

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE COMPLAINT )  
OF MATERIAL SCIENCES )  
CORPORATION, )

Complainant, )

v. )

THE TOLEDO EDISON COMPANY )

Respondent. )

Case No. 13-2145-EL-CSS

**RESPONDENT THE TOLEDO EDISON COMPANY'S  
NOTICE OF FILING DEPOSITION TRANSCRIPT OF JEFF RAMSAY**

Respondent The Toledo Edison Company hereby gives notice that, pursuant to Section 4901-1-21(N) of the Ohio Administrative Code, the deposition transcript of Complainant's witness, Jeff Ramsay, received by Respondent on May 19, 2014, is being filed this date.

/s/ Laura C. McBride

Carrie M. Dunn (0076952)

Counsel of Record

FirstEnergy Service Company

76 South Main Street

Akron, Ohio 44308

Phone: (330) 761-2352

Fax: (330) 384-3875

[cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)

Laura C. McBride (0080059)

Christine E. Watchorn (0075919)

ULMER & BERNE LLP

65 East State Street, Suite 1100

Columbus, Ohio 43215

Phone: (614) 229-0034

Fax: (614) 229-0035

[lmcbride@ulmer.com](mailto:lmcbride@ulmer.com)

[cwatchorn@ulmer.com](mailto:cwatchorn@ulmer.com)

*On behalf of The Toledo Edison Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Filing Deposition Transcript of Jeff Ramsay* was served this 19<sup>th</sup> day of May, 2014, via electronic mail upon:

Craig I. Smith  
15700 Van Aken Blvd., #26  
Shaker Heights, Ohio 44120  
[wttpmlc@aol.com](mailto:wttpmlc@aol.com)

/s/ Christine E. Watchorn

On behalf of The Toledo Edison Company

COL1997 252397v1  
29414.00049

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF OHIO

IN THE MATTER OF THE )  
COMPLAINT OF )  
MATERIAL SCIENCES CORPORATION, )  
Complainant, )  
vs. ) 13-2145-EL-CSS  
THE TOLEDO EDISON CO., )  
Respondent. )

- - -

DEPOSITION OF JEFF RAMSAY

DATE: May 14, 2014 at 1:00 p.m.  
PLACE: Material Sciences Corporation Walbridge  
30610 East Broadway  
Walbridge, Ohio 43465  
REPORTER: Angela Ellis  
Notary Public

- - -

1 APPEARANCES:

2 On behalf of the Complainant:

3 LAW OFFICES OF CRAIG I. SMITH:  
4 Craig I. Smith  
5 15700 Van Aken Boulevard 26  
6 Shaker Heights, Ohio 44120  
7 (216) 571-2717

8 On behalf of the Respondent:

9 ULMER BERNE LLP:  
10 Laura McBride  
11 1660 West 2nd Street, Suite 1100  
12 Cleveland, Ohio 44113  
13 (216) 583-7034

14 ULMER BERNE LLP:  
15 Christine E. Watchorn  
16 88 East Broad Street, Suite 1600  
17 Columbus, Ohio 43215  
18 (614) 229-0034

19 On behalf of First Energy (via telephone):

20 Carrie M. Dunn  
21 76 South Main Street  
22 Akron, Ohio 44308  
23 (330) 761-2352

24 Also Present:

Peter Blazunas

- - -

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

## INDEX

## EXAMINATION

Witness Name	Page
Jeff Ramsay	
Examination By Ms. McBride .....	5

1                                   JEFF RAMSAY,  
2 a Witness herein, called by the Respondent as if upon  
3 Examination, was by me first duly sworn, as hereinafter  
4 certified, deposed and said as follows:

5                                   EXAMINATION

6 BY MS. WATCHORN:

7           Q.    Mr. Ramsay, as I introduced myself to you a moment  
8 ago, I am Christine Watchorn, one of the attorneys for Toledo  
9 Edison. Have you ever had your deposition taken before?

10          A.    Yes.

11          Q.    How many times?

12          A.    Once.

13          Q.    Okay. Was it related to a utilities matter?

14          A.    No.

15          Q.    In the most general sense?

16          A.    A personal matter.

17          Q.    Thank you. How long ago?

18          A.    I can give an estimation.

19          Q.    Many, many --

20          A.    Yes. Yes. 20 years ago.

21          Q.    Let me provide a little refresher then about the  
22 ground rules.

23          A.    Okay.

24          Q.    Essentially, I will attempt not to talk over you

1 while you are answering. And if you would attempt not to  
2 talk over me while I am asking you the question, that will  
3 make it a little easier for the court reporter. And if you  
4 would please make sure your answers are out loud, because a  
5 nod of the head doesn't really translate into the written  
6 form very well. Okay?

7 A. Yes.

8 Q. Thank you. If you didn't understand any of my  
9 questions, they're not all perfectly conceived. Let me know  
10 and I will try to rephrase.

11 A. Okay.

12 Q. Very good. Will you please state your full name for  
13 the record?

14 A. Jeffrey John Ramsay.

15 Q. And Ramsay is R-a-m-s-a-y?

16 A. That is correct.

17 Q. Is there any reason that you are not able to give  
18 truthful testimony here today?

19 A. No.

20 Q. Other than meeting with MSC's attorney, have you  
21 done anything to prepare for your deposition today?

22 A. No.

23 Q. Did you speak with Mr. Siffer about his  
24 deposition?

1 A. Yes.

2 Q. Was anyone else present during that conversation?

3 A. Craig.

4 Q. Was counsel present for that entire conversation?

5 A. Yes.

6 Q. Have you read the testimony of any of Toledo  
7 Edison's witnesses in this case?

8 A. Yes.

9 Q. Both witnesses?

10 A. Yes.

11 Q. How long -- how recently did you read that  
12 testimony?

13 A. Maybe a week ago.

14 Q. You are currently employed by Material Sciences  
15 Corporation?

16 A. That is correct.

17 Q. Is that the correct name of the entity that is your  
18 employer?

19 A. Material Science Corporation was recently purchased  
20 by New Start Metals, so I believe my employer is Material  
21 Science Corporation still.

22 Q. Okay. Fair enough. You have worked for -- is it  
23 okay if I call it MSC?

24 A. Sure. That's fine.



1 Q. You have worked for MSC for 31 years?

2 A. That is correct.

3 Q. Have you always been at the Walbridge facility?

4 A. Yes.

5 Q. What is your current title?

6 A. Operations manager.

7 Q. How long have you been the operations manager?

8 A. Since 2001.

9 Q. Prior to that, were you the maintenance manager?

10 A. Yes. Yes.

11 Q. Did I get -- if I didn't get that right, tell me.

12 A. Kind of in that -- after 2001, I moved to the  
13 maintenance manager position for a short period of time.  
14 Then I moved back to the operations position. So it was kind  
15 of broken up since 2001.

16 Q. Okay. Starting in 2001, you were the operations  
17 manager, then maintenance manager and now operations manager  
18 again?

19 A. Yes.

20 Q. And as operations manager, you have testified in  
21 this matter, your responsibilities are generally to direct  
22 the day-to-day operations of the plant; is that correct?

23 A. Yes.

24 Q. Do you have a typical work schedule, 8:00 to 5:00,

1 9:00 to 5:00?

2 A. Normal hours are 7:00 a.m. to 5:00 p.m.

3 Q. Monday through Friday?

4 A. Yes.

5 Q. Do you take a lunch break?

6 A. Not typically, no. On occasion.

7 Q. It's up to you?

8 A. Yes.

9 Q. You're not required to leave at noon and come back  
10 at 1:00?

11 A. No.

12 Q. Do you spend the majority of your workday at your  
13 desk, out in the plant or some combination thereof?

14 A. It's probably 50/50.

15 Q. Were you involved in MSC's decision to participate  
16 in or receive electric service from Toledo Edison pursuant to  
17 Rider ELR?

18 A. I don't completely understand that question.

19 Q. Let me back up. Do you know what Rider ELR is?

20 A. I'm aware of the Rider ELR, yes. I don't completely  
21 understand the documents behind the Rider ELR.

22 Q. That's fair. Can you just tell me -- why don't you  
23 tell me what is your understanding of Rider ELR?

24 MR. SMITH: Objection. Too broad. You

1                   may answer.

