

**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.	)	

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**PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF  
BENJAMIN GILMAN  
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

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

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**COLUMBIA GAS OF OHIO, INC.**

**May 13, 2022**

**PREPARED SUPPLEMENTAL DIRECT TESTIMONY  
OF Benjamin Gilman, GISP**

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**I. INTRODUCTION**

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

A. My name is Benjamin Gilman and my business address is 240 W. Nationwide Blvd, Columbus, Ohio.

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

A. I am employed by NiSource as the Manager, GIS Strategy.

**Q. Did you submit Prepared Direct Testimony in this proceeding?**

A. No, I did not.

**Q. Please describe your educational background.**

A. My educational background includes network engineering and database management, along with GIS certification from Penn State University. I am a Certified GIS Professional (GISP) through GISCI. I received a certificate in Geographic Information Systems from Penn State University in 2004, and GIS Professional Certification (GISP) in 2005 and am certified through 2024.

**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 Objection 3.1.14, Pipeline Safety Program (PSP) Expense Deferral Amortization, Schedule C-3.26, which was raised by Columbia in its Objections to the Staff Report that was filed in this case on April 6, 2022.

**III. DAMAGE PREVENTION TECHNOLOGY INITIATIVE**

**Q. Why has Columbia objected to Staff's exclusion of program expenses related to the Damage Prevention Technology Initiative (DPTI)?**

A. Staff inappropriately removed \$10 million associated with the DPTI from the amortization of Pipeline Safety Program (PSP) Expenses in Schedule C-

1 3.26. Columbia should be permitted to recover these actual expenses  
2 related to the DPTI from the DPTI program because the initiatives funded  
3 under the DPTI contribute to reducing risk and thereby improving public  
4 safety. Please refer to the Supplemental Testimony of Tamaleh Shaeffer for  
5 further information related to the PSP deferral.  
6

7 **Q. Please describe the DPTI.**

8 A. The Damage Prevention Technology Initiative is a series of technology  
9 initiatives undertaken by Columbia Gas to improve public safety through  
10 a reduction in excavator damages.  
11

12 **Q. What does the DPTI funding support?**

13 A. There are multiple initiatives funded under the DPTI, but my involvement  
14 and testimony will be limited to the legacy GPS initiative, which is focused  
15 on improving the accuracy of Columbia's infrastructure records through  
16 the use of technology that was not readily available at the time of original  
17 installation.  
18

19 **Q. What benefit does the DPTI provide to Columbia's customers?**

20 A. DPTI benefits Columbia's customers through a reduction in system risk,  
21 through reductions in excavation damage.  
22

23 **Q. Why did Columbia institute the DPTI program?**

24 A. Columbia instituted the DPTI program initiative to capture GPS locations  
25 for existing infrastructure in response to the US Department of  
26 Transportation's rule that all gas distribution companies implement a  
27 Distribution Integrity Management Program (DIMP), which requires  
28 operators to identify risks to their system and take action to reduce those  
29 risks.  
30

31 **Q. When will the DPTI conclude its efforts?**

32 A. Columbia plans to conclude the legacy GPS program in 2030.  
33

34 **Q. Are there planned expenditures related to the DPTI leading to this  
35 conclusion date?**

36 A. Yes. In the Staff Report, Staff states that the DPTI will conclude on  
37 December 31, 2023. This is inaccurate. Columbia plans to complete the  
38 initial GPS walk of all gas mains and services in 2023. Columbia will then  
39 move into the next phase of the program, called Future Action Area  
40 ("FAA") remediation from 2024-2030. FFAs are created during the initial

1 GPS collection walk to identify facilities which cannot be captured through  
2 the legacy GPS process without additional action, such as facility exposure.  
3 The remediation of FAAs is important to public safety, as it makes difficult  
4 to locate facilities more readily locatable through the use of GPS technology  
5 for future locates and improves the total area with GPS data saturation  
6 allowing for full GPS utilization.  
7

8 **Q. Why is it appropriate to collect the expenditures related to DPTI to this**  
9 **point, rather than continue to defer all expenses until the conclusion of**  
10 **the DPTI?**

11 **A.** In order to ensure that Columbia is able to complete the DPTI within the  
12 time frame provided, Columbia needs to be able to utilize the \$10 million  
13 for which Columbia has requested recovery. Columbia planned to utilize  
14 this amount in order to transition to the FAA remediation stage discussed  
15 above. Without it, Columbia will not be able to complete this essential  
16 safety initiative. Staff's recommendation will result in a reduction of the  
17 efficacy of the work done by the program to this point.  
18

19 **III. CONCLUSION**  
20

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

22 **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

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