

FILF

PUCO EXHIBIT FILING

Date of Hearing: February 26th, 2019

Case No. 18-0785-EL-CSS

PUCO Case Caption: Forest Hills Supermarket,
Inc., d/b/a Konni's Family Foods vs
The Cleveland Electric Illuminating
Company and First Energy Corp

List of exhibits being filed:

Complainant's Exhibits 1-4

Company Exhibits A-C

PUCO

2019 MAR 12 AM 8:51

RECEIVED-DOCKETING DIV

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Technician AM Date Processed MAR 12 2019

Reporter's Signature: _____
Date Submitted: _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Forest Hills Supermarket, :
Inc., d/b/a Konnis Family :
Foods, :

Complainant, :

vs. :

Case No. 18-785-EL-CSS

The Cleveland Electric :
Illuminating Company, :

and :

FirstEnergy Corp., :

Respondents. :

PUCO

2019 MAR 12 AM 8:51

RECEIVED-COCKETING DIV

PROCEEDINGS

before Patricia A. Schabo, Attorney Examiner, at the
Public Utilities Commission of Ohio, 180 East Broad
Street, Room 11-D, Columbus, Ohio, called at 10:30
a.m. on Tuesday, February 26, 2019.

ARMSTRONG & OKEY, INC.
222 East Town Street, Second Floor
Columbus, Ohio 43215-4620
(614) 224-9481 - (800) 223-9481



A-FECC
76 South Main St
Akron OH 44308-1812
800-589-3101

August 01, 2017

FOREST HLS SPR MRKT INC
13598 EUCLID AVE
EAST CLEVELAND OH 44112

Dear FOREST HLS SPR MRKT INC:

Your account has been billed from 12/09/2016 to 07/06/2017 due to your account not being established for the electric service at the following address:

13598 EUCLID AVE NEW SERVICE
EAST CLEVELAND OH 44112

This bill is based on the current read and the usage on the new meter. As of this date, your total account balance is a debit of \$44,961.07. This amount will be displayed on your next bill. If this is the first bill for a new account your balance may include a service charge.

We apologize for any inconvenience this billing adjustment may cause. The Public Utility Commission of Ohio requires that we place you on a payment plan. If you have any questions, please call us at the number shown above.

Sincerely,

The Illuminating Co
A FirstEnergy Company

Enclosure



Billing Period: Jun 08 to Jul 08, 2017 for 29 days
Bill For: FOREST HLS SPR MKRT INC
13598 EUCLID AVE NEW SERVICE
EAST CLEVELAND OH 44112

August 01, 2017
Account Number: 110 124 917 649

Amount Due: \$44,961.07

Due Date: August 28, 2017
30-19651 -s 4

To report an emergency or an outage, call 24 hours a day 1-888-544-4877. For Customer Service, call 1-800-589-3101. For Payment Options, call 1-800-686-9901. Pay your bill online at www.firstenergycorp.com

Bill Issued by: The Illuminating Company, PO Box 3687, Akron OH 44309-3687

Messages			Account Summary		Amount Due
To avoid a 1.50% Late Payment Charge being added to your bill, please pay the Amount Due by the Due Date.			Previous Balance		37,384.63
			Payments/Adjustments		0.00
			Balance at Billing on Aug 01, 2017		37,384.63
			The Illuminating Company - Consumption		7,576.44
			Amount Due by Aug 28, 2017		\$44,961.07
Usage Information for Meter Number S914036132					
Energy Efficiency			Jul 06, 2017 KWH Reading (Actual)		2,319
Peak Demand Reduction			Jun 08, 2017 KWH Reading (Actual)		1,968
Renewable Energy			Difference		351
			Multiplier		200
			KWH used		70,200
			Metered Load in KW		0.763
			Measured Lagging Reactive Demand		125.8
			Billed Load in KW/KVA		152.6
			Billed Reactive Demand		125.8
Charges From The Illuminating Company					
			Customer Number: 0801054962 5001428258		
			Rate: General Service Secondary CE-GSF		
			Customer Charge		7.00
			Distribution Related Component		2,536.91
			Cost Recovery Charges		803.02
			Bypassable Generation and Transmission Related Component		4,229.51
			Current Consumption Bill Charges		7,576.44

70,200 KWH x 0.002047 \$143.73
70,200 KWH x 0.000512 \$35.95
70,200 KWH x 0.000533 \$37.39

Your next meter reading is scheduled to occur on or about Aug 04, 2017.

