

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

FEDERAL INSURANCE COMPANY,
as subrogee of Genesis Healthcare System,

Complainant,

v.

OHIO POWER COMPANY d/b/a
AMERICAN ELECTRIC POWER
COMPANY, INC.

Respondent.

CASE NO.: 12-1750-EL-CSS

**COMPLAINANT FEDERAL INSURANCE COMPANY a/s/o GENESIS HEALTHCARE
SYSTEM SUPPLEMENTAL FILING OF DIRECT TESTIMONY OF RESPONDENT
OHIO POWER COMPANY d/b/a AMERICAN ELECTRIC POWER EMPLOYEE
DAVID SULLIVAN**

David Sullivan is employed as an Engineering Tech by the Respondent. Mr. Sullivan replaced the control panel which failed and caused the tap changer at the Linden Avenue substation to go into full boost. He worked with fellow employee Robert Hall in removing the failed control panel and replacing it with a new one. Prior to the date of the power surge incident on June 15, 2010, and on July, 28, 2008, Mr. Sullivan was a member of a crew of Respondent's employees which responded to the Linden Avenue substation to check for any problem with the load tap changer and they found that the load tap changer had been running excessively. During his deposition, Mr. Sullivan acknowledged that he kept his own job diary or field notes. His field notes were subsequently produced by the Respondent in this matter. The field notes document a series of problems with the load tap changers at the Linden Avenue substation.¹ He

¹ The notes are still being analyzed but they include notations relative to the Linden Avenue substation as follows: (1) " 6/06/08, Linden Ave LTC Problem, LR 65, 84X, 84Y, Possibly Bad Tested by Dave Peterson checking W. Lafayette for spare parts; (2) "7/21/08, Linden Ave – Bank #2 LTC runs lower occasionally, troubleshot system, possibly found 335I top switch w/controls 84/L to be out of adjustment, Linden Ave cont. went to new comestown [sic] to get 33S switch out of far rear TFR switched out for one @ Linden Avenue sys. works good"; (3) "08/07/08, Linden Ave – LTC controls removed & replaced, LTC control panel for new Becwidth [sic] need to write prints."

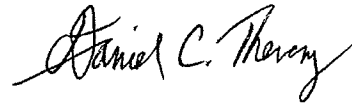
confirmed that his job duties and responsibilities include working on transformers. This includes work on load tap changers and control panels for load tap changers. This also includes the responsibility to perform regular maintenance and inspection on transformers and related parts and equipment. He did not know how often the transformers at the Linden Avenue substation have to be inspected and maintained. Mr. Sullivan also stated that he utilizes the ISIS substation inspection system computer software program which includes information about all aspects of the transformers. He utilizes the system and carries a laptop with him to do so. In describing the information and data inputted into the ISIS system, Mr. Sullivan stated that it did not include any information about measurement of the contacts on load tap changers for the transformers at the substations. He confirmed that contacts for the load tap changers will wear over time and that it is part of his job duties and responsibility to measure the contacts for load tap changers, but there is no separate field or database entry for recording the measurement in the ISIS system. Mr. Sullivan confirmed that the acceptable thickness when measuring the contacts for a load tap changer is found within the maintenance manual for the load tap changer. (General Electric Load-Tap-Changing equipment, Type LR-65, AEP079-AEP086). In particular, the manufacturer's maintenance manual requires that the contacts need to be replaced when they are quarter inch measured at the center. Mr. Sullivan also testified that he is required to note in ISIS when measurements require him to replace the load tap changer contacts. Mr. Sullivan also confirmed that the manufacturer's maintenance manual includes a recommended level of oil that needs to be in the load tap changer compartment, and that the information is included on the name plate for the equipment. It also is found in ISIS. His job duties and responsibilities also include checking the level of oil for the transformers during each inspection but he does not record the level. However, the ISIS database does not allow one to determine the level of oil for

the subject transformer and load tap changer involved in this incident on the date it was last inspected prior to the event.

See, Exhibit A attached hereto, Deposition of David Sullivan taken on January 9, 2013 at pages 4; 11-12; 15-16; 22; 27-28; 37; 39-40; 42-45; 46; 47-48; 51; 55-57; and 58-59.

