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August 28, 2014

Sharla Dillon  
Tennessee Regulatory Authority  
502 Deaderick Street  
4<sup>th</sup> Floor  
Nashville, TN 37243

Re: Application of B&W Pipeline, LLC for a Certificate of Convenience and  
Necessity to Operate a Natural Gas Pipeline System in Pickett, Morgan &  
Fentress Counties - Direct Testimony of Rafael E. Ramon on behalf of B&W  
Pipeline, LLC  
Docket No. 13-00151

Dear Sharla:

Please accept the attached, direct testimony of Rafael Ramon as an exhibit to the above-captioned application.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:   
Henry Walker

HW/mkc  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

APPLICATION OF B&W PIPELINE, )  
LLC FOR A CERTIFICATE OF )  
CONVENIENCE AND NECESSITY TO )  
OPERATE A NATURAL GAS ) Docket No. 13-00151  
PIPELINE SYSTEM IN PICKETT, )  
MORGAN & FENTRESS COUNTIES )  
)

**DIRECT TESTIMONY**  
of  
**RAFAEL E. RAMON**

ON BEHALF OF  
**B&W PIPELINE, LLC**

*August 27, 2014*

1    ***Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND***  
2                   ***OCCUPATION FOR THE RECORD.***

3    A1.    My name is Rafael E. Ramon. My business address is 728 S. Jefferson Avenue,  
4            Cookeville, TN 38501. I am the Controller for Enrema, LLC (“Enrema”)  
5            Enrema is an affiliate and service company for B&W Pipeline, LLC (“B&W  
6            Pipeline” or “the Company”).

7  
8    ***Q2. PLEASE PROVIDE A SUMMARY OF YOUR BACKGROUND AND***  
9                   ***PROFESSIONAL EXPERIENCE.***

10   A2.    A detailed description of my educational and professional background is provided  
11            in Attachment RER-1 to my testimony. Briefly, I have a Bachelors degree in  
12            Civil Engineering, and a Masters degree in Business Administration. I have been  
13            employed by Enrema since 2011.

14  
15   ***Q3. ON WHOSE BEHALF ARE YOU TESTIFYING?***

16   A3.    I am testifying on behalf of B&W Pipeline.

17  
18   ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***  
19                   ***PROCEEDING?***

20   A4.    The purpose of my testimony is to present information to the TRA on the  
21            managerial, financial, and technical capabilities of B&W Pipeline.

22  
23   ***Q5. PLEASE DESCRIBE B&W PIPELINE.***

1 A5. B&W Pipeline is a limited liability company authorized to conduct business in  
2 Tennessee and is a wholly-owned subsidiary of FIR Energy. The pipeline now  
3 owned by B&W Pipeline was formerly owned by Gasco Distribution System  
4 which was the parent company of Titan Energy Group, Inc. As part of the Gasco  
5 system, the pipeline operated pursuant to Gasco's certificate. Following the  
6 bankruptcy of Gasco, the pipeline was separated from Gasco and sold to B&W  
7 Pipeline. B&W Pipeline's system is approximately fifty miles long and extends  
8 through parts of Pickett, Morgan and Fentress counties.  
9

10 ***Q6. PLEASE DESCRIBE THE TERRITORY THAT B&W PIPELINE***  
11 ***PROPOSES TO SERVE.***

12 A6. At this time, B&W Pipeline only intends to provide transportation service to  
13 Navitas TN NG LLC ("Navitas") which owns the natural gas distribution system  
14 formerly owned by Gasco.  
15

16 ***Q7. DOES A NEED PRESENTLY EXIST FOR AN INTRASTATE NATURAL***  
17 ***GAS PIPELINE IN PICKETT, MORGAN AND FENTRESS COUNTIES?***

18 A7. Yes. All natural gas ultimately sold to customers of Navitas must flow through  
19 B&W Pipeline.  
20

21 ***Q8. DOES B&W PIPELINE POSSESS THE MANAGERIAL CAPABILITIES***  
22 ***TO OPERATE A NATURAL GAS PIPELINE?***

1 A8. Yes. The officers of B&W Pipeline and its affiliates have broad experience  
2 working with natural gas systems. In addition, B&W Pipeline has engaged  
3 various legal, accounting and regulatory experts to advise and assist it with the  
4 managerial responsibilities of operating a natural gas pipeline in Tennessee.  
5

6 ***Q9. DOES B&W PIPELINE POSSESS THE FINANCIAL CAPABILITIES TO***  
7 ***OPERATE A NATURAL GAS PIPELINE?***

8 A9. Yes. The financial statements that were provided along with our application  
9 show that FIR Energy, the parent company of B&W Pipeline, controlled over \$6  
10 million in assets at December 31, 2012. In addition, B&W Pipeline is already  
11 built and operating and therefore requires no new funding for its completion.  
12

13 ***Q10. DOES B&W PIPELINE POSSESS THE TECHNICAL CAPABILITIES TO***  
14 ***OPERATE A NATURAL GAS PIPELINE?***

15 A10. Yes. The officers of B&W Pipeline and its affiliates have broad technical  
16 experience with the design and maintenance of natural gas pipeline systems.  
17

