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June 16, 2009

*Via Federal Express  
and Facsimile (614-466-0313)*

Ms. Renee J. Jenkins  
Director, Administration Department  
Secretary to the Commission  
Docketing Division  
The Public Utilities Commission of Ohio  
180 Broad Street  
Columbus, OH 43215-3793

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2009 JUN 16 PM 4:17  
PUCO

Dear Ms. Jenkins:

Re: *Direct Expert Testimony of Kimberly K. Vujas  
Filed on Behalf of Ohio Edison Company  
Susan Aikey Walker v. Ohio Edison Company  
Case No. 08-1203-EL-CSS*

Enclosed for filing, please find the original and twelve (12) copies of the *Direct Expert Testimony of Kimberly K. Vujas Filed on Behalf of Ohio Edison Company* regarding the above-referenced case. Please file the enclosed *Testimony*, time-stamping the two extras and returning them to the undersigned in the enclosed envelope.

Thank you for your assistance in this matter. Please contact me if you have any questions concerning this matter.

Very truly yours,

Ebony L. Miller

ELM/jhp

Enclosures

cc: Parties of Record

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**SUSAN AIKEY-WALKER,**

**Complainant,**

V.

OHIO EDISON COMPANY,

**Defendant.**

**CASE NO. 08-1203-EL-CSS**

**DIRECT EXPERT TESTIMONY OF KIMBERLY K. VUJAS**

**FILED ON BEHALF OF OHIO EDISON COMPANY**

## Company Exhibit 1

Ebony L. Miller of

**Ebony L. Miller (077063)**

**Attorney**

**FirstEnergy Service Company**

76 South Main Street

Akron, Ohio 44308

**Phone: 330-384-5969**

Fax: 330-384-3875

Attorneys for Ohio Edison Company

1       **Q: Please state your name and occupation for the record?**

2       **A: My name is Kimberly K. Vujas, and I am an employee of FirstEnergy Service**  
3       **Company ("FirstEnergy").**

4       **Q: How long have you worked for FirstEnergy?**

5       **A: I began my association with FirstEnergy in 2001 and have worked for certain**  
6       **FirstEnergy's affiliates, including Ohio Edison Company, which is also referred**  
7       **to as Ohio Edison, since then.**

8       **Q: What are your professional qualifications?**

9       **A. I am a supervisor at the FirstEnergy contact center in Akron, Ohio. I attended the**  
10       **University of Akron for 2 years, focusing on a Business Administration**  
11       **curriculum. I have also completed several FirstEnergy trainings courses dealing**  
12       **with our SAP computer system, analyzing customer accounts, leadership skills,**  
13       **and many other topics related to customer accounts and customer service. I am**  
14       **extremely familiar with the manner in which FirstEnergy trains its personnel to**  
15       **handle customer inquiries and analyze customer accounts. I am also extremely**  
16       **familiar with PUCO regulations and internal company policies and procedures as**  
17       **they relate to the complaint before the PUCO.**

18       After beginning my employment with FirstEnergy in 2001, I worked in the  
19       FirstEnergy contact center as a customer service representative where I handled  
20       customer phone inquiries and billing issues. I transitioned to the FirstEnergy  
21       contact center management team in April 2007 and was promoted to the position  
22       of Coordinator. I became responsible for overseeing the daily work of 14  
23       customer service representatives. In December 2007, I was promoted to the  
24       position of Supervisor at the FirstEnergy contact center. As a supervisor, I  
25       currently oversee the work of 15 customer service representatives. I also answer  
26       customer's escalated account issues and respond to informal inquiries from the  
27       OCC and PUCO. I work closely with the FirstEnergy compliance department to  
28       ensure timely and accurate responses to the OCC and PUCO. I also strive to  
29       ensure that Ohio Edison provides accurate and quality service to FirstEnergy  
30       customers.

31       **Q: Based upon your experience, what can you tell the Commission about Ohio**  
32       **Edison's Customer Service and Energy Delivery?**

33       **A: The FirstEnergy - Ohio Edison Customer Service/Contact Centers answer phone**  
34       **inquiries from our customers. Our representatives are trained to analyze customer**  
35       **accounts, follow PUCO regulations and internal company policies and**  
36       **procedures, and answer customer inquiries in a timely and accurate manner. Ohio**  
37       **Edison strives to provide our customer's with accurate and professional service.**

38       **Q: Now, let me direct your attention to the Complaint that brings us to hearing**

39 on June 23, 2009. Are you aware that Ms. Aikey-Walker filed a complaint  
40 with the Commission on November 3, 2008?