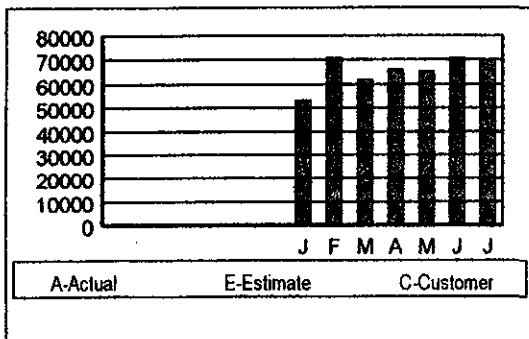
We are required to include your name, address and usage information on a list of eligible customers that is made available to other competitive retail electric service providers. If you do not wish to be included on this list, please call us at 1-800-225-0444, go to the Customer Choice section of our website - www.firstenergycorp.com - or write to us at 76 S. Main St., Akron, OH 44308 Attn: FECC. Please note that an election to not be included on this list will not prevent Ohio Edison, The Illuminating Company or Toledo Edison from providing your information to governmental aggregators. If you previously made a similar election, your name will continue to be excluded from the list without any additional action on your part. If you previously decided not to be included on the list and would like to reverse that decision, please call or write us at the same telephone number and address.

An important message to dog owners - to ensure that our meter readers' visits to your home are safe and productive, please keep your dog secured in an area away from the path to your meter.

Additional messages, if any, can be found on back.

Usage History

Jan 17	53,200	Jul 17	70,200
Feb 17	71,000		
Mar 17	62,000		
Apr 17	66,200		
May 17	65,400		
Jun 17	71,000		



Average Daily Use (KWH)
Average Daily Temperature
Days in Billing Period
Last 7 Months Use (KWH)
Average Monthly Use (KWH)

This Year
2421
74
29
459,000
65,571



Billing Period: Jul 07 to Aug 07, 2017 for 32 days
Billed For: FOREST HLS SPR MKRT INC
 13598 EUCLID AVE NEW SERVICE
 EAST CLEVELAND OH 44112

August 09, 2017
Account Number: 110 124 917 649
Amount Due: \$14,911.63
Due Date: August 30, 2017

To report an emergency or an outage, call 24 hours a day 1-888-644-4877. For Customer Service, call 1-800-688-3101. For Payment Options, call 1-800-686-9901. Pay your bill online at www.firstenergycorp.com
 Bill issued by: The Illuminating Company, PO Box 3687, Akron OH 44309-3687

Bill issued by: The Illuminating Company, PO Box 3687, Akron OH 44309-3687

To avoid a 1.50% Late Payment Charge being added to your bill, please pay the Amount Due by the Due Date.

Energy Efficiency	80,400 KWH x 0.001550	\$124.62
Peak Demand Reduction	80,400 KWH x 0.000387	\$31.11
Renewable Energy	80,400 KWH x 0.000771	\$61.99

Your next meter reading is scheduled to occur on or about
Sep 05, 2017.

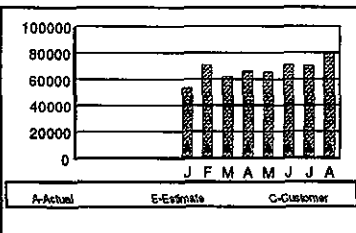
Thank you for setting up a payment arrangement with The Eliminating Company on 08/01/2017. The terms of the installment plan require a monthly installment amount of \$6,423.00 in addition to the current charges. The amount you must pay will be shown on your bill each month. Please pay this amount by the due date on the bill. Failure to keep the terms of the installment plan may result in the disconnection of your service.

We are required to include your name, address and usage information on a list of eligible customers that is made available to other competitive retail electric service providers. If you do not wish to be included on this list, please call us at 1-800-225-0444, go to the Customer Choice section of our website - www.firstenergycorp.com or write to us at 76 S. Main St., Akron, OH 44308 ATN: FECC. Please note that an election to not be included on this list will not prevent Ohio Edison, The Lumina Group Company or Toledo Edison from providing your information to governmental aggregators. If you previously made a similar election, your name will continue to be excluded from the list without any additional action on your part. If you previously decided not to be included on the list and would like to reverse that decision, please call or write us at the same telephone number and address.

An important message to dog owners - to ensure that our meter readers' visits to your home are safe and productive, please keep your dog secured in an area away from the path to your meter.

Additional messages, if any, can be found on back.

