

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

DANIEL ADKINS,)	
)	
Complainant,)	
)	Case No. 16-1543-EL-CSS
v.)	
)	
OHIO EDISON COMPANY)	
)	
Respondent.)	

OHIO EDISON COMPANY’S POST-HEARING BRIEF

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I. INTRODUCTION

Complainant Daniel Adkins alleges that his electric bills from Ohio Edison Company (“Ohio Edison,” “OE,” or “Company”) were too high from approximately October 2014 through March 2015. He believes (incorrectly) that the alleged high bills were the result of Ohio Edison changing the eclectic meter at his residence sometime in August 2014. He is wrong for two main reasons.

First, the evidence in this proceeding supports the conclusion that Complainant’s electric bills were, at all relevant times, just, reasonable, and accurate. As an initial matter, Complainant’s bills make sense in light of his admitted electric usage. By way of example, Complainant heated his *uninsulated* home during one the coldest winters in recent history—including the second coldest month ever recorded in Complainant’s area—with at least nine different electric heaters. Complainant does not dispute this fact. Complainant also does not dispute the fact his mother used medical equipment 24/7 at his home that required electricity. This, of course, is on top of Complaint’s every day use of electric, including lighting, appliances, and electronics. Complainant himself expected that his electric bills would be “extremely high” due to his usage.

More notably, however, is the fact Complainant’s electric bills were the result of usage that was proven accurate by a meter test conducted in September 2015. The meter test, which Ohio Edison conducted free of charge at Complaint’s request, proved that Complainant’s meter was operating accurately at 100.18%, well within the accuracy parameters established by the Commission. In other words, the meter servicing Complainants’ home was operating properly during the relevant time period, and Complainant presented no evidence at the hearing showing otherwise. His electric bills, therefore, are just and reasonable.

Second, the evidentiary record in this proceeding clearly demonstrates that Ohio Edison *did not* change the meter at his residence in August 2014. Indeed, Complainants' residence had the same electric meter from the time Ohio Edison began servicing the residence in 2013 until September 8, 2015, when Ohio Edison removed the meter for testing at Complainant's request. There is no credible evidence to the contrary—no copies of work orders, invoices, records, notices, letters, e-mails, or anything of the like showing that Complainant's meter was actually changed in 2014. That is because it was not. The only evidence in the record, including Complainant's own evidence—a photograph he took of the meter at issue—proves that the meter was not changed in 2014. The photograph unequivocally shows that the meter Complainant alleges was placed on his property in 2014 is the same exact meter that had been servicing his home since he purchased it in 2013.

To be sure, Ohio Edison has done everything it can to help Complainant. For instance, Complainant has fallen behind on his electric bills on several occasions, leading to a current arrearage of over \$3,200. To assist Complainant, Ohio Edison placed him on several different installment payment plans, which allowed him to make a payment for the current month plus an additional fixed amount designed to eventually catch him up on his late payments. Complainant, however, routinely defaulted on his payment plans, missing the required payment on 16 different occasions. Missing multiple payments, quite obviously, resulted in higher subsequent electric bills, a concept Complainant seems to eschew.

In addition to the payment plans, Ohio Edison tried, on several occasions, to educate Complainant on his bills and on ways to reduce his electric usage. Indeed, Complainant was referred on several occasions to free literature designed to educate Ohio Edison's customers on their electric bills and usage, including two brochures called "Understanding Electric

Usage/Costs” and “More Than 100 Ways to Improve Your Electric Bill.” Complainant was also referred to Ohio Edison’s “Home Energy Analyzer Tool,” which allows customers to gain a better understanding of their household energy use and to identify ways to improve their efficiency. Moreover, Ohio Edison representatives routinely offered to walk Complainant through each of his electric bills, offers Complainant often refused. If Complainant is dissatisfied with his electric bills during the relevant time period, he has no one to blame but himself.

For all these reasons, Complainant failed to meet his burden in this proceeding and the Complaint should be dismissed against Ohio Edison, with prejudice.

II. BACKGROUND

Complainant first moved into his residence at 1263 Country Club Drive in Salem, Ohio, sometime in 2013.¹ Other individuals have lived with Complainant at his residence during various time periods, including Complainant’s girlfriend and his elderly mother.² Complainant’s mother, who lived with Complainant from late 2013 to June 2016,³ was ill throughout her time at the residence, requiring the constant use of several pieces of electrically-powered medical equipment, including an oxygenator, a hospital bed, and a lift chair.⁴ Complainant’s girlfriend also lived with him in his residence from January 2014 to September 2015.⁵ Notably, Complainant was conducting construction on his home during the relevant time period, which is demonstrated in pictures that are part of the record in this case.⁶

¹ Hearing Tr. at 22:1-4 (Complainant Cross).

² *Id.* at 22-25 (Complainant Cross).

³ *Id.* at 25:22-26:4 (Complainant Cross).

⁴ *Id.* at 27:7-25 (Complainant Cross).

⁵ *Id.* at 22:5-8 (Complainant Cross).

⁶ Exhibit 1 at Attachments 3-7, 9-10 (Pictures of 1262 Country Club Drive).

Complainant's account with Ohio Edison was established on August 27, 2013.⁷ At that time, his property at 1263 Country Club Drive was serviced by meter number S59042102.⁸ On May 2, 2014, Complainant contacted Ohio Edison to have the service at his residence changed from overhead to underground.⁹ Complainant requested the work as part of an upgrade he was making to his home to 200 amps.¹⁰ Before his service could be upgraded, Complainant had to have someone come out to his property to install new underground electrical lines.¹¹ It is undisputed that Ohio Edison did not conduct any such work—Complainant hired an individual to complete that work.¹²

After the new underground lines were installed, Complainant had a different individual come to his property to conduct an inspection of the new lines.¹³ Again, Ohio Edison was not involved in that process.¹⁴ On July 14, 2014, after the upgrade work was completed and inspected on Complainant's property, Ohio Edison came to Complainant's property and "made the permanent connection to the underground service and removed the overhead line."¹⁵ Additionally, Ohio Edison moved Complainant's meter, meter number S59042102, to a different location within Complainant's property.¹⁶ Critically, "the meter was merely moved at that time;

⁷ Company Exhibit 5, Direct Testimony of Deborah Reinhart on Behalf of Ohio Edison Company (Jan. 3, 2017) ("Reinhart Testimony") at 8.

⁸ *Id.*

⁹ Reinhart Testimony at 4, 6-7. A copy of the work order placed by Complainant is attached as Exhibit DLR-1 to OE Witness Reinhart's Testimony. *Id.* at Exhibit DLR-1 (Notification No. 733212290).

¹⁰ *Id.* at 4.

¹¹ Hearing Tr. at 42:12-43:21 (Complainant Cross).

¹² *Id.*; *see also* Reinhart Testimony at 4-5.

¹³ Hearing Tr. at 42:12-43:21 (Complainant Cross).

¹⁴ *Id.*

¹⁴ *Id.*; *see also* Reinhart Testimony at 4-5.

¹⁵ *Id.* at 5; Hearing Tr. at 43:7-21 (Complainant Cross).

¹⁶ Reinhart Testimony at 5.

it was not changed or replaced.”¹⁷ Even Complainant admits that the meter was not changed or replaced at that time.¹⁸

Complainant contends, rather, that Ohio Edison replaced the electric meter serving his residence sometime in August 2014—approximately a month after the service upgrade.¹⁹ There are no records of such a meter change. As explained below, that is because there was no meter change in August 2014. Indeed, the evidence in this case, which includes Company testimony, Company records (including Complainant’s electric bills), and photographs Complainant himself took—prove that there was no such meter change. Nevertheless, according to Complainant, the meter that he believes was installed on his property in August 2014 was inaccurately recording his electric usage. As such, he is alleging in this proceeding that his Ohio Edison electric bills from October 2015 through March 2015 (the relevant time period) are inaccurate.²⁰

From November 26, 2014 through February 5, 2016, Complainant contacted Ohio Edison on various occasions to express his belief that his bills were “too high.” Complainant also expressed his belief that Ohio Edison “replaced” his meter in the summer of 2014. OE Witness Reinhart described these communications in detail in her Testimony and at the hearing.²¹ In short, Ohio Edison followed its internal process for customer bill inquiries during the various calls.²² Indeed, as fully discussed below, Ohio Edison obtained information from Complainant that justified his electric usage, as well as repeatedly explained to Complainant that the Company did not change his meter in August 2014.²³

¹⁷ *Id.*

¹⁸ Hearing Tr. at 43:7-25 (Complainant Cross)

¹⁹ *Id.* at 43:22-44:19-23 (Complainant Cross).

²⁰ *Id.* at 18:18-22 (Complainant Cross).

²¹ See Reinhart Testimony at 8-17; Hearing Tr. at 59:14-64:14 (Reinhart Cross).

²² Reinhart Testimony at 8-17; Hearing Tr. at 59:14-64:14 (Reinhart Cross).

²³ Reinhart Testimony at 8-17; Hearing Tr. at 59:14-64:14 (Reinhart Cross).

At Complainant's request, Ohio Edison removed meter number S59042102 for inspection and testing in September 2015.²⁴ The meter test, which was conducted on September 11, 2015, determined that meter number S59042102 was reading at 100.18% accurate, well within the accuracy parameters established by the Commission.²⁵ Ohio Edison promptly sent Complainant a letter notifying him of the results of the test and explaining that the usage charges on his Ohio Edison electric bills were accurate.²⁶ Because Ohio Edison has to remove a meter from the service location in order to test it, Complainant was issued a new meter the same date meter number S59042102 was removed for testing.²⁷ Complainant's new meter, meter number S313186697, was tested prior to installation on Complainant's property.²⁸ Like meter number S59042102, meter number S313186697 also tested within the accuracy parameters established by the Commission.²⁹ Meter number S313186697 continues to serve Complainant's residence to this day.³⁰

Complainant filed this proceeding against Ohio Edison on July 8, 2016. The Attorney Examiner conducted a one-day evidentiary hearing on January 10, 2017. Ohio Edison presented its case through the testimony of Deborah Reinhart and through the introduction of Company Exhibits 1 through 6. Complainant presented his case through his own testimony. The Attorney Examiner closed the record in this case at the close of all testimony. Pursuant to the Attorney Examiner's directive, Ohio Edison now submits this initial brief in support of its position in this proceeding.

²⁴ Reinhart Testimony at 5-6.

²⁵ *Id.* at 6, 14; *see also id.* at Exhibit DLR-2.

²⁶ *Id.* at 6-7; *see also id.* at Exhibit DLR-3.

²⁷ *Id.* at 7.

