

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Authority)
to Amend its Filed Tariffs to Increase the) Case No. 21-637-GA-AIR
Rates and Charges for Gas Services and)
Related Matters.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval of) Case No. 21-638-GA-ALT
an Alternative Form of Regulation.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval of)
a Demand Side Management Program) Case No. 21-639-GA-UNC
for its Residential and Commercial Cus-)
tomers.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval to) Case No. 21-640-GA-AAM
Change Accounting Methods.)

**PREPARED DIRECT TESTIMONY OF
SCOTT C. TUSTIN
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

- Management policies, practices, and organization
- Operating income
- Rate base
- Allocations
- Rate of return
- Rates and tariffs
- Other

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July 14, 2021

**PREPARED DIRECT TESTIMONY
OF SCOTT C. TUSTIN**

1 **I. INTRODUCTION**

2

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

4 A. My name is Scott C. Tustin and my business address is 290 W. Nationwide
5 Blvd., Columbus, Ohio 43215.

6

7 **Q. By whom are you employed?**

8 A. I am employed by Columbia Gas of Ohio, Inc. ("Columbia"). My current
9 title is Operations Program Leader.

10

11 **Q. Please summarize your professional experience.**

12 A. In 1993, I began my career with Columbia as a Pipe Fitter, where I
13 performed work in all aspects of pipeline maintenance and emergency
14 response. In 2000, I was promoted to Field Operations Leader, responsible
15 for management of Field Operations including customer service interaction
16 work, gas pipeline construction, installation, repair and projects, winter
17 operations planning, and emergency response, in addition to providing
18 technical assistance for various company activities. In 2008, I accepted a
19 position as the Damage Prevention Leader, with responsibilities for Ohio,
20 Kentucky, and Massachusetts. While acting in this position, I managed the
21 Locate Ticket Screening Center that assigned locate work to the field,
22 conducted QA/QC of contract locators, was responsible for their overall
23 performance, and served on the Board of Directors for KY811 and OUPS
24 (Ohio 811). In 2012, I was promoted to the position of Project Specialist II in
25 the Pipeline Safety and Compliance part of the organization. I maintained
26 my responsibilities for Damage Prevention and also was responsible for
27 conducting internal assessments, emergency exercises, and assisting with
28 Public Utilities Commission of Ohio audits. In 2015, I began my work
29 managing the Cross Bore Program for Columbia.

30

31 In addition, I am currently Operator Qualified in 27 Op Qual tasks. I also
32 am Project Management Professional II Certified from the Project
33 Management Institute (PMBOK).

1 **Q. What are your responsibilities for the current Columbia Cross Bore**
2 **Program?**

3 A. As the Program Manager, my responsibilities include: assisting in the
4 collection and analysis of data for regulatory filings; managing Cross Bore
5 Prevention training materials and learning requirements; the evaluation,
6 standardization, and improvement of internal processes; and providing
7 technical support for various teams and initiatives within
8 NiSource/Columbia. I organize, generate, and deliver work order packs for
9 contractors to perform inspection work for areas of suspected Cross Bores.
10 I am responsible for contractor performance and managing the current
11 Cross Bore budget. In addition, I develop Public Awareness materials for
12 distribution to industry associates and perform Cross Bore education
13 presentations to municipalities, plumbers, homeowners, and other pipeline
14 operators.

15
16 **Q. What is the purpose of your testimony in this proceeding?**

17 A. The purpose of my testimony is to explain how the proposed \$9.534 million
18 pro forma adjustment to expand the Cross Bore Program (“CBP”) will im-
19 prove Columbia’s ability to provide safe and reliable service to its custom-
20 ers. I will discuss Columbia’s current CBP, including Columbia’s observa-
21 tions, lessons learned since the CBP’s inception, and ways Columbia pro-
22 poses to improve its ability to safely and efficiently meet the needs of its
23 customers.

24
25 **II. COLUMBIA’S EXISTING CROSS BORE PROGRAM**

26
27 **Q. What is a Cross Bore?**

28 A. Cross Bores are defined as the intersection of one underground utility or
29 structure by a second underground utility or structure that compromises
30 the structural integrity of the underground utility and or the underground
31 structure.

32
33 **Q. What risks do Cross Bores present?**

34 A. When a natural gas facility and sewer facility intersect, there is the potential
35 for unintentional release of natural gas into a sewer facility, which can pose
36 a risk to life and property due to the sewer facility’s direct connection to
37 building and structures.

38
39 **Q. Please summarize the components of Columbia’s CBP.**

40 A. The CBP, which began in 2015, consists of four segments:

1 The Risk Model is focused on identifying the areas of highest risk
2 and consequence, utilizing known factors within the pipeline assets.

3
4 The Inspection segment is focused on utilizing advanced camera in-
5 spection equipment to perform an in-depth inspection of the known
6 sewer facilities obtained from the local sewer authority that are iden-
7 tified in the risk model.

8
9 The Remediation segment is primarily focused on remediating all
10 known Cross Bores identified during an inspection or reported to
11 Columbia by municipalities, plumbers, homeowners, and other in-
12 ternal or external resources such as company and contractor crews
13 performing routine replacement or maintenance activities.

14
15 The Public Awareness segment of the program is focused on public
16 and industry awareness concerning the possibility of a Cross Bore
17 existing in another utility's sewer facility.

