

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Janice L. Guess,

Complainant,

v.

Ohio Power Company,

Respondent.

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Case No. 14-2313-EL-CSS

**TESTIMONY**

**OF**

**ANGELA GRIFFITH**

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

Filed February 9, 2016

1    **Q.    WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

2    A.    My name is Angela Griffith and my business address is 311 London Rd., Delaware, Ohio  
3        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 an  
6        Associate Customer Services Account Representative.

7    **Q.    WHAT ARE YOUR RESPONSIBILITIES AS A CUSTOMER SERVICE  
8        ACCOUNT REPRESENTATIVE?**

9    A.    I am responsible for investigating and responding to customer questions and concerns  
10        regarding their electric distribution service within my assigned area. This includes meter  
11        or metering issues, billing issues, questions regarding rates, access issues and other  
12        miscellaneous customer related services.

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

14   A.    I graduated from Mount Vernon Nazarene University with a degree in Business. I joined  
15        AEP Ohio in 2001 as a meter reader. I was promoted to a meter specialist in 2007 and  
16        worked in that position until I was named to my current position in 2014.

17   **Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY  
18        PROCEEDING?**

19   A.    No.

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

21   A.    The purpose of my testimony is to address the communications between AEP Ohio and  
22        Ms. Janice Guess leading up to and regarding disconnection of service on December 9,

2014, and to demonstrate that there was a reasonable period of time between notices given to the customer and the disconnection of service.

**Q. WHY WAS MS. GUESS'S SERVICE DISCONNECTED?**

A. Ms. Janice Guess's service was disconnected on December 9, 2014 at 804 Wager Street, Columbus, Ohio 43206 ("804 Wager Street"), and service was also disconnected at 806 Wager Street, Columbus, Ohio 43206 ("806 Wager Street") after reasonable notice was given to Ms. Guess because Ms. Guess refused to allow AEP Ohio employees access to our meters in her backyard; specifically, Ms. Guess denied access to the 806 Wager Street meter. 806 Wager Street, which is attached to 804 Wager Street as a duplex property, needed to be disconnected for inactive use. Since Ms. Guess refused to allow AEP Ohio employees to enter her backyard at the duplex property in order to disconnect service at the 806 Wager Street meter, AEP Ohio had to disconnect service at the pole.

**Q. WHY DID SERVICE AT 806 WAGER STREET REQUIRE DISCONNECTION?**

A. The account at 806 Wager Street had been inactive for approximately four years. Throughout that time period, there had been small amounts of electric usage without any account holder taking responsibility for that use. Company witness Michele Jeunelot speaks in detail about this in her filed testimony.

**Q. WAS THERE ANY WAY TO DISCONNECT SERVICE ONLY AT 806 WAGER STREET?**

A. Yes, 804 Wager Street and 806 Wager Street are separately metered and therefore can be disconnected individually, but to do that it would have required Ms. Guess to allow AEP Ohio employees to disconnect 806 Wager Street at the meter in the backyard of her duplex located at 804-806 Wager Street. Since she refused to allow AEP Ohio employees

1 to access the meter at 806 Wager Street, AEP Ohio had to disconnect at the pole and  
2 disconnecting at the pole disconnects service at both 804 and 806 Wager Street.

3 **Q. HOW WERE AEP OHIO EMPLOYEES DENIED ACCESS TO THE METER AT**  
4 **806 WAGER STREET?**

5 A. Ms. Guess owns the duplex at 804-806 Wager Street, Columbus, Ohio 43206. At this  
6 property, there is a locked fence which requires the homeowner to open it in order for  
7 AEP Ohio employees to access the backyard where the meters at issue are located.  
8 Company witness Michele Jeunelot speaks about this in detail in her filed testimony.

9 **Q. HOW DO YOU KNOW MS. GUESS OWNS THE PROPERTY AT 804-806**  
10 **WAGER STREET, COLUMBUS, OHIO 43206?**

11 A. Because I checked the Franklin County Auditor's website which states that Ms. Guess  
12 has owned that property since December of 1999. A true and accurate copy of that  
13 information from the Franklin County Auditor's website is attached as Exhibit AG1.