Dated: June 17, 2013

Respectfully Submitted,

A handwritten signature in black ink, reading "Daniel C. Theveny". The signature is fluid and cursive, with the first name "Daniel" being more prominent than the last name "Theveny".

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EXHIBIT “A”

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Federal Insurance Company, :
as subrogee of Genesis :
HealthCare System, :

:
Complainant, :

vs. : Case No. 12-1750-EL-CSS

:
Ohio Power Company d/b/a :
American Electric Power :
Company, Inc., :

:
Respondent. :

DEPOSITION

of David L. Sullivan, taken before me, Valerie J. Sloas, a Notary Public in and for the State of Ohio, at the offices of American Electric Power Service Corporation, 1 Riverside Plaza, 29th Floor, Columbus, Ohio, on Wednesday, January 9, 2013, at 9:56 a.m.

ARMSTRONG & OKEY, INC.
222 East Town Street, Second Floor
Columbus, Ohio 43215-4620
(614) 224-9481 - (800) 223-9481
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APPEARANCES:

1 Cozen O'Connor
2 By Daniel C. Theveny, Sr., Esq.
3 1900 Market Street
4 Philadelphia, PA 19103

5 On behalf of the Complainant via
6 videoconferencing.
7 American Electric Power Service
8 Corporation
9 By Marilyn McConnell, Esq.
10 and Sophia Chang, Esq.
11 1 Riverside Plaza, 29th Floor
12 Columbus, Ohio 43215

13 On behalf of the Respondent.
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1 Wednesday Morning Session,
2 January 9, 2013.
3
4

5 DAVID L. SULLIVAN,
6 being by me first duly sworn, as hereinafter
7 certified, deposes and says as follows:
8 CROSS-EXAMINATION

9 BY MR. THEVENY:

10 Q. Good morning, Mr. Sullivan.

11 A. Hi.

12 Q. Let me just ask you to state your full
13 name, address, date of birth, and current employer,
14 please, for the record.

15 A. David L. Sullivan, 7642 -- I just
16 moved -- Wyndover Lane -- Wyndover Place, Blacklick,
17 Ohio 43007, an AEP employee.

18 Q. And date of birth.

19 A. 3/12/61.

20 Q. And position with AEP.

21 A. Engineer Tech.

22 Q. My name is Dan Theveny, and I first of
23 all say it's nice to meet you, if only over the phone
24 and by videoconference. I'm an attorney representing
Federal Insurance Company. They are the insurance

Wednesday Morning Session,

January 9, 2013.

- - -

DAVID L. SULLIVAN,

being by me first duly sworn, as hereinafter

certified, deposes and says as follows:

CROSS-EXAMINATION

BY MR. THEVENY:

Q. Good morning, Mr. Sullivan.

A. Hi.

Q. Let me just ask you to state your full name, address, date of birth, and current employer, please, for the record.

A. David L. Sullivan, 7642 -- I just moved -- Wyndover Lane -- Wyndover Place, Blacklick, Ohio 43007, an AEP employee.

Q. And date of birth.

A. 3/12/61.

Q. And position with AEP.

A. Engineer Tech.

Q. My name is Dan Theveny, and I first of all say it's nice to meet you, if only over the phone and by videoconference. I'm an attorney representing Federal Insurance Company. They are the insurance

1 Q. What did you talk about?

2 A. Just how did it go, what happened, how
3 did you feel.

4 Q. Okay. Did he say he felt okay, it went
5 all right? You don't have to answer.

6 A. Okay.

7 Q. I'm sure he enjoyed the experience.

8 A. Okay.

9 Q. I know you reviewed these documents,
10 Exhibits 1 through 5, and I'm going to get into it in
11 a little bit more detail, but I want to at least set
12 the framework of what you might know or not know. Do
13 you recall this load tap changer going into full
14 boost resulting in a power surge at the Linden Avenue
15 Substation in June of 2010?

16 A. I don't recall the initial incident. I
17 was involved later.

18 Q. All right. I'll show you some documents
19 that are among the documents in front of you that
20 might refresh your recollection about that in a
21 little bit, but before we do that, just tell me what
22 you can recall, as you sit here today, about what
23 your involvement was after the incident.