²⁸ *Id.* at 7; *see also id.* at Exhibit DLR-4.

²⁹ *Id.*

³⁰ Reinhart Direct Testimony, p. 8, 8-9.

III. LAW AND ARGUMENT

Complainant has failed to satisfy his burden in this proceeding. Section 4905.26 of the Ohio Revised Code requires that the Commission set for hearing a complaint against a public utility when grounds appear that:

[A]ny rate, fare, charge, toll, rental, schedule, classification, or service, or any joint rate, fare, charge, toll, rental, schedule, classification, or service rendered, charged, demanded, exacted, or proposed to be rendered, charged, demanded, or exacted, is in any respect unjust, unreasonable, unjustly discriminatory, unjustly preferential, or in violation of law, or that any regulation, measurement, or practice affecting or relating to any service furnished by the public utility, or in connection with such service, is, or will be, in any respect unreasonable, unjust, insufficient, unjustly discriminatory, or unjustly preferential, or that any service is, or will be, inadequate or cannot be obtained³¹

It is well-established that the burden of proof rests with the complainant in proceedings before the Commission.³² Thus, Complainant bears the burden of proving his allegation that Ohio Edison's electric bills from October 2014 through March 2015 were somehow unjustly or unreasonably excessive.³³ Complainant must make this showing by a preponderance of the evidence.³⁴ This is a burden Complainant cannot meet. As set forth below, the *only* evidence in the record demonstrates that Complainant's electric bills during the relevant time period were just, reasonable, and accurate. Because Complainant cannot meet his burden, the Commission must dismiss the Complaint in its entirety and find in favor of Ohio Edison.

³¹ O.R.C. §4905.26.

³² *Grossman v. Pub. Util. Comm.*, 5 Ohio St. 2d 189, 214, 214 N.E.2d 666 (1966).

³³ O.R.C. §§4905.22, 4905.26; *see also DiSiena v. The Cleveland Electric Illuminating Company*, Case No. 09-0947-EL-CSS, Opinion and Order, 2 (Dec. 8, 2010).

³⁴ *Ohio Bell Telephone Co. v. Pub. Util. Comm.*, 49 Ohio St. 3d 123, 126 (1990); *Grossman*, 5 Ohio St. 2d at 190.

A. Complainant's Ohio Edison Bills Were Just and Reasonable.

The Commission analyzes “high bill” complaints by looking at two specific factors: (1) whether the meter servicing the property has been tested and determined to be within the accuracy parameters established by the Commission; and (2) whether the record demonstrates a plausible explanation for the Complainant’s electric usage.³⁵ Here, both factors undoubtedly favor Ohio Edison.

First, it is undisputed that Ohio Edison tested the meter servicing Complainant’s property during the relevant time frame, which was determined to be functioning accurately and well within the accuracy parameters established by the Commission.³⁶ **Second**, the record in this proceeding clearly shows that Complainant’s electric usage is justified in light of his admitted electric usage. Indeed, Complainant’s usage is easily explained by his use of at least nine different electric heaters to heat an uninsulated home during an extreme winter, combined with his mother’s use of multiple pieces of medical equipment that required electricity 24/7, as well as Complainant’s daily use of electric, including lighting, appliances, and electronics.

1. The September 2015 Test On Complainant’s Electric Meter Confirmed That His Usage Was Accurate and Justified.

On September 4, 2015, Complainant asked Ohio Edison to remove and test the electric meter servicing his residence at 1263 Country Club Drive, which he alleged was not working properly.³⁷ Four days later, on September 8, 2015, Ohio Edison removed the meter on

³⁵ See, e.g., *In re the Complaint of Kingsville Apartments a/k/a Center Court Apartments, LLC v. Columbia Gas of Ohio, Inc.*, Case No. 05-1229-GA-CSS, Opinion and Order, 19-20 (Apr. 4, 2007) (“Further, the Commission has held that, in addition to the utility company’s proof as to the accuracy of the meter, the company must provide at least a ‘plausible explanation’ to support the consumption for which the customer was billed.”) (citing *In re the Complaint of Merle Davis v. The Cleveland Electric Illuminating Company*, Case No. 81-1495-EL-CSS, Opinion and Order (Nov. 2, 1983)).

³⁶ Reinhart Testimony at 6, 18-19.

³⁷ Reinhart Testimony at 5; Hearing Tr. at , 60:22-61:6, 64:2-12 (Reinhart Cross).

Complainant's residence, meter number S59042102, so that it could be tested for accuracy.³⁸ Complainant does not dispute this fact and conceded at the hearing that he was even present when Ohio Edison came to remove the meter for testing.³⁹ As OE Witness Reinhart explained, Ohio Edison cannot test an electric meter at a residence; it must be removed for off-site testing.⁴⁰ The meter was tested on September 11, 2015.⁴¹

The results of the test confirmed that meter number S59042102 was working properly and was thus accurately recording Complainant's electric usage.⁴² As OE Witness Reinhart testified, "[t]he Commission established standards for the accuracy of residential meters in Section 4901:1-10-05(B) of the Ohio Administrative Code, which incorporates the standards proscribed by the American National Standards Institute."⁴³ Pursuant to those standards, Ohio Edison must maintain its residential electric meters "at an accuracy level that does not deviate more than 2% from actual usage."⁴⁴ In other words, "residential meters must score between 98% and 102% accurate upon being tested."⁴⁵ Meter number S59042102 tested at **100.18% accurate**, well within the accuracy parameters accepted and adopted by the Commission.⁴⁶ The results of the test on meter number S59042102 are attached as Exhibit DLR-2 to OE Witness Reinhart's Testimony.⁴⁷

Ohio Edison notified Complainant of the test results by letter dated September 14, 2015.⁴⁸ The letter, which is attached as Exhibit DLR-2 to OE Witness Reinhart's Testimony,

³⁸ Reinhart Testimony at 5, 14-15; Hearing Tr. at , 60:22-61:6 (Reinhart Cross).

³⁹ Hearing Tr. at 41:25-42:7 (Complainant Cross).

⁴⁰ Hearing Tr. at 69:21-70:2 (Reinhart Re-Direct).

⁴¹ Reinhart Testimony at 5, 14; Hearing Tr. at 60:22-61:6, 64:2-12 (Reinhart Cross).

⁴² Reinhart Testimony at 6, 14.

⁴³ Reinhart Testimony at 6, 14; *see also* O.A.C. § 4905:1-10-05(B).

⁴⁴ Reinhart Testimony at 6, 14; *see also* O.A.C. § 4905:1-10-05(B).

⁴⁵ Reinhart Testimony at 6, 14; *see also* O.A.C. § 4905:1-10-05(B).

⁴⁶ Reinhart Testimony at 6, 14; Hearing Tr. at 64:2-12 (Reinhart Cross).

⁴⁷ Reinhart Testimony at Exhibit DLR-2; *id.* at 6.

⁴⁸ Reinhart Testimony at 6, 14; Hearing Tr. at 64:2-12 (Reinhart Cross).

explained that the meter tested within the accuracy parameters discussed above and that Complainant's electric bills were thus accurate.⁴⁹ Notably, Complainant never disputed the results of the meter test. Nor can he. Indeed, there is no evidence in the record challenging or otherwise disputing the September 2015 test on meter number S59042102. The record is also devoid of any evidence that meter number S59042102 was working improperly or operating inaccurately at any time during the relevant time period. As Complainant admitted, he does not have any proof or records showing that the meter failed any inspection, test, and/or analysis, or that the meter was somehow faulty or malfunctioning at any time in any way.⁵⁰

Consistent with the Company's practice, meter number S59042102 was not re-installed on Complainant's property after testing.⁵¹ Rather, Complainant was issued a new meter when his old meter was removed for testing, meter number S313186697.⁵² Ohio Edison tested Complainant's new meter (S313186697) prior to installing it at his residence.⁵³ Complainant's new meter tested at 100.02% accurate, also well-within the above-mentioned standards. The results of that test are attached as Exhibit DLR-4 to OE Witness Reinhart's Testimony.⁵⁴ Complainant does not take issue with his electric usage after this new meter was installed on September 8, 2015.⁵⁵ (In fact, as stated above, Complainant does not take issue with his Ohio Edison bills after March 2015.)⁵⁶

For these reasons, the first factor of the Commission's "high bill" analysis is satisfied. When coupled with Complainant's admitted electric usage, discussed below, it becomes clear

⁴⁹ Reinhart Testimony at Exhibit DLR-3; *id.* at 6-7.

⁵⁰ Hearing Tr. at 64:2-12 (Complainant Cross).

⁵¹ Reinhart Testimony at 7.

⁵² *Id.*

⁵³ Reinhart Testimony at 7.

⁵⁴ *Id.* at Exhibit DLR-4; *id.* at 7.

⁵⁵ Hearing Tr. at 50:18-24 (Complainant Cross).

⁵⁶ *Id.* at 18:18-22 (Complainant Cross). Even if Complainant disputed his electric bills between March 2015 and September 8, 2015 (which, the record does not support), his Complaint would fail for the same exact reasons discussed in Section III.A of this Brief.

that the second factor of the Commission's analysis is also satisfied. As a result, the only reasonable conclusion in this proceeding is that Complainant's electric meter was operating accurately during the time period and that Complainant's electric bills from Ohio Edison were just and reasonable.

2. Complainant's Bills Were Reasonable In Light of His Electric Usage.

The evidentiary record in this proceeding supports Complainant's electric usage. When a customer calls to ask questions about his or her electric bill, Ohio Edison goes through an internal process to determine whether that customer's electric usage is justified.⁵⁷ There is no dispute that Ohio Edison went through that process when Complainant contacted the Company.⁵⁸ As OE Witness Reinhart testified, Ohio Edison first had Complainant provide a meter reading as part of the process. After the meter reading proved consistent, Ohio Edison asked Complainant "questions regarding his [electric] usage, including what types of heating sources he was utilizing."⁵⁹ Complainant informed Ohio Edison that he "was performing construction" at the time and provided information on his specific electric usage, including the fact "that he was running both a barn heater and baseboard heaters in his residence."⁶⁰ Based on the information provided, Ohio Edison determined that Complainant's usage was justified.⁶¹ Ohio Edison also referred Complainant "to several brochures offered by the Company that are designed to educate [] customers . . . on their electric bills and usage."⁶²

Ohio Edison followed its internal process on subsequent calls from Complainant. For instance, Ohio Edison conducted a "customer bill analysis" for Complainant in late June 2015, which included gathering Complainant's usage information to determine whether the electric

⁵⁷ *Id.* at 61:24-5 (Reinhart Cross).

