

**CORNING NATURAL GAS CORPORATION**

**REBUTTAL TESTIMONY**

**OF**

**MATT J. COOK**

**VICE PRESIDENT - OPERATIONS**

**November 15, 2016**

REBUTTAL TESTIMONY OF MATT J. COOK

1 Q. Please state your name and business address.

2 A. My name is Matt J. Cook. My business address is 330 West William Street, Corning,  
3 NY 14830.

4 Q. Are you the same Matt J. Cook who presented direct testimony on behalf of Corning  
5 Natural Gas Corporation (“Corning” or the “Company”)?

6 A. Yes, I am.

7 Q. What is the purpose of your rebuttal testimony?

8 A. I am addressing the Staff Gas Safety Panel’s testimony regarding the following:

9 (a) Staff’s recommendation to include services in Corning’s risk ranking model;

10 (b) Staff’s recommendation regarding the amount of gas main to be replaced in 2017;

11 (c) Staff’s recommendation for the Company to file a petition if the entire replacement

12 program cannot be completed in ten years; (d) Staff’s recommendation to eliminate

13 the NRA for Leak Prone Service replacement and to increase the NRA for Leak Prone

14 Main replacement; (e) Staff’s recommendation to modify the mismarks and Company

15 & Company Contractor damage targets; (f) Staff’s recommendation regarding high

16 and other risk safety violations; (g) Staff’s recommendation regarding Fire

17 Department training; (h) Staff’s recommendation regarding deployment of residential

18 methane detectors; and (i) Staff’s recommendation regarding the prioritization of the

19 Company’s 1950’s vintage pipe. I am also addressing the Staff GIO Panel’s

20 recommendations: (a) to adjust the Company’s construction escalation factor; (b) to

21 begin utilizing “White Papers” for project tracking; (c) to modify the estimate of dual

22 main to be installed in the LPP replacement program; (d) pertaining to the cost

23 estimate for Line 15; (e) pertaining to the cost estimate for Line 6; (f) pertaining to the

24 creation of a unit cost tracking mechanism; (g) for a revision to the unit cost for the

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1 installation of new mains and services in the Capital Budget; (h) for a revision to the  
2 capital budget regarding depleted equipment (odorizer) removal; and (i) pertaining to  
3 Company vehicles. Finally, I will request the discontinuance of a monthly report filed  
4 by the Company with the Commission Secretary.

5 Q. Are you sponsoring any exhibits?

6 A. Yes, I am sponsoring Exhibit \_\_\_ (MJC-R-1) which contains a basic estimate for the  
7 cost of for the Company to create a hands-on fire department training system, and  
8 Exhibit \_\_\_ (MJC-R-2) which contains two sheets provided by two separate  
9 contractors as part of a bid for 2016 construction.

10 **GAS SAFETY PANEL**

11 Q. Before discussing the individual items you listed, do you have any general comments  
12 on the Gas Safety Panel's presentation?

13 A. Yes. Maintaining a safe and reliable gas system is critical to Corning's business and  
14 to the Company's responsibility to the public it serves. We take safety very seriously  
15 in everything we do. At the same time, we are mindful of the need to control costs.  
16 As we have expressed in the past, we believe that safety objectives can be met in a  
17 cost-effective manner if the Company is permitted to apply a certain amount of  
18 discretion and flexibility in its program. Annual targets for certain types of work are a  
19 case in point, where safety objectives can be achieved and, at the same time, with a  
20 little flexibility as to timing, the Company can achieve savings for its customers. The  
21 problem with rigid targets and penalties for not meeting those targets is that such  
22 punitive measures discourage any departure from the "script" – even those that might  
23 be of significant benefit to customers. In addition, and consistent with REV, all areas

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1 that have penalties should have incentives as well. I will discuss this subject later in  
2 my testimony.

3 Q. The Staff Gas Safety Panel recommends in its testimony on page 15, lines 6-8, that  
4 Corning include in its risk ranking model the entire pool of leak prone services to be  
5 replaced. Does Corning agree?

6 A. No. Corning does not see a need to do this. The majority of its leak prone services are  
7 connected to leak prone main. Therefore, as the main is chosen for replacement, the  
8 services will also be replaced. Additionally, Corning's risk based assessment ranks a  
9 segment of pipe higher, therefore to be replaced sooner, if it has repaired or existing  
10 leaks on the facility. In most cases, a leak on a bare steel or coated unprotected  
11 service means it will be replaced immediately or as soon as practical. Therefore, there  
12 is no chance that an existing service will contain a repaired leak. That means that a  
13 service will always be ranked low or in most cases equal to each other.