24 A. I replaced the controls.

1 Q. I heard from Mr. Hall yesterday, Bob
2 Hall, that you and he were out there on June 18th and
3 both of you were involved in taking out the old
4 control panel and putting in the new one. Is that
5 what you're referring to, the work you did with Bob
6 Hall out there?

7 A. Correct.

8 Q. All right. After that, according to
9 Bob's -- Mr. Hall's testimony, his affidavit, and the
10 records that have been produced, you guys did that
11 work on June 18th of 2010. Have you been out there
12 since that date to do any work at that Linden Avenue
13 Substation?

14 A. Yes.

15 Q. All right. And prior to this June 18th,
16 2010, work that you recall, which was after the
17 incident involving the load tap changer going into
18 full boost, had you been out at the Linden Avenue
19 Substation prior to the date that the full -- that
20 the load tap changer went into full boost? And I
21 will represent to you that that occurred on June
22 15th, 2010. Had you done work prior to June 15th of
23 2010?

24 A. I would say yes. For sure I can't tell

1 I only found one incident with my name
2 on it.

3 Q. What's the number designation on the
4 bottom right-hand side of the page?

5 A. Thirty-four.

6 Q. Thirty-four. All right. Can you turn
7 to page -- Exhibit 5, Page AEP034, please?

8 A. Okay.

9 Q. And identify for me which entry is yours
10 on this Exhibit 5 at AEP034.

11 A. When you say mine, it's not really mine.
12 It's just when -- I was on the crew with them, so
13 they include me.

14 Q. Which date entry is that?

15 A. 7/28/08 -- I mean, 7/21/08.

16 Q. It says, if I'm reading it correctly,
17 "Check 12 kV LTC" -- is it your understanding that
18 LTC stands for load tap changer?

19 A. Correct.

20 Q. It says, quote, "Check 12 kV LTC for
21 proper operation. Did not find" -- it looks like --
22 "any problem." After that it says, quote, "LTC has
23 been running excessively, but voltage has been okay
24 when checked," and on that crew that day was

1 yourself, Robert Hall. I don't recognize the next --
2 is it Burke?

3 A. Correct.

4 Q. What's Mr. Burke's first name?

5 A. Brady.

6 Q. If you know. Brady. Is he still
7 employed by Ohio Power Company?

8 A. Yes.

9 Q. And then Mr. Peterson?

10 A. Correct.

11 Q. What's his first name, please?

12 A. David.

13 Q. Is he still employed by Ohio Power
14 Company?

15 A. Yes.

16 Q. And then the last name is Weingard;
17 right?

18 A. Correct.

19 Q. Is that Dwight -- no. What's his first
20 name? I'm sorry.

21 A. Kyle.

22 Q. And is he still employed by Ohio Power?

23 A. K-y-l-e. Yes.

24 Q. Can you tell me -- having seen this

1 Q. I forgot to tell you that. That's a
2 common thing that happens, Mr. Sullivan, in
3 conversations. People will often answer questions
4 before they're fully asked, but since we have a court
5 reporter -- it's a compound problem, too, because I'm
6 on the phone, so I'll try and remember to let you
7 fully answer before I ask my next question as well.

8 Other than this -- these two
9 incidents -- I don't want to say incidents. Other
10 than these two occasions when you were out at the
11 Linden Avenue Substation, the first time reflected on
12 July 21st of 2008, and then the next occasion being
13 on June 18th of 2010, when you were out there with
14 Robert Hall, have you been out at the Linden Avenue
15 Substation on other occasions, for other reasons that
16 would not necessarily be reflected on these notes
17 that are included within Exhibit 5?

18 A. To the best of my memory, yes. Exact
19 dates, I don't know.

20 Q. Do you keep your own job diary, field
21 notes, journal, anything like that?

22 A. Yes.

23 Q. Do you have -- would you note on
24 these -- what do you call it, your job diary or

1 A. That's it.

2 Q. All right. I think at this point I'll
3 go back to more general questions that will help me
4 frame my questions a little better, but I did jump
5 ahead. So you told me that you believe you were
6 employed for the first time by Ohio Power Company
7 sometime in 2005, 2006; is that correct?