14 **Q. HOW DID YOU FIRST BECOME AWARE THAT THERE WAS A METERING**  
15 **ACCESS ISSUE AT MS. GUESS'S PROPERTY?**

16 A. I was approached by a line mechanic who had been to Ms. Guess's property at 804-806  
17 Wager Street, Columbus, Ohio 43206, and he was unable to access the meters at this  
18 property due to the barriers present there.

19 **Q. APPROXIMATELY WHEN DID YOU BECOME AWARE OF THIS ISSUE?**

20 A. I was first made aware of the metering access issue at 804-806 Wager Street around  
21 August or September of 2014.

22 **Q. WHY DID THE LINE MECHANIC COME TO YOU INSTEAD OF SOMEONE**  
23 **ELSE?**

1 A. The property was located within my service area as a customer service representative.

2 **Q. WHEN DID AEP OHIO FIRST DETECT ACCOUNT INACTIVITY AT 806**  
3 **WAGER STREET?**

4 A. In November of 2010. Company witness Michele Jeunelot talks about this in detail in her  
5 filed testimony.

6 **Q. DO YOU KNOW IF AEP OHIO HAD ATTEMPTED TO MAKE CONTACT**  
7 **WITH MS. GUESS BETWEEN THE INITIAL DETECTION OF INACTIVITY IN**  
8 **NOVEMBER 2010 AND THE DATE OF DISCONNECTION ON DECEMBER 9,**  
9 **2014?**

10 A. Yes. AEP Ohio had sent several inactive usage letters to the property at 806 Wager  
11 Street. These letters are included as attachments in Company witness Michele Jeunelot's  
12 filed testimony. In addition, AEP Ohio field employees made several visits to the  
13 property and also left notices at the door on 806 Wager Street.

14 **Q. DID YOU PERSONALLY ATTEMPT TO CONTACT MS. JANICE GUESS?**

15 A. Yes. I called Ms. Janice Guess twice and on both occasions left voicemails asking her to  
16 contact me because we needed to access her meters. I also personally sent Ms. Guess a  
17 letter on October 21, 2014 stating that we would disconnect her service if she did not  
18 contact us regarding this issue. I gave Ms. Guess my direct number as a contact in both  
19 situations. A true and accurate copy of the letter I sent to Ms. Guess is attached as Exhibit  
20 AG2.

21 **Q. WHEN DID YOU MAKE THESE PHONE CALLS TO MS. GUESS?**

1 A. I do not remember the exact dates, but I believe I called Ms. Guess the first time about a  
2 month before I sent the letter. I called Ms. Guess for a second time about a week after I  
3 sent the letter when I did not receive a response to my first voicemail or the letter.

4 **Q. DID MS. GUESS RESPOND TO YOUR VOICEMAILS?**

5 A. No.

6 **Q. ARE YOU AWARE OF ANY OTHER EFFORTS BY AEP OHIO TRYING TO**  
7 **CONTACT THE PROPERTY OWNER AT 804 WAGER STREET IN ORDER TO**  
8 **GAIN ACCESS TO THE METER?**

9 A. Yes. As I mentioned before, I was approached by a line mechanic who had tried to make  
10 personal contact at the property and through my investigation at the time I became aware  
11 of several attempts by both the meter group and our line department group to contact Ms.  
12 Guess in order to gain access to the meters. As Ms. Guess states in her complaint, we  
13 tried on numerous occasions to resolve the issue through personal contact.

14 **Q. DID MS. GUESS RESPOND TO YOUR LETTER?**

15 A. No.

16 **Q. AFTER YOU SENT THE LETTER TO MS. JANICE GUESS STATING THAT**  
17 **HER SERVICE WOULD BE DISCONNECTED IF SHE CONTINUED TO**  
18 **REFUSE ACCESS TO THE METER, DID MS. GUESS AGAIN REFUSE AEP**  
19 **OHIO ACCESS TO THE METER?**

20 A. Yes, AEP Ohio was again refused access to the meter at 806 Wager Street on November  
21 20<sup>th</sup>, 2014 when a field employee initiated contact with Ms. Guess's daughter at the  
22 property and attempted to access the 806 Wager Street meter.