14 Q. The Staff Gas Safety Panel recommends in its testimony on page 16, lines 10-12, that  
15 Corning maintain the amount of main to be replaced at approximately 10.6 miles per  
16 calendar year of 2018, 2019 and 2020. Does the Company agree?

17 A. Corning will have approximately 101 miles of leak prone main remaining in its system  
18 by the end of year 2016. Corning agrees with a ten year plan for replacing its leak  
19 prone pipe. However, due to the projected amount of main remaining, the Company  
20 would like to reduce Staff's recommended removal rate to 9.8 miles per year. As a  
21 result of previous Commission Orders and a Commission approved settlement with  
22 Bath, Electric, Gas and Water, Line 15 is under a one mile per year schedule.

23 Q. The Staff Gas Safety Panel recommends in its testimony on page 16, lines 21-24 and  
24 page 17, lines 1-4, that, if Corning is not able to replace all LPP as forecasted over a

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1 10-year period, the Company should file a petition prior to December 31, 2025  
2 explaining how many miles it replaced each year, along with the cost associated with  
3 these replacements and the number of remaining miles to be replaced. Do you agree  
4 with that proposal?

5 A. No. Corning disagrees with the requirement to file a petition if it is unable to  
6 complete replacement of the LPP main within ten years, because it appears to be  
7 unnecessary paperwork.

8 Q. The Staff Gas Safety Panel recommends in its testimony on page 18, lines 14-22, that  
9 the Leak Prone Service replacement metric be eliminated. Does Corning agree?

10 A. Yes. Corning appreciates the removal of this metric. The Company estimates that, as  
11 of the end of 2016, it will have approximately 2,500 leak prone services to replace.  
12 Based on what appears to be a move toward completing this replacement program in  
13 ten years the Company would have to replace an average of 250 services per year.

14 Q. The Staff Gas Safety Panel recommends in its testimony on page 19, lines 2-6, to  
15 eliminate the two pre-tax basis point NRA for leak prone service removal, but to  
16 increase the six pre-tax basis point NRA for leak prone main replacement to eight pre-  
17 tax basis points. Does Corning agree?

18 A. No. While Corning does appreciate that Staff has removed the metric for leak prone  
19 services, thereby allowing the Company to do what is proper and replace services as  
20 part of its leak prone main replacement program, it does not agree that the NRA  
21 should be increased for main replacement. Corning has met and exceeded every LPP  
22 and LPS target since this program's inception. To be subjected to an increased penalty  
23 for doing exceptional work is as unjust as it is illogical. Corning requests that the  
24 NRA for the LPP remain at six pre-tax basis points. In addition to that, Corning

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1 requests a 10% dead-band around the 9.8 mile target. As previously stated, flexibility  
2 increases cost efficiency and effectiveness. Corning also believes that there should be  
3 an equal incentive if Corning exceeds the 9.8 mile target by more than 10%.

4 Q. The Staff Gas Safety Panel recommends in its testimony on page 25, lines 1-2,  
5 regarding damages that Corning maintain a NRA target for damages due to mismarks  
6 of 0.26, and 0.20 for damages due to Company and Company contractor. Does  
7 Corning agree?

8 A. Corning appreciates Staff's recommendations that are positive for the Company  
9 relating to damages, such as allowing us to implement a three year approach to  
10 progressively work from a NRA target for overall damages from 2.3 in 2018, to 2.1 in  
11 2019 and 1.87 in 2020, and to have a chance to earn a Positive Revenue Adjustment  
12 (PRA) if the overall damage total is 1.50 or less. However, the Company requests that  
13 it be allowed to maintain the 0.29 target as set forth currently for CY 2017 for both  
14 mismarks and Company and Company contractor in place of Staff's  
15 recommendations. The Company believes that it has done well containing damages in  
16 these two categories.

17 Q. The Staff Gas Safety Panel recommends in its testimony on page 35, lines 13-20, to  
18 maintain the approved repairable leak backlog target of 5 leaks at year-end 2018 –  
19 2020 and total leak backlog targets of: 65 for year-end 2018, 55 for year-end 2019  
20 and 50 for year-end 2020. Does Corning agree?