41 A: Yes. I am.

42 Q: Have you familiarized yourself with Complainant's Complaint?

43 A: Yes. As I understand Complainant claims (i) she was overcharged for service  
44 rendered from February 14, 2008 to April 2008, (ii) her meter was not read  
45 correctly; and (iii) her invoice did not properly reflect her supplier discount.

46 Q: Are you familiar with Ms. Aikey-Walker's usage and billing history?

47 A: Yes, I am.

48 Q: How does Ohio Edison record and track a customer's usage and billing  
49 history?

50 A: Ohio Edison, in its normal course of business, tracks customer usage and billing  
51 information in an electronic database referred to as SAP.

52 Q: Can historical usage and billing information be printed out and provided to a  
53 customer?

54 A: Yes.

55 Q: I am handing you what has been pre-marked Company's Exhibit 2. Can you  
56 please identify Company's Exhibit 2 for the record?

57 A: Yes. This document is an electronic print out from SAP containing a detailed  
58 account summary of usage and billing for customer Susan Aikey-Walker from  
59 5/03/2006 through 6/2/ 2008.

60 Q: Please explain this detailed account summary.

61 A: The detailed account summary provides a number of pieces of information,  
62 including but not limited to, the customers consumption, applicable rate, and  
63 billing amount.

64 Q: What was Ms. Aikey-Walker's applicable rate?

65 A: From approximately June 30, 1996 to July 2, 2007, Ms. Aikey-Walker was on  
66 Rate 11-B. From July 3, 2007 to January 1, 2008 service was not in Ms. Aikey-  
67 Walker's name. However, on January 2, 2008 service went back into Ms. Aikey-  
68 Walker's name but this time under Rate 10-A. Currently, service is in Ms. Aikey-  
69 Walker's name and she is served under Ohio Edison's Residential Rate.

70 Q: Based on your experience and analysis what have you observed with Ms.  
71 Aikey-Walker's account?

72 A. Generally, Ms. Aikey-Walker's account, like most customers with electric heat,  
73 tended to significantly increase during the winter months. Although, most  
74 recently it appears that she has curtailed her usage in the winter months usage still  
75 remains much higher than in the summer months.

76 Q. You mentioned Rate 11-B. What is the significance of that Rate?

77 A. Ms. Aikey-Walker is an all-electric customer which means Ohio Edison provides  
78 her electric and heating needs. Rate 11-B was an all electric rate offered up until  
79 12/31/2006.

80 Q. Why was Rate 11-B discontinued?

81 A. Rate 11-B was a discounted rate introduced at a time when there was only a  
82 limited competitive electricity market and the electric utility owned the generating  
83 plants. Since that time, the cost of producing and delivering electricity has  
84 increased dramatically. As a result, this discounted rate is no longer an accurate  
85 reflection of the true cost to provide the service. In addition, Rate 11-B was a  
86 declining block rate, which means that the rate decreased as the total consumption  
87 increased. This old rate did not encourage conservation and was eliminated.

88 Q. What was the practical effect of Ms. Aikey-Walker being on Rate 11-B?

89 A. Under 11-B, Ms. Aikey-Walker could have a relatively high consumption but still  
90 have a relatively low bill. For example, on 3/2/2007 Ms. Aikey-Walker had a  
91 consumption of 7327 kWh which billed at \$370.85. However, today, a customer  
92 with a consumption of 7327 kWh would pay approximately \$634.41.

93 Q. You mentioned that service went back into Ms. Aikey-Walker's name. What  
94 was the effect of service coming out of Ms. Aikey-Walker's name and then  
95 approximately 5 months later new service being put into Ms. Aikey-Walker's  
96 name?

97 A. A customer only qualifies for any given rate for the period in which the person is  
98 a customer. When Ms. Aikey-Walker discontinued her service she was no longer  
99 the customer of record. However, when Ms. Aikey-Walker re-applied for new  
100 service she was only eligible for then existing rates. Stated simply, Rate 11-B had  
101 been discontinued and was no longer available to new customers.

102 Q. What do you mean by "then existing rates"?

103 A. For example Rate 11-B expired on 12/31/2006, current customers under that rate  
104 were grandfathered-in, or stated differently were able to keep that same rate.  
105 However, the rate was no longer offered to new customers. When Ms. Aikey-  
106 Walker cancelled her service she in effect terminated her eligibility under the  
107 terminated rate.

108 Q. Are there any customers on Rate 11-B today?

109 A. No.

110 Q. You state that on January 2, 2008 service went back into Ms. Aikey-Walker's  
111 name under Rate 10-A, what is the significance of Rate 10-A?

