

FILE

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

CASE NO. 17-0818-EL-CSS

2017 APR 20 PM 3:11
PUCO

Richard Burkart,
Complainant,

v.

Ohio Power Company,
Respondent.

REQUEST FOR
PRODUCTION OF DOCUMENTS

For the purpose of this Request, the following definitions shall apply:

“Company” shall refer to Ohio Power Company d/b/a AEP Ohio

“Document” includes any written, recorded, electronic, or graphic matter, however produced or reproduced, that is or was ever in the possession, custody, or control of the Company.

“Document” includes the originals and all drafts and copies which differ in any respect from the original. “Document” includes all of the above materials, whether privileged or not. If any of the documents designated below are withheld on the grounds of privilege or work product, such document should be identified by author, recipient, date, and nature of the document.

“Electric Meter” shall refer to the electric metering device in service at the complainant’s address of 990 Rutland Way, Worthington, Ohio until its removal on February 10th, 2017

With respect to any document designated below which was once, but is no longer, in the Company’s possession, custody, or control, please indicate the date the document ceased to be in the Company’s possession, custody, or control, the manner in which it ceased, and the name and address of its present custodian.

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document delivered in the regular course of business.
Technician te Date Processed APR 20 2017

Page 1 of 4

If the document is responsive to more than one request, it need be produced only once, but the written response should identify all the requests to which it is responsive.

REQUEST FOR PRODUCTION OF DOCUMENTS

The below documents are requested:

1. All records of instrument calibrations or testing for the Electric Meter. Include records for the Electric Meter from its initial in-service date whether at the complainant's address or not.
2. All Electric Meter manufacture's certifications and suitability claims.
3. All Company procedures related to and used for the purpose of calibration or testing of the Electric Meter.
4. All training records for Company employees involved in the calibration or testing of the Electric Meter.
5. All Company procedures related to and used for the purpose of reading the Electric Meter.
6. All training records for Company employees involved in the reading of the Electric Meter.
7. All records of monthly kilo-watt-hour (KWH) usage at the complaint's address whether generated from usage measured by the Electric Meter or with any other electric metering device.
8. Complete text of all applicable standards to which the Electric Meter is tested, certified, calibrated, or otherwise adheres to. This shall include, but is expressly not limited to, the complete text of ANSI C12.1-2008
9. Complete text of the operating manual for the Electric Meter.
10. All certifications and records for all calibration or testing equipment used for the purpose of calibrating or testing the Electric Meter.
11. Complete text of all operating manuals for all calibration or test equipment used for the purpose of calibrating or testing of the Electric Meter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Richard Burkart", written in a cursive style.

Richard Burkart:

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for the Respondent by regular first class mail at the address listed below, on this 19th day of April, 2017.

A handwritten signature in black ink, appearing to read "Rich Burkart", with a stylized, cursive script.

Richard Burkart:

Ryan F.M Aguiar
American Electric Power Service Corp
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215