21 A. Yes. Corning has no issue with these targets. While it is true that, due to Corning's  
22 LPP replacement program for 2018, the Company should recognize a reduction of  
23 approximately 30 leaks in its total backlog, it is important to keep in mind that we  
24 continue to discover an average of 179 new leaks each year. It is true that we do

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1 repair some leaks as part of our replacement program; however, the majority of our  
2 repaired leaks are repaired the year they are discovered.

3 Q. The Staff Safety Panel indicated in its testimony on Page 40, lines 11-13, that from  
4 2011 through 2015, Staff has identified an average of 23 high risk violations and 26  
5 other risk violations. Does Corning agree?

6 A. No. First, Corning's records were not under the Commission's pipeline safety  
7 regulatory requirement in 2011. The requirement for a Safety Regulation NRA was  
8 implemented for the first time as a high risk code adjustment only in Case 11-G-0280,  
9 effective April 20, 2012, and was not retroactive to 2011 records. To further  
10 strengthen that point, Staff's 2011 records audit letter did not contain a break out of  
11 what were high risk code section violations. Additionally, Corning disagrees with the  
12 averages Staff identified. If the 2011 records audit were considered (which it should  
13 not, since, as discussed, it was not part of the requirement) Corning believes its five  
14 year average of high risk occurrences is 19 and that its five year average of other risk  
15 occurrences is 18. Without the 2011 records included, Corning believes that its four  
16 year average of high risk occurrences is 15 and its four year average of other risk  
17 occurrences is 18. These are considerably lower than what Staff had identified.

18 Q. The Staff Safety Panel expresses concern in its testimony on Page 37, lines 11-17,  
19 with Corning's compliance with the Commission's pipeline safety regulations.  
20 Further on in its testimony, on Page 42, lines 13-24 continued on Page 43, lines 1-4,  
21 Staff recommends to maintain the 2017 threshold that for each of the first 15 "high  
22 risk" and "other risk" violations, Corning would owe one-half and one-ninth of a pre-  
23 tax basis point respectively to customers. For each "high risk" and "other risk"

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1 violation in excess of 15, one pre-tax and one-third of a pre-tax basis point

2 respectively would be owed to customers. Does Corning agree?

3 A. No. In light of the fact that Corning's average violations of safety regulations is less  
4 than Staff's estimate, the Company requests that the threshold be maintained at the  
5 2016 level of 20 instead of 15.

6 Q. The Staff Safety Panel states in its testimony on Page 46, lines 5-8 and 20-24, Page 47,  
7 lines 1-8, that according to 16 NYCRR Part 255.615(c) covering "Emergency Plans",  
8 natural gas utilities are required to offer training annually to volunteer fire  
9 departments. This training is meant to cover scenarios where both the Company and  
10 fire department jointly interact. The Panel further recommends that the Company  
11 conduct drills, provide hands-on activities and facilitate workshops with a review of  
12 processes and procedures that would be used during an incident. Staff also  
13 recommends that Corning develop a plan to improve its fire department first  
14 responders training program, with a cost estimate and a proposal for cost recovery, in  
15 its rebuttal testimony. Staff recommends that Corning work with neighboring utilities  
16 that have a robust first responder training program for sharing their training facilities,  
17 including on-line training. Does the Company agree?

18 A. First to better explain what Corning currently does for fire department training, the  
19 following is a more detailed explanation of this program:

- 20 • The Company mails all fire departments within our franchise area an annual letter  
21 offering onsite training.
- 22 • The training contains: Natural Gas Safety, Properties of natural gas, Carbon  
23 Monoxide, Odorant basic response knowledge, Transmission and distribution  
24 pipeline working knowledge of CNG, Woodhull, and Corning Incorporated

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1 owned distribution systems (including diameters, operating pressures, services,  
2 valves (mainline, curb, and riser), meters, regulator and meter stations, relief  
3 valves (what it means if they are relieving gas), line markers and test stations.  
4 Training also includes: Discussion regarding type of CGI the fire department is  
5 using, level of training they have on how to use it and reading scale; Specific  
6 scenario training, emergency contact information, communication methods  
7 between the Company and fire departments during emergencies (provide  
8 Company radio frequencies); Discussion of what the expectations are between the  
9 two entities in the event of an emergency.