2                   THE WITNESS: Can you repeat the  
3 question, please?

4           Q.    What is your understanding of what Rider ELR is?

5           A.    If our electrical supplier is having issues on the  
6 grid, then we're required to reduce our usage below, I  
7 believe, 2000 KWH.

8           Q.    Was it up to you to determine whether or not MSC  
9 would participate in Rider ELR?

10          A.    I -- no.

11          Q.    Do you know whose decision that was to make?

12          A.    No.

13          Q.    Were you consulted in the company's decision-making  
14 process about Rider ELR?

15          A.    No.

16          Q.    Is it fair -- well, I will just ask you. You were  
17 not the person at MSC who is responsible for deciding whether  
18 or not MSC will be a signatory to Toledo Edison's electric  
19 security plan. Is that fair?

20          A.    I'm not sure I understand the question.

21          Q.    Okay. Were you responsible for entering into MSC's  
22 contract for electric service with Toledo Edison?

23          A.    No.

24          Q.    And you're not the person who signed that

1 contract?

2 A. No.

3 Q. Are you the person at MSC who determined -- let me  
4 back up. I keep getting ahead of myself. Do you know what  
5 MSC's firm load is under Rider ELR?

6 A. Can you define firm load? I --

7 Q. Earlier you said something to me about you  
8 understand Rider ELR to involve situations where MSC has to  
9 reduce its load to 2000, I think you said?

10 A. Right.

11 Q. Do you understand that 2000 -- is it your  
12 understanding that 2000 is MSC's firm load? Do you put those  
13 things together?

14 A. No.

15 Q. Okay. Was it up to you to decide that 2000 was the  
16 number to which MSC would have to reduce its load?

17 A. No.

18 Q. Do you receive or review MSC's electric bills?

19 A. No.

20 Q. Have you ever read Rider ELR?

21 A. No.

22 Q. You used the terms ECE in your testimony. What does  
23 that abbreviation mean to you?

24 A. I believe it means electrical curtailment event.

1       Q.    Can you explain what an electrical curtailment event  
2   is?

3       A.    Electrical curtailment event is a curtailment due to  
4   the issue that Edison is having or our electric supplier is  
5   having issues on the grid, and they ask us to reduce to 2000  
6   KWH.

7       Q.    And so for purposes of our discussion here today,  
8   would it be all right if I just refer to it as ECEs?

9       A.    Okay.

10      Q.    In your testimony in this case, you testified that  
11   the facility, by which I mean MSC's Walbridge facility that  
12   we are here in today, developed downtime outage shutdown  
13   procedures to ensure the timely shutdown of equipment during  
14   ECEs, correct?

15      A.    Correct.

16      Q.    Were you personally involved in developing these  
17   procedures?

18      A.    I had input into some of the procedures, yes.

19      Q.    Can you quantify -- how many procedures are there?

20      A.    I would have a -- I don't remember the exact title  
21   of the procedure, but I have it here.  Can you give me a  
22   minute?

23      Q.    Of course.

24      A.    The facility downtown -- outage shutdown, the oven

1 shutdown procedure, and there's also a oven startup  
2 procedure.

3 Q. And just for the record, are you looking at  
4 Exhibit's JR1, JR2 and JR3 to your testimony?

5 A. Yes.

6 Q. Of those three procedures, were you involved in  
7 creating all three or just some of the three?

8 A. I was involved in creating the JR1 procedure and the  
9 JR2 procedure.

10 Q. Not the JR3 procedure?

11 A. (Witness nods head).

12 Q. Is JR3 --

13 MR. SMITH: I'm sorry. Did he answer?

14 MS. WATCHORN: He did.

15 MR. SMITH: What did he say?

16 MS. WATCHORN: Maybe he just nodded.

17 Q. Was the answer to my last question yes?

18 A. I -- can you repeat the question?

19 (Court Reporter read back previous question.)

20 A. I wasn't involved in anything with the JR3  
21 procedure.

22 Q. Okay. Is the JR3 procedure a shutdown procedure?

23 A. JR3 is the startup procedure.

24 Q. And that's the nature of my question. The second

1 page of JR3 is entitled startup procedure for prime and  
2 finish ovens. So is JR3, Exhibit JR3, is that a startup  
3 procedure as opposed to a shut down procedure?

4 A. JR3 is the startup procedure for prime and finish  
5 ovens.

6 Q. Would JR3 be used in shutting down the system, its  
7 production capacities or the ovens themselves?

8 A. Can you repeat that question?

9 Q. Sure. Is JR3 a procedure that the facility uses  
10 when it shuts down its production line or its ovens?

11 A. No. It's used to restart the process after it is  
12 shut down.

13 Q. Okay. Then focusing on JR1 and JR2, are these the  
14 procedures that this facility uses when it has to shut down  
15 in response to an ECE response?

16 A. Yes.

17 Q. And does the facility follow the same procedure  
18 every time it has to shutdown in response to an ECE?

19 A. Yes.

20 Q. Are there any other shut down procedures that the  
21 facility uses in response to an ECE besides JR1 and JR2?

22 A. I don't -- can you repeat the question.

23 Q. Are there any other shutdown procedures that MSC,  
24 this facility, uses when it is shutting down in response to

1 an ECE, besides JR1 and JR2?

2 A. These are the procedures that are driven by the ECE  
3 shutdown. They are other shutdown procedures, but not  
4 initiated by an ECE shutdown.

5 Q. Let me test my understanding here. So there are  
6 some other shutdown procedures that the facility uses, but  
7 not in response to an ECE?

8 A. Correct.

9 Q. Okay. What circumstances would the facility be  
10 using the other shutdown procedures in?

11 A. Any time the line is shutdown.

12 Q. Okay. Does the facility use the shutdown procedures  
13 in JR1 and JR2 when it is shutting down production for some  
14 reason other than an ECE?

15 MR. SMITH: Repeat the question, please. I  
16 don't understand the question. I object to the  
17 sense that I don't understand the question.

18 Q. Let's back up. What are some other reasons why the  
19 facility may shutdown its production, besides an ECE?

20 A. Well, we shutdown when we're done with production  
21 for the week. We shut down if we have an unscheduled issue  
22 on the line. That type of thing.

23 Q. And am I correct that you also shut down in a  
24 scheduled way in July and again in December every year?



1 A. That's correct.

2 Q. Do you use the shutdown procedure in Exhibit JR1 and  
3 JR2 during these examples that you have just given me?

4 A. Yes.

5 Q. But there are other shutdown procedures that are  
6 also used at those times?

7 A. Yes.

8 Q. Okay. Why would the shutdown well, strike that  
9 Let's look at Exhibit JR1. Look at the -- are you there?

10 A. Uh-huh.

11 Q. Okay. At the top of this document, it states, warm  
12 weather, higher than 32 degrees F, downtime outage shutdown  
13 lists, 10, 3, 10, slash, zero, 3, slash, zero, 3. Was this  
14 policy drafted on October 3, 2003?

15 A. I don't know what date the policy was drafted.

16 Q. Has this policy been updated over time?

17 A. Yes.

18 Q. When?

19 A. I don't know those dates.

20 Q. If you would turn to JR2. What's the purpose of  
21 this policy or procedure?

22 A. It's the process needed to follow to shutdown our  
23 ovens in our process.

24 Q. This document at the top indicates an effective date

1 of January 22, 2001. Do you see that?

2 A. Yes.

3 Q. Is that when this policy was created?

4 A. It's possible, yes.

5 Q. And has this policy been updated or revised over  
6 time?

7 A. Yes.

8 Q. How many times?

9 A. I am -- I think I answered incorrectly to your first  
10 question regarding when the procedure was initially written.  
11 Because if you go to the back page of the procedure, it says  
12 there that it was created in 1996 and it was revised on  
13 1-22-2001.

14 Q. Thank you for the correction. Are you the person  
15 responsible for curtailing the facility's electric load to  
16 2000 during an ECE?

17 A. I -- can you repeat the question again?

18 Q. Are you the person here at MSC who is responsible  
19 for curtailing the facility's electrical load to 2000 during  
20 an ECE?

21 A. Yes.

22 Q. How long does it take the facility to curtail its  
23 load to 2000?

24 A. That really depends on what products we're running

1 at the time.

2 Q. What is the quickest that it can be curtailed?

3 A. In my estimation, the quickest is one hour.

4 Q. What is the longest that it might take?

5 A. One-and-a half hours.

6 Q. And that's the time that it would take the facility  
7 to implement the steps that are laid out in Exhibit JR1 and  
8 JR2; is that right?