23 **Q. WHEN DID AEP OHIO DISCONNECT SERVICE TO MS. GUESS?**

1 A. December 9, 2014.

2 **Q. DID YOU EVER SPEAK TO MS. GUESS DIRECTLY?**

3 A. Yes. After AEP Ohio disconnected her service for continued refusal to access our  
4 equipment, Ms. Guess called my direct cell phone number.

5 **Q. DO YOU KNOW HOW SHE WOULD HAVE HAD ACCESS TO YOUR DIRECT**  
6 **TELEPHONE NUMBER?**

7 A. She would have gotten my cell phone number from either the letter I sent or from the  
8 voicemails I left.

9 **Q. WHAT WAS DISCUSSED ON THIS PHONE CALL?**

10 A. Ms. Guess called me the same day her service was disconnected on December 9<sup>th</sup>, 2014  
11 asking why that had occurred. I reiterated what I had said in my letter and voicemails: I  
12 told her that AEP Ohio needed access to the meter in the backyard at 804-806 Wager  
13 Street in order to disconnect 806 Wager Street; and because she had denied access to the  
14 806 Wager Street meter in her backyard and never made an arrangement for AEP Ohio  
15 employees to access the meter as requested in my letter and phone calls, and from AEP  
16 Ohio field employees, AEP Ohio has to disconnect 806 Wager Street at the pole instead  
17 of at the meter which necessarily resulted in the disconnection of 804 Wager Street as  
18 well.

19 **Q. WHAT WAS MS. GUESS'S RESPONSE?**

20 A. At first, she was frustrated and angry. Once we discussed the situation further, however,  
21 she appeared to understand the circumstances and seemed more amenable to cooperating  
22 with AEP Ohio.

1 **Q. DID ANY OTHER COMMUNICATIONS TAKE PLACE BETWEEN YOU AND**  
2 **THE GUESS FAMILY REGARDING THE DECEMBER 9, 2014**  
3 **DISCONNECTION OF SERVICE?**

4 A. Yes, on December 9, 2014, after speaking with Ms. Guess, I received a phone call from  
5 Ms. Guess's daughter. She attempted to inquire about her mother's account and the  
6 disconnection of service. I informed her that I could not speak with her about mother's  
7 account or the disconnection of service on her mother's account because the account was  
8 in her mother's name, not her name. Ms. Guess's daughter then handed the phone to Ms.  
9 Guess's brother, whom I told the same thing: he was not privy to information about Ms.  
10 Guess's account.

11 **Q. DID ANYONE IN THE GUESS FAMILY ATTEMPT TO CONTACT YOU**  
12 **AFTER THAT?**

13 A. Yes, I received several phone calls and voicemails from Ms. Guess's daughter and  
14 brother inquiring about Ms. Guess's account and the disconnection of service at 804-806  
15 Wager Street. I did not, however, speak with them directly.

16 **Q. DID YOU SPEAK WITH MS. GUESS ABOUT HER ACCOUNT AFTER YOUR**  
17 **CONVERSATION ON DECEMBER 9<sup>TH</sup>?**

18 A. Ms. Guess called me on December 10<sup>th</sup>. She was still upset about the disconnection of  
19 service that occurred. She let AEP Ohio employees into her backyard to access the 804  
20 and 806 Wager Street meters on December 10<sup>th</sup>, but she stated to me that she would not  
21 allow AEP Ohio in her backyard again.



1 **Q. ARE YOU AWARE IF DURING ANY OF THE MULTIPLE VISITS MADE BY**  
2 **AEP OHIO TO MS. GUESS'S PROPERTY IF PERSONAL CONTACT WAS**  
3 **EVER MADE?**

4 A. Yes. Ms. Guess's adult daughter repeatedly answered the door and refused to allow  
5 access to the backyard. Each employee that attempted to access the meters had an AEP  
6 Ohio ID, AEP Ohio Clothing, and either drove an AEP marked Mini-Van or an AEP  
7 marked bucket truck.

