

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**TESTIMONY  
OF  
ZACHARY C. MILLER  
ON BEHALF OF OHIO POWER COMPANY d/b/a AEP OHIO**

Filed March 2, 2017

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

2    A.           My name is Zachary C. Miller. My business address is 1 Riverside Plaza,  
3           Columbus, Ohio 43215.

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

5    A.           I am employed by American Electric Power Service Corporation (AEPSC)  
6           as a Principal Corporate Finance Analyst. In addition, I currently act as Manager of  
7           Regulatory Operations for Ohio Power Company (“AEP Ohio” or the “Company”).

8    **Q.           WHAT ARE YOUR RESPONSIBILITIES AS PRINCIPAL**  
9    **CORPORATE FINANCE ANALYST?**

10   A.           My responsibilities include planning and executing the corporate finance  
11           programs of the regulated operating companies in the AEP System, including AEP  
12           Ohio. I am also responsible for preparing dividend payment recommendations for  
13           the companies in the AEP System, support regulatory filings, establishing  
14           capitalization targets, and managing the relationships between AEP and its  
15           subsidiaries with the credit rating agencies.

16   **Q.           WHAT ARE YOUR RESPONSIBILITIES AS MANAGER OF**  
17   **REGULATORY OPERATIONS?**

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

21   **Q.           WHAT IS YOUR PROFESSIONAL AND EDUCATIONAL**  
22   **BACKGROUND?**

23   A.           I earned a Bachelor of Science in Business Administration as an Accounting

1 major from The Ohio State University in 2009. I earned a Master of Business  
2 Administration from Capital University in 2013.

3 I began employment with AEPSC as a Treasury Analyst in June 2009.  
4 Between June 2009 and January 2013, I worked in various capacities, with primary  
5 focus on cash and deal management operations within the Treasury Department. In  
6 February 2013, I transferred to the Corporate Finance group as an Analyst. In March  
7 2016, I was promoted to Principal Corporate Finance Analyst. In January 2017, I  
8 became acting Manager of Regulatory Operations for AEP Ohio.

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

11 A. The purpose of my testimony is to address some of the factual issues raised  
12 in the complaint filed by Complainant Janice Guess (Ms. Guess) on December 23,  
13 2014. I have reviewed the complaint, relevant company records, and have spoken  
14 with AEP Ohio employees who have direct knowledge of the facts at issue.  
15 Through my testimony, I will demonstrate and support that AEP Ohio correctly  
16 followed all rules; that AEP Ohio attempted to access its meters several times prior  
17 to disconnecting Ms. Guess; that Ms. Guess refused to allow AEP Ohio access to  
18 the meters; that AEP Ohio provided reasonable notice to Ms. Guess using various  
19 methods before disconnecting service; and that Ms. Guess ignored all of AEP  
20 Ohio's attempts to contact her over several years.

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

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

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

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

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

9 A. Ms. Guess owns a duplex that has two meters. These meters feed 804 Wager  
10 Street and 806 Wager Street separately. The 804 and 806 Wager Street meters are  
11 both located behind a locked privacy fence that AEP Ohio cannot gain access to  
12 without Ms. Guess or another resident opening the gate or otherwise allowing  
13 access.

14 **Q. WHY DID AEP OHIO NEED TO ACCESS THE METER AT 806**  
15 **WAGER STREET?**

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

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

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

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

1 A. No. According to the complaint, Ms. Guess and her adult daughter live on  
2 one side of the duplex at 804 Wager Street.

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

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

9 **Q. IS THE ACCOUNT AT 804 WAGER STREET IN MS. JANICE**  
10 **GUESS' NAME?**

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

12 **Q. HOW DID AEP OHIO KNOW ELECTRIC WAS BEING USED AT**  
13 **806 WAGER STREET IF THE METER WAS NOT ACCESSIBLE?**

14 A. AEP Ohio had installed an AMR (Automatic Meter Reading) Meter at this  
15 location. This type of Radio meter allows a meter reader to pick up the usage  
16 readings from the meter on a portable device. For disconnection, this type of meter  
17 needs to be manually disconnected.

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

21 A. Yes, several inactive usage letters were sent to 806 Wager Street. These  
22 letters attempt to notify potential occupants that there is usage on the meter without a  
23 customer of record, and if the premise is occupied, the occupant should contact AEP

1 Ohio immediately. True and accurate copies of these letters sent to 806 Wager Street  
2 are attached as Exhibits ZCM 1 – 4.

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

5 A. These letters were captured by company retention and are company records  
6 that I reviewed. From June 7, 2012 to May 23, 2014, we can verify that at least 4  
7 letters were sent via mail, although there may have been more sent that no longer  
8 show in AEP Ohio's system due to the age of the letters. All of these letters were  
9 addressed to 806 Wager Street, a property owned by Ms. Guess. Again, true and  
10 accurate copies of these letters are attached as Exhibits ZCM 1–4.