9 A. No. JR2 procedure, once again, depends on the  
10 products that we are running.

11 Q. Does the time that it takes to implement the  
12 procedure in JR1 vary or is that the same every time?

13 A. JR1 is the same every time.

14 Q. How long does JR1 by itself take?

15 A. Once again, I need to review the procedure,  
16 please.

17 Q. Sure.

18 A. One hour.

19 Q. JR1 takes one hour consistently; is that right?

20 A. Yes.

21 Q. And JR2, then, you have indicated the time for JR2  
22 to be implemented can vary based on the production process?

23 A. The time that it takes to cool the ovens, depends on  
24 how hot you are running the ovens for the current product

1 that you're running.

2 Q. What is the fastest that the oven could cool?

3 A. Well if I was running the oven at 200 degrees, then  
4 an hour, probably, would be the fastest that I could cool the  
5 ovens.

6 Q. And what's the longest that it might take to cool  
7 the ovens?

8 A. If I am running the ovens at 1000 degrees, it would  
9 take at least four hours to cool the ovens.

10 Q. Do you initiates the processes in JR1 and JR2 at the  
11 same time in response to an ECE?

12 A. Yes.

13 Q. They happen simultaneously?

14 A. Yes.

15 Q. Can the facility speed up the shutdown process?

16 MR. SMITH: Objection to the form of the  
17 question. You may answer.

18 A. No.

19 Q. Are you aware that an ECE was called for by PJM on  
20 September 11, 2013?

21 A. Yes.

22 Q. Do you personally receive notice when an ECE is  
23 called?

24 A. Yes.

1 Q. By what method do you receive those? Is it by  
2 phone, by e-mail?

3 A. I get an e-mail and a phone call.

4 Q. On September 11, 2013, did you receive notice of  
5 that ECE by e-mail and by phone call?

6 A. Yes.

7 Q. Were you here at the facility when you received  
8 notice of the ECE on September 11?

9 A. Yes.

10 Q. Were you at the facility during the entire ECE on  
11 that date?

12 A. Can you -- during the entire ECE, can you --

13 MR. SMITH: I object on the basis that it is  
14 vague as far as the entire ECE. What time are you  
15 specifying that it ends?

16 Q. Do you know --

17 MR. SMITH: It continued for six hours.

18 MS. WATCHORN: Thank you. Your objection is  
19 noted.

20 MR. SMITH: Thank you.

21 Q. Do you know when the ECE ended on September 11,  
22 2013?

23 A. I don't have that time. I don't recall the time  
24 right now. I don't recall the time that the -- what time the

1 ECE ended on that date.

2 Q. Do you remember on September 11th shutting down the  
3 production facility and the ovens?

4 A. Yes.

5 Q. Were you here when they were started back up on that  
6 date?

7 A. No.

8 Q. When you received the ECE notice, when you received  
9 the ECE notice on September 11, 2013, what do you do? What  
10 is your next step?

11 A. First I contacted my boss.

12 Q. Who is?

13 A. John Siffer. John told me that we need to initiate  
14 a shutdown. Next, I contacted the production supervisor to  
15 insert a lead strip into the line to shut our production line  
16 down, and then I contacted the electricians to initiate their  
17 shutdown procedures.

18 Q. Who was the production supervisor on September 11,  
19 2013?

20 A. Jeremy Carlen.

21 Q. Do you know how to spell Carlen?

22 A. C-a-r-l-e-n.

23 Q. Is Mr. Carlen still with the Walbridge facility?

24 A. Yes.

1           Q.    You testified that you contacted John Siffer. Did  
2 you contact Mr. Siffer by phone? Did you locate him in the  
3 plant and speak face to face? How did you communicate with  
4 him that day?

5           A.    By phone.

6           Q.    Was Mr. Siffer here at the facility?

7           A.    Yes.

8           Q.    Did you contact Mr. Siffer immediately after you  
9 received the e-mail and/or the phone call notice of the  
10 ECE?

11          A.    Yes.

12          Q.    Had Mr. Siffer also received notice of the ECE?

13                   MR. SMITH: Objection. Speculation.

14          Q.    If you know.

15          A.    I don't remember if he had received it or not.

16          Q.    How long did you speak with Mr. Siffer on September  
17 11, 2013 after you received the ECE notice?

18          A.    Just a very short period of time.

19          Q.    Once you give the instruction -- let me back up.  
20 You instructed Mr. Carlen to insert something into the  
21 production line. Please tell me what that was?

22          A.    It's a lead strip or a non-customer strap coil that  
23 we have to put in the line.

24          Q.    Did Mr. Carlen do that immediately after you told

1 him to do so?

2 A. He does it as soon as possible. There's customers'  
3 material running in the line, so we are a continuous coil  
4 coating line. So you can't stop the line or you damage the  
5 customers' material. So when -- at the end of the next  
6 coils, when it tails off, you're able to insert that lead  
7 strip into the line.

8 Q. And then you tell the electricians to begin their  
9 shutdown procedure?

10 A. I did.

11 Q. And did they immediately begin their shutdown  
12 procedure in response to your instruction?

13 A. As soon as the customer material clears the line,  
14 they're able to initiate their procedure.

15 Q. On September 11, 2013, what time did you instruct  
16 the electricians to begin the shutdown procedure?

17 A. I don't know exactly what time it was.

18 Q. Do either Exhibit JR1 or JR2 address what is to be  
19 done with the fans in a shutdown situation?

20 A. Can you explain the question? What type of fans?

21 Q. Are there oven fans on the ovens at this facility?

22 A. Yes.

23 Q. That cool the ovens? Yes?

24 A. Yes.



1       Q.    Do Exhibit JR1 or JR2 talk about -- address or  
2   instruct what is to happen with those oven fans during a  
3   shutdown?

4       A.    Yes.

5       Q.    Which policy, JR1 or JR2?

6       A.    JR2.

7       Q.    Can you direct me to the place that you're looking  
8   at in JR2?

9       A.    It would be 5.3 and 5.4.

10      Q.    The facility establishes its own shutdown  
11   procedures, right?

12      A.    Yes.

13      Q.    Toledo Edison doesn't dictates the facility's  
14   shutdown procedure, does it?

15      A.    Can you repeat the question?

16      Q.    Does Toledo Edison dictate the company's shutdown  
17   procedure?

18      A.    I guess I don't understand what you're asking.

19      Q.    Does Toledo Edison say the method by which the  
20   company has to shutdown?

21      A.    They don't tell us the method that we have to  
22   shutdown.

23      Q.    You have your testimony in front of you.

24      A.    Yes.

1       Q.    On page 4, line two and three, you testified that  
2 management needs to ensure successful results every time the  
3 facility incurs the downtime outage shutdown because Toledo  
4 Edison sent an ECE notice. Do you see where I am there?

5       A.    I'm sorry. What line?

6       Q.    Two and three, do you see where I am now, sir?

7       A.    Yes.

8       Q.    Why must management ensure successful results every  
9 time an ECE notice is issued?

10      A.    I don't understand your question.

11      Q.    You have testified that management needs to ensure  
12 successful results every time the facility incurs a downtime  
13 outage shutdown because Toledo Edison sent an ECE notice,  
14 correct?

15      A.    Because the requirement is that we reduce our  
16 electrical usage below 2000 KWH.

17      Q.    When MSC determined to participate in Rider ELR to  
18 take its electrical service, pursuant to Rider ELR, it was  
19 aware that ECE events could and would occur, right?

20      A.    Yes.

21      Q.    And MSC must have known that these events would  
22 involve a disruption of the production process, right?

23      A.    Yes.

24      Q.    Including things like dismissing hourly employees

1 without pay?

2 A. Yes.

3 Q. And incurring additional scrap materials as a result  
4 of the shutdown and re-starting process?

5 A. Yes.

6 Q. And the possibility of missed delivery dates to  
7 MSC's customers?

8 A. Yes.

9 Q. And the potential overtime cost of having to run  
10 weekend production to catch up?

11 A. Yes.

12 Q. And possible additional wear and tear on the  
13 facility's equipment?

14 A. Yes.

15 Q. Are you aware that some ECEs end earlier than their  
16 scheduled end time?

17 A. Yes.

18 Q. When that happens, does MSC re-call its hourly  
19 workers so they can come back and finish their shift and earn  
20 additional wages?