8 A. Yes.

9 Q. You have some notes there in front of
10 you. What are those notes you're looking at?

11 A. It's the one that you had me looking at
12 before (indicating).

13 Q. I thought maybe you had notes of your
14 employment history or something.

15 A. No.

16 Q. And your current position with Ohio
17 Power Company is Engineering Technologist?

18 A. Correct.

19 Q. And when you were first employed by Ohio
20 Power Company, what position did you hold?

21 A. The same.

22 Q. Okay. Describe for me your job duties
23 and responsibilities as an Engineering Technologist
24 for Ohio Power Company.

1 A. I specifically work on transformers.

2 Q. Anything else?

3 A. For the most part, I'm just --
4 transformers only.

5 Q. Do you work on load tap changers?

6 A. Yes. They're part of the transformer.

7 Q. All right. I wanted to make sure of
8 that. Do you also work on the control panels for
9 load tap changers?

10 A. Yes.

11 Q. What else would you consider to be part
12 of a transformer in connection with your job duties
13 and responsibilities for transformers? We talked
14 about the transformer itself --

15 A. Bushings --

16 Q. -- the load -- the load tap changer, and
17 the control panel. What else?

18 A. Bushings, radiators, hydrans, Calistos.

19 Q. Can you spell that, please, for the
20 court reporter?

21 A. C-a-l-i-s-t-o.

22 Q. What are Calistos?

23 A. They're gas detection units.

24 Q. Any other parts or components that are

1 hundreds of transformers that you might be --

2 A. A lot.

3 Q. -- at any one time?

4 A. A lot.

5 Q. Fair enough. Is there also -- although
6 you might -- I take it you might be asked by Ohio
7 Power Company to go assist a crew if there's a
8 problem with a transformer; is that fair? Is that
9 part of your duties and responsibilities?

10 A. Yes.

11 Q. Is it also part of your duties and
12 responsibilities to perform regular maintenance and
13 inspection on transformers?

14 A. Yes.

15 Q. Is there a set -- what's the schedule
16 for maintenance of transformers, once a year, twice a
17 year, once a month?

18 A. It depends on the type of transformer,
19 and all that data is given to me by my supervisor, so
20 I -- basically, I go where he -- you know, he assigns
21 my work; well, you're going here because this one is
22 due.

23 Q. Hold on just for a second.

24 (Discussion off the record.)

1 out at the Linden Avenue Substation? We saw a
2 reference to the type of transformer it was. How
3 often would a transformer like that have to be
4 inspected and maintained?

5 A. I don't know for sure.

6 Q. Who do you think might know the answer
7 to that, John Fliehman?

8 A. Yes. ISIS.

9 Q. I'll get to ISIS in a little bit --
10 well, since you brought it up, my understanding is
11 that ISIS is a station inspection system computer
12 software program. Am I right about that?

13 A. As far -- yeah, I guess, yeah.

14 Q. Have you ever had an opportunity to use
15 ISIS?

16 A. Yes. It does a lot more than what
17 you -- it does a lot more than what you said. It
18 has --

19 Q. Describe to me what ISIS does.

20 A. It has the information for the
21 computers, the data. It has the nameplate
22 information. It has the oil frequencies. It has
23 when the oil was taken, when was it -- there's a
24 plethora of information in there.

1 Q. Do you have access to ISIS through a
2 laptop or is it something you need to do at the
3 offices of Ohio Power Company before you go out into
4 the field?

5 A. Laptop.

6 Q. Are you assigned a truck?

7 A. Yes.

8 Q. Do you carry that laptop with you in the
9 truck?

10 A. When I remember it, yes.

11 Q. We all forget. Describe for me how it
12 would be that you would access ISIS off of your
13 laptop or a desktop computer, for that matter, if you
14 wanted to acquire information about the Linden Avenue
15 Substation and the transformers located there?

16 A. Repeat the question again.

17 Q. Sure. I just want you to walk me
18 through -- you log onto your laptop. You access the
19 ISIS database. How is it that you then go about
20 finding the Linden Avenue Substation and the history
21 of that station and the transformers there?

22 A. You put in the station name.

23 Q. Pardon?

24 A. You put in the station name.

1 specifically to inspection. Would there be a
2 checklist of items that need to be attended to in
3 connection with an inspection?

4 A. Within ISIS?

5 Q. Yes.

6 A. No.

7 Q. Would the information in ISIS indicate
8 the measurement of the contacts on any load tap
9 changers for any of the transformers at a particular
10 substation?

