

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Evelyn and John Keller,)	
)	
Complainants,)	Case No. 12-2177-EL-CSS
)	
v.)	
)	
Ohio Power Company,)	
)	
Respondent.)	

TESTIMONY

OF

STEVEN M. LAJEUNESSE

ON BEHALF OF OHIO POWER COMPANY d/b/a AEP OHIO

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Steven M. Lajeunesse and my business address is 5721 Shier Rings
3 Road Dublin, Ohio 43015.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Ohio Power Company (“AEP Ohio” or the Company”) as a
6 Utility Forester.

7 **Q. WHAT ARE YOUR RESPONSIBILITIES AS A UTILITY FORESTER?**

8 A. I am responsible for managing the Company’s forestry program for the Northwest
9 area of the Columbus district, which includes the county of Delaware and parts of
10 Licking, Franklin, and Marion counties. I am responsible for planning and
11 coordinating the activities of planners and tree trimming crews throughout that
12 area.

13 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL**
14 **BACKGROUND?**

15 A. I graduated from Kent State with a bachelor’s of science degree in conservation in
16 1989. I am a certified herbicide applicator, arborist, and utility arborist. I have
17 been employed by American Electric Power for 16 years. I started as a Utility
18 Forester with AEP’s West Virginia subsidiary and made a lateral move to work as
19 a Utility Forester for the Company in 1998. I have been in my current position
20 since then.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A. The purpose of my testimony is to describe the process by which the Company
23 planned and trimmed circuit 3101, the circuit serving the Keller residence, prior to
24 the major storm event that occurred on June 29, 2012 (“Derecho”) and to describe

1 the outage restoration efforts undertaken by the Company on circuit 3101 after the
2 Derecho.

3 **Q. PLEASE DESCRIBE THE PROCESS BY WHICH THE COMPANY**
4 **PLANS AND TRIMS ITS CIRCUITS?**

5 A. The planning and trimming of a circuit occurs in three phases. First, a planner
6 walks the entire circuit to be trimmed, contacting customers to inform them that
7 trimming will be taking place in the future and marking vegetation and trees for
8 trimming or removal. Next, tree crews arrive on the circuit to perform the
9 trimming and removal work, beginning at the substation and systematically
10 working through the circuit. Lastly, the work is audited both by me and an
11 outside auditing company. The whole process can take several months,
12 depending on the length and terrain of the circuit.

13 **Q. DID THE PLANNING AND TRIMMING OF CIRCUIT 3101 IN 2012**
14 **OCCUR IN THIS MANNER?**

15 A. Yes. Planning work on circuit 3101, a nearly 9-mile-long circuit, began the
16 second week of April 2012 and was completed during the third week of May.
17 Tree crews began trimming the circuit during the last week of May, starting at the
18 substation at the west end of the circuit and moving eastward toward S.R. 315.

19 **Q. IS A PLANNER RESPONSIBLE FOR MARKING EVERY TREE THAT**
20 **COULD POSE A THREAT TO THE COMPANY'S FACILITIES?**

21 A. No, and it is likely impossible for them to mark every tree that could pose a threat
22 to the Company's facilities or that will be trimmed or removed. As a practical
23 matter, a planner may be unable to access a tree due to such factors as terrain
24 limitations or landowner restrictions. Moreover, as I described above, the planner

1 is only the first step in the process. Once the tree crews arrive on a circuit they
2 often remove or trim trees not specifically identified by the planner and also may
3 not trim or remove trees identified by the planner depending upon their
4 observations once on the scene.

5 **Q. DO YOU KNOW WHETHER THE TREE THAT FELL ACROSS THE**
6 **LINE WAS MARKED FOR REMOVAL?**

7 A. No. I examined remaining portions of the tree after it fell but could not tell for
8 sure whether it had been marked for removal.