21 A. I guess that depends on what time that happens.

22 Q. Has that happened, to your knowledge?

23 A. Has what happened?

24 Q. That an ECE has ended before its scheduled end time

1 and MSC re-called its hourly workers that it had sent home?

2 A. I don't recall if we have re-called the workers back  
3 to the plant.

4 Q. Are workers here ever sent home without pay for  
5 reasons that have nothing to do with an ECE?

6 A. Yes.

7 Q. And I think we have established the production line  
8 or any part of it is occasionally shutdown for reasons that  
9 have nothing to do with an ECE, right?

10 A. Yes.

11 Q. In 2013, when were the -- when was the July  
12 scheduled shutdown in 2013? What dates?

13 A. I don't know what those dates are without looking  
14 through past records.

15 Q. You have records like that?

16 A. Sure.

17 Q. One of the other situations you told me where the  
18 production is shutdown is when you have completed the  
19 production cycle for the week. Is that fair?

20 A. Yes.

21 Q. Did I state that correctly?

22 A. Yes.

23 Q. Does that sometimes happen earlier than expected?

24 A. Yes.

1       Q.   And are hourly workers sent home when that  
2 happens?

3       A.   At times, yes.

4       Q.   How often does MSC miss its delivery dates to its  
5 customers?

6               MR. SMITH:  Objection.  It's not relevant to  
7 this case.  It's confidential, even if it is.

8               MS. WATCHORN:  Well, that I regard that as a  
9 speaking objection.

10              MR. SMITH:  You shouldn't.

11              MS. WATCHORN:  There are references to missed  
12 delivery dates as one of the elements of  
13 Mr. Ramsay's testimony.

14              MR. SMITH:  Well, then ask the question from  
15 there.

16       Q.   How many customer dates -- how many customer  
17 delivery dates has MSC missed as the result of an ECE?

18       A.   I don't have that information.  I don't know that  
19 answer.

20       Q.   Who would know?

21       A.   It would be someone in customer service.

22       Q.   You are not offering any testimony in this matter  
23 regarding the content or the timing of the ECE notices, are  
24 you?

1 A. Can you clarify your question?

2 Q. Help me understand what part of my question you  
3 don't understand?

4 A. Can you repeat the question then?

5 MS. WATCHORN: Can you read back the question?

6 (Court Reporter read back previous question.)

7 THE WITNESS: So are you referring to my  
8 testimony that I have here?

9 Q. That is correct.

10 A. No.

11 Q. No, you are not?

12 A. Right.

13 Q. You are not offering any testimony in this matter  
14 regarding the calculation of the penalties that Toledo Edison  
15 is imposing on the facility, are you?

16 A. No.

17 Q. Did you attend a webinar sponsored by Toledo Edison  
18 or First Energy regarding ECEs and Rider ELR?

19 A. No.

20 Q. Do you know who from the facility did attend that  
21 webinar?

22 A. No.

23 Q. Have you ever contacted a First Energy customer  
24 service representative regarding an ECE?

1           A.     No.

2           Q.     Have you ever contacted a First Energy customer  
3 support or customer service representative regarding an ECE  
4 notice?

5           A.     No.

6           Q.     On September 11 2013, when you talked with  
7 Mr. Siffer about the ECE, after you received the notice of  
8 the ECE, did Mr. Siffer tell you that that ECE was  
9 voluntary?

10          A.     No.

11                   MS. WATCHORN:  Let's go off the record for a  
12 minute.

13                   (Brief recess was had.)

14          Q.     I just have a few more questions for you,  
15 Mr. Ramsay.  How often does this facility run the ovens at  
16 1000 degrees?

17          A.     There's only a certain percentage of our products  
18 that operate at 1000 degrees.  I can estimate on that  
19 question.

20          Q.     Please do.

21          A.     Maybe, you know, 50 percent of the time that we're  
22 producing.

23          Q.     On September 11, after you received -- of 2013,  
24 after received the notice of ECE and you contacted Mr. Siffer

1 by phone, what did the two of you discuss?

2 A. I told him that I had received the notice and asked  
3 him -- and I asked him if we should shut the plant down.  
4 That was his directive, to shut the plant down.

5 Q. Did you believe that the September 11, 2013 ECE was  
6 voluntary?

7 MR. SMITH: Objection to the form of the  
8 question. There was nothing in the record about  
9 voluntary.

10 MS. McBRIDE: Okay.

11 MR. SMITH: Do you want to go off the record?

12 MS. McBRIDE: No.

13 MR. SMITH: He wasn't here with Mr. Siffer  
14 You're -- what do you mean by voluntary?

15 MS. WATCHORN: I -- you have had a number of  
16 objections that have led to commentary. I  
17 understand that you are objecting to the form of my  
18 question. My question, I believe, is  
19 straightforward. I am simply asking -- and there  
20 is reference to voluntary throughout MSC's  
21 witnesses' testimony. My question to this witness  
22 is whether he believes he was present on September  
23 11, 2013, received a notice, talked to Mr. Siffer,  
24 and was involved in the shutdown procedure. I'm



1           asking if it was his understanding that the ECE on  
2           September 11, 2013 was voluntary.

3           Q.    Please answer my question.

4           A.    No.

5           Q.    Did you do anything differently on September 11,  
6   2013 in your shutting-down process than what you would do for  
7   any other ECE?

8           A.    No.

9           Q.    The procedures that are set forth in Exhibits JR1  
10   and JR2 to your testimony, were those procedures designed  
11   specifically for the purpose of responding to an ECE?

12          A.    Can you repeat the question?

13          Q.    Yes.   Exhibits JR1 and JR2 to your testimony, those  
14   procedures that we have talked about, were those procedures  
15   designed or created specifically for the purpose of  
16   responding to an ECE?

17          A.    No.

18          Q.    Are you aware that this facility previously was  
19   required to curtail its load during an ECE within 10  
20   minutes?

21          A.    Can you ask the question again?

22          Q.    Are you aware that this facility was previously  
23   required to curtail to that 2000 KWH load within 10  
24   minutes?

1           A.     No.

2                     MS. WATCHORN:   Okay.   Thank you, sir, for your  
3                     time.   Those are all my questions.

4                     MR. SMITH:   We do not waive signature.

5                     (Deposition concluded and witness excused at  
6                     1:53.)

7                                     (Signature reserved.)

8                                     - - -

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

## SIGNATURE PAGE

Date of Deposition: May 14, 2014

Correction page(s) enclosed? Yes\_\_\_ No\_\_\_

How many correction pages?\_\_\_\_\_

\_\_\_\_\_  
John Siffer                      Date

- - -

Please return this signed signature page along with  
correction page(s) to:

COLLINS REPORTING SERVICE, INC.  
405 North Huron Street  
Toledo, Ohio 43604  
(419) 255-1010

Worksheet No.: AE14-2887

## C E R T I F I C A T E

I, Angela Ellis, a Notary Public in and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named witness was by me first duly sworn to tell the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the testimony then given was by me reduced to stenotype in the presence of said witness and afterwards transcribed; that the foregoing is a true and correct transcription of the testimony so given as aforesaid.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified.

I do further certify that I am not a relative, employee of or attorney for any of the parties in this action; that I am not a relative or employee of an attorney of any of the parties in this action; that I am not financially interested in this action, nor am I or the court reporting firm with which I am affiliated under a contract as defined in the applicable civil rule.

Angela Ellis  
Notary Public  
in and for the State of Ohio

My Commission expires January 23, 2016.

## C E R T I F I C A T E

I, Angela Ellis a Notary Public in and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named witness was by me first duly sworn to tell the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the testimony then given was by me reduced to stenotype in the presence of said witness and afterwards transcribed; that the foregoing is a true and correct transcription of the testimony so given as aforesaid.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified.

I do further certify that I am not a relative, employee of or attorney for any of the parties in this action; that I am not a relative or employee of an attorney of any of the parties in this action; that I am not financially interested in this action, nor am I or the court reporting firm with which I am affiliated under a contract as defined in the applicable civil rule.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Angela Ellis  
Notary Public  
in and for the State of Ohio

My Commission expires January 23, 2016.