10 As can be seen, the Company does provide a comprehensive training program to  
11 our fire departments. The Company is committed to improving and strengthening  
12 its program. Therefore, Corning believes that an effective first responders training  
13 program will require that we spend approximately \$88,000 (see Exhibit \_\_\_\_  
14 (MJC-R-1)). This estimate includes the construction of Corning's own training  
15 facility (i.e., not utilizing neighboring utilities training facilities as recommend by  
16 Staff). The nearest utility-owned hands-on natural gas training facility is in  
17 Johnson City, NY which is 80 miles from the Corning office. The majority of our  
18 fire departments are volunteer and we believe that requiring their members to  
19 travel 160 miles round trip for training would be a burden. Asking a group of  
20 volunteers to train on their own time is one thing; but to have them travel two or  
21 more hours to do so would significantly reduce attendance. We believe that, in  
22 order to assure that we get proper training to the first responders in our area, it  
23 would be best to have a local facility.

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1 Q. The Staff Safety Panel recommends in its testimony on Page 49, lines 17-26, that  
2 Corning develop a plan for the deployment of residential methane detectors within its  
3 service territory. Does Corning agree?

4 A. No. Corning believes that residential methane detectors would enhance the safety of  
5 our customers. However, in Staff's response to Corning's interrogatory CNG/DPS-  
6 27, it was stated that, as part of a deployment program, Corning is to actually perform  
7 the installation of each methane detector in the residence. Corning has a serious  
8 concern. The Company does not believe it would be prudent for its employees or  
9 contractors to be responsible for installing the methane detectors in its customers'  
10 homes. First, many of these detectors need to be plugged into a 120V outlet (with a  
11 battery back-up). If an outlet is not present at the proper location for the detector, the  
12 Company should not be expected to install an electrical outlet. Second, for effective  
13 operation, these detectors must be installed in the proper location in the home. Were  
14 Corning employees or Company contractors to install this detector in the incorrect  
15 location and an incident occurred, the Company may be held liable. Third, once  
16 installed, the customer is likely to consider this device as a Company-owned piece of  
17 equipment and contact us for general maintenance and upkeep such as battery  
18 changes, cleaning, etc. This would be a service that the Company is not prepared to  
19 provide. Fourth, as we have reiterated throughout our rebuttal testimony, resources  
20 are an issue for Corning. Requiring this Company to install residential methane  
21 detectors only places greater strain on those resources. Lastly, Corning believes that  
22 there remain questions as to the viability of the current methane detectors available on  
23 the market. Staff itself acknowledged that research and testing are continuing to  
24 assure the detectors' effectiveness. We fail to see how it is appropriate for Corning to

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1 offer a product that is not ready for commercial use. Corning sees no basis for  
2 entering into a deployment plan until these issues are resolved.

3 Q. The Staff Safety Panel recommends in its testimony on Page 51, lines 12-14, that  
4 Corning make an effort to include the 1950s vintage pipe in its LPP replacement  
5 model as a priority. Does Corning agree?

6 A. Corning does make the 1950s pipe a priority in its replacement program. In the  
7 Company's Risk Based Assessment program, the 1950s pipe has the highest numerical  
8 ranking in the Facility Material category. Therefore, the 1950s vintage pipe receives a  
9 higher rank and would be replaced sooner than other pipe categories.

10 Q. The Staff Safety Panel recommends in its testimony on Page 52, lines 14-19, that the  
11 Company will be eligible to achieve a Positive Revenue Adjustment ("PRA") of 4  
12 basis points for reducing the total damage rate below 1.50 per 1,000 one-call tickets in  
13 any calendar year. Does Corning agree?

14 A. Yes, Corning takes no exception to this recommendation.

15 **STAFF GIO PANEL**

16 Q. The Staff GIO Panel recommends in its testimony on Page 7, line 9-12, that Corning  
17 use a two percent year-to-year construction escalation factor on unit costs in its capital  
18 budget process. Does the Company agree?

19 A. The Company takes no issue with this and will use a two percent escalation factor for  
20 future capital budgets.

21 Q. The Staff GIO Panel details in its testimony, on Pages 8 and 9, the reasons why  
22 Corning should utilize a white paper format for all capital projects and programs, to  
23 file updated white papers annually with the Secretary and to provide these white  
24 papers to Staff in its next rate filing as a separate exhibit. Does Corning agree?

