

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:)
)
 Columbia Gas of Kentucky, Inc.)
)
 Complainant)
)
 v.)
)
 Natural Energy Utility Corporation)
)
 Defendant)

FEB 23 2010

PUBLIC SERVICE
COMMISSION

Case No. 2009-00340

**PREPARED DIRECT TESTIMONY OF
 RUSSELL DEWAYNE RYAN
 ON BEHALF OF COLUMBIA GAS OF KENTUCKY, INC.**

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February 22, 2010

Attorneys for Applicant
COLUMBIA GAS OF KENTUCKY, INC.

PREPARED DIRECT TESTIMONY OF RUSSELL DEWAYNE RYAN

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

2 A: My name is Russell Dewayne Ryan and my business address is 121 9th St. Ashland KY
3 41101.

4

5 **Q: What is your current position and responsibilities?**

6 A: I am currently the Field Operation Leader for Columbia Gas of Kentucky, Inc. I am
7 responsible for the daily field operations in the Ashland area, including oversight for matters
8 of main line and service line installation and repair. Additionally, I oversee all service work
9 in this area, including new and replacement meter installation.

10

11 **Q: What is your educational background?**

12 A: I graduated in 1977 from Paul G. Blazer High School in Ashland, KY. In addition, I have
13 attended a number of gas industry educational schools and programs including: DOT
14 Operator Qualification; Appalachian Underground Short Course.

15

16 **Q: Please describe your employment history?**

17 A: I began working for Columbia Gas of Kentucky on April 19, 1982, as a Field Technician
18 in Ashland, Kentucky. I held this position until October 1988, when I was promoted to
19 my current position.

20

21 **Q: Have you previously testified before the Kentucky Public Service Commission or**
22 **any other Kentucky regulatory commissions?**

1 A: No.

2

3 **Q: What is the purpose of your testimony in this proceeding?**

4 A: To provide facts and operational information related to this matter. Specifically, I will
5 describe the natural gas service provided to those customers in Ashland, Kentucky whom
6 Natural Energy Utility Corporation (“NEUC”) is also attempting serve.

7

8 **Q: Please describe Columbia’s service area in Ashland, Kentucky.**

9 A: Columbia Gas of Kentucky serves approximately 21,000 industrial, commercial and
10 residential gas service to customers in Ashland and surrounding communities.

11

12 **Q: Does Columbia provide natural gas distribution service to the properties at 901 13th
13 Street Ashland, Kentucky 41101; 915 13th Street, Ashland Kentucky 41101, 1200
14 Bryan Street Ashland, Kentucky 41101?**

15 A: Currently, Columbia Gas of Kentucky provides natural gas service to these customers.
16 The customers in question, Continental Liquors at 901 13th St has been served by
17 Columbia since 1980. The restaurant at 915 13th Street has been served since 1974 and
18 the video store located on Bryan St had a new 3” plastic service installed in 1993.

19

20 **Q: When was service initiated to each of the customers at the addresses listed above?**

21 A: Service was initiated in the current customer's name at 901 13th Street on March 4, 1982;
22 at 915 13th Street in the current customer's name on August 15, 2007 and under prior

1 customer names dating back to 1991; and at 1200 Bryan Street on November 13, 1993 in
2 the current customer's name.

3

4 **Q: Did the owner of the properties ever contact Columbia to disconnect service?**

5 A: Yes, on July 22, 2009, the owner of the properties listed above requested that Columbia
6 disconnect service in October of 2009 because she wanted to initiate service with NEUC
7 instead.

8

9 **Q: Describe Columbia's facilities around these properties.**

10 A: Columbia's facilities include medium and low pressure distribution mains, service lines
11 and meters that provide gas service to all business and residential accounts surrounding
12 the area in question.

13

14 **Q: Does NEUC also serve customers in the Ashland area?**

15 A: Yes and in some instances our service territories border each other.

16

17 **Q: Can you describe the location of NEUC's facilities in relation to the above-**
18 **mentioned properties?**

19 A: To the best of my knowledge, NEUC has a distribution main in an unimproved area
20 adjacent to these customers, however, it provides no gas service to any of the residential
21 or commercial businesses in this area.

22

23 **Q: How long has the NEUC's distribution main line described above been in existence?**

1 A: I do not know the a specific amount of time the NEUC facility has been in service. I have
2 known about the NEUC line for many years, as evidenced by the NEUC line markers and
3 former well lines.

