

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Janice L. Guess,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 14-2313-EL-CSS
	)	
Ohio Power Company,	)	
	)	
Respondent.	)	

**TESTIMONY  
OF  
MICHELE L. JEUNELOT  
ON BEHALF OF OHIO POWER COMPANY d/b/a AEP OHIO**

Filed February 9, 2016

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

2   A. My name is Michele L. Jeunelot, and my business address is 850 Tech Center Drive,  
3       Gahanna, Ohio 43230.

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  
6       Manager of Regulatory Operations.

7   **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER OF**  
8       **REGULATORY OPERATIONS?**

9   A. In my role as AEP Ohio Manager of Regulatory Operations, I am responsible for  
10       investigating customer complaints. In addition, I am responsible for ensuring  
11       compliance with regulatory requirements.

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

13   A. I earned a bachelor’s degree in Electrical Engineering from Wright State University  
14       and a master’s degree in Business Administration from Capital University. I have  
15       ten years of electric utility experience, focusing primarily on distribution operations.  
16       In 2000, I joined Columbus Southern Power, an operating unit of American Electric  
17       Power, as a Quality of Service Engineer supporting the Columbus area. In 2002, I  
18       became a Project Design Engineer, before joining the Distribution Support Group in  
19       2006 as a Budget & Performance Analyst. In 2009, I joined the Business Support  
20       Group as a Business Operations Support Analyst before being named to my current  
21       position as AEP Ohio Regulatory Manager of Operations.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

A. The purpose of my testimony is to address some of the factual issues raised in the complaint filed by Complainant Janice Guess (Ms. Guess) on December 23, 2014. Through my testimony, I will demonstrate that AEP Ohio correctly followed all rules, contacted Ms. Guess multiple times using various methods before disconnecting service, and that Ms. Guess ignored all of AEP Ohio's attempts to contact her over several years. I am not an attorney and I am not attempting to address any of the legal issues presented in this proceeding.

**Q. PLEASE BRIEFLY DESCRIBE THE NATURE OF MS. GUESS'S COMPLAINT?**

A. AEP Ohio received a formal complaint in this case regarding the disconnection of service to Ms. Guess's property.

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

A. Ms. Guess refused to allow for several years AEP Ohio access to the meters located on her property at 804 Wager Street, Columbus OH 43206 ("804 Wager Street") and 806 Wager Street, Columbus, OH 43206 ("806 Wager Street"). Company witness Angela Griffith speaks in detail about this in her filed testimony.

**Q. DESCRIBE THE SET-UP OF THE PROPERTY IN QUESTION.**

A. Ms. Guess owns a duplex that has two meters which feed 804 Wager Street and 806 Wager Street separately. The 804 and 806 Wager Street meters are both located behind a locked privacy fence which AEP Ohio cannot gain access to.

1 **Q. WHY DID AEP OHIO NEED TO ACCESS MS. GUESS'S METER AT 806**  
2 **WAGER STREET?**

3 A. AEP Ohio needed to disconnect the meter at 806 Wager Street because there had  
4 not been an occupant at that address taking responsibility for the active electric  
5 service since November of 2010.

6 **Q. WAS ELECTRIC BEING USED AT 806 WAGER STREET AFTER THE**  
7 **LAST PERSON CLOSED THEIR ACCOUT IN NOVEMBER OF 2010?**

8 A. Yes. Although the usage was fairly low—under 200 kWH a month—it was being  
9 used and no one was paying for that usage.

10 **Q. DOES MS. GUESS LIVE AT 806 WAGER STREET?**

11 A. No, Ms. Guess lives on one side of the duplex at 804 Wager Street, as mentioned in  
12 the complaint.

13 **Q. DOES MS. GUESS OWN BOTH THE 804 WAGER STREET AND 806**  
14 **WAGER STREET PROPERTY?**

15 A. Yes. AEP Ohio was able to determine through the Franklin County Auditor's  
16 website that Ms. Guess was the owner of the entire duplex. A true and accurate  
17 copy of that information from the Franklin County Auditor's website is attached to  
18 Company witness Angela Griffith's filed testimony.

