

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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PUCO

In the Matter of the Application of Ohio Edison	:	
Company, The Cleveland Electric Illuminating	:	Case No. 07-551-EL-AIR
Company and The Toledo Edison Company for	:	Case No. 07-551-EL-ATA
Authority to Increase Rates for Distribution	:	Case No. 07-553-EL-AAM
Service, Modify Certain Accounting Practices and	:	Case No. 07-554-EL-UNC
for Tariff Approvals.	:	

**PREFILED TESTIMONY
OF
DUANE A. ROBERTS
SERVICE MONITORING & ENFORCEMENT DEPARTMENT
RELIABILITY & SERVICE ANALYSIS DIVISION
UTILITIES DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

STAFF EXHIBIT _____

January 30, 2008

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

2 A. My name is Duane A. Roberts. My business address is 180 E. Broad
3 Street, Columbus, Ohio 43266-0573.

4

5 2. Q. By who are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO).

7

8 3. Q. What is your current position with the Public Utilities Commission of Ohio
9 and what are your duties?

10 A. I am a Utility Special 3 in the Non-Competitive Electric Section within the
11 Reliability and Service Analysis Division of the Service Monitoring and
12 Enforcement Department. My duties are to develop, implement, and
13 enforce service quality and consumer protection policies and rules for non-
14 competitive electric service. My role in rate cases, commission-ordered
15 investigations, and tariff reviews is to analyze their impact on customers
16 and recommend policies and practices that ensure quality, safe, and reliable
17 service, fair treatment of customers, and consumer protection.

18

19 4. Q. Would you please state your background?

20 A. I am a 1984 graduate from DeVry Institute of Technology in Columbus
21 with an Associate of Science Degree in Computer Programming and a
22 Bachelor of Science Degree in Computer Science for Business. After

1 graduation, I was employed by the Ohio Exposition Commission as the
2 Commission's Fiscal Officer. I began my employment with the Public
3 Utilities Commission of Ohio in October 1984 as a Utility Examiner I in
4 the Accounts and Valuation Division of the Utilities Department. In June
5 1989, I transferred to the Information Systems Division of the Administra-
6 tion Department as a Programmer/Analyst 3. In September 1990, I trans-
7 ferred to the Accounts and Audits Division of the Utilities Department in
8 the same capacity. In December 1998, I transferred to the Electric Section
9 in the Compliance Division of the Consumer Services Department as a
10 Management Analyst Supervisor 2. In March 2000, I transferred to the
11 Reliability and Service Analysis Division of the Service Monitoring and
12 Enforcement Department at my present position. In addition and concu-
13 rent with my employment with the Commission, I served as a Computer
14 Programming Instructor during the evening sessions at the Circleville
15 Branch of Bliss College from January 1986 until September 1986.

16
17 5. Q. What is the purpose of your testimony in this proceeding?

18 A. The purpose of my testimony is to respond to Ohio Edison's objections
19 related to the section of the Ohio Edison Staff Report titled, "Electric
20 Service Performance Reliability Assessment" that begins on Page 72 and
21 ends with the first paragraph on Page 79. Specifically, I will address Ohio
22 Edison's SMED Objections 12, 13, 14 and 15.

1 6. Q. To address the Company's SMED Objection 12, will you briefly describe
2 the format and contents of the section of the Ohio Edison Staff Report
3 titled, "Electric Service Performance Reliability Assessment"?

4 A. Yes. Staff begins by describing the duties of the Reliability and Service
5 Analysis Division (RSAD) followed by a description of the requirements of
6 Electric Service and Safety Standards, Rule 4901:1-10-10, O.A.C. (ESSS
7 Rule 10) titled, "Distribution System Reliability". This section continues
8 with a discussion of the Company's system performance for the years 2000
9 through 2006 illustrated by using the system average interruption frequency
10 index (SAIFI) and customer average interruption duration index (CAIDI).
11 Staff reported that the Company missed its SAIFI target for the years 2004
12 through 2006 with an average interruption frequency that exceeds its target
13 level.

