. Students received a kit of energy efficiency ma-  
9 terials, including an energy-efficient showerhead, faucet and bathroom  
10 aerator, and weather stripping, to install in their homes as part of the  
11 course curriculum to help lower their home energy usage. During 2016,  
12 21,288 students were educated through the program. Columbia collabo-  
13 rated with AEP in school districts served by both utilities and shared the  
14 cost of 78% of the total kits distributed through the program. The remain-  
15 ing kits were funded by Columbia, though OEP used grant funding to  
16 cover the cost of adding compact fluorescent lightbulbs to the Columbia  
17 kit.

18  
19 Columbia continued its contract with CLEAResult to implement the High  
20 Efficiency Heating System Replacement rebate program. This program  
21 provides instant rebates to customers when they have a high efficiency  
22 natural gas furnace or boiler installed by a participating contractor. In  
23 2016, 6,501 instant rebates were provided through participating sub-  
24 contractors to customers who installed high efficiency heating systems  
25 through the program.

26  
27 OPOWER, Inc., which implements Columbia’s Home Energy (Efficiency)  
28 Reports program, was acquired by Oracle in 2016. The Home Energy (Effi-  
29 ciency) Report is an engaging, user-friendly customer experience tool that  
30 anonymously compares customers’ energy usage to that of their neighbors  
31 of similar size homes and demographics, tapping into the behavioral sci-  
32 ence insight that social pressure is a driving factor in motivating behavior-  
33 al change around energy usage. The program provides customers with  
34 their energy usage information, a comparison of their usage with similar  
35 homes, and energy saving tips to help them take actions to reduce their  
36 natural gas usage. The program provided reports to approximately  
37 390,000 randomly selected customers in 2016.

1 The Innovative Energy Solutions program provides funding for energy  
2 audits; rebates for energy efficiency improvements; funding for building  
3 commissioning; research and demonstration projects; and evaluation,  
4 measurement and verification projects for commercial and industrial  
5 buildings, including those owned by not-for-profits and religious institu-  
6 tions. In 2016, Columbia continued its contract with DNV GL to provide  
7 implementation services for the program. Thirty-nine energy audits were  
8 funded in 2016, and rebates were provided for one hundred forty energy  
9 efficiency improvement projects. We anticipate that some of the remaining  
10 customers that had energy audits funded in 2016 will apply for rebates in  
11 2017.

12  
13 In 2016, Columbia continued its contract with MaGrann Associates to  
14 operate its Energy Design Solutions program. The Energy Design Solu-  
15 tions program, branded the Small Commercial Construction program,  
16 provides education and training to building industry professionals and  
17 owners on the benefits of building energy efficient small buildings. During  
18 2016, the program provided 13 training sessions to 122 attendees, and  
19 provided incentives to six customers to implement energy efficiency  
20 measures into new small commercial construction projects.

21  
22 During 2016, Columbia supported the Environmental Protection Agency's  
23 Portfolio Manager tool for commercial and industrial buildings to track  
24 energy consumption over time and compare energy consumption of their  
25 building with that of similar building types to identify energy saving op-  
26 portunities. Columbia worked with the city of Columbus' Green Team to  
27 promote benchmarking within the city, and worked with the Ohio Hospi-  
28 tal Association to provide natural gas usage data to enable the benchmark-  
29 ing of its members' hospital buildings. Columbia also partnered with Ohio  
30 Interfaith Power and Light to promote benchmarking and energy efficien-  
31 cy for houses of worship.

32  
33 Finally, in 2016 Columbia continued to offer its Home Energy Checkup  
34 program, a simple, easy-to-use on-line energy audit for customers who  
35 want to determine how efficient their homes are without an energy audi-  
36 tor visiting their home. The on-line energy audit provides information on  
37 low-cost actions as well as DSM programs that are appropriate for cus-  
38 tomers to participate in. During 2016, 6,809 households completed the  
39 Home Energy Checkup.