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1 A. Corning does see some benefit to completing documentation for each project and/or  
2 program to use as a means for documenting why a project was created and justified.  
3 Staff indicates in its testimony (p. 9) that, “a white paper will provide the basis for the  
4 monetary requirements needed to meet the proposed project goals and to better  
5 implement cost control.” Staff also states that “developing and utilizing white papers  
6 will assist the Company in prioritizing work and improving its strategic planning.” As  
7 I’m sure the GIO Panel is aware, a large portion of the Company’s Capital Budget is  
8 committed to mandated projects such as main and service replacements. These main  
9 and service replacement projects are prioritized by a separate risk based assessment  
10 system already in place. The Company’s capital project strategic planning is already  
11 dictated by the PSC requirements for systematic replacement. Therefore, these  
12 projects are planned and prioritized before the white paper stage will occur. The  
13 Company will utilize a white paper program, but it may not carry the benefits to the  
14 Company and its customers that Staff believes it will.

15 With regard to the Staff requirement that the Company file its white papers annually  
16 with the Secretary, Corning does not see the benefit in doing this. There is no  
17 compelling reason to continuously burden the Company with these types of  
18 requirements that provide little benefit and require additional work for an already  
19 overburdened Company staff.

20 Q. The Staff GIO Panel recommends in its testimony on Page 14, line 15-18, that the  
21 Company use a three year average of actual dual main footage installation of 6,800  
22 feet in Project ID 3.2 of its Capital Budget. Does Corning agree?

23 A. While Corning does agree with Staff that the amount of dual main in the budget could  
24 be adjusted, we would like to change the number to something different from Staff’s

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1 recommendation. Corning has installed 4,700 feet of dual main in 2016. Adding that  
2 to the 5,700 feet installed in 2014, 12,300 feet installed in 2015 the new three year  
3 average is 7,600 feet of dual main.

4 Q. Adopting the Company's revised three year average footage of dual main, what would  
5 be the revised level of capital expenditure for the Project ID 3.2?

6 A. Using the Gas Safety Panel's recommended target to replace 55,960 feet (10.6 miles)  
7 of main per year and adding the revised total of dual main of 7,600 feet results in a  
8 total of 63,560 feet of new main to be installed each year. Multiplying the agreed  
9 upon unit cost of \$35 per foot yields a revised budget for Project ID 3.2 of \$2.22  
10 million for CY 2017 and 2018.

11 Previously, the Company has requested that this main replacement target be reduced to  
12 51,744 feet (9.8 miles), which satisfies the Gas Safety Panel's ten year replacement  
13 program. Adding the 7,600 feet of dual main and multiplying by the \$35 per foot unit  
14 cost produces a preferred budget for project ID 3.2 of \$2.08 million for CY 2017 and  
15 2018.

16 Q. The Staff GIO Panel recommends in its testimony on Page 16, line 20-24 and Page 17,  
17 line 1, that the unit cost for Project ID 4.5 (Line 15) be reduced to \$170 per foot based  
18 on an average unit cost provided by Corning's response to DPS-226. This reduced the  
19 budget for Project ID 4.5 to \$900,000. Does Corning agree?

20 A. Yes. Corning accepts this revision.

21 Q. The Staff GIO Panel recommends in its testimony on Page 17, line 4-6, that Corning  
22 utilize a unit cost of \$80 per foot based on an average of historic actual unit costs.  
23 Does the Company agree?

24 A. Yes. Corning will accept \$80 per foot for Line 6 construction.

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1 Q. The Staff GIO Panel recommends in its testimony on Page 17, line 6-8, that the  
2 revised unit cost of \$80 per foot be multiplied by the 2,460 feet (0.5 miles) target for  
3 the 2017 replacement of a segment of Line 6. Does Corning agree?

4 A. No. Corning is mandated by the PSC to replace a minimum of ½ mile of Line 6 per  
5 year. However, the proposed segment to be replaced in 2017 is 3,500 feet. One end  
6 of the new PE segment will tie into a previously replaced segment, the other end into a  
7 remaining segment of Line 6. Including the increased footage (860 feet) allows the  
8 removal of a segment of the line containing multiple leaks. Corning requests that the  
9 project length be increased to 3,500 feet and that the budget amount be adjusted  
10 accordingly.

