

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	:	
Suburban Natural Gas Company for	:	Case No. 18-1205-GA-AIR
Approval of an Increase in Rates	:	
	:	
In the Matter of the Application of	:	
Suburban Natural Gas Company for	:	Case No. 18-1206-GA-ATA
Tariff Approval	:	
	:	
In the Matter of the Application of	:	
Suburban Natural Gas Company for	:	Case No. 18-1207-GA-AAM
Approval of Certain Accounting	:	
Authority	:	

**PREFILED TESTIMONY  
IN RESPONSE TO OBJECTIONS TO THE STAFF REPORT  
OF  
CRAIG SMITH  
SERVICES MONITORING AND ENFORCEMENT DEPARTMENT  
SERVICE ANALYSIS AND RELIABILITY DIVISION  
PUBLIC UTILITIES COMMISSION OF OHIO**

**Staff Exhibit\_\_\_\_**

**June 7, 2019**

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

2 A. My name is Craig Smith. My business address is 180 East Broad Street,  
3 Columbus, Ohio 43215.  
4

5 2. Q. By whom are you employed and in what capacity?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or  
7 Commission). I am a Public Utilities Administrator with the Reliability and  
8 Service Analysis Division within the Service Monitoring and Enforcement  
9 Department. My current duties include the oversight of service reliability,  
10 consumer protection policies and rules for gas, water, and electric, as well  
11 as low income assistance programs.  
12

13 3. Q. Would you briefly state your educational background and work experience.

14 A. I received a Bachelor of Arts degree that included a Major in Political  
15 Science and a Minor in Chemistry from Denison University. I received a  
16 Master's degree in Public Administration from The Ohio State University.  
17 I received a Juris Doctor from Capital University. In addition, I completed  
18 over a dozen post-baccalaureate classes in accounting from Columbus State  
19 Community College.  
20

21 While obtaining my Master's and Law degrees, I served as a management  
22 and legal intern with the PUCO in the Consumers Services Department.

1 After Law School, I began employment with the Ohio Department of  
2 Taxation. While at the Department of Taxation I was employed as an  
3 Internal Audit Supervisor 2, Chief Counsel Supervisor 2 in Tax Appeals,  
4 and as a Deputy Tax Commissioner. I have also been a private sector  
5 attorney and a Certified Internal Auditor (2006-2017).

6  
7 In January of 2014, I accepted a Utilities Specialist 1 position with the  
8 PUCO in the Accounting and Electricity Division. In October of 2014, I  
9 accepted a Utilities Specialist 2 position with the PUCO in the Reliability  
10 and Service Analysis Division. And in October of 2015, I accepted my  
11 current position, a Public Utilities Administrator 2 in the Reliability and  
12 Service Analysis Division.

13  
14 4. Q. Have you testified before the PUCO?

15 A. Yes

16  
17 5. Q. What is the purpose of your testimony?

18 A. The purpose of my testimony is to support the Staff Report's  
19 recommendations regarding several tariff items that are in the Suburban  
20 Natural Gas Company's (Suburban or Company) Application. My  
21 testimony will also address the Ohio Partners for Affordable Energy's  
22 (OPAE) objection to the field collection charge and the tampering

1 investigation charge. In addition, I will address the Office of the Ohio  
2 Consumers' Counsel's (OCC) Objection 6.

3  
4 6. Q. What are OPAE's objections to the \$10 field collection charge?

5 A. OPAE objects to the \$10 field collection charge for two reasons. The first  
6 concern of OPAE is that the \$10 charge is not disclosed as an amount to  
7 avoid disconnection on the disconnection notice and thus violates various  
8 administrative rules regarding disconnection. The second concern of  
9 OPAE is that this is not a new service but one that customers are currently  
10 entitled to receive.

11  
12 7. Q. Does Staff agree with OPAE regarding the \$10 field collection charge?

13 A. No, Staff does not agree. The \$10 field collection charge is not an  
14 additional charge to avoid disconnection but is a processing charge for cash  
15 and checks handled in person by a Company field representative.  
16 Customers would still have the ability to pay by credit card or other  
17 electronic pay channels. The \$10 field charge is for the convenience of  
18 paying with cash or check at your premise and it is reasonable to charge  
19 those who utilize this convenience the incremental cost of the service. Staff  
20 finds that the Company's proposal is not in conflict with the disconnection  
21 rules.

1 OPAE is correct that the Company's customers currently enjoy the ability  
2 to pay by cash or check at their premise without a fee. The Company  
3 estimated that 30 customers in 2017 and 38 customers in 2018 utilized  
4 payment in the field.<sup>1</sup> OPAE is incorrect that customers have a right to pay  
5 cash or check at the premise. Ohio Adm.Code 4901:1-18-06(A)(4) requires  
6 utility company's employees or agents who disconnect service to be  
7 authorized to perform one of the following: accept payment, dispatch an  
8 employee to accept payment, or make available to the customer another  
9 means to avoid disconnection. Customers do not have an exclusive right to  
10 avoid disconnection by paying cash to the utility. The \$10 charge is  
11 incremental to those who use the service and is similar to the fees third  
12 party entities utilize for credit card payments. The Company currently  
13 meets the requirement of the rule by accepting payment by cash or check at  
14 their premises without a fee and providing another means to avoid  
15 disconnection (credit card payment).

16  
17 8. Q. What are OPAE's objections to the Company's theft of service/tampering  
18 investigation charge?

19 A. OPAE claims that the theft of service charge should only be applied when  
20 tampering is established, because the charge of tampering is rebuttable.

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<sup>1</sup> Staff DR 83-09

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9. Q. Does Staff agree with OPAE?
- A. Yes, the charge for tampering should only be applied when an investigation has established tampering. The Company performed seven theft of service investigations<sup>2</sup> over the last three years with four confirmed thefts.<sup>3</sup> These investigations are incremental to the customer and should be a separate charge when the tampering is confirmed.
10. Q. Please summarize OCC Objection 6.
- A. OCC Objection 6 claims Staff unreasonably recommended that customers only be allowed to make payments in the field to avoid disconnection by cash, check, or money order. OCC argues that customers should also be allowed to use a credit card or debit card to make a payment over the phone.
11. Q. Does Staff agree with OCC Objection 6?
- A. Staff agrees that customers should be allowed to use a credit or debit card to make a payment over the phone. But OCC has misinterpreted Staff's recommendation regarding the field collection charge. Staff's recommendation was for the Company to disclose that the \$10 charge is

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<sup>2</sup> Staff DR 83-11.  
<sup>3</sup> Staff DR 83-12.

1           only collected when cash, check, or money order is accepted at the premise  
2           prior to disconnection. Staff did not intend to limit customers to cash,  
3           check, or money orders as a means of payment to avoid disconnection, but  
4           rather that the \$10 field charge only applies to these payment types not to  
5           other types of payment such as credit or debit cards.

6  
7   12.   Q.   Does this conclude your testimony?

8           A.   Yes, this concludes my testimony. However, I reserve the right to submit  
9           supplemental testimony as described herein, as new information  
10          subsequently becomes available or in response to positions taken by other  
11          parties.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the Pre-filed Testimony of Craig Smith has been served upon the below-named counsel via electronic mail, this 7<sup>th</sup> day of June, 2019.

/s/Robert A. Eubanks

**Robert A. Eubanks**

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Summary: Testimony of Craig Smith electronically filed by Ms. Tonnetta Scott on behalf of  
PUC