19 **Q. IS THE ACCOUNT AT 804 WAGER STREET IN MS. JANICE GUESS'S**  
20 **NAME?**

21 A. Yes. The account has been open in Ms. Guess's name since March 1, 1998.

22 **Q. HOW DID AEP OHIO KNOW ELECTRIC WAS BEING USED AT 806**  
23 **WAGER STREET IF IT COULD NOT GET TO THE METER?**

1 A. AEP Ohio had installed an AMR (Automatic Meter Reading) Meter at this location.  
2 This is a type of Radio meter in which a meter reader can pick up the usage  
3 readings from the meter on a portable device. It is not a smart meter.

4 **Q. WHAT'S THE DIFFERENCE BETWEEN AN AMR METER AND A**  
5 **SMART METER?**

6 A. An AMR meter is similar to a traditional dial meter except for the fact that you can  
7 pick up the meter usage through a radio signal. A smart meter is a more  
8 sophisticated meter that can record distinct usage times and transmits over a mesh  
9 network with capabilities to remotely start and stop the meter.

10 **Q. WHY DID AEP OHIO NEED TO PHYSICALLY CONTACT THE 806**  
11 **WAGER STREET METER IF THERE WAS AN AMR FUNCTION**  
12 **AVAILABLE AT THIS LOCATION?**

13 A. Although an AMR meter allows usage to be read without contacting the meter, AEP  
14 Ohio needed to disconnect at the 806 Wager Street meter, and such a disconnection  
15 requires a manual process.

16 **Q. WERE ATTEMPTS MADE TO CONTACT 806 WAGER STREET TO**  
17 **ENSURE A NEW CUSTOMER HAD NOT MOVED IN AND DID NOT**  
18 **APPLY FOR SERVICE?**

19 A. Yes, several inactive usage letters were sent to 806 Wager Street in case there were  
20 occupants at this location in order to let them know that there was usage on the  
21 meter without an open account. True and accurate copies of these letters are  
22 attached as Exhibits MLJ 1 – 4.

23 **Q. WHAT IS AN INACTIVE USAGE LETTER?**

1 A. An inactive usage letter is a letter sent to a location in which AEP Ohio  
2 shows that there is electric usage registering on the meter, but no person has  
3 taken responsibility for the account at that location. AEP Ohio usually  
4 leaves electric service on between tenants and sometimes customers forget  
5 to call AEP Ohio to start service in their name; therefore, we send reminder  
6 letters to start service in their name, and these letters are called an inactive  
7 usage letter.

8 **Q. HOW MANY INACTIVE USAGE LETTERS DID AEP OHIO SEND**  
9 **TO 806 WAGER STREET?**

10 A. We can verify that at least 4 letters were sent via mail, although there may  
11 have been more sent which no longer show in AEP Ohio's system due to the  
12 age of the letters. Again, true and accurate copies of these letters are  
13 attached as Exhibits MLJ 1-4.

14 **Q. DID MS. GUESS RESPOND TO ANY OF THESE INACTIVE USAGE**  
15 **LETTERS OR NOTICES?**

16 A. No, not to the knowledge of AEP Ohio.

17 **Q. WERE ATTEMPTS MADE IN PERSON TO CONTACT MS. GUESS?**

18 A. Yes, Company witness Angela Griffith will discuss in her filed testimony the  
19 contact between AEP Ohio and Ms. Guess.

20 **Q. HOW DID AEP OHIO DISCONNECT SERVICE IF IT COULD NOT GET**  
21 **TO THE METER?**

22 A. AEP Ohio had to disconnect service at the pole, which disconnected service at both  
23 804 and 806 Wager Street.

1 **Q. WHEN DID THIS DISCONNECTION HAPPEN?**

2 A. December 9, 2014.

3 **Q. IF AEP OHIO COULD HAVE GOTTEN ACCESS TO THE 806 WAGER**  
4 **STREET METER, THEN WHAT ADDRESSES WOULD HAVE BEEN**  
5 **DISCONNECTED?**

6 A. In that scenario, AEP Ohio would have been able to disconnect the service to only  
7 806 Wager Street, and 804 Wager Street would not have been disconnected.

8 **Q. WAS IT COMPLIANT PRACTICE TO DISCONNECT AT THE POLE**  
9 **SINCE AEP OHIO COULD NOT DISCONNECT AT THE METER?**

10 A. Yes. Per Ohio Administrative Code Rule 4901:1-18-03(E)(2) it states, "Electric,  
11 gas, or natural gas utility companies under the jurisdiction of the commission may  
12 disconnect service to residential customers only for the following reasons: When a  
13 customer, consumer, property owner, landlord or his/her agent does any of the  
14 following: After notice and a reasonable period of time, prevents utility company  
15 personnel from accessing, calibrating, maintaining, or replacing the utility  
16 company's meter, metering equipment, or other utility company property used to  
17 supply service."