<p><b>A</b></p> <p><b>abbreviation</b> 10:23  <b>able</b> 5:17 22:6,14  <b>action</b> 34:17,18,19  36:16,17,18  <b>additional</b> 25:3,12,20  <b>address</b> 22:18 23:1  <b>AE14-2887</b> 33:23  <b>affiliated</b> 34:20 36:19  <b>affixed</b> 35:2 37:2  <b>aforsaid</b> 34:8,12 36:7  36:11  <b>ago</b> 4:8,17,20 6:13  <b>ahead</b> 10:4  <b>Aken</b> 2:4  <b>Akron</b> 2:15  <b>and/or</b> 21:9  <b>Angela</b> 1:17 34:4 35:5  36:3 37:5  <b>answer</b> 9:1 12:13,17  18:17 27:19 31:3  <b>answered</b> 16:9  <b>answering</b> 5:1  <b>answers</b> 5:4  <b>APPEARANCES</b> 2:1  <b>applicable</b> 34:21 36:20  <b>April</b> 35:3  <b>asked</b> 30:2,3  <b>asking</b> 5:2 23:18 30:19  31:1  <b>attempt</b> 4:24 5:1  <b>attend</b> 28:17,20  <b>attorney</b> 5:20 34:16,17  36:15,16  <b>attorneys</b> 4:8  <b>aware</b> 8:20 18:19 24:19  25:15 31:18,22  <b>a.m</b> 8:2</p>	<p><b>broad</b> 2:11 8:24  <b>Broadway</b> 1:15  <b>broken</b> 7:15</p> <p><b>C</b></p> <p><b>C</b> 34:2,2 36:1,1  <b>calculation</b> 28:14  <b>call</b> 6:23 19:3,5 21:9  <b>called</b> 4:2 18:19,23  <b>capacities</b> 13:7  <b>caption</b> 34:14 36:13  <b>Carlen</b> 20:20,21,23  21:20,24  <b>Carrie</b> 2:14  <b>case</b> 6:7 11:10 27:7  <b>catch</b> 25:10  <b>cause</b> 34:8 36:7  <b>certain</b> 29:17  <b>certified</b> 4:4  <b>certify</b> 34:6,13,15 36:5  36:12,14  <b>Christine</b> 2:11 4:8  <b>circumstances</b> 14:9  <b>civil</b> 34:21 36:20  <b>clarify</b> 28:1  <b>clears</b> 22:13  <b>Cleveland</b> 2:9  <b>coating</b> 22:4  <b>coil</b> 21:22 22:3  <b>coils</b> 22:6  <b>COLLINS</b> 33:18  <b>Columbus</b> 2:12  <b>combination</b> 8:13  <b>come</b> 8:9 25:19  <b>commentary</b> 30:16  <b>Commission</b> 1:1 35:8  37:8  <b>commissioned</b> 34:5  36:4  <b>communicate</b> 21:3  <b>company</b> 23:20  <b>company's</b> 9:13 23:16  <b>Complainant</b> 1:6 2:2  <b>COMPLAINT</b> 1:4  <b>completed</b> 26:18  <b>completely</b> 8:18,20  <b>conceived</b> 5:9  <b>concluded</b> 32:5  <b>confidential</b> 27:7  <b>consistently</b> 17:19  <b>consulted</b> 9:13  <b>contact</b> 21:2,8  <b>contacted</b> 20:11,14,16  21:1 28:23 29:2,24  <b>content</b> 27:23  <b>continued</b> 19:17  <b>continuous</b> 22:3</p>	<p><b>contract</b> 9:22 10:1  34:20 36:19  <b>conversation</b> 6:2,4  <b>cool</b> 17:23 18:2,4,6,9  22:23  <b>Corporation</b> 1:5,15  6:15,19,21  <b>correct</b> 5:16 6:16,17  7:2,22 11:14,15 14:8  14:23 15:1 24:14  28:9 34:11 36:10  <b>correction</b> 16:14 33:3,4  33:17  <b>correctly</b> 26:21  <b>cost</b> 25:9  <b>counsel</b> 6:4  <b>course</b> 11:23  <b>court</b> 5:3 12:19 28:6  34:19 36:18  <b>Craig</b> 2:3,3 6:3  <b>created</b> 16:3,12 31:15  <b>creating</b> 12:7,8  <b>current</b> 7:5 17:24  <b>currently</b> 6:14  <b>curtail</b> 16:22 31:19,23  <b>curtailed</b> 17:2  <b>curtailing</b> 16:15,19  <b>curtailment</b> 10:24 11:1  11:3,3  <b>customer</b> 22:13 27:16  27:16,21 28:23 29:2,3  <b>customers</b> 22:2,5 25:7  27:5  <b>cycle</b> 26:19  <b>C-a-r-l-e-n</b> 20:22</p> <p><b>D</b></p> <p><b>damage</b> 22:4  <b>date</b> 1:14 15:15,24  19:11 20:1,6 33:2,6  <b>dates</b> 15:19 25:6 26:12  26:13 27:4,12,16,17  <b>day</b> 21:4 35:3 37:3  <b>day-to-day</b> 7:22  <b>December</b> 14:24  <b>decide</b> 10:15  <b>deciding</b> 9:17  <b>decision</b> 8:15 9:11  <b>decision-making</b> 9:13  <b>define</b> 10:6  <b>defined</b> 34:21 36:20  <b>degrees</b> 15:12 18:3,8  29:16,18  <b>delivery</b> 25:6 27:4,12  27:17  <b>depends</b> 16:24 17:9,23  25:21</p>	<p><b>deposed</b> 4:4  <b>deposition</b> 1:12 4:9  5:21,24 32:5 33:2  34:13 36:12  <b>designed</b> 31:10,15  <b>desk</b> 8:13  <b>determine</b> 9:8  <b>determined</b> 10:3 24:17  <b>developed</b> 11:12  <b>developing</b> 11:16  <b>dictate</b> 23:16  <b>dictates</b> 23:13  <b>differently</b> 31:5  <b>direct</b> 7:21 23:7  <b>directive</b> 30:4  <b>discuss</b> 30:1  <b>discussion</b> 11:7  <b>dismissing</b> 24:24  <b>disruption</b> 24:22  <b>document</b> 15:11,24  <b>documents</b> 8:21  <b>downtime</b> 11:12 15:12  24:3,12  <b>downtown</b> 11:24  <b>drafted</b> 15:14,15  <b>driven</b> 14:2  <b>due</b> 11:3  <b>duly</b> 4:3 34:5,6 36:4,5  <b>Dunn</b> 2:14</p> <p><b>E</b></p> <p><b>E</b> 2:11 34:2,2 36:1,1  <b>earlier</b> 10:7 25:15  26:23  <b>earn</b> 25:19  <b>easier</b> 5:3  <b>East</b> 1:15 2:11  <b>ECE</b> 10:22 13:15,18,21  14:1,2,4,7,14,19  16:16,20 18:11,19,22  19:5,8,10,12,14,21  20:1,8,9 21:10,12,17  24:4,9,13,19 25:24  26:5,9 27:17,23 28:24  29:3,7,8,8,24 30:5  31:1,7,11,16,19  <b>ECEs</b> 11:8,14 25:15  28:18  <b>Edison</b> 1:8 4:9 8:16  9:22 11:4 23:13,16,19  24:4,13 28:14,17  <b>Edison's</b> 6:7 9:18  <b>effective</b> 15:24  <b>either</b> 22:18  <b>electric</b> 8:16 9:18,22  10:18 11:4 16:15  <b>electrical</b> 9:5 10:24</p>	<p>11:1,3 16:19 24:16,18  <b>electricians</b> 20:16 22:8  22:16  <b>elements</b> 27:12  <b>Ellis</b> 1:17 34:4 35:5  36:3 37:5  <b>ELR</b> 8:17,19,20,21,23  9:4,9,14 10:5,8,20  24:17,18 28:18  <b>employed</b> 6:14  <b>employee</b> 34:16,17  36:15,16  <b>employees</b> 24:24  <b>employer</b> 6:18,20  <b>enclosed</b> 33:3  <b>ended</b> 19:21 20:1 25:24  <b>ends</b> 19:15  <b>Energy</b> 2:13 28:18,23  29:2  <b>ensure</b> 11:13 24:2,8,11  <b>entering</b> 9:21  <b>entire</b> 6:4 19:10,12,14  <b>entitled</b> 13:1  <b>entity</b> 6:17  <b>equipment</b> 11:13 25:13  <b>Essentially</b> 4:24  <b>established</b> 26:7  <b>establishes</b> 23:10  <b>estimate</b> 29:18  <b>estimation</b> 4:18 17:3  <b>event</b> 10:24 11:1,3  <b>events</b> 24:19,21  <b>exact</b> 11:20  <b>exactly</b> 22:17  <b>Examination</b> 3:2,4 4:3  4:5  <b>examples</b> 15:3  <b>excused</b> 32:5  <b>Exhibit</b> 13:2 15:2,9  17:7 22:18 23:1  <b>Exhibits</b> 31:9,13  <b>Exhibit's</b> 12:4  <b>expected</b> 26:23  <b>expires</b> 35:8 37:8  <b>explain</b> 11:1 22:20  <b>e-mail</b> 19:2,3,5 21:9</p>
<p><b>B</b></p> <p><b>back</b> 7:14 8:9,19 10:4  12:19 14:18 16:11  20:5 21:19 25:19  26:2 28:5,6  <b>based</b> 17:22  <b>basis</b> 19:13  <b>behalf</b> 2:2,6,13  <b>believe</b> 6:20 9:7 10:24  30:5,18  <b>believes</b> 30:22  <b>BERNE</b> 2:7,10  <b>bills</b> 10:18  <b>Blazunas</b> 2:18  <b>boss</b> 20:11  <b>Boulevard</b> 2:4  <b>break</b> 8:5  <b>Brief</b> 29:13</p>				<p><b>F</b></p> <p><b>F</b> 15:12 34:2 36:1  <b>face</b> 21:3,3  <b>facility</b> 7:3 11:11,11,24  13:9,14,17,21,24 14:6  14:9,12,19 16:22 17:6  18:15 19:7,10 20:3,23  21:6 22:21 23:10  24:3,12 28:15,20  29:15 31:18,22</p>