18 ***Q11. HAS B&W PIPELINE SUBMITTED PROPOSED TARIFFS ALONG***  
19 ***WITH ITS APPLICATION?***

20 A11. No. In lieu of a tariff, B&W Pipeline has negotiated a special contract with  
21 Navitas. A copy of this special contract is included along with our application.  
22

1    ***Q12. IS B&W PIPELINE AWARE OF THE TRA'S PIPELINE SAFETY***  
2            ***REQUIREMENTS?***

3    A12. Yes. B&W Pipeline will adhere to all of the TRA's safety requirements.  
4

5    ***Q13. HAS B&W SUPPLIED THE TRA WITH THE DETAILS OF ITS***  
6            ***OPERATIONS?***

7    A13. Yes. B&W Pipeline has supplied the TRA Staff with all of the information that it  
8            has sought in its two formal data requests in this docket. In addition, B&W  
9            Pipeline has provided follow-up information to the TRA Staff through informal  
10           discovery responses.  
11

12   ***Q14. DOES THIS CONCLUDE YOUR TESTIMONY?***

13   A14. Yes, it does.

ATTACHMENT RER-1

Rafael E. Ramon Vitae

# RAFAEL E. RAMON

12631 NW 32ND PLACE  
SUNRISE, FL-33323

Telephone: 954-835-5712 / 561-306-6866  
rafaelramondelosrios@gmail.com

## EDUCATION

### FLORIDA INTERNATIONAL UNIVERSITY (FIU)

Miami, FL

Master in Business Administration (IMBA)

Aug 2011

Full time, intensive International MBA program; GPA: 3.77/ 4.00

### UNIVERSIDAD CATOLICA ANDRES BELLO (UCAB)

Caracas, Venezuela

B.S. in Civil Engineering

Feb 2004

Construction Site Safety Thesis published in the University's engineering journal

## EXPERIENCE

### ENREMA, LLC

Miami, FL - Cookeville, TN

#### Controller

October 2012 – Present

- Responsible of the entire administrative function of the Company
- Participate in the analysis and selection of prospective investment alternatives
- Perform performance evaluations and budget control for all undergoing projects and sub-projects
- Participate in the sourcing of required materials and in the selection of contractors and service companies

### ENREMA, LLC

Miami, FL - Cookeville, TN

#### Assistant Controller

May 2011 – October 2012

- Actively participated in the design and implementation of all the internal control policies of the Company. Proposed and applied changes to policies in place and increased efficiency in all billing, paying and collecting processes. Times were reduced by half and information was always readily available.
- Initially conducted all bookkeeping of six interrelated companies. Then trained and supervised a bookkeeper for the purpose while remained available to assist with the recording of complex transactions.
- Participated in the re-design of the business structure. Proposed and helped conduct changes in the business model that lead to greater tax efficiencies. Coordinated and implemented all tax compliance matters of six interrelated companies. Coordinated all liability insurance matters.
- Permanently prepared diverse kinds of ad-hoc financial reports of interest to management and shareholders. Prepared monthly consolidated financial statements of all six companies of the project.
- Assisted management in the creation of a model to constantly value each company and the project.
- Assisted management in all payroll related matters, including employee benefits coordination.
- Conducted all recruiting efforts for the Company, including relationships with outsourced recruiters, College Career Management Centers as well as directly through online resources.
- Coordinated all operative legal matters in conjunction with the Company's legal counsel.
- Acted as an interpreter on behalf of management. Translated manuals and SOP's manuals from Spanish.

### PROYECTOS 2 TORRES, C.A.

Caracas, Venezuela

#### Chief Project Supervisor and Logistics Coordinator

2005 – 2010

- Supervised and managed the construction of projects in execution by the firm: residential communities, residential buildings, commercial and educational facilities.
- Assembled and led the team that conducted the construction of the first two stages of the "Basic Sciences University" (Caracas, Venezuela)
- Directed the elaboration of project estimates, budgets and blueprints; Handled the hiring and management of engineers and sub-contractors as well as the acquisitions of construction material, tools and equipment
- Successfully handled the Firm's relationships with Labor Unions, and all levels of Government involved

### FREE LANCE

Caracas, Venezuela

#### Project manager and contractor

2004 – 2005

- Managed the construction of a luxury family residence. (6750 Sf.) Duties included every aspect of the construction process. Procurement of construction materials and tools. Completed the work on schedule as required from the Client

### PROYECTOS 2 TORRES, C.A.

Caracas, Margarita; Venezuela

#### Internship: Assistant to Resident Engineers for diverse projects

2002 – 2004

- Assistant to chief project manager in the construction of a residential complex composed of 1300 single family homes. The project was completed on schedule in two one-year stages



**OTHER**

- Languages: Fluent in English, Danish and Spanish (Native). Advanced Italian, conversational French and Portuguese
- Computer Skills: Proficient in the use of MS Office Suite, AutoCAD, MS Project, Intuit Quickbooks Enterprise
- Activities:
  - YFU International Exchange Student Denmark 1997-1998
  - Co-founder of "Hagamos Algo" (Venezuelan Community Service NGO),
  - Member of the Venezuelan delegation for the 2004 edition of the American Airlines Leadership Program for the Americas. San Jose, Costa Rica
  - Assistant Instructor of Descriptive Geometry at Andres Bello Catholic University from 2001 to 2004