11 A. In ISIS?

12 Q. Yes.

13 A. No.

14 Q. If I wanted to find out the measurement
15 of the contacts for a particular load tap changer at
16 any substation, how would I go about getting that
17 information?

18 A. In your -- in this packet that you
19 have --

20 Q. Yes. Exhibit 5?

21 A. Yes. There's --

22 Q. Take your time and find the page.

23 A. AEP079 and AEP094 are examples of
24 manuals that would have the -- I haven't looked

1 through this one, but normally that's where you would
2 find them, which is not included in ISIS.

3 Q. All right. Let me ask you this, after a
4 period of use, when a transformer and an LTC, load
5 tap changer, are in service, will the contacts for
6 the load tap changer wear over time?

7 A. Yes.

8 Q. Is it part of your job duties and
9 responsibilities in maintaining transformers to
10 measure the contacts for a load tap changer?

11 A. Yes.

12 Q. Is that done -- how often is that done,
13 each time you're asked to go inspect the particular
14 transformer?

15 A. During the inspections, yes.

16 Q. Where is it that you enter the
17 measurement you find for the contacts for the load
18 tap changer when you do that part of the inspection?

19 A. Where do you enter them?

20 MS. McCONNELL: Well, I'm going to
21 object. I'm going to object to the form of the
22 question. You're assuming facts not in evidence. He
23 has not testified that he does enter them anywhere.

24 MR. THEVENY: I appreciate that, and I

1 didn't mean to assume, but I may have missed even a
2 more fundamental point.

3 MS. McCONNELL: Right.

4 Q. I think you told me, though, that -- let
5 me start again. I'll address the objection. From
6 time to time counsel will object mostly because the
7 question was poorly asked, so -- it's not a problem.
8 I'll try and address the objection. Sometimes I
9 won't and you still have to answer it, but -- unless
10 your attorney tells you not to, but I'm going to try
11 to address the question.

12 You did tell me that when you are asked
13 to inspect a particular transformer, part of the
14 inspection work involves you measuring the contacts
15 for the load tap changer; is that right?

16 A. Correct.

17 Q. All right. When you take that
18 measurement, do you record it somewhere, in ISIS, on
19 a logbook, anywhere?

20 A. I -- I don't recall ever having written
21 the actual numbers down. It's a good or a not good
22 type thing. That's the best --

23 Q. It's not a separate field that requires
24 you to enter the measurement on ISIS, for example?

1 A. No.

2 Q. It's not something you have to fill
3 out -- handwrite somewhere on a log entry or
4 something like that?

5 A. I have a form, but I would have to look
6 at it to see if that's even on it. I don't think it
7 is, but --

8 Q. That's fine. What's that form called?

9 A. It's part of the -- the pre-engineer --
10 I'm sorry, the -- it's part of the -- what's it
11 called? Transformer Minor Maintenance Checklist.

12 MR. THEVENY: I did not see that within
13 the documents produced, so I would ask for a copy of
14 that as well from counsel.

15 Q. And you certainly can refer back to
16 Exhibit 5 at AEP079 or AE -- or Exhibit 5, AEP087, if
17 you want, but my question is do you know what -- I'm
18 sorry. I have the wrong -- no. I think I have the
19 right -- yeah. Most particularly AEP079. Do you
20 know what the acceptable measurement is for the
21 thickness of the contacts on the LTC for that
22 particular model of load tap changer referred to in
23 Exhibit 5 at AEP079?

24 A. Without having to look it up, no.

1 Q. All right. When you go out and are
2 asked to inspect a particular transformer including
3 the load tap changer and to measure the thickness of
4 the load tap changer, how do you go about determining
5 the acceptable thickness you must measure for the
6 load tap changer when you're performing the
7 inspection work?

8 A. If you look on the front of Page AE079,
9 it says, "Type LR-65." I have multiple different
10 types of transformers with books just like this, so I
11 would refer to this manual (indicating). I mean,
12 each one is different. This is an LR-65. There's
13 LR-200. There's 200-Ts, I mean, so many multiple
14 different types that I work on, so I always refer
15 back to the --

16 Q. That's what I was asking, so you
17 answered my question. My understanding is that
18 because this document was produced by the Defendant,
19 Ohio Power Company, to me in connection with this
20 matter, that Exhibit 5, AEP079, is the model of tap
21 changer that was -- that was out at the Linden Avenue
22 Substation. Do you know where I would find in
23 Exhibit 5, AEP079 through AEP086, the acceptable
24 measurements for the thickness of the contacts for

1 the load tap changer?