9 **Q. WITHOUT KNOWING WHETHER THE TREE WAS MARKED,**
10 **WOULD IT HAVE BEEN UNREASONABLE OR IRRESPONSIBLE IF**
11 **THE PLANNER HAD NOT MARKED THE TREE FOR REMOVAL?**

12 A. No. The physical marking of trees is a guide that is part of the initial step in
13 preparing a circuit for trimming and not a final blueprint for the tree trimming
14 process. The marking is not a prerequisite to removal. There are a series of
15 opportunities that can lead to a tree being removed. Regardless of whether the
16 tree was marked or not, it would not have prevented the outage because this
17 portion of the circuit was not trimmed prior to the storm. I expect that had the
18 tree crews been able to reach the tree before the Derecho hit they would have
19 trimmed or removed the tree regardless of whether it was marked by the planner.
20 I also would have identified the tree during my audit of the trimming work on the
21 circuit. As a practical matter, however, the tree crews were not able to safely
22 reach the tree at issue prior to the Derecho.

1 **Q. WHAT WAS THE STATUS OF THE TRIMMING OF CIRCUIT 3101**
2 **WHEN THE DERECHO HIT ON JUNE 29, 2012?**

3 A. By the end of June, the tree crews were trimming the circuit and had made it to
4 the end of Jewett road but had not completed trimming the portion of the circuit
5 along S.R. 315.

6 **Q. WERE THERE ANY ISSUES IMPACTING THE ABILITY TO TRIM**
7 **THAT REMAINING PORTION OF THE CIRCUIT?**

8 A. The portion of circuit 3101 that runs north and south along S.R. 315 between
9 Powell and Jewett roads is situated in a hazardous location. The Company's
10 facilities are located on a steep hill with very little space between them and the
11 west side of S.R. 315, making access by large trimming equipment dangerous and
12 impossible without occupying the roadway. The highway itself in that area is a
13 narrow, heavily-trafficked two-lane stretch of road. Due to these hazardous
14 conditions, trimming along that section of circuit 3101 requires coordination with
15 Ohio Department of Transportation ("ODOT") for road closure and traffic control
16 assistance. While the Company had earlier contacted ODOT to arrange for the
17 road closure, the Derecho hit before the road could be closed and the work
18 completed.

19 **Q. DID THE ATTEMPTS TO COORDINATE THE TREE TRIMMING**
20 **WORK WITH THE PLANNED LINE WORK CAUSE THE DELAY IN**
21 **TRIMMING THE PORTION OF CIRCUIT 3101 ALONG S.R. 315?**

22 A. No, the tree trimming on circuit 3101 was not intentionally delayed to coordinate
23 the planned re-phasing line work. As I stated earlier, tree crews began trimming
24 the circuit during the last week of May 2012 and had reached the end of Jewett

1 road only days before the Derecho hit in the end of June; the trimming was
2 actually occurring at a faster than normal progression. ODOT had yet to confirm
3 a time for the road closure and traffic control assistance by the time the tree crews
4 reached the end of Jewett road. Neither the remaining trimming on circuit 3101
5 nor the line work could have been accomplished safely without the road closure
6 and traffic assistance from ODOT.

7 **Q. WHAT WORK WAS PERFORMED ON CIRCUIT 3101 AFTER THE**
8 **DERECHO STORM?**

9 **A.** While the downed line was being repaired, crews were trimming trees, and two
10 phases of the line were being removed. All the work was being performed
11 simultaneously.

12 **Q. DID PERFORMING THE TREE TRIMMING AND PHASE REMOVAL**
13 **WORK SIMULTANEOUSLY WITH THE REPAIR OF THE DOWNED**
14 **LINE LEAD TO A DELAY IN RESTORING POWER TO CUSTOMERS?**

15 **A.** It is unlikely, but if it did it would have only been a very small delay. Because we
16 were in major storm restoration mode extra tree crews and line crews were
17 available on site to accomplish the necessary trimming and line work much more
18 quickly. In fact, further delay and outage was avoided by completing all the work
19 simultaneously while the road was already closed. It made sense for the
20 Company to coordinate the line work and tree trimming work to eliminate
21 multiple road closures, reduce disruptions to traffic, and minimize inconvenience
22 to landowners – not to mention that performing the line work required trimming
23 of the Rights-of-Way. Our focus during outage restoration is always to restore
24 power to customers as quickly and safely as possible.

1 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

2 **A. Yes.**

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Summary: Testimony Direct Testimony of Steven M. Lajeunesse electronically filed by Mr. Yazen Alami on behalf of Ohio Power Company