Jan 17	63,200	Jul 17	70,200
Feb 17	71,000	Aug 17	80,400
Mar 17	62,000		
Apr 17	66,200		
May 17	65,400		
Jun 17	71,000		



	This Year
Average Daily Use (KWH)	2513
Average Daily Temperature	75
Days in Billing Period	32
Last 8 Months Use (KWH)	539,400
Average Monthly Use (KWH)	67,425

Previous Balance	44,961.07
Payments/Adjustments	-44,961.07
Balance at Billing on Aug 08, 2017	0.00
The Illuminating Company - Consumption	8,488.63
Consumption Inst. Plan Amount	8,423.06
Total Current Charges	14,911.63
Amount Due by Aug 30, 2017	\$14,911.63

To pay your account in full you owe \$52,448.70.	

Aug 07, 2017 KWH Reading (Actual)	2,729
Jul 07, 2017 KWH Reading (Actual)	2,318
Difference	405
Multiplier	204
KWH used	82,600.00
Metered Load in KW	0.765
Measured Lagging Reactive Demand	109.5
Billed Load in KW/KVA	163.8
Billed Reactive Demand	109.5

Customer Number: 0801054962 5001428258	
Rate: General Service Secondary CE-GSF	
Customer Charge	7.00
Distribution Related Component	2,605.69
Cost Recovery Charges	809.69
Bypassable Generation and Transmission Related Component	5,086.25
Current Consumption Billed Charges	8,488.63
<hr/>	
08/01/17 Installment plan created	-44,961.07
<hr/>	
Installment Date	08/30/2017
Installment Amount	44,961.07
Paid to date	0.00
Balance Aug 09, 2017	44,961.07

Return this part with a check or money order payable to The Illuminating Company



76 South Main Street
Akron, OH 44308-1890

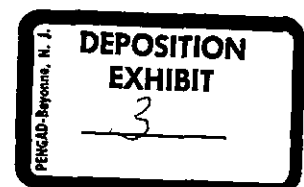
FOREST HLS SPR MKRT INC
13500 EUCLID AVE
EAST CLEVELAND OH 44112-4206

Account Number: 110 124 917 649

Amount	Paid	
Amount	Due	\$14,911.63
Due Date		Aug 30, 2017

THE ILLUMINATING COMPANY
PO BOX 3687
AKRON OH 44309-3687

04110124917649000000000000000000000000014911630014911639



Business Distribution Credit - Applied during the winter billing period for non-residential electric heat and/or water heating customers on a qualifying rate.

Bypassable Generation and Transmission Related Component - Charges for purchasing power and delivering it through the transmission system. These charges are avoided when switching to a Certified Retail Electric Service provider.

Cost Recovery Charges - Recovers previously incurred costs, including PUCO-approved Phase-In Recovery Charges CEI collects from all customers on behalf of CEI Funding, LLC which owns the right to impose and collect such charges.

Customer Charge - Monthly charge that offsets costs for billing, meter reading, equipment, and service line maintenance.

Distribution Related Component - Charge for moving electricity over distribution lines to a service location.

Economic Development Component - Charges related to economic development support.

Estimated Reading - On the months we do not read a meter, we calculate the bill based on past electrical usage.

Kilovolt-Amperes (KVA) - Volts times amperes divided by 1,000. Actual measured power used for circuit sizing.

Kilovolt-Amperes Reactive or KiloVar (KVAR) - The portion of electricity that establishes and sustains the electric and magnetic fields of ac equipment. It is used to control voltage on the transmission network.

Kilowatt (KW) - Unit of electric power representing a rate of consumption equivalent to 1,000 watts.

KWH (Kilowatt Hour) - A unit of measure for electricity usage equal to 1,000 watts used for one hour.

Late Payment Charge - A charge added to the bill on balances owed after the Due Date.

School Distribution Credit - A distribution credit that replaces the former Energy for Education II Program.

If you have billing questions or complaints about your Illuminating Company account or for a written explanation of the Price to Compare:

Call Customer Service at 1-800-688-3101 from Monday - Friday, 8 a.m. - 6 p.m.

Call Payment Options at 1-800-688-9901 from Monday - Friday, 8 a.m. - 6 p.m.

Visit our web site at <http://www.firstenergycorp.com>

Write to us at The Illuminating Company, 76 S. Main St., A-RPC, Akron, OH 44308-1890.

Customers with hearing or speech impairments can contact the Telecommunications Relay Service (TRS) at 711.