<b>facility's</b> 16:15,19 23:13 25:13 <b>fair</b> 6:22 8:22 9:16,19 26:19 <b>fans</b> 22:19,20,21 23:2 <b>far</b> 19:14 <b>fastest</b> 18:2,4 <b>financially</b> 34:19 36:18 <b>fine</b> 6:24 <b>finish</b> 13:2,4 25:19 <b>firm</b> 10:5,6,12 34:20 36:19 <b>first</b> 2:13 4:3 16:9 20:11 28:18,23 29:2 34:6 36:5 <b>focusing</b> 13:13 <b>follow</b> 13:17 15:22 <b>follows</b> 4:4 <b>foregoing</b> 34:10,14 36:9,13 <b>form</b> 5:6 18:16 30:7,17 <b>forth</b> 31:9 <b>four</b> 18:9 <b>Friday</b> 8:3 <b>front</b> 23:23 <b>full</b> 5:12 <b>further</b> 34:13,15 36:12 36:14	<b>hot</b> 17:24 <b>hour</b> 17:3,18,19 18:4 <b>hourly</b> 24:24 25:18 26:1 27:1 <b>hours</b> 8:2 17:5 18:9 19:17 <b>Huron</b> 33:19	12:23 13:1,2,2,4,6,9 <b>July</b> 14:24 26:11	<b>mean</b> 10:23 11:11 30:14 <b>means</b> 10:24 <b>meeting</b> 5:20 <b>Metals</b> 6:20 <b>method</b> 19:1 23:19,21 <b>minute</b> 11:22 29:12 <b>minutes</b> 31:20,24 <b>missed</b> 25:6 27:11,17 <b>moment</b> 4:7 <b>Monday</b> 8:3 <b>moved</b> 7:12,14 <b>MSC</b> 6:23 7:1 9:8,17 9:18 10:3,8,16 13:23 16:18 24:17,21 25:18 26:1 27:4,17 <b>MSC's</b> 5:20 8:15 9:21 10:5,12,18 11:11 25:7 30:20	<b>OFFICES</b> 2:3 <b>Ohio</b> 1:2,16 2:4,9,12,15 33:19 34:5 35:2,6 36:4 37:2,6 <b>okay</b> 4:13,23 5:6,11 6:22,23 7:16 9:21 10:15 11:9 12:22 13:13 14:9,12 15:8,11 30:10 32:2 <b>once</b> 4:12 17:9,15 21:19 <b>One-and-a</b> 17:5 <b>operate</b> 29:18 <b>operations</b> 7:6,7,14,16 7:17,20,22 <b>opposed</b> 13:3 <b>outage</b> 11:12,24 15:12 24:3,13 <b>oven</b> 11:24 12:1 18:2,3 22:21 23:2 <b>ovens</b> 13:2,5,7,10 15:23 17:23,24 18:5,7,8,9 20:3 22:21,23 29:15 <b>overtime</b> 25:9	
<b>G</b>	<b>I</b>	<b>K</b>	<b>L</b>	<b>N</b>	
<b>general</b> 4:15 <b>generally</b> 7:21 <b>getting</b> 10:4 <b>give</b> 4:18 5:17 11:21 21:19 <b>given</b> 15:3 34:8,11 36:7 36:10 <b>go</b> 16:11 29:11 30:11 <b>good</b> 5:12 <b>grid</b> 9:6 11:5 <b>ground</b> 4:22 <b>guess</b> 23:18 25:21	<b>immediately</b> 21:8,24 22:11 <b>implement</b> 17:7,11 <b>implemented</b> 17:22 <b>imposing</b> 28:15 <b>Including</b> 24:24 <b>incorrectly</b> 16:9 <b>incurring</b> 25:3 <b>incurs</b> 24:3,12 <b>INDEX</b> 3:1 <b>indicated</b> 17:21 <b>indicates</b> 15:24 <b>information</b> 27:18 <b>initially</b> 16:10 <b>initiate</b> 20:13,16 22:14 <b>initiated</b> 14:4 <b>initiates</b> 18:10 <b>input</b> 11:18 <b>insert</b> 20:15 21:20 22:6 <b>instruct</b> 22:15 23:2 <b>instructed</b> 21:20 <b>instruction</b> 21:19 22:12 <b>interested</b> 34:19 36:18 <b>introduced</b> 4:7 <b>involve</b> 10:8 24:22 <b>involved</b> 8:15 11:16 12:6,8,20 30:24 <b>issue</b> 11:4 14:21 <b>issued</b> 24:9 <b>issues</b> 9:5 11:5	<b>keep</b> 10:4 <b>kind</b> 7:12,14 <b>know</b> 5:9 8:19 9:11 10:4 15:15,19 19:16 19:21 20:21 21:14 22:17 26:13 27:18,20 28:20 29:21 <b>knowledge</b> 25:22 <b>known</b> 24:21 <b>KWH</b> 9:7 11:6 24:16 31:23	<b>laid</b> 17:7 <b>Laura</b> 2:8 <b>LAW</b> 2:3 <b>lead</b> 20:15 21:22 22:6 <b>leave</b> 8:9 <b>led</b> 30:16 <b>Let's</b> 14:18 15:9 29:11 <b>line</b> 13:10 14:11,22 20:15,15 21:21,23 22:3,4,4,7,13 24:1,5 26:7 <b>lists</b> 15:13 <b>little</b> 4:21 5:3 <b>LLP</b> 2:7,10 <b>load</b> 10:5,6,9,12,16 16:15,19,23 31:19,23 <b>locate</b> 21:2 <b>long</b> 4:17 6:11 7:7 16:22 17:14 21:16 <b>longest</b> 17:4 18:6 <b>look</b> 15:9,9 <b>looking</b> 12:3 23:7 26:13 <b>loud</b> 5:4 <b>lunch</b> 8:5	<b>name</b> 3:3 5:12 6:17 <b>nature</b> 12:24 <b>need</b> 17:15 20:13 <b>needed</b> 15:22 <b>needs</b> 24:2,11 <b>New</b> 6:20 <b>nod</b> 5:5 <b>nodded</b> 12:16 <b>nods</b> 12:11 <b>non-customer</b> 21:22 <b>noon</b> 8:9 <b>Normal</b> 8:2 <b>North</b> 33:19 <b>Notary</b> 1:17 34:4 35:5 36:3 37:5 <b>noted</b> 19:19 <b>notice</b> 18:22 19:4,8 20:8,9 21:9,12,17 24:4,9,13 29:4,7,24 30:2,23 <b>notices</b> 27:23 <b>number</b> 10:16 30:15	<b>page</b> 3:3 13:1 16:11 24:1 33:1,17 <b>pages</b> 33:4 <b>page(s)</b> 33:3,17 <b>part</b> 26:8 28:2 <b>participate</b> 8:15 9:9 24:17 <b>parties</b> 34:16,18 36:15 36:17 <b>pay</b> 25:1 26:4 <b>penalties</b> 28:14 <b>percent</b> 29:21 <b>percentage</b> 29:17 <b>perfectly</b> 5:9 <b>period</b> 7:13 21:18 <b>person</b> 9:17,24 10:3 16:14,18 <b>personal</b> 4:16 <b>personally</b> 11:16 18:22 <b>Peter</b> 2:18 <b>phone</b> 19:2,3,5 21:2,5,9 30:1 <b>PJM</b> 18:19 <b>place</b> 1:15 23:7 34:14 36:13 <b>plan</b> 9:19 <b>plant</b> 7:22 8:13 21:3 26:3 30:3,4 <b>please</b> 5:4,12 9:3 14:15 17:16 21:21 29:20 31:3 33:17 <b>policy</b> 15:14,15,16,21
<b>H</b>	<b>J</b>	<b>M</b>	<b>O</b>		
<b>half</b> 17:5 <b>hand</b> 35:2 37:2 <b>happen</b> 18:13 23:2 26:23 <b>happened</b> 25:22,23 <b>happens</b> 25:18,21 27:2 <b>head</b> 5:5 12:11 <b>Heights</b> 2:4 <b>Help</b> 28:2 <b>hereinafter</b> 4:3 <b>hereunto</b> 35:1 37:1 <b>higher</b> 15:12 <b>home</b> 26:1,4 27:1	<b>January</b> 16:1 35:8 37:8 <b>Jeff</b> 1:12 3:3 4:1 <b>Jeffrey</b> 5:14 <b>Jeremy</b> 20:20 <b>John</b> 5:14 20:13,13 21:1 33:6 <b>JR1</b> 12:4,8 13:13,21 14:1,13 15:2,9 17:7 17:12,13,14,19 18:10 22:18 23:1,5 31:9,13 <b>JR2</b> 12:4,9 13:13,21 14:1,13 15:3,20 17:8 17:9,21,21 18:10 22:18 23:1,5,6,8 31:10,13 <b>JR3</b> 12:4,10,12,20,22	<b>M</b> 2:14 <b>Main</b> 2:15 <b>maintenance</b> 7:9,13,17 <b>majority</b> 8:12 <b>management</b> 24:2,8,11 <b>manager</b> 7:6,7,9,13,17 7:17,17,20 <b>material</b> 1:5,15 6:14,19 6:20 22:3,5,13 <b>materials</b> 25:3 <b>matter</b> 1:3 4:13,16 7:21 27:22 28:13 <b>McBride</b> 2:8 3:4 30:10 30:12	<b>object</b> 14:16 19:13 <b>objecting</b> 30:17 <b>objection</b> 8:24 18:16 19:18 21:13 27:6,9 30:7 <b>objections</b> 30:16 <b>occasion</b> 8:6 <b>occasionally</b> 26:8 <b>occur</b> 24:19 <b>October</b> 15:14 <b>offering</b> 27:22 28:13 <b>office</b> 35:2 37:2		