⁵⁸ *Id.*

⁵⁹ Reinhart Testimony at 10; Hearing Tr. at 62:6-10 (Reinhart Cross).

⁶⁰ Reinhart Testimony at 10; Hearing Tr. at 62:6-10 (Reinhart Cross).

⁶¹ Hearing Tr. at 62:6-10 (Reinhart Cross).

⁶² Reinhart Testimony at 10-11.

usage in his Ohio Edison bills was accurate and justified.⁶³ A copy of that bill analysis is attached as Exhibit DLR-7 to OE Witness Reinhart’s Testimony.⁶⁴ The bill analysis showed that Complainant’s electric usage was justified based on the information he provided to Ohio Edison.⁶⁵ Indeed, the bill analysis determined that, based on Complainant’s admitted usage at that time, his typical “usage range” for a 30-day billing cycle should be between 1,454 kWh and 1,778 kWh,⁶⁶ which was consistent with the usage Complainant was actually billed for in June 2015—1,325 kWh.⁶⁷ Ohio Edison also explained to Complainant that his electric bill reflected his payment plan amount (for arrearages) and a late payment charge in addition to his usage charges.⁶⁸

In addition to the information Complainant provided to Ohio Edison during his contacts with the Company, evidence unveiled during the course of this proceeding revealed even more justifications for Complainant’s electric usage. **First**, Complainant admitted that he was using at least *nine different electric heaters* to heat his uninuslated home during a bad winter that spanned the entirety of the relevant time period. **Second**, Complainant also admitted that his mother used medical equipment 24/7 at his home that required electricity. **Third**, Complainant admitted to further use of other electric appliances and electronics. In fact, based on the overall

⁶³ Reinhart Testimony at 12-13; Hearing Tr. at 62:17-19, 63:16-64:1 (Reinhart Cross). Complainant refused to cooperate and declined to go through the bill analysis process with an Ohio Edison representative during a prior call in December 2014. *See* Reinhart Testimony at 11; Hearing Tr. at 62:11-63:2 (Reinhart Cross). At that time, Ohio Edison referred Complainant to the Company’s “Home Energy Analyzer” tool, which is designed to help customers identify ways to save energy and lower their bills. *See* Reinhart Testimony at 11-12; Hearing Tr. at 62:11-63:2 (Reinhart Cross). Ohio Edison also directed Complainant “to brochures on improving electric bills and understanding electricity usage and costs.” Reinhart Testimony at 11. Complainant also declined a customer bill analysis on a subsequent call in July 2015. *Id.* at 13-14.

⁶⁴ Reinhart Testimony at Exhibit DLR-7; *id.* at 13.

⁶⁵ *Id.* at 13; Hearing Tr. at 63:16-64:1 (Reinhart Cross).

⁶⁶ Reinhart Testimony at Exhibit DLR-7 (Adkins_000063).

⁶⁷ *See, e.g.*, Reinhart Testimony at Exhibit DLR-5 (Adkins_000024); *id.* at Exhibit DLR-6 (Adkins_000064); Company Exhibit 4 (Adkins_000024).

⁶⁸ Reinhart Testimony at 12-13.

electric usage in his home at 1263 Country Club Drive, Complainant admitted that he expected his electric bills to be “extremely high.”⁶⁹

(a) Complainant’s use of at least nine different electric heaters during the winter of 2014 explained his electric usage.

As discussed above, Complainant’s bill dispute in this proceeding spans from October 2014 to March 2015, a period that includes the winter of 2014.⁷⁰ That particular winter was one of the coldest winters recorded in northern Ohio.⁷¹ Indeed, according to a study from the National Weather Service, the month of February 2015—the month for which Complainant’s usage was highest—was the *second coldest month ever recorded* in Complainant’s area.⁷² Complainant admitted that the winter of 2014 was a “bad winter” and that he had a hard time keeping his home at 1263 Country Club Drive warm during that time.⁷³

Complainant also admitted to taking extreme measures during that winter to heat his home.⁷⁴ First, Complainant used four different electric “space heaters” in an attempt to heat his home.⁷⁵ That was not enough. Complainant, in addition to the four space heaters, also hired a certified electrician to install four separate “baseboard heaters” to heat his home.⁷⁶ That was also not enough. Complainant, on top of the eight heaters just discussed, also used a more powerful electric heater he refers to as a “barn heater.”⁷⁷ Complainant admitted that the “barn heater,”

⁶⁹ Hearing Tr. at 33:11-14 (Complainant Cross).

⁷⁰ *Id.* at 18:18-22 (Complainant Cross).

⁷¹ See Historical Weather Data from November 2014 through March 2015, attached hereto as Attachment 1. Attorney Examiner Sheets took administrative notice of this report during the evidentiary hearing in this proceeding. See Hearing Tr. at 70:18-71:14 (Administrative Notice).

⁷² See National Weather Service, *NWS Cleveland Record Report for the Month of February 2015*, attached hereto as Attachment 2 (“A record cold average monthly temperature of 13.7 degrees was set at the Youngstown Warren Regional Airport for the month of February . . . This [] was the second coldest month ever recorded.”). Attorney Examiner Sheets took administrative notice of this report during the evidentiary hearing in this proceeding. See Hearing Tr. at 70:18-71:14 (Administrative Notice).

⁷³ Hearing Tr. at 11:17-20, 36:4-5 (Complainant Cross).

⁷⁴ *Id.* at 35:24-36:3 (Complainant Cross).

⁷⁵ *Id.* at 28:8-13 (Complainant Cross).

⁷⁶ *Id.* at 28:18-29:2 (Complainant Cross).

⁷⁷ *Id.* at 29:3-30:23 (Complainant Cross).

which he explained was “bigger than a space heater and uses more electricity,” produced “a lot of heat.”⁷⁸ Therefore, during the winter of 2014, there were points where Complainant was admittedly attempting to heat his home with at least nine different electric heaters at the same time.⁷⁹ In fact, it was so cold, that Complainant, on top of the multiple electric heaters, also used propane heaters in an attempt to heat his home.⁸⁰

Complainant’s extreme use of numerous electric heaters to heat his home during a bad winter certainly justifies the electric usage reflected in his Ohio Edison bills.⁸¹ However, the usage is further explained by the fact Complainant’s home was not properly insulated during that time. At the hearing, Complainant contended that his property on 1263 Country Club Drive had “lax insulation.”⁸² Describing the insulation at Complainant’s home as “lax” would be overly generous, a fact that was made clear at the hearing.⁸³

Indeed, photographic evidence in the record plainly shows that the insulation in Complainant’s home was grossly inadequate.⁸⁴ To start, there were entire rooms in Complainant’s home that were not insulated at all.⁸⁵ Complainant does not dispute this fact.⁸⁶ In fact, Complainant admitted that he was conducting construction on his home at that time.⁸⁷ Moreover, and as Complainant admitted, there was no insulation in the kitchen of the home, or in several of the interior walls to the home, including a large room that Complainant added to his

⁷⁸ *Id.* at 29:8-13 (Complainant Cross).

⁷⁹ *Id.* at 31:6-14, 35:24-36:6 (Complainant Cross).

⁸⁰ *Id.* at 31:19-32:1 (Complainant Cross).

⁸¹ *Id.* at 62:6-10 (Reinhart Cross).

⁸² *Id.* at 11:10-11 (Complainant Direct).

⁸³ *Id.* at 34:4-35:4, 35:15-39:10 (Complainant Cross).

⁸⁴ *See, e.g.*, Exhibit 1 at Attachments 3-7, 9-10 (Pictures of 1262 Country Club Drive).

⁸⁵ *Id.* at 34:19-21 (Complainant Cross)(“Q. But there were rooms on your property that were not insulated, correct? A. Yes.”).

⁸⁶ *Id.*

⁸⁷ *Id.* at 34:4-11 (Complainant Cross).

home.⁸⁸ Pictures attached to Exhibit 1 in the record, which Complainant himself took and authenticated, demonstrate these facts.⁸⁹ Complainant at deposition admitted that he is just now getting around to fixing the insulation in his home, which remains to this day under “construction.”⁹⁰

(b) Complainant’s mother also used electric medical devices, which further explained his electric usage.

Again, Complainant’s admitted use of at least nine different electric heaters to heat an uninsulated home during an extreme winter is enough to justify his electric usage. The record, however, contains even more evidence supporting his usage. Indeed, it is undisputed that, during the relevant time period, Complainant’s mother lived with him at his home on 1263 Country Club Drive (with the exception of certain periods when she was in the hospital and/or rehab).⁹¹ It is also undisputed that Complainant’s mother “used [an] oxygenator 24 hours a day 7 days a week the entire time she lived with [Complainant].”⁹² That oxygenator, according to Complainant, stayed plugged into electricity at all times.⁹³ Complainant’s own estimated cost in electricity for running his mother’s oxygenator at his home was between \$125 and \$140 per month.⁹⁴ That is for one single electric device.

In addition to the oxygenator, Complainant’s mother also required the use of other electrical devices, including an electric hospital bed and an electric lift chair.⁹⁵ Like the oxygenator, those devices stayed plugged into electricity the whole time Complainant’s mother

⁸⁸ *Id.* at 34:19-35:4, 37:4-7, 38:10-16, 38:18-39:10 (Complainant Cross).

⁸⁹ Exhibit 1 at Attachments 3-7, 9-10 (Pictures of 1262 Country Club Drive); *see also* Hearing Tr. at 35:5-23 (Complainant Cross).

⁹⁰ *Id.* at 41:5-24, 34:8-11 (Complainant Cross).

⁹¹ *Id.* at 25:22-26:3, 23:23-24:6 (Complainant Cross).

⁹² *Id.* at 27:7-21 (Complainant Cross).

⁹³ *Id.* at 27:11-13 (Complainant Cross).

⁹⁴ *Id.* at 27:18-21 (Complainant Cross).

⁹⁵ *Id.* at 27:22-28:7 (Complainant Cross).

lived with him.⁹⁶ There can be no doubt that the use of the chair lift and hospital bed, like the oxygenator, resulted in an increase of electric usage at Complainant's home.

(c) Complainant's use of several additional electric devices and appliances further explained his electric usage.