We welcome the opportunity to work with you and will try to answer your questions. If your complaint is not resolved after you have called your electric utility, or for general utility information, residential and business customers may contact the public utilities commission of Ohio (PUCO) for assistance at 1-800-688-7826 (toll free) from 8 a.m. to 5 p.m. weekdays, or at <http://www.puco.ohio.gov>. Hearing or speech impaired customers may contact the PUCO via 7-1-1 (Ohio relay service).

For your protection, all of our employees wear Photo I.D. badges.

Electronic Check Conversion - Your check authorizes us either to make a one-time electronic funds transfer (EFT) from your account or process as a check. If you have questions about this program, call 1-866-283-8081.

Billing Period: Mar 09 to Apr 05, 2018 for 28 days
Bill For: FOREST HLS SPR MKRT INC
13598 EUCLID AVE NEW SERVICE
EAST CLEVELAND OH 44112

April 09, 2018

Account Number: 110 124 917 649

Amount Due: \$44,453.31

Due Date: April 30, 2018

To report an emergency or an outage, call 24 hours a day 1-888-544-4877. For Customer Service, call 1-800-589-3101. For Payment Options, call 1-800-686-9901. Pay your bill online at www.firstenergycorp.com

Bill Issued by: The Illuminating Company, PO Box 3687, Akron OH 44309-3687

Messages		Account Summary		Amount Due																												
<p>*** DISCONNECTION NOTICE ***</p> <p>Our records indicate your electric service payment is past due. Your electric service could be disconnected unless payment of \$41,153.61 is made by 04/30/2018. If service is disconnected, you will be required to pay a reconnection fee \$35.00 and may be required to pay a security deposit to have power restored. Failure to pay charges for competitive retail electric service may result in the cancellation of your contract with the competitive retail electric service provider and return you to The Illuminating Company's standard-offer generation service. This amount due does not include charges for nonratified products or services but may include charges for competitive retail electric service. Failure to pay charges for other nonratified products or services may result in loss of those products or services. This provision applies only to accounts issued a consolidated bill for electric service. Please be aware that the due date of this notice does not void the due date on any notice previously sent to you regarding a past due amount.</p> <p>To avoid a 1.50% Late Payment Charge being added to your bill, please pay the Amount Due by the Due Date.</p>		<p>Previous Balance 17,802.79</p> <p>Payments/Adjustments 23,350.82</p> <p>Balance at Billing on Apr 09, 2018 41,153.61</p>																														
		<p>The Illuminating Company - Consumption 2,683.10</p> <p>Late Payment Charges 616.60</p> <p>Total Current Charges 3,299.70</p>																														
		<p>Amount Due by Apr 30, 2018 \$44,453.31</p>																														
<p>Usage Information for Meter Number S314036132</p>																																
		<p>Apr.05, 2018 KWH Reading (Actual) 5,310</p> <p>Mar 09, 2018 KWH Reading (Actual) 5,039</p> <p>Difference 271</p> <p>Multiplier 200</p> <p>KWH used 54,200</p> <p>Metered Load in KW 0.578</p> <p>Measured Lagging Reactive Demand 85.0</p> <p>Billed Load in KW/KVA 115.6</p> <p>Billed Reactive Demand 85.0</p>																														
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		<p>Customer Number: 0801054962 5001428258</p> <p>Rate: General Service Secondary CE-GSD</p> <p>Customer Charge 7.00</p> <p>Distribution Related Component 1,958.61</p> <p>Cost Recovery Charges 717.49</p> <p>Current Consumption Bill Charges 2,683.10</p> <p>Late payment charge 616.60</p> <p>Total Charges \$3,299.70</p>																														
<p>Charges from Consolidated Generation</p>																																
<p>250 E. Broad Street Suite 1400, Columbus OH 43215-0000</p> <p>1-888-638-2210</p>																																
<p>Billing Period: Mar 09, 2018 to Apr 05, 2018</p> <p>This supplier is responsible for billing your generation charges on a separate bill.</p>																																
<p>Detail Payment and Adjustment Information</p>																																
		<p>03/16/18 Payment -6,044.79</p> <p>03/08/18 Deactivated Installment Plan 29,395.61</p> <p>Total Payments and Adjustments \$23,350.82</p>																														
<p>Additional messages, if any, can be found on back.</p>																																
<p>Usage History</p>																																
<table border="1"> <tbody> <tr> <td>Apr 17</td> <td>66,200</td> <td>Oct 17</td> <td>76,400</td> </tr> <tr> <td>May 17</td> <td>65,400</td> <td>Nov 17</td> <td>65,600</td> </tr> <tr> <td>Jun 17</td> <td>71,000</td> <td>Dec 17</td> <td>69,400</td> </tr> <tr> <td>Jul 17</td> <td>70,200</td> <td>Jan 18</td> <td>69,800</td> </tr> <tr> <td>Aug 17</td> <td>80,400</td> <td>Feb 18</td> <td>63,600</td> </tr> <tr> <td>Sep 17</td> <td>58,400</td> <td>Mar 18</td> <td>60,400</td> </tr> <tr> <td></td> <td></td> <td>Apr 18</td> <td>54,200</td> </tr> </tbody> </table>					Apr 17	66,200	Oct 17	76,400	May 17	65,400	Nov 17	65,600	Jun 17	71,000	Dec 17	69,400	Jul 17	70,200	Jan 18	69,800	Aug 17	80,400	Feb 18	63,600	Sep 17	58,400	Mar 18	60,400			Apr 18	54,200
Apr 17	66,200	Oct 17	76,400																													
May 17	65,400	Nov 17	65,600																													
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<p>Comparisons</p> <table border="1"> <thead> <tr> <th></th> <th>Last Year</th> <th>This Year</th> </tr> </thead> <tbody> <tr> <td>Average Daily Use (KWH)</td> <td>2207</td> <td>1936</td> </tr> <tr> <td>Average Daily Temperature</td> <td>43</td> <td>36</td> </tr> <tr> <td>Days in Billing Period</td> <td>30</td> <td>28</td> </tr> <tr> <td>Last 12 Months Use (KWH)</td> <td></td> <td>804,800</td> </tr> <tr> <td>Average Monthly Use (KWH)</td> <td></td> <td>67,067</td> </tr> </tbody> </table>						Last Year	This Year	Average Daily Use (KWH)	2207	1936	Average Daily Temperature	43	36	Days in Billing Period	30	28	Last 12 Months Use (KWH)		804,800	Average Monthly Use (KWH)		67,067										
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<p>Usage History</p> <p>A-Actual E-Estimate C-Customer</p>																																
<p>DEPOSITION EXHIBIT</p> <p>4</p>																																

