

**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 SUPPLEMENTAL DIRECT TESTIMONY OF
SCOTT 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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May 13, 2022

Attorney for

COLUMBIA GAS OF OHIO, INC.

**PREPARED SUPPLEMENTAL DIRECT TESTIMONY
OF SCOTT TUSTIN**

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Scott Tustin and my business address is 290 W Nationwide Blvd. Columbus, OH 43214.

Q. By whom are you employed?

A. I am employed by Columbia Gas of Ohio.

Q. Are you the same Scott Tustin who submitted Prepared Direct Testimony in this proceeding?

A. Yes, I am.

Q. On whose behalf are you appearing in this proceeding?

A. I am appearing on behalf of Columbia Gas of Ohio in this rate proceeding.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Supplemental Direct Testimony in this proceeding?

A. The purpose of my Supplemental Direct Testimony is to support the following issues raised by Columbia in its Objections to the Staff Report that was filed in this case on April 6, 2022:

Objection 3.1.10. Safety Operations O&M Expense Adjustment

III. Cross Bore Program Expansion

Q. Did the Staff Report address the expansion of the Cross Bore Program (CBP) discussed in your Direct Testimony?

A. Yes. The Staff Report mentioned Cross Bores in one sentence: "Staff removed this proposed adjustment because it does not recommend expansion of the cross bores program..." Staff provided no evidentiary support, nor other justification, for its recommendation to remove expanded CBP expense.

1 **Q. Why is the expansion of the CBP important?**

2 A. The CBP is an integral component of accelerated actions for DIMP
3 requirements. Thus, expanding the CBP confers a direct safety benefit to
4 Columbia's customers. As I mentioned in my Direct Testimony, a Cross
5 Bore is the intersection of one underground utility or structure by a second
6 underground utility or structure that compromises the structural integrity
7 of the underground utility and or the underground structure. Cross Bores,
8 once discovered, necessitate remediation because, when they occur, there is
9 a material risk of natural gas migrating through a second utility pipeline
10 (for example, a storm or a sanitary line) into buildings or homes, even those
11 that do not have natural gas service. Non-gas customers, and even gas
12 customers, may not have natural gas detection equipment and/or may not
13 be prepared to properly respond to the smell of natural gas should such
14 migration occur.

15
16 For these reasons, aggressively diminishing risks presented by Cross Bores
17 should be a priority for the Commission. As stated in my Direct Testimony,
18 the current plan for addressing Cross Bores on Columbia's system will take
19 more than 100 years. Columbia's proposal in this case would shorten this
20 outlay by more than half.

21
22 **Q. Would Commission authority for the expansion of the CBP make**
23 **Columbia's system safer?**

24 A. Yes. There is a direct correlation between implantation of CBP initiatives
25 (i.e., inspection, remediation and education resources) and the number of
26 Cross Bores uncovered or discovered and remediated.

27

Year	Number of Cross Bores Identified	Spend
2015-Actual	101	\$ 978,703
2016-Actual	150	\$ 2,123,511
2017-Actual	152	\$ 2,048,728
2018-Actual	127	\$ 1,938,629
2019-Actual	124	\$ 1,516,473
2020-Actual	102	\$ 1,027,209
2021-Actual	97	\$ 946,724

1 Further, if the Commission approves cost recovery to fund expansion of the
2 CBP, Columbia will prioritize targeting the urban areas of its service area
3 as the risk model indicates, thereby greatly reducing the risk to a majority
4 of its customer base in the first 20 years.
5

6 **Q. Is the expense of expanding the CBP justified?**

7 Yes, considering the return on investment from a safety standpoint. The
8 question presented to the Commission in Columbia's Application is: what
9 time period represents an appropriate level of risk relative to gas migration
10 from Cross Bores? Columbia's proposal would accelerate completion of the
11 current CBP from 100+ years to 40 years. Staff's recommendation implies
12 that there is no reason to compress the time period. Columbia disagrees.
13 This safety program is important enough to accelerate.
14

15 **III. CONCLUSION**
16

17 **Q. Does this complete your Prepared Supplemental Direct Testimony?**

18 **A.** Yes, it does.

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 13th day of May, 2022, upon the persons listed below.

/s/ Joseph M. Clark

Joseph M. Clark

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