2 A. I'd have to look through it. For one,
3 this is hard to see.

4 Q. Yeah, the copy is not good on my end
5 either, so --

6 A. It's very bad.

7 Q. Take a few minutes, if you would. I
8 would appreciate it.

9 A. Sorry. I said I need a magnifying glass
10 to see this. I'm sorry. I can't really see this.

11 MS. McCONNELL: Is yours better?

12 MS. CHANG: No.

13 (Discussion off the record.)

14 THE WITNESS: Where?

15 MS. McCONNELL: We're just trying to
16 find out if any of ours has a better copy of that, so
17 we all came from the same source, so not really.

18 A. Something -- I can't see the exact
19 writing, but I see numbers that might help you.
20 AEP085, under where it says, "Arcing Contacts," you
21 can see the tips of those are supposed to be -- it
22 looks like 9/16th-inch thick when new and replaced
23 when they're a quarter inch measured at the center.
24 It looks like that's what it says. That's the tips

1 of them.

2 Q. What section are you on on Exhibit 5,
3 AEP --

4 A. Under where it says Arcing Contacts, at
5 the top, middle section.

6 Q. Yes. I'm with you. All right. So it's
7 your understanding that arcing contacts would refer
8 to the load tap changer contacts?

9 A. Say that again.

10 Q. Would it be your understanding that
11 arcing contacts, as used in this document, would be
12 referring to the load tap changer contacts?

13 A. They are part of it, correct.

14 Q. Anywhere else where you see reference to
15 acceptable measurements for contact points for the
16 load tap changer or measurements where it needs to be
17 replaced or addressed?

18 A. Just quickly glancing through it, no.

19 Q. That's fine. I think you probably found
20 the location. Let me ask you this, for the Linden
21 Avenue Substation location, that would be within the
22 area of work you do transformer inspection work; is
23 that right?

24 A. Yes.

1 A. I make entries that I might have changed
2 it, but I don't -- I'm not saying that -- I may not
3 have wrote the thickness of it at the time, but I
4 make entries.

5 Q. And I'm not asking what the measurement
6 was you found. I'm just saying in those situations
7 where you do actually replace the load tap changer
8 contact --

9 A. Oh, yes. Okay.

10 Q. All right. Are you required to make
11 that notation in ISIS?

12 A. In ISIS, no.

13 Q. Where do you make that notation?

14 A. On the inspection form.

15 Q. All right. If the load tap changer
16 contacts for the Linden Avenue Substation load tap
17 changer were replaced at some point by either you or
18 one of your coworkers who also do that type of work,
19 would they have noted that replacement on this
20 maintenance inspection sheet?

21 A. I don't know what they would have done.

22 Q. How about you?

23 A. Normally. Now, yes. As far as the
24 thickness or what it was, no. It's good or bad.

1 in Ohio Power Company where I could reference the --
2 find and locate the notation of the measurement of
3 the thickness of those load tap changers at some
4 point prior to this June 15th, 2010, date?

5 A. Me personally, no.

6 Q. Okay. You can only tell me based on
7 your own knowledge. As part of your job duties and
8 responsibilities, when you were asked to inspect
9 transformers, do you also check the level of the oil
10 in the load-tap-changer compartment?

11 A. Yes.

12 Q. Is there a recommended level of oil that
13 needs to be in the load-tap-changer compartment based
14 on, say, Exhibit 5 at AEP079 through zero --

15 A. You want to know if there's something in
16 here that says what the oil level would be?

17 Q. Yeah. Let me ask you this, and you can
18 certainly page through it, you testified that you do
19 check the level of the oil in the oil compartment for
20 a load tap changer as part of the work you do in
21 inspecting transformers, so my question is how do you
22 know what level of oil is acceptable on your
23 inspections?

24 A. Oh, that's easy. There's a -- on the

1 nameplate it says the amount of gallons that are in
2 it.