Complainant's admitted use of various other electrical devices and appliances further puts his electric usage into context. For instance, at the hearing, Complainant admitted that he utilized two separate refrigerators at his home in 1263 Country Club Drive—one for the home generally, and a smaller one for his mother's specific use.⁹⁷ Complainant was additionally using a stand-alone freezer for several months during the relevant time period.⁹⁸ Since Complainant's home does not have a functional air conditioning system, Complainant also cooled the home during the relevant time frame with an air conditioning window unit.⁹⁹ Moreover, Complainant testified that he utilized the following electrical devices and/or appliances at his home: (1) an electric stove and oven; (2) an electric washer; (3) an electric dryer; (4) two televisions (one for himself and one for his mother); and (5) a desktop computer.¹⁰⁰

These electric devices and/or appliances, coupled with the other electric uses discussed above, help explain and justify Complainant's electric usage during the relevant time period. All in all, Complainant's overall electric usage—*none of which he disputed in this proceeding*—provides context for his electric bills and serves as a clear explanation for those bills. Accordingly, there is more than just a “plausible explanation” to support the consumption for

⁹⁶ *Id.*

⁹⁷ *Id.* at 32:10-16 (Complainant Cross).

⁹⁸ *Id.* at 32:1-20 (Complainant Cross).

⁹⁹ *Id.* at 32:2-9 (Complainant Cross).

¹⁰⁰ *Id.* at 32:2-33:10 (Complainant Cross).

which the Complainant was billed.¹⁰¹ The second factor of the Commission's "high bill" analysis is thus satisfied.

3. Ohio Edison Did Not Replace Complainant's Meter In 2014, And There Is No Evidence To The Contrary.

Complainant's assertion that Ohio Edison replaced the meter serving his residence sometime in August 2014 is simply wrong. As previously stated, Complainant believes that his electric meter was changed or replaced in August 2014, and that the meter that was installed at that time was not working properly during the relevant time frame.¹⁰² The record in this proceeding, however, supports only Ohio Edison's position that Complaint's meter was *not* removed or replaced at that time. Indeed, other than Complainant's bald assertion, there is no evidence that Ohio Edison replaced the electric meter on Complainant's property at 1263 Country Club Drive in 2014.

As an initial matter, Ohio Edison's internal records do not support Complainant's theory. There is no record of Complainant's alleged meter change in 2014. OE Witness Reinhart testified that Complainant's residence has been serviced by only two electric meters: (1) meter number S59042102, which serviced Complainant's home at 1263 Country Club Drive from the date his Ohio Edison account was established on August 27, 2013 until it was removed for testing on September 8, 2015; and (2) meter number S313186697, which serviced Complainant's home from that time to the present.¹⁰³ No other electric meters have serviced Complainants' property.

Furthermore, Complainant's electric bills unmistakably show that Ohio Edison has only billed Complainant for usage metered by those two specific meters. As demonstrated at the

¹⁰¹ Case No. 05-1229-GA-CSS, Opinion and Order, 19-20.

¹⁰² Hearing Tr. at 49:23-50:1 (Complainant Cross).

¹⁰³ Reinhart Testimony at 8, 4-7.

hearing, Complainant's Ohio Edison bills include usage information for his electric meter, including the meter number for the particular meter servicing his property.¹⁰⁴ As OE Witness Reinhart explained, Complainant's "OE Bills from the date his service was established through his bill dated October 2, 2015" reflect "[m]eter number S59042102."¹⁰⁵ From that date forward, only "[m]eter S313186697 has appeared on [Complainant]'s OE bills."¹⁰⁶ Complainant readily admitted that the *only* meter appearing on his electric bills "from [his] very first Ohio Edison electric bill" until August 26, 2015 was meter number S59042102.¹⁰⁷ Copies of Complainant's electric bills are in the record at Company Exhibit 4.¹⁰⁸

Tellingly, even Complainant's own evidence supports Ohio Edison's position. Indeed, a photograph of the electric meter on Complainant's property taken by Complainant himself proves that there was no meter change in 2014.¹⁰⁹ The picture, which Complainant took between October 2014 and March 2015, clearly depicts the meter number for the electric meter that was on Complainant's property at 1263 Country Club Drive.¹¹⁰ The meter number shown on the picture is "S59042102."¹¹¹ Complainant does not dispute this fact, acknowledging that the picture reflects the same meter number that appeared on his Ohio Edison bills from the date his account was opened in August 2013 until August 2015.¹¹²

At the hearing, Complainant conceded that he had no copies of any work orders, invoices, records, notices, letters, e-mails, or anything of the like showing that the meter at 1263

¹⁰⁴ *Id.* at 8; Hearing Tr. at 47:8-48:5 (Complainant Cross).

¹⁰⁵ Reinhart Testimony at 8.

¹⁰⁶ *Id.*

¹⁰⁷ Hearing Tr. at 47:8-48:5 (Complainant Cross).

¹⁰⁸ Company Exhibit 4, Complainant's Ohio Edison Electric Bills From Sept. 2013 Through Jul. 2016 ("Company Exhibit 4"); *see also* Reinhart Testimony at Exhibit DLR-5 (copies of same bills). For meter number reference, see section of electric bill called "Usage Information For Meter Number."

¹⁰⁹ *See* Company's Exhibit 1, Jan. 3, 2017 e-mail from D. Adkins to J. Eckert ("Company's Exhibit 1") at Attachment 1 (Picture of electric meter with number "S59042102").

¹¹⁰ Company's Exhibit 1 at Attachment 1 (Picture of electric meter with number "S59042102"); *id.* at Attachment 2; Hearing Tr. at 18:5-12 (Complainant Cross).

¹¹¹ Company's Exhibit 1 at Attachment 1 (Picture of electric meter with number "S59042102"); *id.* at Attachment 2.

¹¹² Hearing Tr. at 47:24-48:10 (Complainant Cross).

Country Club Drive was actually changed in 2014.¹¹³ Complainant also admitted that he “never compared meter numbers on [his] property to confirm that [his] meter was actually replaced in the summer of 2014.”¹¹⁴ Nor does Complainant have pictures of the meter he believes was removed from his property in 2014.¹¹⁵ Instead, in support of his theory, Complainant references a “FirstEnergy tag” he photographed after allegedly finding it on his property.¹¹⁶ That tag, however, does not support his position.

As OE Witness Reinhart explained, the “tag” Complaint references is a meter ring seal, which is used by Ohio Edison “to secure the meter socket to prevent unauthorized individuals from removing the meter.”¹¹⁷ Complainant’s photograph of that ring seal is in the record as Company Exhibit 3.¹¹⁸ While Ohio Edison’s ring seals have numbers on them, those numbers are not tracked by the Company, nor are they used by the Company in any way.¹¹⁹ In other words, meter ring seal tags such as the one Complainant photographed cannot be used to identify the electric meters on which they came from.¹²⁰ Even if they could, a photograph of a particular meter’s ring seal hardly proves the meter itself was changed or moved. This is particularly true when there are no records in existence of a meter change.

In short, there was no meter change in August 2014. Even assuming, however, that Ohio Edison replaced Complainant’s meter in August 2014 (which it certainly did not), Complainant would still be unable to meet his burden in this proceeding. Indeed, as fully set forth above, the uncontroverted record evidence demonstrates that the meter serving Complainant’s property—

¹¹³ *Id.* at 48:11-49:4 (Complainant Cross).

¹¹⁴ *Id.* at 48:24-49:1 (Complainant Cross).

¹¹⁵ *Id.* at 48:20-23(Complainant Cross).

¹¹⁶ *Id.* at 9:18-21 (Complainant Direct); *id.* at 21:6-23 (Complainant Cross).

¹¹⁷ Company Exhibit 6, Supplemental Direct Testimony of Deborah Reinhart on Behalf of Ohio Edison Company (Jan. 9, 2017) (“Reinhart Supp. Testimony”) at 2.

¹¹⁸ Company’s Exhibit 3, Jan. 3, 2017 e-mail from D. Adkins to J. Eckert (“Company’s Exhibit 3”) at Attachment 1 (Picture of meter ring seal); *see also* Reinhart Supp. Testimony at Exhibit DLR-8 (copy of same photograph).

¹¹⁹ Reinhart Supp. Testimony at 2.

¹²⁰ Reinhart Supp. Testimony at 2.

whether installed in 2014 as Complainant alleges or at some prior point in time—was working properly and recording Complainant’s electric usage accurately.¹²¹ Moreover, any and all electric usage billed to Complainant during the relevant time period is just, reasonable, and easily explained by Complainant’s admitted usage.¹²²

For each of these reasons, Complainant has failed to meet his burden in this proceeding and the Complaint against Ohio Edison should be dismissed in its entirety.

B. Ohio Edison Assisted Complainant By Placing Him On Multiple Payment Plans And By Attempting To Educate Him On His Electric Usage.

1. Ohio Edison Placed Complainant On Several Payment Plans.

Ohio Edison has gone above and beyond in assisting Complainant with his electric bills. Since becoming a customer in 2013, Complainant has been placed on four different installment payment plans to assist him with “catching-up” on arrearages and past-due balances.¹²³ Payment plans allow customers such as Complainant “to make the payment for the current month plus and additional payment for a fixed dollar amount during a fixed time period.”¹²⁴ As OE Witness Reinhart explained, the goal of a payment plan is “to eventually catch up a customer on payments in arrears.”¹²⁵ To date, Complainant owes Ohio Edison over \$3,200 in arrearages, which does not even include the additional monies Complainant owes to AEP, his CRES provider.¹²⁶

Ohio Edison placed Complainant on installment payment plans on February 3, 2014, November 2, 2014, May 4, 2015, and February 16, 2016.¹²⁷ Complainant failed to make the

¹²¹ See Section III.A.1, *supra* at 8-11.

¹²² See Section III.A.2, *supra* at 11-17.

¹²³ Reinhart Testimony at 18; Hearing Tr. at 51:12-15 (Complainant Cross).

¹²⁴ Reinhart Testimony at 18.

¹²⁵ *Id.*

¹²⁶ *Id.*

¹²⁷ *Id.*

required payment under his plans on sixteen different occasions.¹²⁸ In fact, with the exception of his first plan, Complainant defaulted on each payment plan.¹²⁹ Each time Complainant defaulted, Ohio Edison assisted him by offering him a new payment plan.¹³⁰ Eventually, Complainant simply stopped paying his electric bills.¹³¹

As a result of Complainant's failure to pay in accordance with his payment plans, his Ohio Edison account accrued and accumulated past-due amounts. These "past-due" amounts appear on Complainant's monthly electric bills, making them larger than they otherwise would be.¹³² For example, in April 2015, Complainant's bill showed a total balance of \$1,927.45.¹³³ Of that amount, ***\$1,513.73 reflected Complainant's past-due balance***, which accrued over a span of several months due to Complainant's failure to make full payments.¹³⁴ Complainant ignores this fact and seems to believe that his bills are "too high" simply due to his electric usage. Not so. These past-due balances, although accurate, likely contribute to Complainant's dissatisfaction with his electric bills.