1  
2 **Q. What are the key DSM programs on which Columbia focused its**  
3 **program ramp-up and implementation efforts in 2016?**

4 A. Columbia focused on ramping up the On-Line Energy Audit (Home  
5 Energy Checkup), integrating a new information management system into  
6 the WarmChoice® program, and continued to implement all of its core  
7 DSM programs.  
8

9 Noteworthy program awards include the 2016 ENERGY STAR® Certified  
10 Homes Market Leader Award, the 2016 EPA Partner of the Year - Sus-  
11 tained Excellence in Energy Efficiency Program Delivery award, and the  
12 BIA of Central Ohio Marketing and Merchandising Excellence - Most Suc-  
13 cessful One-Time Event award.  
14

15 **Q. What are some of the challenges that Columbia faced in implementing**  
16 **DSM programs in 2016?**

17 A. There were two primary challenges that Columbia faced in implementing  
18 its DSM programs in 2016. Warmer than normal winter weather appeared  
19 to have an impact on some DSM program demand, and the Simple Energy  
20 Solutions program e-store was taken off line in December for an update to  
21 the software platform that is used to host the e-store.  
22

23 **Q. How do actual DSM costs to date compare to the DSM Action Plan?**

24 A. Columbia invested approximately \$20.6 million in its DSM programs in  
25 2016 versus the \$24.2 million in the DSM Action Plan budget.  
26

27 **Q. What are Columbia's plans for the DSM funds not invested in 2016?**

28 A. Columbia has no plans for the DSM funds not invested in 2016 and/or  
29 prior years since it does not have authority to invest unspent funds after  
30 December 31, 2016, the end date of the DSM Action Plan approved in Case  
31 No. 11-5028-GA-UNC. Columbia is not seeking recovery for any funds not  
32 spent.  
33

34 **Q. How are the schedules included in Columbia's November 28, 2016**  
35 **Notice of Intent different from the updated schedules filed in this pro-**  
36 **ceeding on February 27, 2017?**

37 A. The schedules included in Columbia's Notice of Intent contained nine  
38 months actual and three months estimated calendar year 2016 data. The

1 schedules filed February 27, 2017 contain twelve months of actual calen-  
2 dar year 2016 data.

3

4 **Q. Does your testimony support the estimated data?**

5 A. No. My testimony supports the actual data filed in this proceeding on  
6 February 27, 2017 because the actual data is what supports the Rider DSM  
7 rate calculated on Schedule DSM-6 that will ultimately be billed to cus-  
8 tomers.

9

10 **Q. What types of DSM expenses are deferred?**

11 A. Expenses incurred in the development, implementation, and administra-  
12 tion of the comprehensive energy efficiency programs are deferred using  
13 actual costs as incurred. In addition, carrying costs were deferred as actual  
14 costs and calculated using Columbia's actual 2016 weighted cost of debt  
15 rate, 5.47%. The Commission Orders in Case Nos. 08-0833-GA-UNC and  
16 11-5028-GA-UNC authorize the inclusion of carrying costs.

17

18 **Q. What is included in the DSM revenue requirement?**

19 A. Deferred expenses incurred through December 31, 2016 have been  
20 included in the DSM revenue requirement.

21

22 **Q. How is the DSM revenue requirement allocated to Columbia's customer  
23 base?**

24 A. Pursuant to the Commission's Order in Case No. 08-0833-GA-UNC, the  
25 DSM program costs will be recovered from those customer classes primar-  
26 ily eligible to participate – Small General Service customers. The total rev-  
27 enue requirement calculated on Schedule DSM-1 is divided by the project-  
28 ed annual throughput of Small General Service customers for the twelve  
29 months rates will be in effect and the resulting rate will be billed volumet-  
30 rically.

31

32 **Q. What is the basis for including all of the items described in the para-  
33 graphs above in the development of the DSM revenue requirement?**

34 A. Each item included in the revenue requirement is a reasonable, necessary,  
35 business-related expense directly resulting from the development, admin-  
36 istration, and implementation of the DSM program.

37

38 **Q. What is the source for the actual data shown on these schedules?**

1 A. Generally, the information came from either the General Ledger or the  
2 supporting sub-ledgers of Columbia. When data came from another  
3 source, it was indicated on the appropriate schedule or elsewhere in this  
4 testimony.  
5

6 **Q. Please describe the shared savings mechanism approved in Case 11-  
7 5028-GA-UNC.**

8 A. Columbia's shared savings are computed on the difference between the  
9 net present value of program lifetime energy savings and the net present  
10 value of the program costs calculated from the Utility Cost Test. The re-  
11 recovery of the shared savings incentive is based on the following tiered  
12 levels of program achievement:

- 13 1. No shared savings are earned for a program that does not meet  
14 75% of the program impacts at its prorated budgeted cost level.
- 15 2. 5% of the savings is earned once the program meets 75% of the pro-  
16 jected program impacts at its prorated budgeted cost level up to  
17 85% of budgeted expenditures.
- 18 3. 5.5% of the savings is earned once the program meets 80% of the  
19 projected program impacts at its prorated budgeted cost level up to  
20 90% of budgeted expenditures.
- 21 4. 6% of the savings is earned once the program meets 85% of the pro-  
22 jected program impacts at its prorated budgeted cost level up to  
23 95% of budgeted expenditures.
- 24 5. 6.5% of the savings is earned once the program meets 90% of the  
25 projected program impacts at its prorated budgeted cost level.
- 26 6. 7% of the savings is earned once the program meets 95% of the pro-  
27 jected program impacts at its prorated budgeted cost level.
- 28 7. 7.5% of the savings is earned once the program meets 100% of the  
29 projected program impacts at its prorated budgeted cost level.
- 30 8. 8.0% of the savings is earned once the program meets 105% of the  
31 projected program impacts at its prorated budgeted cost level.
- 32 9. 8.5% of the savings is earned once the program meets 110% of the  
33 projected program impacts at its prorated budgeted cost level.  
34

35 **Q. Please describe the process used to track and verify shared savings.**

36 A. Columbia developed a process to track and calculate its shared savings  
37 incentive. The process gathered and tracked data for energy conservation  
38 measures installed and/or energy savings achieved through each DSM  
39 program. Columbia, along with its DSM evaluation consultant, Scott Pigg

1 of Seventhwave used this data to calculate the projected lifetime natural  
2 gas savings estimates using the formulas identified in the State of Ohio  
3 Energy Efficiency Technical Reference Manual, except for the Warm-  
4 Choice program where historic billing analysis was used, the Home Ener-  
5 gy Reports program where guaranteed contract savings with adjustments  
6 for measured actual savings were used, and Innovative Energy Solutions  
7 where the energy audit projected natural gas savings were used. Colum-  
8 bia's shared savings were computed by taking the difference between the  
9 net present value of the program lifetime energy savings and the value of  
10 the program costs calculated from the Utility Cost Test. Columbia provid-  
11 ed the data tracking tool, including DSM program data, to Mr. Pigg, to  
12 verify that the natural gas savings complied with the approved methods  
13 for determining savings. Mr. Pigg's testimony discusses the process used  
14 and the results of the shared savings verification process.  
15

16 **Q. Did Columbia earn shared savings from its DSM programs in 2016?**

17 A. Yes. Columbia exceeded 110% of its annual natural gas savings target,  
18 making it eligible to earn 8.5% of the net benefit value of the natural gas  
19 savings.  
20

#### 21 **EXPLANATION OF REMAINING SCHEDULES**

22

23 **Q. Would you please provide a brief explanation of each of the schedules?**

24 A. Attachment A computes the proposed combined volumetric Rider DSM  
25 rate for each rate schedule. It also computes the monthly Rider IRP rate,  
26 which Columbia witness Beil is also sponsoring. Attachment B details the  
27 rate schedules to which Rider DSM applies. Attachment C compares typi-  
28 cal bills for each rate schedule between current rates and the proposed  
29 Riders IRP and DSM rates.  
30

#### 31 **REASONABLENESS OF REQUESTED INCREASE AND BENEFITS TO** 32 **RATEPAYERS AND THE PUBLIC INTEREST**

33

34 **Q. Do you have an opinion regarding whether Columbia's request to**  
35 **adjust the Rider DSM is reasonable?**

36 A. Yes. I believe Columbia's request to adjust its Rider DSM is fair and  
37 reasonable. These are prudent, necessary business expenses incurred in  
38 the day-to-day operations of the DSM Program. It should be further noted  
39 that this filing provides for a reduction in the current DSM Rider rate.

1

2 **Q. Do the DSM programs benefit ratepayers and the public interest?**

3 A. Yes. The DSM programs will provide residential and small commercial  
4 customers easy access to energy saving measures, which will directly re-  
5 duce natural gas usage, improving the affordability of natural gas service.  
6 Beyond the value of energy savings, DSM programs provide other bene-  
7 fits such as: economic development through hiring of firms and employ-  
8 ees to provide DSM services, increased sales of products made in Ohio  
9 and sold by Ohio firms, improved health, safety, durability and comfort,  
10 reduced greenhouse gas emissions and a lower carbon footprint, and re-  
11 duced water and electricity consumption.

12

13 **Q. Does this complete your Prepared Direct Testimony?**

14 A. Yes.

## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 27<sup>th</sup> day of February, 2017 upon the parties listed below.

/s/ Joseph M. Clark

Joseph M. Clark

Attorney for

**COLUMBIA GAS OF OHIO, INC.**

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Summary: Testimony of John A. Laverty electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.