4

5 **Q: Have you observed NEUC undertake any construction projects in Ashland?**

6 A: Yes, in late July or early August of 2009. This construction was on private property
7 behind the customers in question.

8

9 **Q: What did you observe?**

10 A: I observed the installation of a 2” plastic gas main and associated service lines adjacent to
11 our existing main and service lines that currently serve these customers.

12

13 **Q: Are you aware whether NEUC served any other customers near the above-listed
14 properties?**

15 A: To the best of my knowledge, NEUC does not serve any other customers near the above-
16 listed properties.

17

18 **Q: Prior to this construction, are you aware whether NEUC had any existing lines in
19 the area?**

20 A: Yes, they had an existing line in the area.

21

22 **Q: Where was NEUC’s line located?**

1 A: NEUC had an existing main along the unimproved McKinley Street that abuts the
2 property in question. This NEUC facility was relocated to the customers' private
3 property, adjacent to an existing private easement Columbia obtained from this property
4 owner in 1970 to lay an 8" steel gas main.

5

6 **Q: To your knowledge, were any customers served off of this previous main?**

7 A: To the best of my knowledge, NEUC did not serve any customers from its previous main
8 within the area in question.

9

10 **Q: Are you aware whether the previous main/line is still in service?**

11 A: I am unaware whether it is still in service.

12

13 **Q: Approximately how far away is the existing NEUC line from the customers in
14 question?**

15 A: The previous NEUC line is approximately 125 feet from the closest customer in question.
16 NEUC installed a new plastic main adjacent to our existing medium pressure main,
17 approximately 40 feet from the back of the existing buildings.

18

19 **Q: What did you observe about the new main line?**

20 A: The new main is 2" and 4" plastic.

21

22 **Q: Do you know what the previous main line looked like?**

1 A: Yes. During Columbia's replacement project construction, Columbia damaged a 2" gate
2 valve that belonged to NEUC in the McKinley Street R/W. Normally, one would install a
3 valve that matched in kind and size, the main that it is connected to. Though not
4 conclusive, the implication is that the main would be 2" as well.

5

6 **Q: Approximately how far away is the new NEUC line from Columbia's existing line?**

7 A: The new NEUC main is within 10 feet of Columbia's existing 8" steel gas main behind
8 the properties in question.

9

10 **Q: Did NEUC's line have to cross any existing Columbia easements, lines or facilities?**

11 A: At one location, NEUC crossed Columbia's 8" steel gas main to extend its new 2" plastic
12 gas line to the Checkers Video customer on Bryan St.

13

14 **Q: Were any service lines run off of the new NEUC line?**

15 A: Yes.

16

17 **Q: How many service lines were installed?**

18 A: Three.

19

20 **Q: Where were these service lines installed?**

21 A: The service lines were installed adjacent to the previously mentioned address of the three
22 Columbia customers.

23

1 **Q: Did NEUC construct any risers, meter boxes or other facilities for the customers at**
2 **the addresses in question?**

3 A: Yes, NEUC installed risers at each building adjacent to Columbia's meter facilities
4

5 **Q: How close are the new NEUC facilities to Columbia's existing facilities?**

6 A: NEUC's facilities are within a foot of Columbia's facilities.
7

8 **Q: Are there any photographs or maps that would demonstrate the existence of**
9 **NEUC's lines and the proximity to Columbia's lines?**

10 A: Yes, we have pictures of our existing service facilities, and NEUC's new service facilities
11 for each address in question. (Attached hereto as Attachment 1). Additionally, we have
12 pictures of NEUC's restoration work and above ground facilities that indicate where
13 NEUC laid its new main in relation to our existing facilities. (Attached hereto as
14 Attachment 2).
15

16 **Q: When were these pictures taken?**

17 A: The pictures were taken on August 20, 2009, at approximately 10:00am.
18

19 **Q: By whom were these pictures taken?**

20 A: I took the pictures.
21

22 **Q: Does this complete your Prepared Direct testimony?**

23 A: Yes, however, I reserve the right to file rebuttal testimony if necessary.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Testimony of Russell Dewayne Ryan on behalf of Kentucky, Inc. was served upon the parties on the Service List below by regular U.S. Mail this 22nd day of February, 2009.



Brooke E. Leslie
Attorney for
COLUMBIA GAS OF KENTUCKY, INC.