2. Ohio Edison Attempted To Educate Complainant On His Electric Usage.

In addition to offering the various payment plans, Ohio Edison tried, on several occasions, to educate Complainant on ways to reduce his electric usage and lower his bills. OE Witness Reinhart explained these efforts in her Testimony.¹³⁵ Those efforts even date back to the first time Complainant contacted Ohio Edison in the fall of 2014.¹³⁶ At that time, Ohio

¹²⁸ *Id.* at 18; *see also* Hearing Tr. at 51:20-52:3 (Complainant Cross).

¹²⁹ Reinhart Testimony at 19.

¹³⁰ *Id.* In addition to the payment plans, Ohio Edison received three different medical certificates from Complainant. *Id.* at 18.

¹³¹ Hearing Tr. at 52:12-16 (Complainant Cross).

¹³² *See, e.g.*, Company Ex. 4.

¹³³ *Id.* at Adkins_000022 (OE Bill dated April 29, 2015).

¹³⁴ *See id.*

¹³⁵ Reinhart Testimony at 19.

¹³⁶ *Id.* at 9-11.

Edison referred Complainant to free literature designed to educate customers on their electric bills and usage, including two brochures called “Understanding Electric Usage/Costs” and “More Than 100 Ways to Improve Your Electric Bill.”¹³⁷ Complainant was referred to similar energy savings information and educational materials on other occasions.¹³⁸

On subsequent contact, Complainant was also referred to Ohio Edison’s “Home Energy Analyzer Tool,” which allows customers to gain a better understanding of their household energy use and to identify ways to improve their efficiency.¹³⁹ The tool “is essentially designed to help customers become more efficient in their use of household energy.”¹⁴⁰ In addition, Ohio Edison representatives offered to complete “customer bill analyses” for Complainant or to walk him through each of his electric bills to help him gain a better understanding of those bills and his usage.¹⁴¹ Complainant, however, often declined to cooperate in those efforts.¹⁴²

There can be no dispute that Ohio Edison went above and beyond what it was required to do in assisting Complainant. If Complainant is dissatisfied with his electric bills during the relevant time period, he has no one to blame but himself. He cannot shift the blame to Ohio Edison, which reasonably and justly billed for services rendered during the relevant time period.

III. CONCLUSION

The sole evidence presented in this proceeding demonstrates that Complainant’s Ohio Edison electric bills during the relevant time period were just, reasonable, and accurate. Indeed, the record demonstrates that the meter serving Complainant’s property was functioning properly and reading accurately within the parameters established by the Commission. Moreover,

¹³⁷ *Id.* at 10-11.

¹³⁸ *See, e.g., id.* at 11, 14.

¹³⁹ *Id.* at 11-12; Hearing Tr. at 62:20-63:2 (Reinhart Cross).

¹⁴⁰ Reinhart Testimony at 12.

¹⁴¹ *Id.* at 11, 13-14.

¹⁴² *Id.*

Complainant's electric usage is explained by a combination of many factors, including the construction Complainant was performing on his home throughout the relevant time period, the appliances he used in his household, and, most notably, the extreme measures Complainant took to heat his home during a bad winter. As a result, Complainant "has been charged properly and accurately for his electricity usage at 1263 Country Club Drive."¹⁴³ Having presented no evidence to the contrary, Complainant failed to meet his burden.

Accordingly, Ohio Edison respectfully requests that the Commission dismiss the Complaint in its entirety, with prejudice.

February 24, 2017

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ATTORNEYS FOR OHIO EDISON
COMPANY

¹⁴³ Reinhart Testimony at 20.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Ohio Edison Company's Post-Hearing Brief* was served by e-mail and U.S. mail, upon the following on this 24th day of February, 2017.

Daniel Adkins
1263 Country Club Drive
Salem, Ohio 44460

/s/ Sergio A. Tostado
An Attorney for Ohio Edison Company

ATTACHMENT 1

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Weather History for KYNG - November, 2014

From:

November

1

2014

To:

November

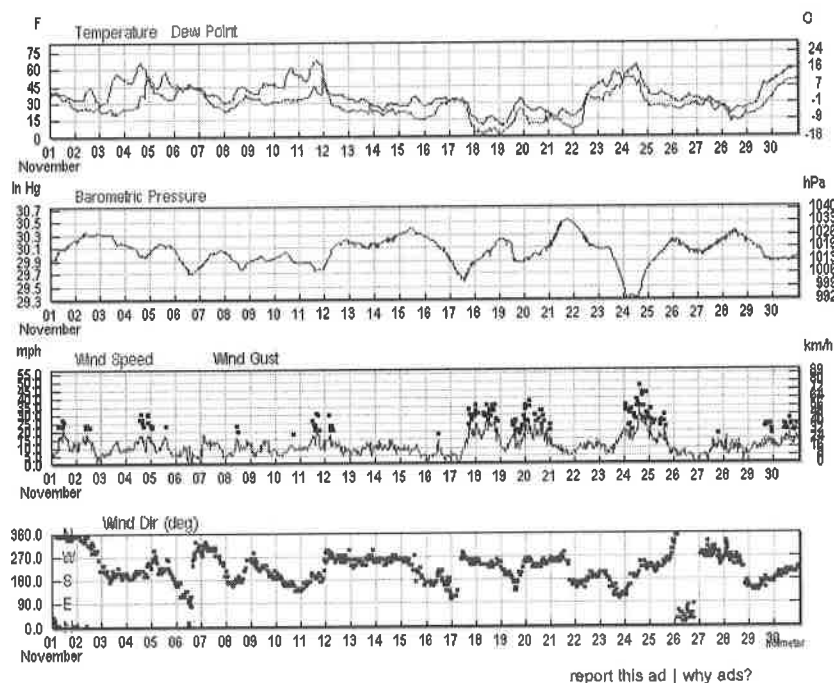
30

2014

Get History

Daily	Weekly	Monthly	Custom				
				Max	Avg	Min	Sum
Temperature							
Max Temperature				68 °F	44 °F	18 °F	
Mean Temperature				59 °F	37 °F	15 °F	
Min Temperature				50 °F	30 °F	9 °F	
Degree Days							
Heating Degree Days (base 65)				50	28	6	829
Cooling Degree Days (base 65)				0	0	0	0
Growing Degree Days (base 50)				9	1	0	26
Dew Point							
Dew Point				55 °F	28 °F	2 °F	
Precipitation							
Precipitation				0.52 in	0.09 in	0.00 in	2.40 in
Snowdepth				4.0 in	0.9 in	0.0 in	
Wind							
Wind				39 mph	11 mph	0 mph	
Gust Wind				52 mph	24 mph	17 mph	
Sea Level Pressure							
Sea Level Pressure				30.53 in	30.04 in	29.30 in	

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November

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Weather History & Observations

2014	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (In)			Visiblity (mi)			Wind (mph)			Precip. (In)	Events
Nov	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	high	sum	
	42	38	34	39	36	26	93	82	70	30.23	30.07	29.91	10	8	2	22	12	30	0.01	Rain , Snow
	45	37	28	27	25	24	78	62	45	30.38	30.31	30.20	10	10	10	20	11	27	0.00	
	57	42	27	25	23	20	85	75	64	30.33	30.25	30.16	10	10	10	17	9	22	0.00	
	66	57	48	52	35	25	93	69	25	30.16	30.05	29.97	10	9	3	23	13	32	0.15	Rain
	58	61	43	48	39	34	93	68	43	30.18	30.13	30.05	10	10	6	21	10	28	0.03	Rain
	47	44	40	45	43	37	100	88	76	30.03	29.81	29.70	10	6	1	14	6	18	0.52	Rain

2014	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
	44	37	30	42	32	23	92	78	64	30.06	29.97	29.81	10	9	4	24	11	32	0.11	Rain , Snow
	46	38	30	37	30	23	79	68	57	30.02	29.89	29.77	10	10	10	21	10	26	T	Rain
	49	44	38	35	32	29	85	67	49	29.99	29.94	29.89	10	10	10	18	9	25	T	Rain
	62	53	43	34	32	31	67	49	30	30.04	29.96	29.87	10	10	10	16	8	22	0.00	
	68	59	50	55	41	34	93	65	37	29.88	29.82	29.76	10	9	3	23	13	31	0.08	Rain
	50	42	33	45	30	23	96	78	59	30.23	30.10	29.86	10	9	3	22	10	30	0.03	Rain
	33	30	27	26	23	20	92	78	63	30.19	30.15	30.08	10	8	2	15	8	22	0.07	Snow
	30	26	22	25	22	19	88	79	69	30.32	30.21	30.11	9	6	1	16	10	21	0.08	Snow
	36	32	27	22	18	15	75	60	44	30.41	30.34	30.27	10	10	7	15	8	19	0.01	Snow
	35	31	27	32	25	16	100	78	56	30.26	30.09	29.88	10	7	1	13	5	18	0.06	Snow
	33	25	17	32	25	6	100	81	62	29.90	29.74	29.58	9	3	0	30	11	37	0.43	Fog , Snow
	18	15	11	8	4	2	76	65	54	30.23	30.04	29.89	10	9	3	29	20	37	0.01	Snow
	34	22	9	25	12	2	80	69	58	30.24	30.03	29.86	10	8	1	28	13	36	0.03	Snow
	29	25	20	18	13	10	84	70	55	30.16	30.02	29.90	10	8	1	28	18	38	0.02	Snow
	25	21	16	17	13	6	92	75	57	30.53	30.36	30.11	10	6	1	16	8	24	0.05	Snow
	47	32	17	36	24	7	92	74	55	30.45	30.23	30.07	10	8	2	16	10	24	0.15	Rain , Snow
	58	50	42	49	39	31	89	70	50	30.09	29.91	29.42	10	10	6	26	11	36	0.24	Rain
	65	52	38	53	45	26	93	71	48	29.82	29.45	29.30	10	10	3	39	21	52	0.04	Rain
	41	36	31	28	27	25	78	69	59	30.22	30.04	29.83	10	10	10	25	13	34	0.00	
	37	34	30	30	27	24	89	80	70	30.21	30.09	29.99	10	9	2	9	4	12	T	Snow
	34	31	28	30	27	21	100	85	69	30.24	30.11	29.99	10	5	0	17	8	22	0.21	Fog , Snow
	28	24	19	25	17	13	92	77	62	30.37	30.27	30.17	10	7	1	15	8	19	0.06	Snow
	49	38	26	36	26	19	75	60	45	30.18	30.01	29.88	10	10	5	18	11	26	T	Snow
	61	55	49	52	46	38	72	67	61	29.97	29.91	29.87	10	10	10	21	13	30	0.01	

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December

1

2014

To:

December

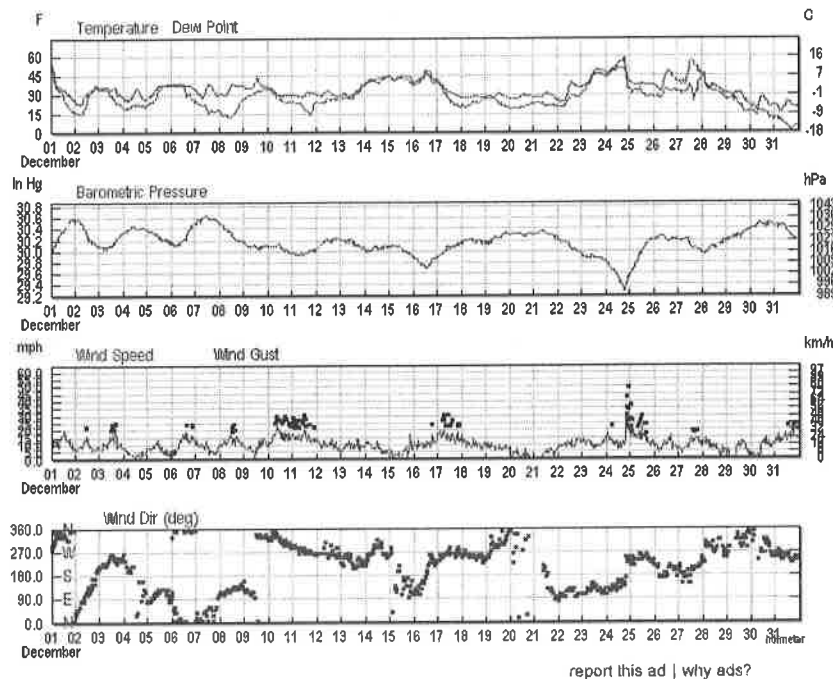
31

2014

Get History

Daily	Weekly	Monthly	Custom				
				Max	Avg	Min	Sum
Temperature							
Max Temperature				60 °F	40 °F	24 °F	
Mean Temperature				50 °F	35 °F	20 °F	
Min Temperature				40 °F	29 °F	15 °F	
Degree Days							
Heating Degree Days (base 65)				45	30	15	933
Cooling Degree Days (base 65)				0	0	0	0
Growing Degree Days (base 50)				0	0	0	0
Dew Point							
Dew Point				54 °F	28 °F	2 °F	
Precipitation							
Precipitation				0.63 in	0.09 in	0.00 in	2.32 in
Snowdepth				0.0 in	0.0 in	0.0 in	-
Wind							
Wind				38 mph	9 mph	0 mph	
Gust Wind				54 mph	23 mph	17 mph	
Sea Level Pressure							
Sea Level Pressure				30.66 in	30.15 in	29.28 in	

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December

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Weather History & Observations

2014	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	high	sum	
Dec	60	43	25	54	34	17	93	78	63	30.60	30.29	30.00	10	7	2	21	12	25	0.18	Rain
	37	30	22	36	25	15	100	84	68	30.58	30.31	30.09	10	6	1	21	9	25	0.07	Rain
	37	33	28	34	29	20	92	78	64	30.33	30.14	30.05	10	8	2	21	11	29	T	Rain
	36	31	25	23	21	19	81	69	56	30.46	30.41	30.35	10	10	7	9	4	11	0.00	
	39	33	27	39	33	22	100	86	72	30.39	30.25	30.14	10	5	0	14	7	18	0.30	Fog , Rain
	40	37	33	39	34	24	100	82	64	30.51	30.25	30.09	10	7	2	21	12	27	0.63	Rain

2014	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
	40	34	27	25	20	15	75	56	37	30.66	30.58	30.48	10	10	10	16	8	20	0.00	
	41	36	30	26	17	12	64	49	33	30.49	30.32	30.17	10	10	10	20	12	27	0.00	
	45	40	35	35	32	27	92	78	64	30.16	30.10	30.05	10	9	3	16	9	19	T	Rain , Snow
	36	33	29	34	27	23	96	84	72	30.13	30.06	29.97	10	6	2	25	16	30	0.02	Snow
	32	30	28	24	21	14	78	64	49	30.05	29.97	29.91	10	10	9	23	15	34	T	Snow
	33	31	29	26	25	23	92	82	72	30.24	30.18	30.05	10	7	2	18	9	24	0.00	
	38	33	28	37	30	26	100	93	85	30.22	30.14	30.03	5	2	0	15	9	19	T	Fog
	45	42	38	44	41	38	100	95	89	30.09	30.05	29.99	10	2	0	14	8	19	0.06	Fog , Rain
	46	43	39	44	42	37	100	92	83	30.11	30.04	29.89	8	2	0	16	5	24	0.01	Fog
	50	45	39	47	42	38	100	92	83	29.89	29.79	29.70	10	7	2	20	10	25	0.34	Rain
	42	35	28	40	28	20	96	83	69	30.15	30.03	29.87	10	8	1	24	15	31	0.03	Rain , Snow
	29	29	28	27	23	19	92	81	69	30.22	30.17	30.12	10	7	2	16	10	21	0.02	Rain , Snow
	31	29	27	28	24	19	92	81	69	30.33	30.21	30.12	10	8	1	14	8	17	0.03	Rain , Snow
	30	28	26	23	20	18	78	71	63	30.32	30.30	30.27	10	10	10	8	2	11	0.00	
	31	28	24	23	21	20	81	72	63	30.35	30.30	30.20	10	9	6	9	3	12	0.00	
	40	32	23	30	25	20	88	76	64	30.20	30.08	29.94	10	9	7	16	10	21	0.00	
	50	43	35	46	41	31	93	87	80	29.94	29.88	29.82	10	8	1	15	10	20	0.06	Rain
	59	50	40	51	47	34	96	86	75	29.79	29.55	29.28	10	8	2	38	14	54	0.14	Rain
	41	39	37	34	31	28	85	78	70	30.21	29.93	29.59	10	10	8	29	14	39	0.01	Rain
	48	40	32	34	31	27	82	69	56	30.27	30.22	30.16	10	10	10	16	9	22	0.00	
	57	46	35	43	34	24	82	56	30	30.22	30.11	29.97	10	10	3	22	9	27	0.03	Rain
	46	38	29	44	34	26	100	89	78	30.19	30.05	29.94	10	7	2	17	7	23	0.39	Rain , Snow
	32	27	21	27	23	16	92	78	63	30.38	30.26	30.15	10	10	6	14	5	17	0.00	
	30	24	17	17	15	9	91	77	63	30.51	30.45	30.38	10	9	4	16	7	23	T	Snow
	24	20	15	11	6	2	73	57	41	30.46	30.35	30.19	10	10	8	24	14	29	T	Snow

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Vienna, OH

Youngstown-Warren Regional

6:26 PM EST on January 09, 2017 (GMT -0500)

Weather History for KYNG - January, 2015

From:

January

1

2015

To:

January

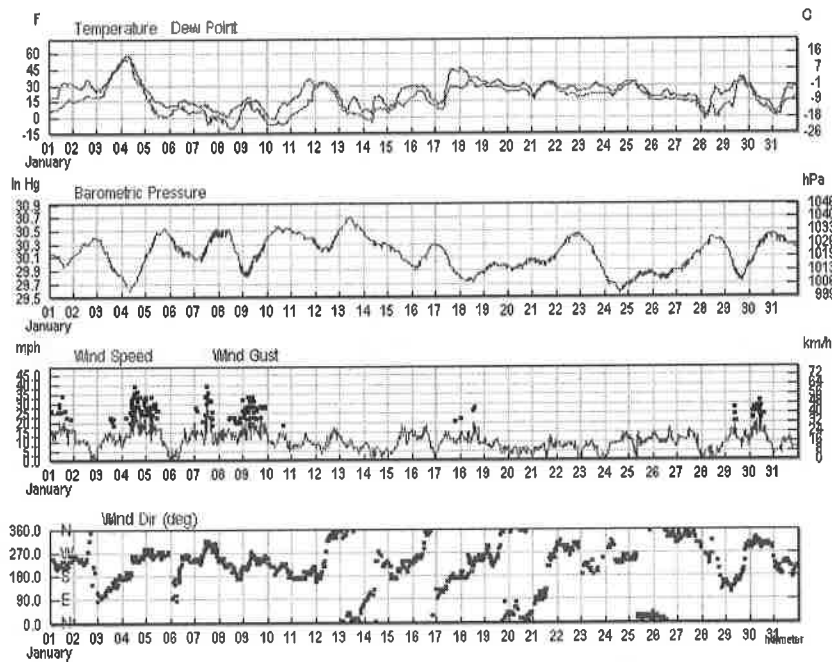
31

2015

Get History

Daily	Weekly	Monthly	Custom				
				Max	Avg	Min	Sum
Temperature							
Max Temperature				68 °F	30 °F	12 °F	
Mean Temperature				42 °F	22 °F	6 °F	
Min Temperature				32 °F	13 °F	-4 °F	
Degree Days							
Heating Degree Days (base 65)				60	43	23	1343
Cooling Degree Days (base 65)				0	0	0	0
Growing Degree Days (base 50)				0	0	0	0
Dew Point							
Dew Point				64 °F	15 °F	-12 °F	
Precipitation							
Precipitation				1.04 in	0.11 in	0.00 in	3.16 in
Snowdepth				8.0 in	4.4 in	0.0 in	
Wind							
Wind				32 mph	10 mph	0 mph	
Gust Wind				41 mph	24 mph	18 mph	
Sea Level Pressure							
Sea Level Pressure				30.70 in	30.14 in	29.66 in	

Custom Weather History Graph



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Airport or City:

KYNG

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Trip Planner

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Date:

January

1

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Weather History & Observations

2015	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
Jan	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	high	sum	
	34	26	17	17	10	5	61	50	38	30.17	30.08	29.97	10	10	10	26	16	35	0.00	
	36	30	23	20	18	15	88	69	49	30.40	30.29	30.14	10	10	10	21	7	26	0.00	
	52	38	24	50	34	18	96	83	69	30.37	30.06	29.81	10	6	1	17	11	25	1.04	Rain
	58	42	26	54	41	22	96	79	61	30.14	29.79	29.60	10	7	1	32	17	41	0.15	Rain , Snow
	26	18	9	21	7	-1	84	70	55	30.53	30.36	30.11	10	7	2	25	12	35	0.04	Snow
	16	13	9	10	6	2	92	77	61	30.42	30.22	30.09	10	6	1	21	9	28	0.08	Snow