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

FOREST HILLS SUPERMARKET, INC.,)

d/b/a KONNIS FAMILY FOODS)

Complainant,)

v.)

**THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,**)

Respondent.)

Case No. 18-785-EL-CSS

**DIRECT TESTIMONY OF PRINCESS DAVIS ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**



INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Princess Davis. I am employed by FirstEnergy Service Company as a Customer Services Compliance Specialist. FirstEnergy Service Company provides corporate support, including customer service, to FirstEnergy Corp.'s regulated public utility subsidiaries. In Ohio, these subsidiaries are Ohio Edison Company, The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I received a Bachelor of Science, Criminal Justice degree from Fairmont State University in December 1999, majoring in criminal justice with a minor in psychology. I have worked at either FirstEnergy Service Company or Allegheny Power Company ("Allegheny Power") in a customer service capacity for the last 18 years. I have held my current position since 2010, although after the merger the title was changed from Business Analyst to Customer Services Compliance Specialist.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities include reviewing and responding to complaints made by customers of FirstEnergy Corp.'s regulated public utility subsidiaries to the Public Utilities Commission of Ohio ("Commission"), which process includes investigating facts including gathering information from subject matter experts. I also have responsibility for reviewing and responding to customer complaints in Maryland and West Virginia. Among other customer service related duties, I also provide training to new hires and to my peers within FirstEnergy regarding various state compliance requirements.

1 **Q. HAVE YOU EVER TESTIFIED BEFORE THE COMMISSION?**

2 A. Yes. I testified in Case No. 18-82-EL-CSS on behalf of The Toledo Edison Company.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THE PRESENT CASE?**

4 A. My testimony addresses several of the allegations raised in the Complaint by Forest Hills
5 Supermarket ("Forest Hills") pertaining to the electric service at 13598 Euclid Ave.,
6 Cleveland, OH 44112 ("Property"). Specifically, my testimony addresses the non-payment
7 of charges for the previously unbilled electric service delivered to the Property.

