BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

DONNA M. BELL	
Complainant,)
v.)
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,)
Respondent.))

Case No. 18-1425-EL-CSS

DIRECT TESTIMONY OF FRANK URBANCIC ON BEHALF OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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INTRODUCTION

2 Q. PLEASE INTRODUCE YOURSELF.

A. My name is Frank Urbancic and I am employed with The Cleveland Electric Illuminating
 Company ("CEI" or "Company") as General Supervisor, Reliability and Asset
 Management. I oversee Reliability/Power Quality which is the department responsible for
 investigating reports of outages and implementing solutions.

7 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK 8 EXPERIENCE.

9 A. I received a B.S. in Electrical Engineering from Cleveland State in 2003. I began my career
10 with FirstEnergy in 2005. I spent my first three years working in our corporate office
11 before joining CEI as a reliability engineer in 2008. I held this position for seven years
12 before supervising our mapping and records department between 2015 and 2018. I have
13 been in my current position as general supervisor of reliability and asset management since
14 November 2018.

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15 Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities are to oversee the CEI Reliability/Power Quality, Regulatory
Reporting, and Planning and Protection departments. "Reliability/Power Quality refers to
minimizing service outages as well as delivering electricity within the acceptable range of
voltage and other electricity characteristics, and "Planning and Protection" refers to the
engineering design objectives to meet Company and Commission standards to provide safe
and reliable electric service at a reasonable cost.

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

A. My testimony addresses several aspects of the Complaint pertaining to the electric service
 provided by CEI to Donna M. Bell at 22850 Rockside Rd, #1104, Bedford, Ohio 44146
 (the "Property"). Specifically, my testimony addresses the frequency and nature of outages
 Ms. Bell alleges occurred at the Property between April 28, 2018 and mid-August 2018. I
 also address her concerns about metering.

6 Q. WHAT DID YOU DO TO PREPARE FOR YOUR TESTIMONY IN THIS 7 PROCEEDING?

8 A. I have reviewed the Complaint submitted by Ms. Bell and the Company's response to the 9 informal complaint which preceded the formal Complaint. I also reviewed business 10 records related to this case maintained and preserved within FirstEnergy's SAP System. 11 These records, all of which were kept in the course of regularly conducted business activity, 12 include customer contact notes and account summary, work order requests, outage history 13 data, electric system diagrams, and CEI's Commission-approved tariff. It is the regular 14 practice of FirstEnergy and CEI to make and preserve these business records, and I rely 15 upon such documents in accordance with my duties at FirstEnergy Service Company. I also personally visited the Property to familiarize myself with the electric distribution 16 17 assets in place there.

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OUTAGE HISTORY

19 Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE ELECTRIC SERVICE AT THE 20 PROPERTY?

A. Yes. The Property is part of an apartment complex comprising single-story buildings fed
 from underground electric lines. The underground equipment at this property is served
 from overhead electric lines on Rockside Rd. There are approximately 1,500 customers

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on the circuit that serves the Property. The apartment units are separately metered and
 served from that circuit. It is what I would call a standard or typical configuration used to
 serve residential customers throughout CEI's service territory.

4 Q. WHAT DO COMPANY RECORDS REVEAL ABOUT THE OUTAGE HISTORY

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AT THE PROPERTY?

6 A. Ms. Bell initiated her service at the Property on April 27, 2018. From that time to the date 7 of her Complaint in mid-September, there were two sustained outages (more than five 8 minutes) related to the same incident on July 2, 2018, and six momentary interruptions 9 (less than five minutes) that occurred between June 13, 2018 and August 13, 2018. On 10 July 2, 2018, a lightning strike on a transmission line caused an outage to the substation that serves the Property. The substation supply was re-routed¹ in order to restore service 11 12 to customers while repairs were made, but unfortunately equipment then failed in the substation. The total duration of the July 2 outages was 99 minutes—eighty-four minutes 13 14 for the first, and fifteen minutes for the second.

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Q. WHAT CAUSES EQUIPMENT FAILURE?

A. There are a number of reasons that may cause any given component in an electric distribution system to fail. The most common reason is that it simply reaches the end of its useful service life as material components degrade over time and are no longer capable of carrying the electrical current, not unlike a light bulb that finally burns out. While there may be an average expected service life, it is impossible to predict the exact moment of failure. Other common sources include exposure to external events such as storms, tree limbs or animals contacting the equipment, vehicles hitting poles, and lightning strikes.