SERVICE LIST

Hon. John N. Hughes
124 West Todd St.
Frankfort, KY 40601

ATTACHMENT 1

Page 1 - Existing Columbia meter set at 901 13th Street

Page 2 - Close-up of existing Columbia meter tag at 901 13th Street

Page 3 - 915 13th Street, Existing Columbia facilities on right; to the left (with wrench) is new service riser installed by NEUC

Page 4 - Close-up of existing Columbia meter at 915 13th Street

Page 5 - 1200 Bryan Street, Existing Columbia facilities on right, to the left is new service riser installed by NEUC

Page 6 - Another view of existing Columbia facilities at 1200 Bryan Street

Page 7 - Close-up of existing Columbia meter at 1200 Bryan Street

Attachment 1 -
Page 1



WAR

TAMPERING

It is a violation of the
tamper with this gas
the intent to impede
line of gas usage. Any
this gas meter or pipe
to the fullest extent
of this state.

COLUMBIA GAS
CO OF KENTUCKY
N7203854

AC-250

250 CFM @ 1/2" CW

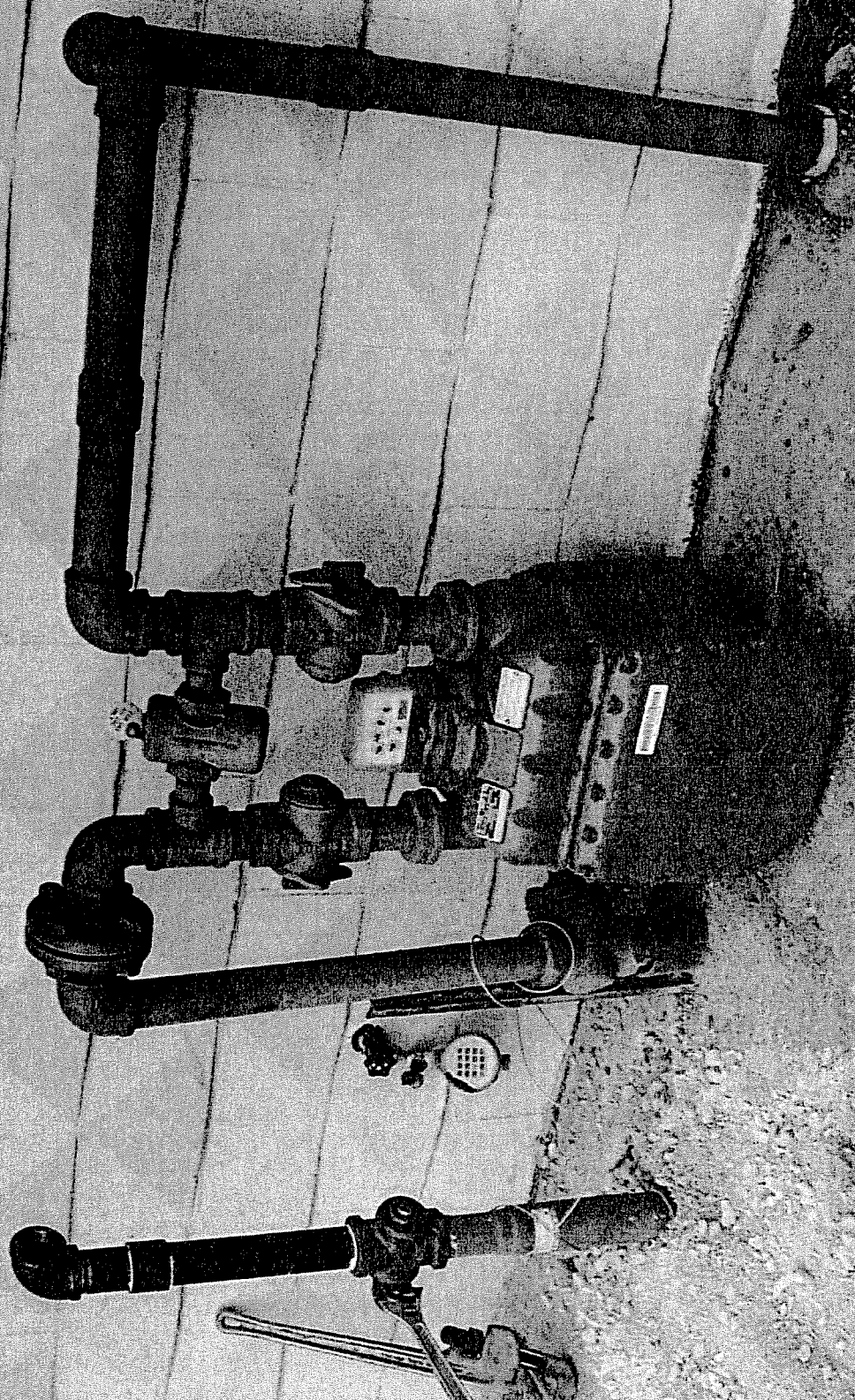
MAOP 5 PSI

HIGH CLASS 250
TYPE 2 CODE



AMERICAN
METER COMPANY

Attachment 1 -
Page 3