11 **Q. DID MS. GUESS RESPOND TO ANY OF THE INACTIVE USAGE**  
12 **LETTERS OR NOTICES?**

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

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

15 A. Yes. The in-person contact between AEP Ohio and Ms. Guess are discussed  
16 in Company witness Angela Griffith's filed testimony.

17 **Q. HOW DID AEP OHIO DISCONNECT SERVICE IF IT COULD NOT**  
18 **ACCESS THE 806 WAGER STREET METER?**

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

21 **Q. WHEN DID THIS DISCONNECTION OCCUR?**

22 A. December 9, 2014.

1    **Q.           IF AEP OHIO COULD HAVE PHYSICALLY ACCESSED THE 806**  
2       **WAGER STREET METER, WHAT ADDRESSES WOULD HAVE BEEN**  
3       **DISCONNECTED?**

4    A.           In this scenario, AEP Ohio would have been able to disconnect the service to  
5       only 806 Wager Street, and 804 Wager Street would not have been disconnected.

6    **Q.           PLEASE SUMMARIZE YOUR TESTIMONY UP TO THE TIME OF**  
7       **DISCONNECT.**

8    A.           Ms. Guess knowingly blocked AEP Ohio from accessing the meter at 806  
9       Wager Street. She was the owner of 806 Wager Street property and that address was  
10      sent four inactive use letters stating that there was usage on the meter with no  
11      customer of record, and if this circumstance continued, 806 Wager Street would  
12      need to be disconnected. Based on this due diligence, AEP Ohio concluded there  
13      was no occupant at 806 Wager Street.

14               Additionally, according to Company witness Angie Griffith, representatives  
15      of AEP Ohio told Ms. Guess, or her adult daughter, on several occasions that 806  
16      Wager Street needed to be disconnected at the meter and that AEP Ohio needed  
17      access to the meter. Ms. Guess denied AEP Ohio access by not allowing AEP Ohio  
18      past her fence. Due to the barrier and Ms. Guess' reluctance to allow AEP Ohio to  
19      traverse the property, AEP Ohio had not physically accessed the 804 or 806 Wager  
20      Street meters for years. Company witness Angela Griffith's filed testimony  
21      addresses safety and other concerns involved in such a scenario.

22               Furthermore, Ms. Guess, or her adult daughter, was informed on several  
23      occasions by Company witness Angela Griffith and other AEP Ohio representatives

1 that 804 Wager Street would also be disconnected if AEP Ohio could not access its  
2 meters. Again, AEP Ohio had to disconnect 806 Wager Street at the pole if it could  
3 not gain access to it physically.

4 The Complaint in this matter confirms these assertions. In reading the  
5 complaint filed in this case, Ms. Guess indicates that AEP Ohio had contacted her in-  
6 person, by phone and by letter. She mischaracterizes these communications as a  
7 “flood of correspondence from AEP representatives...”

8 In sum, AEP Ohio notified Ms. Guess that 806 Wager Street needed to be  
9 disconnected. She was aware it needed to be disconnected and still denied AEP Ohio  
10 access to its meters, as she had for years. AEP Ohio notified Ms. Guess that if she  
11 continued to deny AEP Ohio access to its meters, her 804 Wager Street address  
12 would be disconnected because electric service would be disconnected at the pole for  
13 806 Wager Street, and disconnecting at the pole meant both services would be  
14 discontinued. Despite having this notice, Ms. Guess continued to knowingly block  
15 AEP Ohio employees from accessing its meters to disconnect 806 Wager Street.  
16 Therefore, AEP Ohio disconnected at the pole. AEP Ohio acted reasonably and  
17 justly.

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

20 **A.** No, not to AEP Ohio’s knowledge. Again, we had made several attempts via  
21 letter to contact the residence of 806 Wager Street; and pursuant Company witness  
22 Angela 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**  
5 **WAGER STREET?**

6 A. Service was reconnected on December 10, 2014 because Ms. Guess gave  
7 AEP Ohio 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  
10 name at 804 Wager Street. On that date, also, she elected to take responsibility for  
11 the 806 Wager Street account by electing to continue service at that address under  
12 her name.

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

14 A. Yes.



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***

**AEP OHIO**  
A unit of American Electric Power

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**



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.

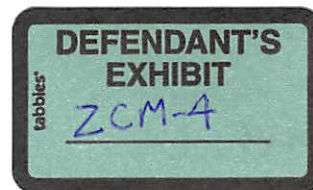
Please contact AEP within the next **five** business days to start service. If an account is not established, electric service will be disconnected at this location.

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***



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**

**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 2<sup>nd</sup> day of March, 2017.

Janice L. Guess  
804 Wager Street  
Columbus, Ohio 43206

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

*Complainant Pro Se*

/s/ Michael J. Benza  
Michael J. Benza (0093473)

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

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

Summary: Testimony of Zachary C. Miller on Behalf of Ohio Power Company d/b/a AEP  
electronically filed by Michael J Benza on behalf of Ohio Power Company