8 **Q. WHAT DO AEP OHIO EMPLOYEES CARRY WHEN THEY ARE IN THE**  
9 **FIELD THAT IDENTIFY THAT THEY ARE IN FACT AEP OHIO**  
10 **EMPLOYEES?**

11 A. Employees who work outside and who could encounter and interact with the public are  
12 required by AEP Ohio to carry their company identification with them at all times. The  
13 AEP Ohio employees that spoke with Ms. Guess's daughter and who were denied access  
14 to the backyard would also be driving in marked AEP Ohio vehicles.

15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A. Yes.

**ParcelID: 010-034951-00**  
**GUESS JANICE L**

**Map-Rt: 010-J027 -056-00**  
**804-806 WAGER ST**

**Owner**

Owner	GUESS JANICE L
Owner Address	804 WAGER ST COLUMBUS OH 43206
Legal Description	804 6 WAGER ST SWAYNE LOT 127 & 126
Calculated Acres	.29
Legal Acres	0
Tax Bill Mailing	JANICE L GUESS  804 WAGER ST COLUMBUS OH 43206-2444  <a href="#">View Google Map</a>

**Most Recent Transfer**

Transfer Date	DEC-17-1999
Transfer Price	\$0

**2015 Tax Status**

Property Class	R - Residential
Land Use	520 - TWO-FAMILY DWLG ON PLATTED LOT
Tax District	010 - CITY OF COLUMBUS
School District	2503 - COLUMBUS CSD
City/Village	COLUMBUS CITY
Township	
Appraisal Neighborhood	01600
Tax Lien	No
CAUV Property	No
Owner Occ. Credit	2015: Yes 2016: Yes
Homestead Credit	2015: No 2016: No
Board of Revision	No
Zip Code	43206

**2015 Current Market Value**

	Land	Improvements	Total
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Base	14,700	59,600	74,300
TIF			
Exempt			
Total	14,700	59,600	74,300
CAUV	0		

**2015 Taxable Value**

	<b>Land</b>	<b>Improvements</b>	<b>Total</b>
Base	5,150	20,860	26,010
TIF			
Exempt			
Total	5,150	20,860	26,010

**2015 Taxes**

<b>Net Annual Tax</b>	<b>Taxes Paid</b>	<b>CDQ</b>
1,586.42	793.21	

**Dwelling Data**

<b>Yr Built</b>	<b>Tot Fin Area</b>	<b>Rooms</b>	<b>Bedrooms</b>	<b>Full Baths</b>	<b>Half Baths</b>
1920	2,408	12	6	2	

**Site Data**

<b>Frontage</b>	<b>Depth</b>	<b>Acres</b>	<b>Historic District</b>
90	140	.2893	



Janice Guess  
P.O.Box 6160  
Columbus Ohio 43206-0160  
October 21, 2014

Account No: [REDACTED]  
Service Address: 804-806 Wager Street  
Meter Number: 535341583-535341582

Dear Janice Guess,

Our technicians have tried to access the property numerous times to service the electric meters. We have been refused access to the meters. Per the customer agreement, we must have access to the meters.

If we are continued to be refused access, we will have no choice but to disconnect both services at the pole.

**SAFETY** is an integral part of AEP Ohio's culture. Our goal is to allow our employees to work safely, to provide our customers with safe electric services and to protect our equipment. Your cooperation and prompt attention is requested in taking care of this safety hazard.

Please contact 614-856-2776 if you have any questions.

Sincerely,

Angie Griffith  
Customer Service Representative  
Customer Services and Marketing

**AEP IS AVAILABLE 24 HOURS A DAY 7 DAYS A WEEK**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via regular mail upon

Complainant at the addresses listed below on this 9<sup>th</sup> day of February, 2016.

Janice L. Guess  
804 Wager Street  
Columbus, Ohio 43206

Janice L. Guess  
P.O. Box 6160  
Columbus, Ohio 43206-0160

/s/ Michael J. Benza  
Michael J. Benza

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

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**in**

**Case No(s). 14-2313-EL-CSS**

Summary: Testimony of Angela Griffith on Behalf of Ohio Power Company d/b/a AEP Ohio electronically filed by Michael J Benza on behalf of Ohio Power Company