Attachment 1 -
Page 4

AL-1000 MAOP 25 PSI
1000 PSI 1/2" BULK
7000 PSI 1/2" BULK
TEMPERATURE
COMPENSATED METER
001 01451 PARTIAL

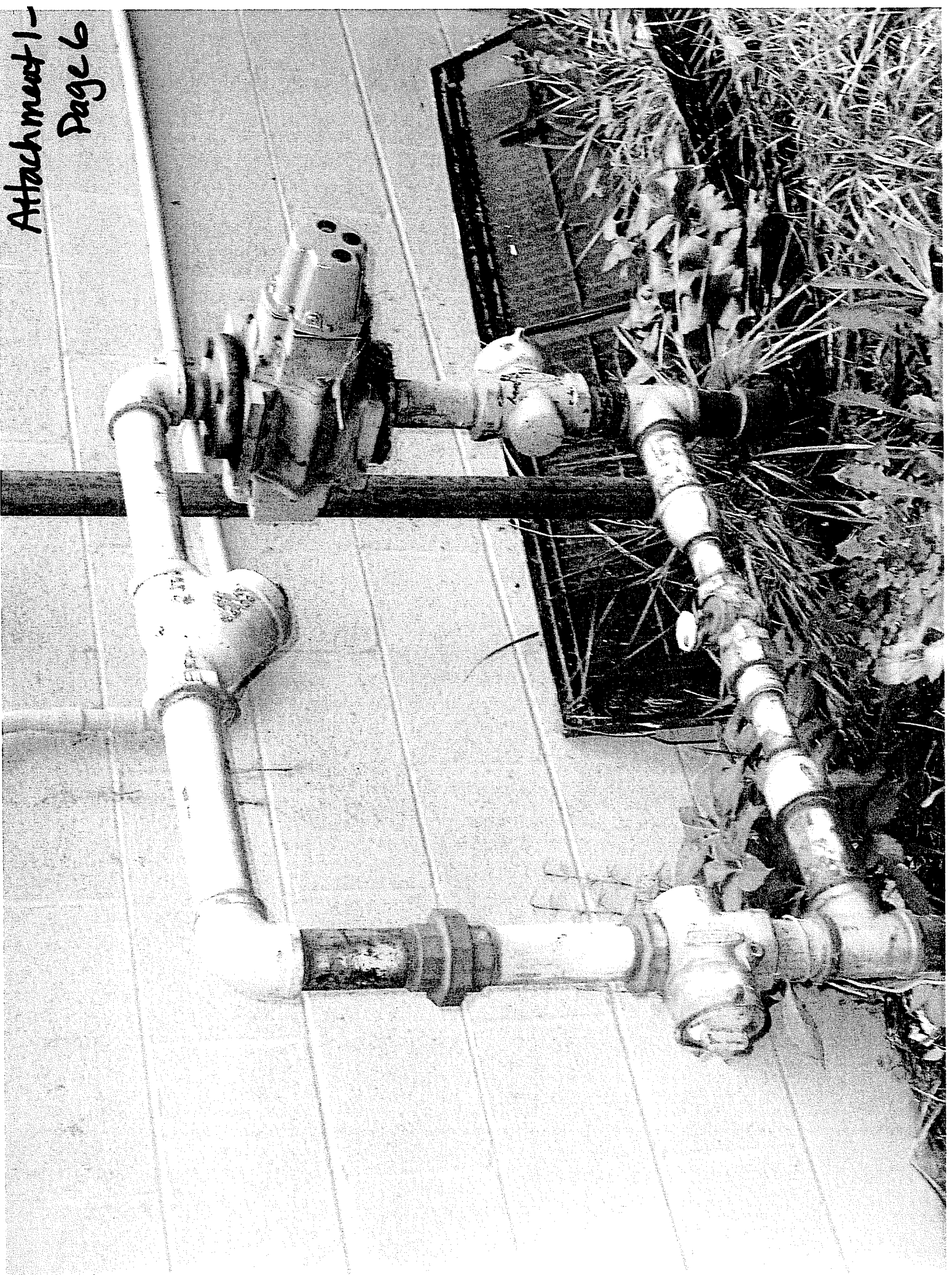
COLUMBIA GAS
OF KENTUCKY
W5290056

Columbia Gas
611 15290056

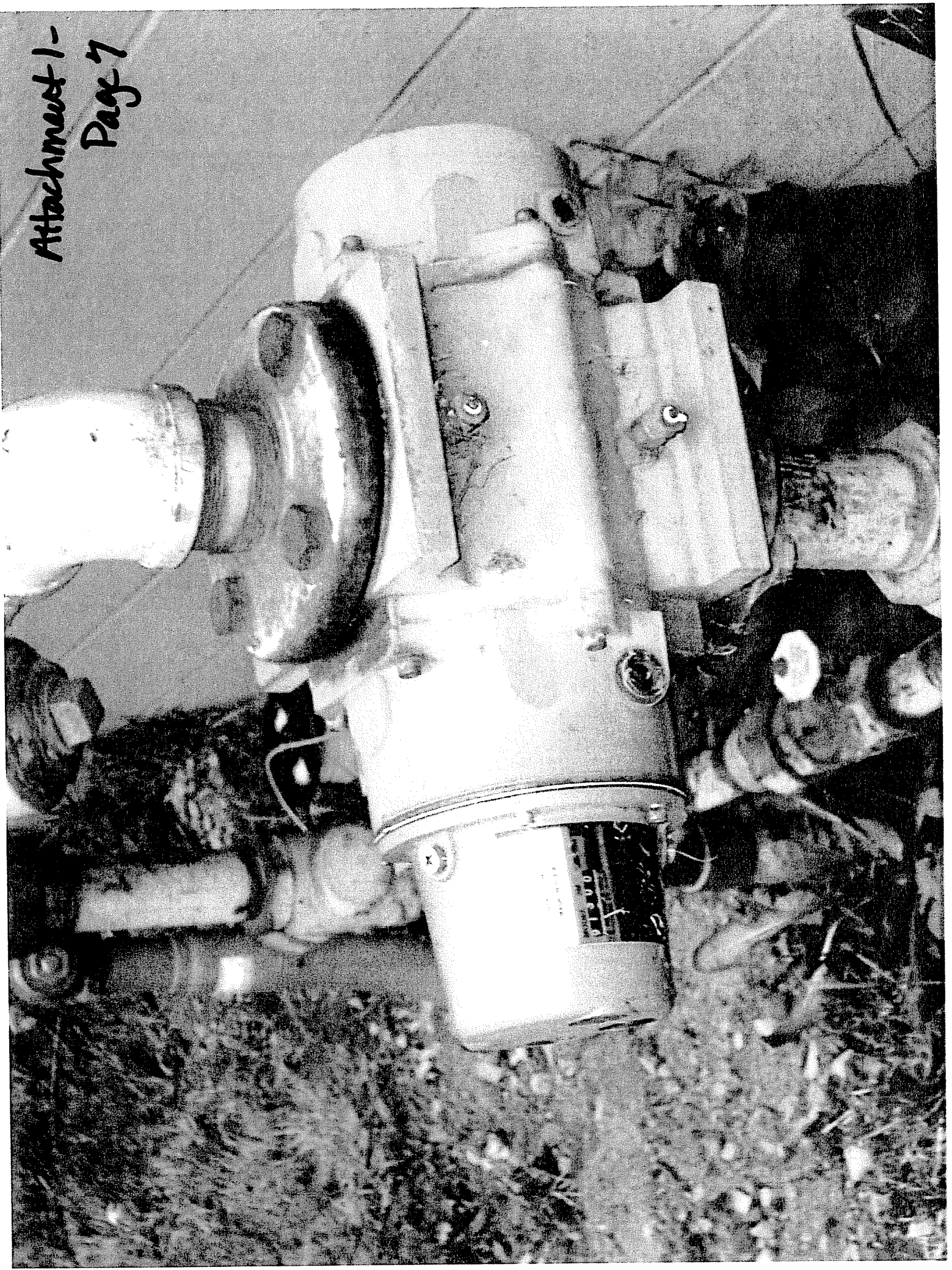
Attachment 1 -
Page 5



Attachment 1 -
Page 6



Attachment 1-
Page 7



ATTACHMENT 2

Page 1 - White paint marking location of new service line NEUC would install to serve 901 13th Street. Yellow pipe between cones is location of new pipe stubbed out by NEUC