112 A. Rate 10-A was the Standard Residential Rate. Customers under this rate did not  
113 receive a discount for having electric heat.

114 Q. In your expert opinion was Ms. Aikey-Walker overcharged for service  
115 rendered from February 14, 2008 to April 2008?

116 A. No. I reviewed Ms. Aikey-Walker's account. I examined her past consumption  
117 including, taking a close look at the February to April of 2008 time period. I  
118 reviewed the applicable rate in 2008 compared it to the applicable historic rate  
119 and I believe Ms. Aikey-Walker was billed appropriately.

120 Q. In Ms. Aikey-Walker's Complaint she states that she was out of town for the  
121 period of February 14, 2008 to April 2008. Please explain how consumption  
122 can remain high even though Ms. Aikey-Walker may not be in the house.

123 A. It is simple. Unless a customer takes affirmative steps to reduce usage,  
124 consumption remains relatively the same. For example, the water heater,  
125 refrigerator, air conditioner or furnace, lights, and other appliances and electronics  
126 still draw on energy,

127 Q. Is it your opinion that Ms. Aikey-Walker's consumption could be the same  
128 whether she is at home or out of town?

129 A. Yes.

130 Q. Could Ms. Aikey-Walker's meter have been misread?

131 A. No. Ms. Aikey-Walker's meter has been thoroughly tested. First, in response to a  
132 high bill complaint by Ms. Aikey-Walker on February 4, 2008, Ohio Edison  
133 dispatched a field representative to re-read her meter which was verified as  
134 accurate. And then subsequently, in response to a July 11, 2008 call from Ms.  
135 Aikey-Walker expressing additional concern with her bill and meter, Ohio Edison  
136 ordered a meter test. As part of the testing process, a new meter was installed at  
137 Ms. Aikey-Walker's property on July 14, 2008 and the old meter was removed  
138 from the property to be tested. The old meter was sent to the Company's meter  
139 testing lab for testing which was completed on July 15, 2008. The old meter  
140 tested at an accuracy rate of 99.90% which is well within the allowable limit, plus  
141 or minus 2% of 100% established by the Public Utilities Commission of Ohio  
142 ("PUCO").

143 Q. Did Ms. Aikey-Walker receive any written communication from the  
144 Company notifying her of the results of her meter test?

- 145 A. Yes. She received a letter from the Company
- 146 Q. I am handing you what has been pre-marked Company's Exhibit 3. Can you  
147 please identify Company's Exhibit 3 for the record?
- 148 A. Yes. This is a copy of the letter sent to Ms. Aikey-Walker on July 15, 2008  
149 notifying her of the results of her meter test.
- 150 Q. Was Ms. Aikey-Walker overcharged?
- 151 A. Based upon my training, experience, and analysis of Ms. Aikey-Walker's account,  
152 I can state with certainty that she was not overcharged or improperly billed.
- 153 Q. Ms. Aikey-Walker also alleges that her invoice did not properly reflect her  
154 supplier discount. Are you aware of this complaint?
- 155 A. Yes. As I understand, Ms. Aikey-Walker requested electric generation service  
156 from an alternative supplier. On February 7, 2008, Ohio Edison sent Mrs. Aikey-  
157 Walker a letter notifying her that her electric generation supplier would change on  
158 her next actual meter reading on March 4, 2008. As scheduled, at some point in  
159 the course of the business day of March 4, 2008, the Company switched Ms.  
160 Aikey-Walker's supplier. The billing period beginning March 5, 2008 reflects the  
161 supplier discount.
- 162 Q. So did Ms. Aikey-Walker timely receive her supplier discount?
- 163 A. Yes. The discount was applied the day after (first full business day) the account  
164 was transferred to the alternative supplier.
- 165 Q. Did Ohio Edison treat the Complainant different from any other customer?
- 166 A. No.
- 167 Q: Ms. Vujas, is there anything that you would like to add to your testimony?
- 168 A: Yes. Ohio Edison at all times complied with its policies and procedures, as well  
169 as its tariffs and the PUCO rules and regulations. In addition, Ohio Edison has  
170 worked diligently to answer all Complainant's questions and address each of her  
171 concerns.

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing Direct Expert Testimony of Kimberly K. Vujas filed on behalf of Ohio Edison Company was served by regular U.S. Mail, postage prepaid, to Susan Aikey-Walker, 1617 Harmony Road, Fairlawn, Ohio 44333, this 16th day of June, 2009.

Ebony L. Miller  
Ebony L. Miller  
Attorney