

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Evelyn and John Keller,	:	
	:	
Complainants,	:	Case No. 12-2177-EL-CSS
	:	
v.	:	
	:	
Ohio Power Company,	:	
	:	
Respondent.	:	

DIRECT TESTIMONY OF EVELYN KELLER

Date Submitted: August 6, 2013

Hearing Date: August 26, 2013

Q1: State your name and address.

A1: Evelyn Keller, 1424 Jewett Road, Powell, Ohio.

Q2: How long have you lived at that address?

A2: Approximately 30 years.

Q3: Do you own or rent the house at that address?

A3: Own.

Q4: Can you briefly describe how your house is aligned?

A4: Our house is in the Olentangy River Valley. The house is located on the top of the valley. At the rear of our property is the Olentangy River and on the other side of the river is Highbanks Metropark. State Route 315 cuts across our property, between the river and our house.

Q5: Where are AEP's electric lines situated?

A5: Parallel to S.R. 315, not far from the road pavement. I consider this the "main" line for electricity.

Q6: Is there an electric line running from the main line to your family house?

A6: Yes, there is a line located along the south boundary of our property, which serves our house and our neighbor's house at 1420 Jewett Road. This distribution line was not damaged during the storm notwithstanding that it runs thru a heavily wooded area.

Q7: For what period were you without power in the June/July period of 2012?

A7: We lost power late in the day on Friday and power was not restored until late in the day the following Thursday, so a full six days.

Q8: Do you know the cause of the outage to your house?

A8: Yes; one tree fell across 315, taking down the main power line behind our neighbor's property.

Q9: Where on S.R. 315 did this outage occur?

A9: It was north of Jewett Road and south of Powell Road, in southern Delaware County. The downed line and tree was not far north of the intersection of 315 and Jewett Road and was visible from that intersection.

Q10: Can you describe that section of 315?

A10: Yes, it is heavily wooded on both sides of 315 for the entire length between Jewett and Powell Roads. The State of Ohio has designated that stretch of 315 as a State Scenic Highway.

Q11: What is the distance between Jewett and Powell Roads?

A11: Approximately one half mile.

Q12: Did any other trees along 315 between Jewett and Powell roads fall during the 2012 storm?

A12: No, just this one tree.

Q13: What financial loss did your family suffer as a result of the power outage?

A13: We lost all the food in our two refrigerators and in our freezer.

Q14: Please describe those appliances.

A14: We have two large refrigerators; one has a freezer at the top and the other has a freezer at the bottom. We also have large chest freezer which is approximately 24 cubic feet.

Q15: Were any steps taken to protect your food?

A15: Promptly after the power went out, a friend brought several large bags of ice, which we put in the freezers and refrigerators. We replaced those bags of ice each day for several days. That doesn't keep food frozen for a long period, but will slow the thawing of frozen food.

Q16: Ultimately, what happened to the perishable food at your house?

A16: We took everything from the chest freezer and both refrigerators, put it into garbage bags and I took it down and put in a dumpster.

Q17: What was the value of the food which was lost?

A17: At least \$1800.

Q18: Did you inventory each item as it was thrown out?

A18: No, we didn't stop to inventory and write down each item of rotten food we were throwing out. But I've been buying food for my family for more than 40 years and have a good idea of what we have in our refrigerators and freezer at any given time. I am confident that if anything, this value is understated.

Q19: Did your family suffer any other economic loss as a result of the power outage?

A19: Yes, we have a fish pond and all of the fish, including six large Koi, all died as a result of the inability to run the filters. To replace fish like that would cost several hundreds of dollars, but what upset me was not the cost, but the loss of living creatures I considered pets.

Q20: During the term of the outage, was 315 physically blocked?

A20: Yes; ODOT put barriers on 315 both at Jewett and at Powell Roads. They also stationed two pickup trucks, one to the north and one to the south of the blockage, and each was manned around the clock by ODOT employees.

Q21: Did you have any communications with the ODOT employees?

A21: Yes, several times I asked the ODOT employees if they knew when the power line was going to be repaired so they could re-open 315. They told me that their supervisor had been in contact with AEP. I also heard them talking between themselves about all the money they were being paid by ODOT just to sit in their trucks, which angered me as a taxpayer.

Q22: Before this outage, did you know when AEP marked the trees on 315 for trimming or removal:

A22: Yes, in the spring of 2012, I believe April, I observed AEP representatives marking trees along 315.

Q23: Before the storm in late June, did AEP do any tree trimming or removal along 315?

A23: No, but I did see them tree trimming before the storm along Jewett Road, which had been marked by AEP's representatives at the same time. I wondered at the time why they were doing Jewett but not 315.

Q24: During the outage period, did you have any contact with the PUCO?

A24: Yes, early in the week I called the PUCO to ask what was being done to open 315. The lady I spoke with said that the PUCO has no control over the prioritization of repairs by AEP and that, while agreed opening a road like 315 should be a priority, the PUCO had no authority and no plan under which AEP would act and suggested I speak with AEP.

Q25: Did you contact AEP?

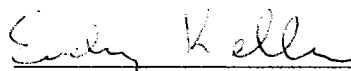
A25: I called AEP's number several times. I never talked with a live person but only got recordings.

Q26: Other than this incident, have you had any other involvement with AEP's vegetation control policies?

A26: At least two other times. First, several years ago they marked a number of trees located below the distribution line on the south side of our property. They said those trees needed to be taken down for the safety of the line. It was then, as I recall, five years between the time those trees were marked as being a risk to the line, and the day they actually came out and cut down the trees. During the delay, there were several times when the branches of those trees came in contact with the line and we lost power until they could come out and reset the breaker. At one time, a branch broke and caught fire, which landed on our neighbor's roof and started a fire and the fire department had to be called. The second time was May 8 of this year. An AEP representative came out and talked with a neighbor and me. He said there was one dead tree in each of our yards which posed a danger to their distribution line and said AEP wanted to remove those trees. I told him we had already hired a tree company to remove the tree on our property so we didn't need AEP. Our neighbor told AEP to go ahead and remove the tree on his property. As of the date of this testimony, AEP has never come back to remove our neighbor's tree, even though they told us that the work was a present danger and needed to be done promptly. That is now three experiences I have had personally with AEP's tree procedures, and in every case they have done what I consider an inadequate and unprofessional job. If they had been contractors of mine, I would have fired them.

Q27: Does this conclude your testimony?

A27: Yes, but I reserve the right to supplement this if needed to respond to AEP's testimony




Evelyn Keller

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail and regular U.S. mail on the following persons this 6th day of August 2013:

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Summary: Testimony Direct Testimony of Evelyn Keller electronically filed by Mr. John K. Keller
on behalf of Keller, Evelyn