18 **Q. WERE TENNANTS LIVING AT 806 WAGER STREET AT THE TIME OF**  
19 **DISCONNECT?**

20 A. No, not to AEP Ohio's knowledge. Again, we had made several attempts via letter to  
21 contact the residence of 806 Wager Street; and per Company witness Angela  
22 Griffith's testimony, we had made several personal visits to the property.

23 **Q. WAS SERVICE RECONNECTED TO 804 WAGER STREET?**

1 A. Yes, on December 10, 2014.

2 **Q. WAS SERVICE RECONNECTED TO 806 WAGER STREET?**

3 A. Yes, on December 10, 2014.

4 **Q. WHY WAS SERVICE RECONNECTED TO BOTH 804 AND 806 WAGER**  
5 **STREET?**

6 A. Service was reconnected on December 10, 2014 because Ms. Guess gave AEP Ohio  
7 access to both the 804 and 806 Wager Street meters.

8 **Q. UNDER WHOSE NAME WAS SERVICE RECONNECTED?**

9 A. On December 10, 2014, Ms. Guess elected to continue service under her name at  
10 804 Wager Street. On that date, also, she elected to take responsibility for the 806  
11 Wager Street account by electing to continue service at that address under her name.

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

13 A. Yes.





Ex. MLJ1

850 Tech Center Dr  
Gahanna, OH 43230-6605  
CYCLE 04 ROUTE 29



OCCUPANT  
806 WAGER ST  
COLUMBUS, OH 43206-2444

June 7, 2012

Meter Number: 535341582

Dear Occupant:

Our most recent meter reading for the above address indicates that electricity is being used. However, no one has applied for service. All new customers are responsible for contacting American Electric Power to establish service.

Please contact AEP within the next **five** business days to start service. If an account is not established, electric service will be disconnected at this location.

We appreciate your cooperation in this matter. If you have any questions, please contact AEP at 1-800-277-2177.

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



Ex. 1113 2

850 Tech Center Dr  
Gahanna, OH 43230-6605  
CYCLE 04 ROUTE 29



OCCUPANT  
806 WAGER ST  
COLUMBUS, OH 43206-2444

July 23, 2013

Meter Number: 535341582

Dear Occupant:

Our most recent meter reading for the above address indicates that electricity is being used. However, no one has applied for service. All new customers are responsible for contacting American Electric Power to establish service.

Please contact AEP within the next **five** business days to start service. If an account is not established, electric service will be disconnected at this location.

We appreciate your cooperation in this matter. If you have any questions, please contact AEP at 1-800-672-2231.

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



Ex. MLJ 3

4500 S Hamilton Rd  
Groveport, OH 43125-9563  
CYCLE 04 ROUTE 29



OCCUPANT  
806 WAGER ST  
COLUMBUS, OH 43206-2444

November 11, 2013

Meter Number: 535341582

Dear Occupant:

Our most recent meter reading for the above address indicates that electricity is being used. However, no one has applied for service. All new customers are responsible for contacting American Electric Power to establish service.

Please contact AEP within the next **five** business days to start service. If an account is not established, electric service will be disconnected at this location.

We appreciate your cooperation in this matter. If you have any questions, please contact AEP at 1-800-672-2231.

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



EX. MLJ4

4500 S Hamilton Rd  
Groveport, OH 43125-9563  
CYCLE 04 ROUTE 29



OCCUPANT  
806 WAGER ST  
COLUMBUS, OH 43206-2444

May 23, 2014

Meter Number: 535341582

Dear Occupant:

Our most recent meter reading for the above address indicates that electricity is being used. However, no one has applied for service. All new customers are responsible for contacting American Electric Power to establish service.

Please contact AEP within the next **five** business days to start service. If an account is not established, electric service will be disconnected at this location.

We appreciate your cooperation in this matter. If you have any questions, please contact AEP at 1-800-672-2231.

**AEP OHIO 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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Summary: Testimony of Michele L. Jeunelot on Behalf of Ohio Power Company d/b/a AEP  
Ohio electronically filed by Michael J Benza on behalf of Ohio Power Company