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NORTH COAST GAS TRANSMISSION, LLC.

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Patrick J. McGonagle
Vice President

PUCO

December 7, 2005

Ms. Renee' J. Jenkins
Secretary
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: Case No. 05-1306-AU-COI

Dear Ms. Jenkins:

North Coast Gas Transmission, LLC (North Coast) welcomes the opportunity to file its comments in the above-referenced case regarding the State of Ohio "one-call" system. North Coast is an intra-state natural gas pipeline regulated by The Public Utilities Commission of Ohio (Commission) which operates a high pressure (greater than 650 psi) transmission pipeline traversing thirteen (13) counties in northern Ohio. North Coast is an active member of the Ohio Utilities Protection Service ("OUPS") and relies highly upon this service to protect the health and safety of persons working in close proximity to our pipeline operations.

On March 14, 2005, the Federal Communications Commission (FCC) issued an Order which designated the 811 dialing code as a nationwide number to be used by state one-call notification systems. This 811 dialing code would increase the efficiencies of one-call nationwide and in Ohio, especially for out-of-state contractors working in close proximity to North Coast's pipeline. The FCC also mandated the states to resolve any conflicts with multiple one-call systems within the state. Ohio suffers from this phenomenon. The "other one-call" system operates in a very limited fashion and in a very limited portion of the state.

The Commission must designate OUPS as the "811 One-Call System" in Ohio. North Coast must be able to rely upon an efficient system that covers **the entire State of Ohio**. The "other one-call" system does not cover all counties affected by North Coast's pipeline operations.

In addition, OUPS should become the "811 One-call System" for the State of Ohio because it presently is a more superior service for the following reasons:

1. OUPS member companies come from every utility industry operating underground facilities in the state, including but not limited to electric, telephone, cable, pipeline (natural gas, liquids and water) and sewer.

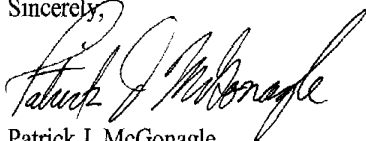
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2. OUPS currently employs 60 people and conducts its operations out of its wholly owned facilities.
3. OUPS service operates 24 hours a day, 7 days a week.
4. Full member utility companies have increased to over 600 in 2005.
5. OUPS provides electronic notification of locate requests to member companies allowing almost immediate receipt of the information
6. The OUPS mapping system is considered to be the most accurate in the state. The Ohio DOT regularly uses the OUPS mapping system for its public work.
7. OUPS organizes the Emergency Responder / Professional Excavator Educational program on behalf of the DOT regulated companies in Ohio. This is a vital element of DOT's mandated public outreach / public awareness programs.
8. OUPS expends significant funds in educating both the public and private sectors of the excavation industry. Through October 31, 2005, these funds have amounted to \$402,378.

For the reasons stated above, North Coast strongly requests the Commission to designate the OUPS as the "811 One-call System" in Ohio. The underground utility industry in Ohio enjoys a sterling reputation with the public and media as a safe and reliable means of providing various utility services. The integrity of a state-wide 811 call system **that will efficiently serve all utilities** should not be denigrated by a secondary one-call system that serves a very limited clientele in a very limited geographic area of the state.

North Coast welcomes the opportunity to express its concerns in this very important matter. If North Coast can be of further assistance, please do not hesitate to contact the undersigned.

Sincerely,



Patrick J. McGonagle
Vice President