14
15 On Pages 76 through 79, Staff presented the results of its analysis per-
16 formed on the Company's outage data for the years 2004 through 2006 that
17 determined the leading causes of its below-target SAIFI performance and
18 identifying seven primary causes and listing these causes in the order of
19 their impact on performance. Staff provided the results of further analysis
20 of those primary causes where the Company exercises some control by per-
21 forming additional maintenance or initiating replacement programs to
22 reduce or prevent customer service outages. Staff presented further analy-

1 sis on two of the top primary outage causes, equipment failures and line
2 failures, identifying the specific types of equipment and line components
3 that failed.

4
5 For each of the outage causes addressed, Staff presented the actions the
6 Company plans to take or is presently taking to mitigate the outage cause.
7 To reduce the Company's exposure to certain outage causes even further,
8 Staff presented recommendations that would enhance the Company
9 reported actions.

10
11 7. Q. In addressing the Company's SMED Objection 13, please clarify the Staff's
12 position on the Company's coding of certain outage causes as "Unknown".

13 A. Staff agrees with Company Witness Susan Lettrich in that the reporting
14 requirements as recommended in the Staff Report for outages causes coded
15 as "Unknown" are overly burdensome on the Company, therefore, the Staff
16 no longer supports the reporting requirement recommendation. However,
17 Staff still sees the importance of the Company thoroughly investigating all
18 service interruptions to determine the root cause. Staff recommends that
19 the Company be required to maintain adequate documentation of all actions
20 it takes to determine the root cause of all service interruptions and to track
21 and trend this data for patterns (i.e. possible abuse, geography, facility spe-
22 cific, technology specific, weather specific, etc.).

1 8. Q. To address the Company's SMED Objection 14, please explain Staff's rec-
2 ommendation to improve the Company's vegetation clearance within the
3 first protection zone on the backbone or mainline of its distribution circuits.

4 A. For the years 2004 through 2006, the outage cause code "Trees/Not
5 Preventable" was the fourth highest cause of service outages on the Com-
6 pany's system. The Company uses this outage cause code when vegetation
7 [danger/weak trees or overhanging vegetation above the conductors and/or
8 equipment/facilities] located outside of its rights-of-way causes momentary
9 and/or sustained service interruptions on its system. Staff Data Request #
10 22(1)(d) asked if the Company tracks and records whether "Trees/Not Pre-
11 ventable" caused outages were caused by overhanging branches/limbs from
12 outside the right-of-way or by trees/branches/limbs [other than overhang]
13 and if so please provide Staff with the following information by respective
14 category:

15
16 iv. Total unique projects by circuit [total number of outages]

17 v. Total number of customers affected

18 vi. Total number of customer minutes interrupted
19

20 The Company responded to this data request by reporting, "Data is not
21 available concerning overhanging branches/limbs from outside the right of

1 way or by trees/branches/limbs [other than overhang] falling into the Com-
2 pany's equipment/facilities.

3
4 It is the Company's failure to maintain data on Trees/Not Preventable
5 caused outages that prompts the Staff's recommended vegetation clearance
6 practices to enhance the Company's reliability. The Staff continues to sup-
7 port its recommendation.

8
9 9. Q. In addressing the Company's SMED Objection 15, please clarify the Staff's
10 recommendation that the Company should continue to install animal
11 guarding on all of its overhead line equipment and substation equipment
12 protecting all exposed energized components from animal contact.

13
14 A. Staff agrees with Company Witness Lettrich that not all of the Company's
15 exposed energized components require animal guarding. For instance,
16 when adequate animal guarding solutions are installed and maintained
17 around the perimeter of exposed energized substation components then
18 there is no need to install animal guarding on each of those individually
19 exposed substation components. Staff further agrees that if exposed ener-
20 gized components are not designed to support animal guarding, then the
21 Company should not be required to install animal guarding to protect those
22 components.

Because “Animal” caused outages was one of the primary causes of sustained service outages on the Company’s system during the period 2004 through 2006, the Staff continues to recommend that the Company install animal guarding solutions on its system where practical.

10. Q. Does this conclude your testimony?

A. Yes.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Duane A. Roberts, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 30th day of January, 2008.



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