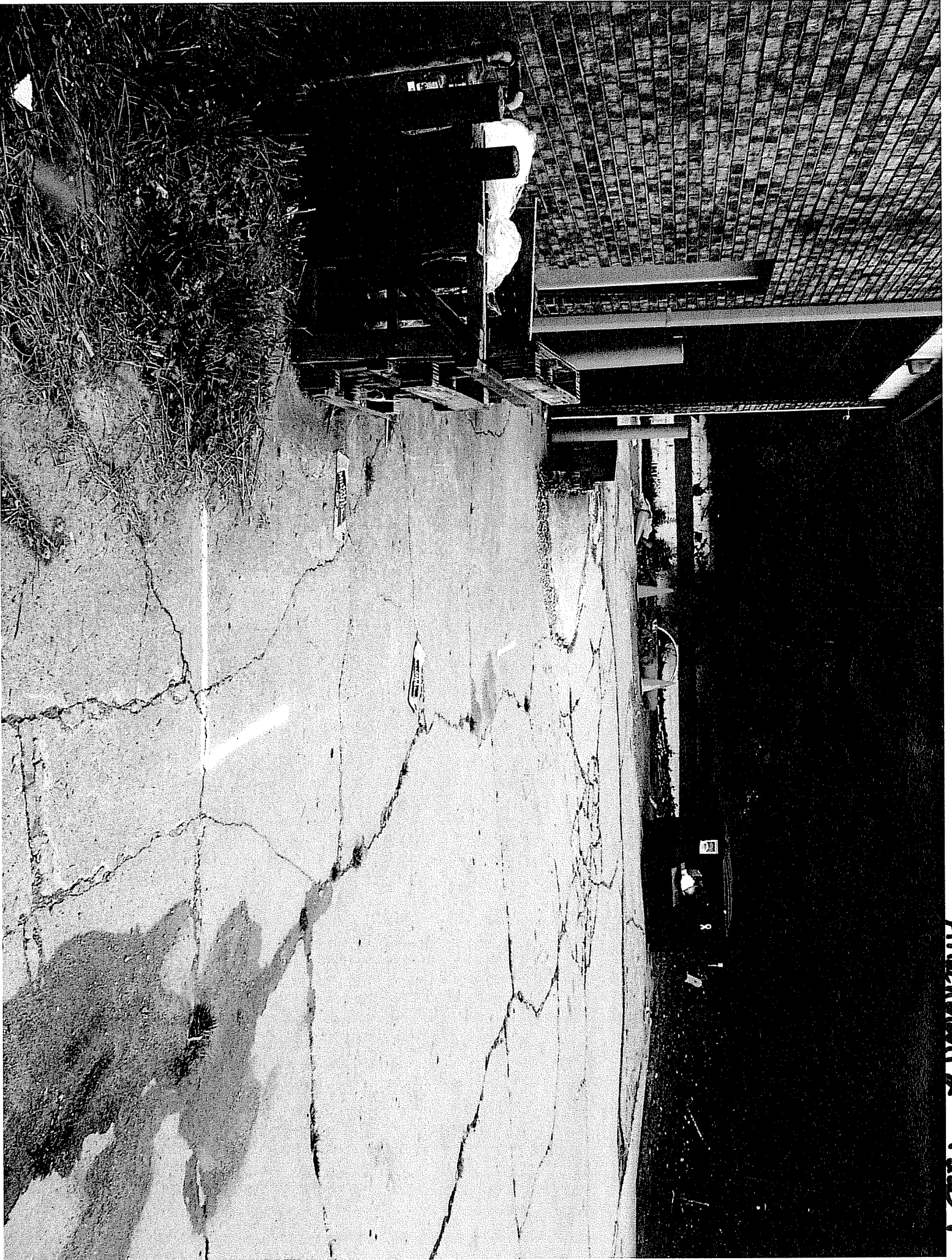
Page 2 - New line installed by NEUC to serve 901 13th Street

Page 3 - View of location of new service line installed by NEUC to serve 915 13th Street

Page 4 - Parking lot showing new 2" and 4" plastic pipe installed by NEUC at 1200 Bryan Street

Page 5 - View behind 1200 Bryan Street where NEUC installed new service line

Page 6 - View of path where new 4" plastic pipe was installed by NEUC









Attachment 2 - Page 4





Attachment 2 - Page 6