8 **Q. DID YOU REVIEW ANY RECORDS RELATED TO THIS CASE?**

9 A. Yes, I have reviewed numerous business records related to this case maintained and
10 preserved within FirstEnergy's SAP System. These records, all of which were kept in the
11 course of regularly conducted business activity, include customer contact notes and other
12 customer service records, and various bills associated with the Property. It is the regular
13 practice of FirstEnergy and CEI to make and preserve these business records, and I
14 regularly rely upon such documents when investigating customer complaints in accordance
15 with my duties as a Customer Services Compliance Specialist. I also reviewed the
16 Complaint and the Company's Answer in this proceeding.

17 **HISTORY OF FOREST HILL'S ACCOUNT**

18 **Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE BACKGROUND OF FOREST**
19 **HILL'S SERVICE AS IT RELATES TO THIS COMPLAINT?**

20 A. Complainant Forest Hills is a grocery store located in a strip mall as a tenant in a landlord-
21 owned building, and currently receives non-residential electric service at the Property from
22 the Company under Account No. 110124917649 ("Account -649"). Complainant began
23 receiving service from CEI under Account -649 in December 2016 after an upgrade

1 requested by the landlord was made to its electric service at the Property. A new meter
2 (Meter S314036132 or "New Meter") was installed and initially set up on an existing
3 account for the landlord. Prior to December 2016, Complainant received electric service
4 at the Property from CEI solely through two meters, #834742596 and #A11692577 ("Old
5 Meters") under Account No. 110023165209 ("Account -209"). On September 6, 2016,
6 CEI completed the project, energized the service to the New Meter, and the New Meter
7 was billed to the landlord. The Complainant continued to be billed for the Old Meters
8 under the Complainant's Account -209, as service to Complainant at that time still ran
9 through the Old Meters until the meter switchover in December 2016.

10 On June 19, 2017, CEI confirmed that the New Meter served 13598 Euclid Avenue
11 not 13520 Euclid Avenue. A billing correction was completed to bill the usage from the
12 New Meter for the period from December 9, 2016 to July 6, 2017 to Account -649 that was
13 established for Complainant. CEI sent a letter to Complainant on August 1, 2017, to advise
14 of the rebill amount and that a payment plan was established. A spreadsheet was also
15 included which provided a detailed breakdown of the billing from December 9, 2016 to
16 July 6, 2017. The term of the Installment Payment Plan ("IPP") was set equal to the period
17 of underbilling—seven months.

18 **Q. WHAT DO THE COMPANY'S RECORDS SHOW ABOUT COMPLAINANT'S**
19 **RESPONSE TO RECEIVING CORRECTED BILLS?**

20 A. The Company's records show that on August 20, 2017, CEI received a letter from
21 Complainant's attorney stating that he had reached out to the landlord to inquire why the
22 New Meter was not being billed to Complainant and that he hoped to reach a resolution
23 with the landlord. On the date the August 9, 2017 bill was due, August 30, 2017,

1 Complainant called CEI and requested a different arrangement for payment which was not
2 granted at that time. Complainant, thereafter, paid only the current charges on that bill.

3 CEI received another letter from Complainant's attorney dated October 11, 2017,
4 stating that "Since the end of 2016, [Complainant] has been attempting to work out an on-
5 going billing issue to no avail." There had been no communications between CEI and
6 Complainant regarding billing issues prior to CEI's August 1, 2017 letter, which indicates
7 that Complainant had been communicating with the landlord on the billing issues.

8 A Company representative spoke with the Complainant on November 10, 2017 and
9 advised that CEI was willing to renegotiate his payment terms; however, the Complainant
10 stated he would need to confer with his attorney.

11 On January 11, 2018, CEI sent a disconnect notice, and on February 1, 2018,
12 Complainant entered into a second IPP, but again paid current charges only and nothing
13 toward the rebill amount which triggered a disconnect notice on April 9, 2018.
14 Complainant then filed this Complaint on May 2, 2018.

15 **Q. PLEASE DESCRIBE HOW CEI DISCOVERED THE ERROR.**

16 A. On May 11, 2017, a representative for the landlord contacted CEI regarding the New Meter
17 appearing on the landlord's account. CEI investigated its records for the meter work and
18 on June 19, 2017, CEI confirmed on-site that the New Meter was serving Complainant's
19 Property at 13598 Euclid Avenue and should have been billed to Complainant. CEI then
20 proceeded to make the corrections to bill the New Meter to Account -649 based on the
21 recorded meter data. CEI presented that amount to Complainant in the August 1, 2017
22 letter and on Complainant's next bill generated on August 9, 2017.