16:3,5 23:5 position 7:13,14 possibility 25:6 possible 16:4 22:2 25:12 potential 25:9 prepare 5:21 presence 34:9 36:8 present 2:17 6:2,4 30:22 previous 12:19 28:6 previously 31:18,22 prime 13:1,4 Prior 7:9 probably 8:14 18:4 procedure 11:21 12:1,2 12:8,9,10,21,22,22,23 13:1,3,3,4,9,17 15:2 15:21 16:10,11 17:9 17:12,15 22:9,12,14 22:16 23:14,17 30:24 procedures 11:13,17 11:18,19 12:6 13:14 13:20,23 14:2,3,6,10 14:12 15:5 20:17 23:11 31:9,10,14,14 process 9:14 13:11 15:22,23 17:22 18:15 24:22 25:4 31:6 processes 18:10 producing 29:22 product 17:24 production 13:7,10 14:13,19,20 17:22 20:3,14,15,18 21:21 24:22 25:10 26:7,18 26:19 products 16:24 17:10 29:17 provide 4:21 Public 1:1,17 34:4 35:5 36:3 37:5 purchased 6:19 purpose 15:20 31:11,15 purposes 11:7 pursuant 8:16 24:18 put 10:12 21:23 p.m 1:14 8:2	28:1,2,4,5,6 29:19 30:8,18,18,21 31:3,12 31:21 questions 5:9 29:14 32:3 quickest 17:2,3	reserved 32:7 Respondent 1:9 2:6 4:2 responding 31:11,16 response 13:15,15,18 13:21,24 14:7 18:11 22:12 responsibilities 7:21 responsible 9:17,21 16:15,18 restart 13:11 result 25:3 27:17 results 24:2,8,12 return 33:17 review 10:18 17:15 revised 16:5,12 re-call 25:18 re-called 26:1,2 re-starting 25:4 Rider 8:17,19,20,21,23 9:4,9,14 10:5,8,20 24:17,18 28:18 right 7:11 10:10 11:8 17:8,19 19:24 23:11 24:19,22 26:9 28:12 rule 34:21 36:20 rules 4:22 run 25:9 29:15 running 16:24 17:10,24 18:1,3,8 22:3 R-a-m-s-a-y 5:15	shut 13:3,12,14,20 14:21,23 20:15 30:3,4 shutdown 11:12,13,24 12:1,22 13:18,23 14:3 14:3,4,6,10,11,12,19 14:20 15:2,5,8,12,22 18:15 20:14,17 22:9 22:11,16,19 23:3,10 23:14,16,20,22 24:3 24:13 25:4 26:8,12,18 30:24 shuts 13:10 shutting 13:6,24 14:13 20:2 shutting-down 31:6 Siffer 5:23 20:13 21:1,2 21:6,8,12,16 29:7,8 29:24 30:13,23 33:6 signatory 9:18 signature 32:4,7 33:1 33:17 signed 9:24 33:17 simply 30:19 simultaneously 18:13 sir 24:6 32:2 situation 22:19 situations 10:8 26:17 six 19:17 slash 15:13,13 Smith 2:3,3 8:24 12:13 12:15 14:15 18:16 19:13,17,20 21:13 27:6,10,14 30:7,11,13 32:4 soon 22:2,13 sorry 12:13 24:5 South 2:15 speak 5:23 21:3,16 speaking 27:9 specifically 31:11,15 specified 34:14 36:13 specifying 19:15 Speculation 21:13 speed 18:15 spell 20:21 spend 8:12 sponsored 28:17 Start 6:20 started 20:5 Starting 7:16 startup 12:1,23 13:1,2 13:4 state 5:12 26:21 34:5 35:6 36:4 37:6 states 15:11 stenotype 34:9 36:8 step 20:10	steps 17:7 stop 22:4 straightforward 30:19 strap 21:22 Street 2:8,11,15 33:19 strike 15:8 strip 20:15 21:22 22:7 successful 24:2,8,12 Suite 2:8,11 supervisor 20:14,18 supplier 9:5 11:4 support 29:3 sure 5:4 6:24 9:20 13:9 17:17 26:16 sworn 4:3 34:7 36:6 system 13:6
qualified 34:5 36:4 quantify 11:19 question 5:2 8:18 9:3 9:20 12:17,18,19,24 13:8,22 14:15,16,17 16:10,17 18:17 22:20 23:15 24:10 27:14	R R 34:2 36:1 Ramsay 1:12 3:3 4:1,7 5:14,15 29:15 Ramsay's 27:13 read 6:6,11 10:20 12:19 28:5,6 really 5:5 16:24 reason 5:17 14:14 reasons 14:18 26:5,8 recall 19:23,24 26:2 receive 8:16 10:18 18:22 19:1,4 received 19:7 20:8,8 21:9,12,15,17 29:7,23 29:24 30:2,23 recess 29:13 record 5:13 12:3 29:11 30:8,11 records 26:14,15 reduce 9:6 10:9,16 11:5 24:15 reduced 34:9 36:8 refer 11:8 reference 30:20 references 27:11 referring 28:7 refresher 4:21 regard 27:8 regarding 16:10 27:23 28:14,18,24 29:3 related 4:13 relative 34:15,17 36:14 36:16 relevant 27:6 remember 11:20 20:2 21:15 repeat 9:2 12:18 13:8 13:22 14:15 16:17 23:15 28:4 31:12 rephrase 5:10 reporter 1:17 5:3 12:19 28:6 reporting 33:18 34:20 36:19 representative 28:24 29:3 required 8:9 9:6 31:19 31:23 requirement 24:15	S says 16:11 schedule 7:24 scheduled 14:24 25:16 25:24 26:12 Science 6:19,21 Sciences 1:5,15 6:14 scrap 25:3 seal 35:2 37:2 second 12:24 security 9:19 see 16:1 24:4,6 sense 4:15 14:17 sent 24:4,13 26:1,4 27:1 September 18:20 19:4 19:8,21 20:2,9,18 21:16 22:15 29:6,23 30:5,22 31:2,5 service 8:16 9:22 24:18 27:21 28:24 29:3 33:18 set 31:9 35:1 37:1 Shaker 2:4 shift 25:19 short 7:13 21:18	T T 34:2,2 36:1,1 tails 22:6 take 8:5 16:22 17:4,6 17:14 18:6,9 24:18 taken 4:9 34:13 36:12 takes 17:11,19,23 talk 4:24 5:2 23:1 talked 29:6 30:23 31:14 tear 25:12 telephone 2:13 tell 7:11 8:22,23 21:21 22:8 23:21 29:8 34:7 36:6 terms 10:22 test 14:5 testified 7:20 11:10 21:1 24:1,11 testimony 5:18 6:6,12 10:22 11:10 12:4 23:23 27:13,22 28:8 28:13 30:21 31:10,13 34:8,11 36:7,10 Thank 4:17 5:8 16:14 19:18,20 32:2 thereof 8:13 thing 14:22 things 10:13 24:24 think 10:9 16:9 26:7 three 12:6,7,7 24:1,6 time 7:13 13:18 14:11 15:16 16:6 17:1,6,11 17:12,13,21,23 18:11 19:14,23,23,24,24 21:18 22:15,17 24:2,9 24:12 25:16,21,24 29:21 32:3 34:14 36:13 timely 11:13 times 4:11 15:6 16:8	