11 Q. The Staff GIO Panel recommends in its testimony on Page 18, line 4-7, that Corning  
12 establish a procedure to track unit costs for each project. Does the Company agree?

13 A. Yes. We will have a procedure in place by January 1, 2018.

14 Q. The Staff GIO Panel recommends in its testimony on Page 19, line 10-12, that  
15 Corning adopt a unit cost of \$1,056 per service for Project ID 1.1 New Services. Does  
16 Corning agree?

17 A. No. The unit cost calculated by Staff of \$1,056 will not cover the cost of a new  
18 service installation. This amount is below our recent contract costs for service  
19 installations which is just the labor component. I may not be able to provide precise  
20 documentation for the \$2,500 unit cost shown in the capital budget; but, based on the  
21 costs we have experienced, this is much closer to actual than what Staff has estimated.  
22 Using the number provided by Staff would cause a serious under-budget situation.  
23 Please refer to Exhibit \_\_\_\_ (MJC-R-2) which contains contract pricing sheets from  
24 two of our 2016 bids. These show the pricing that our contractors are currently

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1 charging for service installation. With material and Company Inspectors included, the  
2 average price for service installation is \$2,430. Corning requests that Staff allow the  
3 \$2,500 unit cost to remain.

4 Q. The Staff GIO Panel recommends in its testimony on Page 20, line 8-16, that Corning  
5 adopt a total cost of \$190,000 to install new main extensions for Project ID 3.1 New  
6 Installations. Does Corning agree?

7 A. No. As can be seen in Exhibit \_\_\_ (MJC-R-2), the two unit prices for 2” contract  
8 main installation from the two bids are \$28.00 per foot and \$46.38 per foot. This is  
9 installation labor only; no material costs are included. Material costs will be  
10 approximately \$2.00 per foot. Averaging the two unit prices, adding \$2.00 per foot,  
11 and multiplying by 7,500 (75 Customers X 100 Ft per customer) yields \$292,500.  
12 Corning requests that Staff allow the \$280,000 cost to remain.

13 Q. The Staff GIO Panel recommends in its testimony on Page 22, line 1-3, that Corning  
14 eliminate the budget item for Project ID 8.5 Odorizer Removal Cost and move  
15 \$40,000 to Corning’s O&M budget. Does Corning agree?

16 A. Yes. The \$40,000 will be removed from the Capital Budget and included in the O&M  
17 budget.

18 Q. The Staff GIO Panel recommends in its testimony on Page 22, line 22-24 and Page 23,  
19 lines 1-2, that Corning replace only two small vehicles per year. Does Corning agree?

20 A. No. Corning believes that replacing only two vehicles per year is not prudent.  
21 Because we must respond to gas emergencies on a 24/7 basis, Corning believes it is  
22 necessary to have and maintain the highest standard possible, especially regarding  
23 vehicles that are integral to ensuring the safety and reliability of our system. It would

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1 be an untenable situation to have a vehicle malfunction and delay our response in an  
2 emergency.

3 **OTHER MATTERS**

4 Q. Do you have any other matters you wish to discuss that are relevant to the subject  
5 matter of the Staff Panels' testimony?

6 A. Yes. Since Case 05-G-1539, we have been required to submit a monthly Leak Repair  
7 Status Report to the Secretary. This report contains system leak survey status,  
8 quantity of leaks discovered, quantity of leaks repaired, and quantity of main and  
9 services replaced since the last report. Corning would like to discontinue the  
10 preparation and filing of this report.

11 Q. Why do you propose eliminating the report?

12 A. This report was required during a time in the Company's history when system  
13 maintenance was minimal, leak repairs were virtually non-existent and the number of  
14 leaks in the Corning system were much greater. None of these conditions exist today.  
15 Since the time this report was first required, we have replaced 90 miles of main,  
16 replaced almost 5,000 services and repaired nearly 3,000 leaks. With the Company's  
17 current leak repair trajectory and facility replacement program, we will soon be  
18 maintaining a small to non-existent leak backlog. We respectfully submit that,  
19 although the report may have served a purpose in past years, it is now obsolete and, as  
20 a matter of efficiency, should now be eliminated.

21 Q. Does that complete your rebuttal testimony at this time?

22 A. Yes, it does.