1 **Q. HOW CAN YOU BE SURE THE PROPER BILLING AMOUNT WAS REBILLED**
2 **TO COMPLAINANT?**

3 A. There are several facts which confirm that Complainant has been billed the proper amount.
4 First, the New Meter has only one service connection to the Property occupied by
5 Complainant. Therefore, the only electric usage that can be measured on that meter is the
6 electricity consumed by Complainant. The billing determinants were based on actual meter
7 data and applied to the applicable tariff rates in effect at the time to produce the billing
8 amounts that would have been generated to Complainant.

9 Second, I examined Complainant's account data from before the meter change,
10 during the rebill period, and after the New Meter was assigned to Complainant. I found
11 that the usage levels on the New Meter after the December 2016 changeout aligned very
12 closely with the usage recorded on the Old Meters during the rebill period from December
13 9, 2016 to July 6, 2017, as well as aligning with the usage recorded on the New Meter after
14 the rebill period.

15 Third, the Old Meters began recording zero consumption after the meter
16 switchover, matching the timing that the New Meter began recording usage corresponding
17 with historical usage by Complainant. CEI's work order records confirm the physical
18 interconnection noted above, so any other explanation would be both illogical and
19 unsupported.

20 Fourth, CEI received a letter from Complainant's attorney on August 20, 2017
21 referencing the amount of \$44,961.07 CEI was billing to Complainant which was noted in
22 the August 1, 2017 letter, and advising they were trying to reach a resolution with the

1 landlord. Complainant's letter did not dispute the amount of the bills, or allege the
2 registered consumption was inaccurate.

3 **Q. WHAT HAPPENED WITH BILLING ON ACCOUNT -209?**

4 A. The Old Meters, which had not been removed, continued to be read and billed under the
5 Account -209 each month. As I stated above, the kWh consumption on the Old Meters
6 associated with Account -209 was zero, so each month Complainant received a billing
7 statement reflecting only the monthly customer charge plus a minimum demand charge
8 pursuant to the tariff. Since Complainant had received these billing statements showing
9 zero kWh, Complainant clearly was alerted that they were not being billed for any electric
10 consumption.

11 **Q. WHAT HAPPENED WHEN THE OLD ACCOUNT WAS CLOSED OUT?**

12 A. Complainant failed to notify CEI to close Account -209, therefore, the Complainant
13 continued to be billed for service through November 27, 2017. Since no usage registered
14 on Account -209 after January 5, 2017, CEI agreed to cancel these bills for the service
15 period from January 6, 2017 to November 27, 2017 which created a credit on the account
16 of \$5,290.34. The credit balance was transferred to the Complainant's Account -649 on
17 January 20, 2018 which reduced the outstanding unpaid balance by that amount.

18 **Q. DID CEI VIOLATE COMMISSION RULES?**

19 A. No. CEI at all times complied fully with the Commission's rules and with CEI's tariff.
20 While the Company strives for 100% accuracy, mistakes sometimes get made. Indeed, the
21 Commission's rules recognize that underbilling of nonresidential customers may occur and
22 provides guidance on the correction process in Section 4901:1-10-23. CEI's rebilling of
23 Complainant was fully in compliance with this rule. CEI notified Complainant of the usage

1 associated with the unpaid balance by way of the Company's letter dated August 1, 2017.

2 CEI's billing was based on the actual metering data on both the Old Meters and on the New

3 Meter, therefore, the usage billed to the Complainant is accurate.

4 **CONCLUSION**

5 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

6 **A.** Yes; however, I reserve my right to supplement my testimony.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/15/2019 4:31:06 PM

in

Case No(s). 18-0785-EL-CSS

Summary: Testimony of Princess Davis on Behalf of The Cleveland Electric Illuminating Company electronically filed by Mrs. Ashlee E Waite on behalf of The Cleveland Electric Illuminating Company

Billing Period: Apr 06 to May 05, 2017 for 30 days
Bill For: FOREST HLS SPR MKT INC
 13596 EUCLID AVE
 EAST CLEVELAND OH 44112

May 10, 2017

Account Number: 110 023 165 209

Amount Due: \$148.84

Due Date: May 31, 2017

To report an emergency or an outage, call 24 hours a day 1-888-544-4977. For Customer Service, call 1-800-589-3101. For Payment Options, call 1-800-686-0801. Pay your bill online at www.firstenergycorp.com
Bill issued by: The Financing Company, PO Box 3637, Akron OH 44308-3637

*** DISCONNECTION NOTICE ***

Our records indicate your electric service payment is past due. Your electric service could be disconnected unless payment of \$90.01 is made by 03/15/2019. If service is disconnected, you will be required to pay a reconnection fee of \$35.00 and may be required to pay a security deposit to have power restored. Failure to pay charges for competitive retail electric service may result in the termination of your contract with the competitive retail electric service provider and return you to The Illuminating Company's standard-offer generation service. This amount due does not include charges for nonbilled products or services but may include charges for competitive retail electric service. Failure to pay charges for other nonbilled products or services may result in loss of those products or services. This provision applies only to accounts issued a consolidated bill for electric service. Please be aware that the due date of this notice does not void the due date on any notice previously sent to you regarding a past due amount.