27:3 <b>timing</b> 27:23 <b>title</b> 7:5 11:20 <b>today</b> 5:18,21 11:7,12 <b>told</b> 20:13 21:24 26:17 30:2 <b>Toledo</b> 1:8 4:8 6:6 8:16 9:18,22 23:13,16,19 24:3,13 28:14,17 33:19 35:2 37:2 <b>top</b> 15:11,24 <b>transcribed</b> 34:10 36:9 <b>transcription</b> 34:11 36:10 <b>translate</b> 5:5 <b>true</b> 34:11 36:10 <b>truth</b> 34:7,7,8 36:6,6,7 <b>truthful</b> 5:18 <b>try</b> 5:10 <b>turn</b> 15:20 <b>two</b> 24:1,6 30:1 <b>type</b> 14:22 22:20 <b>typical</b> 7:24 <b>typically</b> 8:6	<b>Watchorn</b> 2:11 4:6,8 12:14,16 19:18 27:8 27:11 28:5 29:11 30:15 32:2 <b>way</b> 14:24 <b>wear</b> 25:12 <b>weather</b> 15:12 <b>webinar</b> 28:17,21 <b>week</b> 6:13 14:21 26:19 <b>weekend</b> 25:10 <b>West</b> 2:8 <b>we're</b> 9:6 14:20 16:24 29:21 <b>WHEREOF</b> 35:1 37:1 <b>within-named</b> 34:6 36:5 <b>witness</b> 3:3 4:2 9:2 12:11 28:7 30:21 32:5 34:6,10 35:1 36:5,9 37:1 <b>witnesses</b> 6:7,9 30:21 <b>work</b> 7:24 <b>workday</b> 8:12 <b>worked</b> 6:22 7:1 <b>workers</b> 25:19 26:1,2,4 27:1 <b>Worksheet</b> 33:23 <b>written</b> 5:5 16:10	<b>20</b> 4:20 <b>200</b> 18:3 <b>2000</b> 9:7 10:9,11,12,15 11:5 16:16,19,23 24:16 31:23 <b>2001</b> 7:8,12,15,16 16:1 <b>2003</b> 15:14 <b>2011</b> 35:3 <b>2013</b> 18:20 19:4,22 20:9,19 21:17 22:15 26:11,12 29:6,23 30:5 30:23 31:2,6 <b>2014</b> 1:14 33:2 37:3 <b>2016</b> 35:8 37:8 <b>216</b> 2:5,9 <b>22</b> 16:1 <b>229-0034</b> 2:12 <b>23</b> 35:8 37:8 <b>255-1010</b> 33:20 <b>26</b> 2:4	<b>8</b> <b>8:00</b> 7:24 <b>88</b> 2:11 <b>9</b> <b>9:00</b> 8:1
<b>U</b> <b>Uh-huh</b> 15:10 <b>ULMER</b> 2:7,10 <b>understand</b> 5:8 8:18,21 9:20 10:8,11 14:16,17 23:18 24:10 28:2,3 30:17 <b>understanding</b> 8:23 9:4 10:12 14:5 31:1 <b>unscheduled</b> 14:21 <b>updated</b> 15:16 16:5 <b>usage</b> 9:6 24:16 <b>use</b> 14:12 15:2 <b>uses</b> 13:9,14,21,24 14:6 <b>utilities</b> 1:1 4:13	<b>Y</b> <b>year</b> 14:24 <b>years</b> 4:20 7:1	<b>3</b> <b>3</b> 15:13,13,13,14 <b>30610</b> 1:15 <b>31</b> 7:1 <b>32</b> 15:12 <b>330</b> 2:16	
<b>V</b> <b>vague</b> 19:14 <b>Van</b> 2:4 <b>vary</b> 17:12,22 <b>voluntary</b> 29:9 30:6,9 30:14,20 31:2 <b>vs</b> 1:7	<b>Z</b> <b>zero</b> 15:13,13	<b>4</b> <b>4</b> 24:1 <b>405</b> 33:19 <b>419</b> 33:20 <b>43215</b> 2:12 <b>43465</b> 1:16 <b>43604</b> 33:19 <b>44113</b> 2:9 <b>44120</b> 2:4 <b>44308</b> 2:15	
<b>W</b> <b>wages</b> 25:20 <b>waive</b> 32:4 <b>Walbridge</b> 1:15,16 7:3 11:11 20:23 <b>want</b> 30:11 <b>warm</b> 15:11 <b>wasn't</b> 12:20 30:13	<b>1</b> <b>1-22-2001</b> 16:13 <b>1:00</b> 1:14 8:10 <b>1:53</b> 32:6 <b>10</b> 15:13,13 31:19,23 <b>1000</b> 18:8 29:16,18 <b>11</b> 18:20 19:4,8,21 20:9 20:18 21:17 22:15 29:6,23 30:5,23 31:2 31:5 <b>11th</b> 20:2 <b>1100</b> 2:8 <b>13-2145-EL-CSS</b> 1:7 <b>14</b> 1:14 33:2 <b>15700</b> 2:4 <b>1600</b> 2:11 <b>1660</b> 2:8 <b>1996</b> 16:12	<b>5</b> <b>5</b> 3:4 <b>5.3</b> 23:9 <b>5.4</b> 23:9 <b>5:00</b> 7:24 8:1,2 <b>50</b> 29:21 <b>50/50</b> 8:14 <b>571-2717</b> 2:5 <b>583-7034</b> 2:9	
	<b>2</b> <b>2nd</b> 2:8	<b>6</b> <b>614</b> 2:12	
		<b>7</b> <b>7:00</b> 8:2 <b>76</b> 2:15 <b>761-2352</b> 2:16	

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/19/2014 5:48:09 PM**

**in**

**Case No(s). 13-2145-EL-CSS**

Summary: Notice of Filing Deposition Transcript of Complainant's Witness Jeff Ramsay electronically filed by Ms. Laura C. McBride on behalf of The Toledo Edison Company