3 Q. All right.

4 A. It wouldn't say it in that, though. It
5 says proper level mostly, if I'm not mistaken.

6 Q. And that's fine. That's why I asked the
7 question, because I realize I may be under the
8 mistaken assumption that it might have been in the
9 instructions, but it's on the nameplate on the
10 transformer or the load-tap-changer compartment?

11 A. Transformer.

12 Q. Transformer?

13 A. ISIS.

14 Q. And it's recorded in ISIS?

15 A. Well, it's in ISIS.

16 Q. It's also in ISIS, right. So when you
17 punch up, say, for example, the Linden Avenue
18 Substation, it will tell you what type of
19 transformers are in there and what the oil level
20 needs to be for the load-tap-changer compartment; is
21 that right?

22 A. Yes, if it was recorded properly.

23 Q. Do you each time -- as part of your work
24 in completing the inspection of transformers, do you

1 record the oil level?

2 A. No.

3 Q. All right. Do you make a notation if,
4 in fact, you have to add oil?

5 A. Yes.

6 Q. All right. Do you know what can -- what
7 causes the need to add oil from time to time to the
8 load-tap-changer compartment?

9 A. Technically, no. I mean, it could be a
10 multitude of things.

11 Q. Is there any other reason why you have
12 to -- is there any reason why you might have to
13 replace the oil in a load-tap-changer compartment?

14 A. Yes.

15 Q. What are those reasons?

16 A. Arcing, the --

17 Q. Arcing -- I'm sorry. Go ahead.

18 A. The condition of the oil, basically. I
19 mean, when we get the oil tested, once we have it
20 tested, it lets us know if it's good or bad. We do
21 different tests on it, and that's when. You asked,
22 like, two questions there, two separate questions.

23 Q. I didn't mean to. My question simply
24 was, did you ever have to replace -- did you ever

1 have to replace oil in the load-tap-changer
2 compartment, and you said yes.

3 A. And you said why.

4 Q. And then I asked what are the reasons
5 that you might have to replace the oil, and you
6 mentioned arcing, and then we kind of stopped at that
7 point. I don't know if you were finished or not.

8 A. Yes.

9 Q. Anything else?

10 A. Not that I could think of.

11 Q. All right. Based on your understanding
12 of practice and procedure as part of your job duties
13 and responsibilities in inspecting transformers, if I
14 understand your testimony, if I -- well -- would I be
15 able to go into the ISIS database and find out what
16 level of oil was in that load tap changer for the
17 transformer involved in this incident on the date it
18 was last inspected prior to June 14th, 2010?

19 A. No.

20 Q. No. Why not?

21 A. That's what I was trying to explain to
22 you, that in ISIS you'll get what the actual level
23 should be. Like it's got 440 gallons of oil in it,
24 like the main tank has 7,800. That's what's in ISIS.

1 It tells you the levels. It doesn't tell you the
2 change in the level.

3 Q. Would I be able to find out by looking
4 into ISIS the last time oil had been added to that
5 load-tap-changer compartment for the transformer out
6 at the Linden Avenue Substation involved in this
7 incident?

8 A. No.

9 Q. Where would I find information about
10 when oil has been added to that load-tap-changer
11 compartment, if anywhere?

12 A. I'm not sure.

13 Q. It's not something that you note in
14 connection with your transformer inspection work,
15 i.e., that is, you don't note I added oil at such and
16 such location for such and such a load-tap-changer
17 compartment?

18 A. If it's a drastic amount, I probably
19 would, but if it's -- normally all I do is take some
20 out, and it's already mixed with others, and I put
21 back in, so I don't normally -- I mean, my -- my
22 objective when I fill it back up is to get it back up
23 to the proper level. I don't -- I don't calculate
24 numbers.

certificate of service

I hereby certify that a copy of this Supplemental Designation of Complainant Testimony was served electronically upon the following parties identified below on this 17th day of June, 2013:

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Summary: Testimony DIRECT TESTIMONY OF RESPONDENT OHIO POWER COMPANY d/
b/a AMERICAN ELECTRIC POWER EMPLOYEE DAVID SULLIVAN electronically filed by
Daniel C Theveny on behalf of Federal Insurance Company, as Subrogee of Genesis
Healthcare System