To avoid a 1.50% Late Payment Charge being added to your bill please pay the Amount Due by the Due Date.

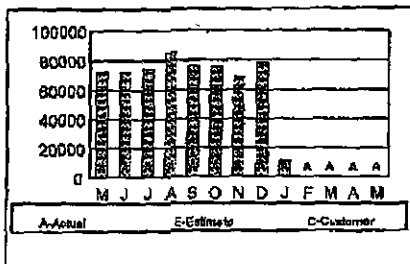
Energy Efficiency	0 KWH x 0.002176	\$0.00
Peak Demand Reduction	0 KWH x 0.000545	\$0.00
Renewable Energy	0 KWH x 0.000470	\$0.00

Your next master reading is scheduled to occur on or about
Jun 08, 2017.

We are required to include your name, address and usage information on a list of eligible customers that is made available to other competitive retail electric service providers. If you do not wish to be included on this list, please call us at 1-800-225-0444, go to the Customer Choice section of our website www.firstenergypco.com or write to us at 76 S. Main St., Akron, OH 44308 Attn: FECC. Please note that an election to not be included on this list will not prevent OH Edison, The SummaCare Company or Toledo Edison from providing service to you.

Additional messages, if any, can be found on back

May 16	72,400	Nov 18	68,450
Jun 16	72,720	Dec 15	78,240
Jul 16	78,760	Jan 17	11,620
Aug 18	85,440	Feb 17	0
Sep 16	78,400	Mar 17	0
Oct 18	75,360	Apr 17	0
		May 17	0



Comparisons	Last Year	This Year
Average Daily Use (KWH)	2413	83
Average Daily Temperature	49	60
Days in Billing Period	33	30
Last 12 Months Use (KWH)		541,800
Average Monthly Use (KWH)		45,150

Previous Balance		98.87	
Payments/Adjustments		0.00	
Balance at Billing on May 10, 2017		98.87	
The Illuminating Company		59.44	
The Illuminating Company - 56 so. Charges		0.00	
Late Payment Charges		1.43	
Total Current Charges		61.87	
Amount Due by May 31, 2017		\$149.94	
Please Refer to Meter Number 004742496			
May 05, 2017 KWH Reading (Actual)		37,785	
Apr 08, 2017 KWH Reading (Actual)		57,100	
Multiplier		80	
KWH used		0	
Rated Load in KW/KVA		51	
Please Refer to Meter Number 004742497			
May 05, 2017 KWH Reading (Actual)		52,421	
Apr 08, 2017 KWH Reading (Actual)		63,421	
Multiplier		80	
KWH used		0	
Please Refer to Meter Number 004742498			
Customer Number: C801C54982 1940001186			
Rate: General Service Secondary C-C-GS			
Customer Charge		7.00	
Distribution Related Component		34.00	
Cost Recovery Charges		17.44	
Current Consumption Bill Charges		84.41	
Late payment charge		1.97	
Security Deposit Interest		-8.86	
Total Charges		\$ 151.27	
Amount Due by May 31, 2017			
Previous Balance	Payments/ Adjustments	Current Charges	Amount Due
The Illuminating Company	99.07	0.00	149.94
American Power & Gas of Ohio, LLC	0.00	0.00	0.00
Total	98.87	0.00	149.94

Return this part with a check or money order payable to The Illuminating Company

Thurman Company 76 South Main Street
Akron, OH 44302-1890

FOREST HLS SUPR MKRT INC
13875 EUCLID AVE
EAST CLEVELAND OH 44112-4208

Account Number: 110 023 165 208

Amount Paid	
Amount Due	\$149.94
Due Date	May 31, 2017

THE ILLUMINATING COMPANY
PO BOX 3817
AKRON OH 44303-1887

[illegible]

Amount Due: 50.00

ENR Issued by: The Illuminating Company, PO Box 3687, Akron OH 44308-3687

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