¹ Re-routing is when circuit connections inside a substation are switched to deliberately change the flow of electricity.

1 The simple fact is that all electric distribution system equipment eventually reaches end of 2 life.

3 Q. WHAT CAUSES "MOMENTARY INTERRUPTIONS?"

4 Momentary interruptions or "momentaries" are caused by temporary faults on the electrical A. 5 system. Faults (short circuits on the electric line) like equipment failure can be caused by 6 storms, tree limbs or animals contacting the electric lines, vehicles hitting poles or 7 occasional failures in the electrical system components. These faults are inherent to 8 electric distribution system operations and can occur miles away from the home. No 9 electric utility can prevent the wide variety of causes that create momentary power interruptions, which is why many utilities, including CEI, use a device called a recloser² 10 11 strategically positioned throughout their distribution systems. A recloser is a "smart circuit 12 breaker" that turns the power "off" & "on" when a fault occurs in an attempt to quickly clear the fault & prevent an extended outage that could affect hundreds of customers. The 13 14 recloser normally allows 2-3 chances for the fault to disappear. If the problem still exists 15 after the last attempt, the recloser will stay open and power will be off until rerouting and/or 16 repairs are made.

17 Q. MS. BELL CLAIMS THAT OUTAGES HAPPENED "SO FREQUENTLY THAT

18 IT FINALLY BLEW A CIRCUIT" AND LEFT HER WITH NO HOT WATER FOR 19 DAYS. HOW DO YOU RESPOND?

A. I consider it highly unlikely that the frequency of outages "finally blew a circuit." Although
she does not elaborate, I assume that Ms. Bell is referring to a control circuit for an electric
water heater in her apartment. The relatively small number of momentaries during the

² Circuit breakers in substations perform the same function in the same manner as reclosers. For convenience, I will refer to both as "reclosers."

1 2018 summer storm season themselves would not have had any impact on her water heater 2 control circuit because recloser operations do not damage end-use equipment-the recloser 3 operates just as a light switch in the home flipping off or on. Unless there is something 4 else happening behind the meter, such as faulty or degraded wiring or equipment, recloser 5 operation alone would not cause a circuit to "blow." However, some events that cause 6 reclosers to operate, such as lightning strikes, are much more traumatic than a brief tree 7 limb or animal contact and sometimes damages equipment inside a home. However, in 8 such a case it would be the lightning that causes the damage, not the recloser or any other 9 aspect of CEI's electric distribution system.

10 Q. DID CEI INVESTIGATE THE OUTAGE HISTORY OF THE CIRCUIT BEFORE 11 MS. BELL MOVED IN?

A. Yes. In response to a Staff inquiry regarding Ms. Bell's informal complaint, in mid-July
2018 CEI examined the outage history of the circuit for the preceding twenty-four months.
In addition to the outages I discussed above, there were two sustained outages and eleven
momentaries going back to mid-July 2016.

Q. WHAT DOES THE COMPANY'S TARIFF SAY ABOUT RELIABILITY OF ELECTRIC SERVICE?

A. CEI's tariff states that the Company will make all reasonable efforts to deliver safe, reliable and adequate electric service, but explicitly states that the Company does not guarantee continuous, uninterrupted service. In plain terms, there are so many variables that can cause interruption in service that a 100% guarantee is impossible without greatly increasing the cost of providing electric service. However, even accepting Ms. Bell's assertion of the number and duration of interruptions referenced in her Complaint, which is not supported