2015	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
	12	8	4	7	1	-7	87	69	50	30.53	30.29	30.04	10	4	0	31	15	39	0.07	Fog , Snow
	15	7	-1	7	-4	-12	86	64	41	30.51	30.30	29.87	10	7	1	23	14	32	0.05	Snow
	18	10	2	14	7	-6	88	75	61	30.38	30.04	29.81	10	3	0	28	16	36	0.14	Fog , Snow
	14	5	-4	0	-6	-8	79	61	42	30.56	30.50	30.41	10	10	10	18	10	22	0.00	
	35	25	14	28	11	2	85	61	36	30.48	30.42	30.32	10	8	1	16	9	24	0.08	Snow
	33	26	19	32	26	12	100	87	74	30.51	30.30	30.19	10	3	0	21	10	24	0.43	Fog , Rain , Snow
	19	10	1	10	4	-1	88	67	45	30.70	30.60	30.46	10	10	8	18	8	23	T	Snow
	20	9	-3	8	2	-6	83	70	56	30.44	30.33	30.23	10	10	9	12	5	13	0.00	
	29	17	5	18	10	3	92	69	46	30.28	30.13	29.96	10	9	5	20	10	26	0.00	
	30	22	13	23	18	10	80	72	63	30.30	30.09	29.90	10	9	5	22	11	26	T	Snow
	44	27	10	28	18	6	83	68	53	30.28	30.06	29.81	10	10	10	16	10	22	0.00	
	46	39	32	34	30	26	92	69	45	29.89	29.78	29.71	10	8	1	23	12	28	0.09	Rain , Snow
	34	31	28	30	27	22	92	84	75	30.01	29.95	29.86	10	7	2	15	7	19	0.02	Snow
	31	27	22	26	23	18	85	80	75	30.07	29.98	29.89	10	8	1	9	5	10	0.04	Snow
	33	25	17	31	27	16	100	93	85	30.13	30.03	29.96	10	4	0	16	6	20	0.19	Fog , Rain , Snow
	30	28	21	25	21	17	92	84	75	30.45	30.34	30.15	10	7	1	13	7	15	0.01	Snow
	31	27	23	21	20	19	88	79	69	30.42	30.19	29.85	10	9	6	13	5	15	0.00	
	32	27	22	29	24	19	92	85	78	29.81	29.67	29.55	7	4	1	16	9	21	T	Rain , Snow
	33	26	19	32	24	15	96	87	78	29.89	29.80	29.66	10	3	1	15	9	19	0.12	Snow
	24	21	18	17	16	15	92	80	68	29.91	29.82	29.75	10	5	1	18	11	21	0.16	Snow
	20	15	9	15	13	6	88	81	73	30.20	30.01	29.87	10	6	1	20	11	23	0.04	Snow
	27	13	-1	11	3	-4	95	64	32	30.40	30.32	30.20	10	9	2	10	4	15	0.00	Fog
	36	29	21	34	24	7	92	67	42	30.24	29.91	29.74	10	5	0	21	12	27	0.27	Fog , Rain , Snow
	30	18	6	28	15	3	92	80	67	30.44	30.21	29.96	10	3	0	24	13	32	0.14	Snow
	28	15	2	19	9	0	91	76	60	30.44	30.34	30.23	10	10	10	16	7	21	0.00	

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Vienna, OH

Youngstown-Warren Regional

6:13 PM EST on January 09, 2017 (GMT -0500)

Weather History for KYNG - February, 2015

From:

February

1

2015

To:

February

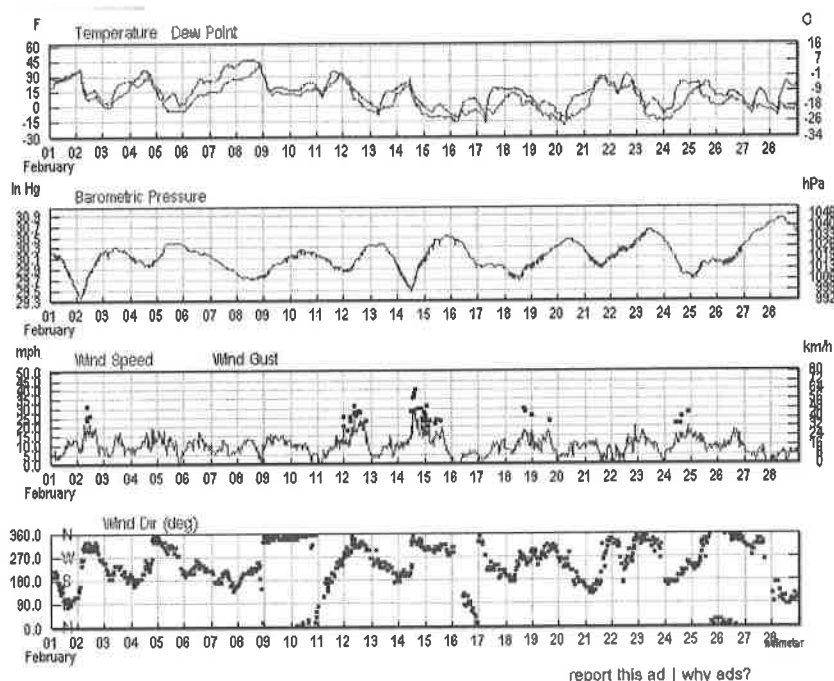
28

2015

Get History

Daily	Weekly	Monthly	Custom				
				Max	Avg	Min	Sum
Temperature							
Max Temperature				47 °F	24 °F	2 °F	
Mean Temperature				39 °F	14 °F	-3 °F	
Min Temperature				31 °F	4 °F	-16 °F	
Degree Days							
Heating Degree Days (base 65)				68	51	26	1432
Cooling Degree Days (base 65)				0	0	0	0
Growing Degree Days (base 50)				0	0	0	0
Dew Point							
Dew Point				41 °F	7 °F	-19 °F	
Precipitation							
Precipitation				0.78 in	0.10 in	0.00 in	2.07 in
Snowdepth				17.0 in	11.0 in	7.0 in	
Wind							
Wind				35 mph	9 mph	0 mph	
Gust Wind				41 mph	23 mph	17 mph	
Sea Level Pressure							
Sea Level Pressure				30.84 in	30.12 in	29.37 in	

Custom Weather History Graph



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Date:

February

1

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Weather History & Observations

2015	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (in)			Visibility (mi)			Wind (mph)			Precip. (in)	Events
Feb	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	high	sum	
	34	30	26	32	26	19	96	83	69	30.21	29.98	29.50	10	2	0	16	8	23	0.78	Fog , Rain , Snow
	37	21	5	36	14	2	96	82	67	30.22	29.79	29.37	10	4	0	24	13	31	0.13	Fog , Rain , Snow
	25	14	2	19	7	-2	87	72	57	30.31	30.23	30.14	10	9	2	20	9	26	0.01	Snow
	36	28	20	30	23	17	92	76	59	30.17	30.04	29.94	10	4	0	21	11	26	0.26	Fog , Snow

2015	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (In)			Visiblility (mi)			Wind (mph)			Precip. (In)	Events
	20	10	0	14	1	-6	91	69	46	30.40	30.30	30.06	10	9	2	22	10	27	T	Snow
	27	14	1	14	6	-5	76	63	50	30.34	30.23	30.16	10	10	10	20	11	26	0.00	
	41	33	24	27	19	13	64	56	47	30.15	29.98	29.83	10	10	10	17	8	23	0.00	
	47	39	31	41	33	27	93	71	49	29.81	29.75	29.70	10	7	0	18	9	23	0.04	Fog , Rain
	31	23	15	29	15	11	92	83	73	30.14	29.96	29.76	10	9	2	20	13	23	0.01	Rain , Snow
	23	19	15	17	13	11	91	81	71	30.25	30.18	30.10	10	8	2	15	8	18	T	Snow
	34	23	11	30	21	8	96	80	63	30.17	29.99	29.84	10	6	1	18	7	25	0.03	Snow
	30	16	2	27	11	-5	88	78	67	30.34	30.02	29.84	10	5	1	26	14	31	0.07	Snow
	17	7	-4	12	0	-8	91	71	51	30.37	30.21	29.93	10	8	1	17	7	20	0.02	Snow
	26	13	0	22	10	-9	92	77	62	30.10	29.74	29.46	10	3	0	35	18	41	0.17	Fog , Snow
	2	-3	-8	-7	-11	-13	83	70	57	30.52	30.35	30.04	10	8	2	23	12	30	T	Snow
	7	-3	-13	-4	-10	-17	92	73	54	30.48	30.27	29.92	10	10	10	9	4	11	0.00	
	18	4	-11	5	-6	-16	86	60	33	29.99	29.95	29.91	10	10	9	15	7	20	T	Snow
	17	12	7	12	7	0	88	75	61	29.97	29.81	29.67	10	4	0	24	11	30	0.09	Fog , Snow
	8	0	-8	4	-6	-14	87	68	49	30.30	30.10	29.91	10	8	0	24	10	31	0.01	Fog , Snow
	11	-2	-16	-5	-12	-19	91	66	41	30.45	30.38	30.25	10	10	10	14	7	19	0.00	
	28	20	11	26	16	-5	92	70	48	30.21	30.02	29.89	10	4	0	15	7	20	0.35	Fog , Snow
	31	22	13	23	16	9	100	79	58	30.43	30.23	30.05	10	6	0	21	7	24	0.02	Fog , Snow
	15	2	-11	7	-7	-16	87	64	40	30.63	30.53	30.40	10	9	4	22	9	23	0.01	Snow
	23	7	-10	10	-6	-15	72	53	33	30.39	30.03	29.77	10	10	6	28	12	34	T	Snow
	23	16	9	17	9	-1	84	67	49	30.05	29.90	29.70	10	8	1	18	11	24	0.03	Snow
	14	9	4	7	3	-2	80	72	63	30.32	30.06	29.93	10	4	0	18	11	22	0.04	Snow
	16	6	-4	2	-3	-8	86	69	51	30.73	30.55	30.33	10	10	7	13	4	16	T	Snow
	24	8	-9	1	-5	-11	86	58	29	30.84	30.74	30.57	10	10	7	10	4	12	T	Snow

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Vienna, OH

Youngstown-Warren Regional

6:32 PM EST on January 09, 2017 (GMT -0500)

Weather History for KYNG - March, 2015

From:

March

1

2015

To:

March

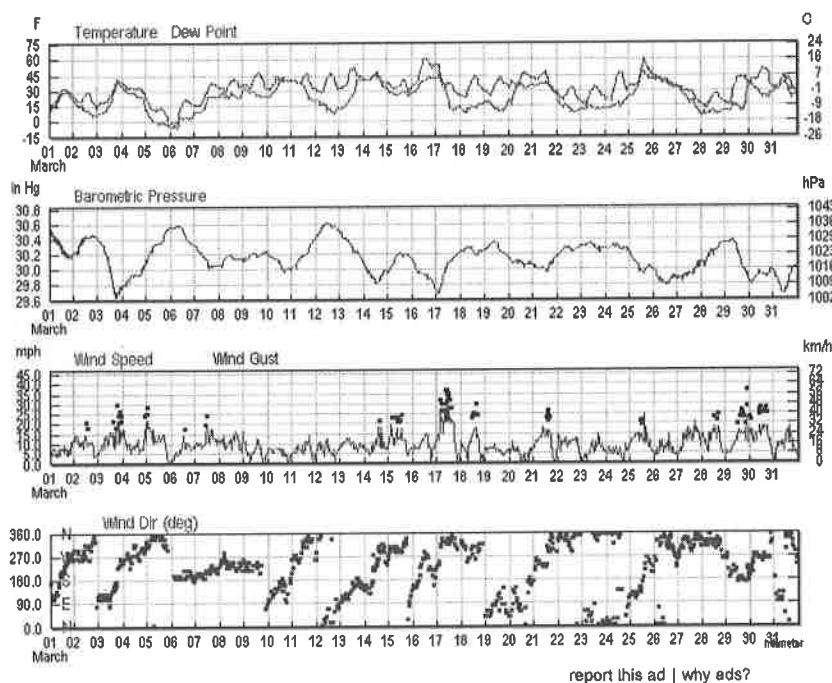
31

2015

Get History

Daily	Weekly	Monthly	Custom				
				Max	Avg	Min	Sum
Temperature							
Max Temperature				62 °F	43 °F	23 °F	
Mean Temperature				48 °F	33 °F	10 °F	
Min Temperature				37 °F	23 °F	-4 °F	
Degree Days							
Heating Degree Days (base 65)				55	32	17	988
Cooling Degree Days (base 65)				0	0	0	0
Growing Degree Days (base 50)				0	0	0	0
Dew Point							
Dew Point				48 °F	23 °F	-8 °F	
Precipitation							
Precipitation				0.46 In	0.10 In	0.00 in	2.32 In
Snowdepth				16.0 In	3.9 In	0.0 In	-
Wind							
Wind				31 mph	9 mph	0 mph	
Gust Wind				39 mph	22 mph	17 mph	
Sea Level Pressure							
Sea Level Pressure				30.62 In	30.14 In	29.65 In	

Custom Weather History Graph

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Date:

March

1

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Weather History & Observations

2016	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (In)			Visibility (mi)			Wind (mph)			Precip. (In)	Events
	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	low	high	avg	high	sum	
Mar																				
	32	25	17	30	22	0	100	70	39	30.67	30.33	30.16	10	3	0	15	7	18	0.43	Fog , Snow
	30	22	13	21	13	6	84	65	46	30.47	30.38	30.22	10	7	1	18	10	25	0.04	Snow
	42	29	15	40	23	8	93	77	61	30.40	29.96	29.65	10	5	0	23	12	30	0.27	Fog , Rain , Snow
	38	32	25	33	26	13	89	76	63	30.14	29.93	29.78	10	9	2	23	10	27	0.01	Snow
	25	12	-1	13	2	-5	79	66	53	30.66	30.34	30.11	10	10	9	24	11	31	T	Snow

2015	Temp. (°F)			Dew Point (°F)			Humidity (%)			Sea Level Press. (In)			Visibility (mi)			Wind (mph)			Precip. (In)	Events
	23	10	-4	10	1	-6	88	67	45	30.58	30.48	30.32	10	10	10	16	7	21	0.00	
	38	27	16	25	18	10	80	70	59	30.30	30.14	30.02	10	10	6	22	12	29	T	Snow
	43	35	27	31	26	23	85	69	53	30.20	30.14	30.04	10	9	4	17	11	26	T	Rain , Snow
	49	40	31	32	28	24	89	66	42	30.24	30.18	30.12	10	10	6	15	6	19	T	Rain , Snow
	44	37	30	42	35	24	100	81	62	30.23	30.09	29.97	10	5	0	12	6	17	0.21	Fog , Rain
	47	39	30	40	34	20	100	72	43	30.39	30.16	29.99	10	4	0	15	7	19	0.00	Fog , Rain
	47	37	27	22	14	7	69	45	21	30.62	30.55	30.41	10	10	10	14	7	18	0.00	
	52	42	31	41	26	13	96	64	32	30.52	30.31	30.10	10	10	6	15	10	19	0.22	Rain
	48	43	37	45	40	33	100	93	85	30.09	29.92	29.82	10	3	0	20	9	25	0.31	Fog , Rain
	41	36	28	34	28	25	85	75	64	30.22	30.12	29.95	10	10	10	21	11	27	0.00	
	62	48	33	43	36	27	76	61	46	30.13	29.94	29.76	10	10	10	18	9	26	T	Rain
	57	41	25	46	27	10	86	61	35	30.22	29.97	29.68	10	10	5	31	16	39	T	Rain , Snow
	45	34	22	17	13	9	63	46	28	30.29	30.24	30.18	10	10	10	23	9	31	0.00	
	45	35	25	19	14	10	75	51	27	30.36	30.27	30.17	10	10	10	13	6	16	0.00	
	48	41	33	36	30	15	76	60	44	30.15	30.09	30.03	10	9	3	15	5	19	0.02	Rain , Snow
	49	39	28	38	34	27	96	81	65	30.16	30.04	29.96	10	9	2	23	11	27	T	Fog , Rain
	33	26	18	28	14	8	92	64	36	30.29	30.25	30.17	10	10	10	17	9	21	0.00	
	36	25	14	15	12	11	88	63	38	30.35	30.29	30.22	10	10	7	15	7	20	T	Snow
	48	33	18	22	15	12	75	50	25	30.32	30.28	30.24	10	10	10	12	5	15	0.00	
	60	46	32	48	36	23	92	77	62	30.23	30.04	29.94	10	8	1	26	11	32	0.24	Rain
	46	40	34	42	37	33	100	95	89	29.99	29.86	29.78	10	5	1	15	6	18	0.46	Fog , Rain
	34	26	17	34	21	9	100	84	68	30.09	29.94	29.85	10	6	2	22	12	27	0.02	Snow
	27	19	11	11	8	5	80	61	42	30.34	30.18	30.02	10	9	2	20	11	31	0.01	Snow
	44	30	15	32	14	9	80	54	27	30.38	30.19	29.92	10	10	7	28	10	36	0.01	Rain , Snow
	51	42	32	36	29	22	85	58	30	29.99	29.89	29.79	10	10	5	25	13	33	0.01	Rain
	46	37	28	38	31	22	92	73	54	30.03	29.83	29.68	10	10	5	20	8	24	0.06	Rain , Snow

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ATTACHMENT 2



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NWS Cleveland Record Report for the Month of February, 2015

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Record Event Report

National Weather Service Cleveland Oh
131 AM EST Sun Mar 1 2015

... Record Cold Temperatures Set in February 2015...

A record cold average monthly temperature of 14.3 degrees was set at Cleveland Hopkins Airport for the month of February. This breaks the old record of 15.2 degrees set in 1875. This also was the second coldest month ever recorded. The coldest month in history remains 11.0 in January 1977.

A record cold average monthly temperature of 13.1 degrees was set at the Erie International Airport for the month of February. This breaks the old record of 14.0 degrees recorded in 1934 and again in 1979. This also was the second coldest month ever recorded. The coldest month in history remains 12.5 in January 1977.

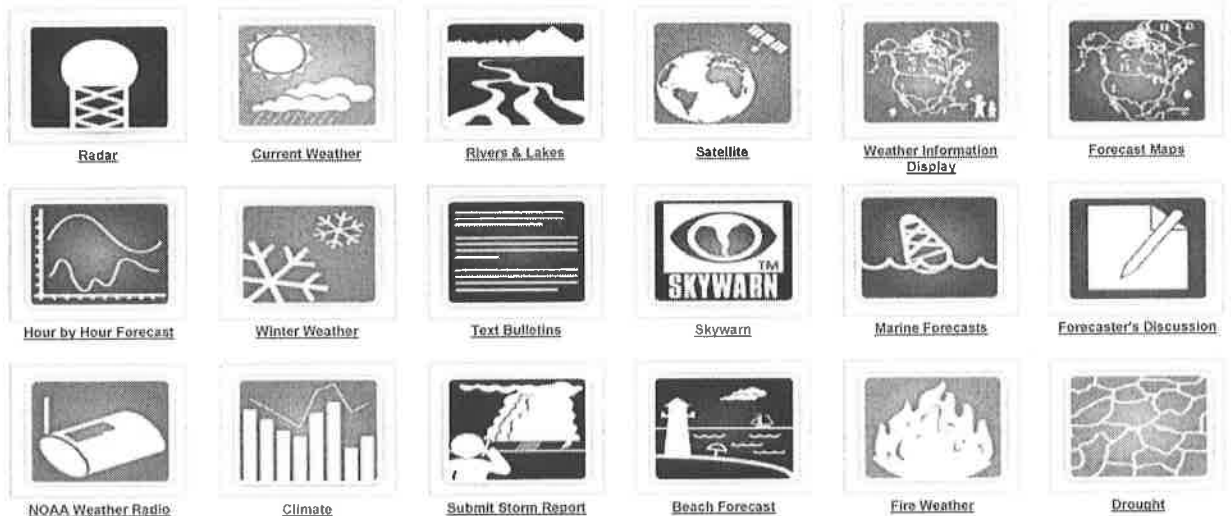
A record cold average monthly temperature of 14.7 degrees was set at Mansfield Lahm Airport for the month of February. This breaks the old record of 15.4 degrees recorded in 1978. This also was the third coldest month ever recorded. The coldest month in history remains 8.7 in January 1977.

A record cold average monthly temperature of 13.7 degrees was set at the Youngstown Warren Regional Airport for the month of February. This breaks the old record of 15.2 degrees recorded in 1934. This also was the second coldest month ever recorded. The coldest month in history remains 10.2 in January 1977.

The average monthly temperature of 15.8 degrees was the second coldest February at the Akron Canton Regional Airport. The coldest February was 15.3 degrees in 1934.

The average monthly temperature of 12.4 degrees was the second coldest February at the Toledo Express Airport. The coldest February was 11.8 degrees in 1978.

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Case No(s). 16-1543-EL-CSS

Summary: Brief --Ohio Edison Company's Post-Hearing Brief electronically filed by Mr. Joshua R. Eckert on behalf of Ohio Edison Company