18
19 **Q. What are the benefits of Columbia's existing CBP?**

20 A. The Cross Bore Program allows Columbia to identify areas of potential con-
21 flict and take a proactive approach for inspection and mitigation of the com-
22 pany's findings. Cross Bores is one of Columbia's top risks. The Cross Bore
23 Program allows Columbia to take a systematic approach to mitigating this
24 risk while also allowing an annual review of progress and key learnings.

25
26 **Q. How does Columbia determine the prioritization for inspection of facili-
27 ties?**

28 A. Many factors are considered when choosing potential sewer facilities for
29 inspection. No single factor, system, or program unilaterally determines the
30 prioritization of inspection projects. Considerations include, but are not
31 limited to, risk scores as calculated by Optimain DS™ (prior to 2022) or Syn-
32 ergi Pipeline (starting in 2022), environmental considerations (e.g., popula-
33 tion density, building class, pipeline assets information), newly identified
34 material risks from past discoveries, jurisdiction requirements, and com-
35 pany standard improvements or clarifications. These considerations assure
36 Columbia prioritizes inspection of pipe segments that could pose additional
37 risk if inspection is delayed. Columbia works collaboratively with local and
38 state governments to obtain sewer system information and also uses local

1 knowledge of where potential risk may exist if known by them through
2 previous experience.

3
4 **Q. How does Columbia ensure that its records reflect the accurate location
5 of inspections performed in its CBP?**

6 A. Columbia's process includes documentation of the inspections performed
7 in its GIS system. Further, Columbia's GIS program maps all reported Cross
8 Bores, with the data stored and available for viewing in the company's GIS
9 system. This data is used in the Risk Model algorithms and upcoming cap-
10 ital designed projects (capital replacements).

11
12 **Q. Since beginning the CBP, how many miles of sewer pipe has Columbia
13 inspected?**

14 A. The table below breaks down the type of sewer pipe inspected over the first
15 6 years (2015-2020) of the CBP:

16
17

	Total Sanitary Main	Total Storm Main	Total Main Camera	Number of Laterals
2015	16.5	24.4	40.9	1,332
2016	63.0	59.0	122.0	6,426
2017	46.4	43.4	89.8	5,419
2018	46.4	29.1	75.5	5,436
2019	40.5	26.1	66.6	5,193
2020	25.8	19.3	45.1	2,645
TOTAL	238.6	201.3	439.9	26,451

18
19 **Q. Since beginning the CBP, what type of facilities have been discovered to
20 have Cross Bores?**

21 A. The table below breaks down the type of Columbia facilities discovered to
22 have Cross Bores. These are a cumulative total of all Cross Bores either
23 found during program inspection or reported to Columbia by the
24 company's construction contractors, plumbers, homeowners,
25 municipalities, and operations employees.

1

Totals 2015 to YE 2020.					
	Steel main	Steel service	Plastic main	Plastic service	
2015	20	13	29	39	101
2016	28	10	35	77	150
2017	20	7	32	93	152
2018	39	7	32	49	127
2019	31	15	34	44	124
2020	16	14	26	46	102
Totals	154	66	188	348	756

Cross Bores by facility type

Facility Type	Percentage
Steel main	20%
Steel service	13%
Plastic main	29%
Plastic service	38%

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III. COLUMBIA'S PROPOSED CBP EXPANSION

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Q. What is Columbia proposing in this proceeding?

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A. Columbia is proposing to expand its current CBP. As discussed in Columbia Witness Shaeffer's testimony, Columbia is proposing a \$9.534 million pro forma adjustment to fund the expansion of the CBP. This \$9.534 million is comprised of \$7.627 million of outside services and \$1.907 of internal labor.

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Q. Why is Columbia seeking to expand its current CBP?

14

A. The need to ramp up the current inspection and awareness efforts are evident by the findings over the first six years of the program. By targeting inspection systematically and addressing issues on a larger scale, the CBP

15

16

1 reduces leaks and damages that can be associated with customer outages,
2 increases customer safety, and provides increased relative efficiency.

3

4 **Q. Will expanding the CBP provide any other benefits?**

5 A. Yes. Beyond increasing the safety of its system, expanding the CBP enables
6 Columbia to inspect system components in advance of, or in conjunction
7 with, state and municipal projects. This expansion will result in a win-win
8 scenario, because the municipalities not only are notified of gas Cross Bores,
9 but also any conflict with other utilities identified by Columbia during the
10 inspection, thus resulting in a more robust public safety program. The Cross
11 Bores discovered during Columbia's inspection have included, but are not
12 limited to, telecommunications lines, electric lines, water lines, and even fi-
13 ber optics lines that controlled county 911 systems. Since the CBP began,
14 we have notified other facility owners of 314 non-gas related Cross Bores.
15 This allows the municipality's infrastructure to remain intact and provides
16 an additional benefit to customers in the areas Columbia serves.

17

18 **Q. Are there any other benefits that will be gained through Columbia's pro-**
19 **posed expansion of the CBP?**

20 A. These changes will enable Columbia to better manage its risks and projects
21 in more efficient ways than it did at the inception of the CBP. It will enable
22 the company to accelerate its current projection of over 100 years to com-
23 plete inspection of its facilities to approximately 40 years. Even with a num-
24 ber of factors affecting the 40-year projection, an expansion will allow the
25 Company to have more resources to efficiently design, schedule, manage,
26 and report the cross bores identified and remediated.

27

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

29 A. Yes, it does. However, I reserve the right to supplement this testimony.

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 14th day of July, 2021, upon the persons listed below.

/s/ Joseph M. Clark

Joseph M. Clark

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Summary: Testimony Direct Testimony of Scott C. Tustin electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.