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1		by Company records, the lights were on for 99.9% of the time. Per CEI's Commission-
2		approved tariff, customers who require guaranteed 100% electric supply or have sensitive
3		equipment must install behind-the-meter protective devices such as battery backup or surge
4		protectors at their own expense. ³
5	Q.	DO YOU CONSIDER THE FREQUENCY OF OUTAGES AT THE PROPERTY
6		TO BE EXCESSIVE?
7	A.	No, the frequency of outages at the Property was not excessive and reflects normal
8		operation of an electric distribution system following good utility practices in compliance
9		with applicable national, state, and local regulations along with the Company's own
10		internal construction standards and engineering practices.
11	Q.	BASED ON YOUR EXPERIENCE, WHAT CONCLUSIONS CAN YOU DRAW
12		FROM THIS INFORMATION?
13	A.	First, and most importantly, I conclude that the reclosers are functioning according to their
14		designed purpose. Considering that some momentaries are truly only for a few seconds,
15		reclosers are preventing sustained outages that otherwise could affect many more
16		customers for longer periods of time. While some customers may feel inconvenienced that
17		their VCR or microwave clocks sometimes are blinking, on balance customers are much
18		better off avoiding outages of longer duration when the inevitable fault conditions occur.
19		Second, the relatively low frequency of service interruptions at the Property-both
•		sustained and momentary indicates reliable and robust delivery of electric service that
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³ P.U.C.O. No. 13, Electric Service Regulations, Section IV.B. Characteristics of Service, Continuity: "The Company will endeavor, but does not guarantee, to furnish a continuous supply of electric energy and to maintain voltage and frequency within reasonable limits. The Company shall not be liable for damages which the customer may sustain due to variations in service characteristics or phase reversals. If supply voltage is unsatisfactory for particular customer applications or for special apparatus requiring close regulation, then the customer shall install regulative apparatus at the customer's own expense." (Sheet No. 4, 1st Revised page 3 of 21, last approved in Case No. 14-1297-EL-SSO (ESP IV)).

meets or exceeds Commission standards. Notably, a "Worst Performing Circuit"
designated under 4901:1-10-11, Ohio Admin. Code, can be listed on the report for two
years in a row without triggering a presumed violation of that reliability rule, and the circuit
serving the Property was not on that list during the relevant time frame. The bottom line
is that CEI provided adequate, safe, and reliable service at all times to Ms. Bell.

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BILLING/METERING

Q. MS. BELL ALSO ASSERTS IN HER COMPLAINT THAT HER BILLING WAS "SPORADIC AND NOT INDICATIVE OF HER USAGE." HOW DO YOU RESPOND?

10 I see no evidence supporting that assertion. First, I would note that Company records show A. 11 that Ms. Bell's apartment is all-electric, including electric heat. Ms. Bell started her 12 tenancy in the Property at the end of April 2018, and as the weather this past Spring has 13 demonstrated, Northeast Ohio can experience measurable heating needs even into June. 14 Second, I would note that Ms. Bell's kWh usage per day was relatively flat from the time 15 of her first bill to the filing of her Complaint ranging from just 14 kWh per day to 6 kWh 16 per day in contrast to her wintertime electric heating peak of 49 kWh per day. The 17 relatively small variation in her monthly usage before her complaint could easily be 18 explained by minimal use of electric heat in the Spring, variability of hot water usage, or 19 even the number of days in the billing cycle. Third, I observed that Ms. Bell's electric 20 usage was significantly lower than—approximately one-half—the previous tenant's usage 21 at the Property during the same time period one year earlier. This strongly suggests that 22 Ms. Bell's meter was not registering higher-than-actual consumption, particularly since the 23 predominant malfunction, which rarely occurs at all, for the type of meter installed at the Propertyis to slow down or stop—not run fast or erratically. Fourth, during a meter read
confirmation on or about December 27, 2018, Meter Services performed a routine
retirement of Ms. Bell's existing analog meter and placed a new digital meter into service.
Ms. Bell's new meter registered the same weather-dependent usage in line with previous
months. However, because Ms. Bell terminated her electric service at the Property on
March 27, 2019, I was unable to compare her 2019 consumption to the 2018 consumption
reflected in her Complaint.

8 Q. ARE THERE ANY OTHER OBSERVATIONS TO NOTE FROM YOUR
9 INVESTIGATION OF SERVICE TO THE PROPERTY?

A. Yes. I also have examined records relating to electric service at the Property since Ms.
Bell terminated service in March 2019. There have been no complaints regarding
reliability or usage, and records show only one sustained outage during the past three
months. Meanwhile, CEI has taken no specific remedial actions at the Property and has
not operated its system any differently than during Ms. Bell's residency. In my opinion,
Ms. Bell's perceptions and expectations simply are not realistically aligned with industry
standards and normal adequate performance of an electric distribution system.

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CONCLUSION

18 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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

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Summary: Testimony of Frank Urbancic on Behalf of The Cleveland Electric Illuminating Company electronically filed by Ms. Emily V Danford on behalf of The Cleveland Electric Illuminating Company