



# International Brotherhood of Electrical Workers

**LOCAL UNION 2199**

**P.O. Box 401 • West Seneca, NY 14224**



April 17, 2013

Honorable Jeffrey C. Cohen, Acting Secretary  
State of New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Re: Initial Comments of International Brotherhood of Electrical Workers Local Unions 97, 320, 503, 2154 and 2199 Regarding Issues of Concern of the Proceeding Case 12-G-0297; Proceeding on Motion of the Commission to Examine Policies Regarding the Expansion of Natural Gas Service

Respectfully Submitted,

A handwritten signature in blue ink that reads "Deborah L. Thur".

Deborah L. Thur  
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Ph. #716-220-1923

## **Introduction**

In response to the comments submitted by Koda Consulting, Inc on behalf of IBEW Local 2199, dated March 12, 2013, we would like to clarify our positions & issue formal retractions for statements contained within the document in order to correct the record in this proceeding.

## **Comments Regarding National Fuel's Energy Services Department**

*"We further submit that these positions have dwindled in numbers...National Fuel Gas disbanded its Energy Services Department which had approximately 8 clerical staff supporting its Management Reps. Those members were moved to other clerical positions...which we believe decreases the effectiveness of the department responsible for increasing gas sales. The fact is that staffing reductions have resulted in customers being underserved in many parts of the State."*

IBEW Local 2199 retracts these statements. The Energy Services department has not been disbanded. While a reduction in clerical staff has occurred, IBEW Local 2199 does not feel that our customers are underserved by National Fuel in any way. The Management & Clerical staff consistently meet the needs of customers in our service territory and continues to secure new customers daily.

## **Comments Regarding IBEW Member Applying For Gas Service**

*"This service deficiency at National Fuel Gas is illustrated by a recent incident involving a new service & mainline installation which shows that at present obtaining service is very slow and not customer friendly...An employee recently applied to covert to natural gas...His calls and email (through company email) were not answered by the new management service rep...(he) was told it was his burden to bring enough customers onboard to generate interest by NFG to extend the mainline. He was offered a mainline extension repayment plan-which at the end of ten years would double the initial cost, because of the interest carrying charge."*

IBEW Local 2199 retracts these statements. National Fuel has maintained an excellent level of satisfaction with the PSC & National Fuel's customers. Customers who apply for service have their services installed in a timely manner which is compliant with

current PSC Rules & Regulations. National Fuel does not control the charges for mainline & service line extensions. We feel that the incident described was an isolated incident .

### **Comments Regarding National Fuel & Compressed Natural Gas ('CNG') Vehicles**

*"In addition, we believe that gas utilities could do a better job of promoting CNG vehicles. For instance, National Fuel Gas' own fleet is not powered by CNG."*

IBEW Local 2199 retracts these statements. IBEW Local 2199 feels that National Fuel does several things to support 'CNG' vehicle development. National Fuel has expressed to us that they have been & are continuing to commit significant capital to converting their fleet to 'CNG' vehicles. National Fuel has already converted several of their vehicles to 'CNG' vehicles and will continue to switch them over as best as they can. National Fuel openly supports customers who switch to 'CNG' vehicles & continues to accept applications for 'CNG' customers. National Fuel has recently also submitted a request to the PSC to improve billing for 'CNG' customers .

### **Comments Regarding National Fuel Engineering Maps & Public Safety**

*"IBEW Local 2199 at National Fuel has lost many of engineering mapping jobs to out-sourced contractors. Since this mapping has taken place, there have been many errors committed by these contractors... For example, there have been two recent incidents, in which engineering maps made by the outside contractor were of poor quality. One incident resulted in an interruption of service to an entire neighborhood, while the second and most recent incident of maps being of poor quality and difficult to read occurred during a gas explosion, thus hampering the eventual shut down and placing both workers and general public at risk."*

IBEW Local 2199 retracts these statements. There is no evidence that contractor errors on maps have ever led to a disruption of service to customers within National Fuel's territory. Over the last several years, technology has improved both our maps & efficiency through which the maps are created. As a result, previous errors made by

clerical & field employees have been resolved through reviews by both a third party contractor and National Fuel employees.

In addition to our above retraction, IBEW Local 2199 wishes to clarify that the explosion incident described was actually a propane explosion and had nothing to do with National Fuel. National Fuel never put anyone in danger as a result of the incident.

IBEW Local 2199 would also like to officially state that these comments had nothing to do with the original purpose of the document, natural gas expansion, and were inappropriate to the topic.

### **Conclusion**

*"First, IBEW Local 97 would like to comment the NYS PSC on its timely and ambitious docket seeking to dramatically grow natural gas infrastructure and positively impact the NYS economy and ecology, as well as deliver enormous savings to NYS customers that includes 550,000 residential customers within 100 feet of existing gas mains."*

The above quote is from an email from IBEW Local 97 sent to the PSC dated 1/30/13. IBEW Local 2199 supports the original intent behind the gas docket. We feel that through the expansion of natural gas service, National Fuel can continue grow and maintain their level of excellence in providing service to customers.

We feel that these retractions are necessary because statements contained with the prior letter sent March 12<sup>th</sup>, 2013 were not in the best interest of the original intent of the docket.

Respectfully Submitted,



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