

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Thaah and Aaron Young,)	
)	
Complainants,)	
)	
v.)	Case No. 18-1832-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

**OHIO POWER COMPANY’S RESPONSES TO COMPLAINANTS’ FIRST
REQUESTS FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES**

Pursuant to Rules 4901-1-16, 4901-1-17, 4901-1-18, 4901-1-19, 4901-1-20, and 4901-1-22 of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio” or the “Company”) objects and responds to Thaah and Aaron Youngs’ (collectively the “Youngs” or “Complainants”) first set of Interrogatories and Requests for Production of Documents propounded June 20, 2018, June 21, 2018, June 26, 2018 (collectively, the “Youngs’ Requests”) as follows:

GENERAL OBJECTIONS

1. AEP Ohio objects to the Youngs’ Requests to the extent that they seek information or documents that are neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

2. AEP Ohio objects to the Youngs’ Requests to the extent that they purport to impose obligations beyond those that Ohio Adm. Code 4901-1-16, 4901-1-17, 4901-1-18, 4901-1-19, 4901-1-20, and 4901-1-22 impose.

3. AEP Ohio objects to the Youngs' Requests to the extent that they seek information or documents, or both, protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

4. AEP Ohio objects to the Youngs' Requests to the extent that they are overly broad or unduly burdensome.

5. AEP Ohio objects to the Youngs' Requests to the extent that they seek information or documents, or both, that are within the Youngs' possession, custody, or control; in the custody, control, or possession of the Youngs' authorized agents or representatives; and/or which AEP Ohio has furnished to the Youngs in the last twelve months.

6. AEP Ohio objects to the Youngs' Requests to the extent that they are unreasonably cumulative or duplicative, or seek information or documents, or both, that may be obtained from another source that is more convenient, less burdensome or less expensive.

7. AEP Ohio objects to the Youngs' Requests to the extent that they seek answers that call for a legal conclusion.

8. AEP Ohio objects to the Youngs' Requests to the extent that they are vague, ambiguous, or otherwise employ undefined terms subject to more than one reasonable interpretation.

9. Each response below is subject to these general objections, and is made without waiver of any general or specific objection.

OBJECTIONS AND ANSWERS TO INTERROGATORIES

YOUNG-INT-01-001:

When deployed, does the Company's Opt-Out meter have any one or more of these communication capabilities offered by GE/Aclara for the I-210+C including RF mesh communication, 1-way RF AMR, RF P2MP, Cellular communication, power line communication (PLC), Ethernet communication, USB, RS232 OPTOCOM, RS485, modem, or any soft-switches?

ANSWER:

AEP Ohio objects to this interrogatory as overly broad, vague, and ambiguous. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio states that its normal "Opt-Out meter" is a digital non-emitting meter. The digital non-emitting meter does not have any remote communication capabilities. Specifically, the digital non-emitting meter has no RF Mesh communication, 1-way RF AMR, RF P2MP, Cellular communication, Power Line communication, Ethernet communication, USB, RS485, or modem.

The digital non-emitting meter allows for the use of soft-switches when there is a need to generate a customer bill for unique tariffs and/or billing parameters (*i.e.*, reactive capability, time of use tariffs, etc.). However, for normal residential service, the digital non-emitting meter does not have a soft-switch installed. Regardless, soft-switches do not add or remove any communication capability within the meter.

Finally, the digital non-emitting meter does have a RS232 OPTOCOM type port. The purpose of this port is to allow for on-site programming, maintenance, and data reading. In order to access this port, AEP Ohio personnel must travel to the customer's residence and manually connect to the meter.

YOUNG-INT-01-002:

Where any one or more of the above communication technologies is not used in the Opt-Out meter when deployed, as a design feature of this meter, is it possible for AEP to add any of the above communication devices, modules or hardware to the meter by AEP after the meter is deployed?

ANSWER:

AEP Ohio objects to this interrogatory as overly broad, vague, and ambiguous. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio states that it is not possible for AEP Ohio to retrofit any of the listed communication technologies into the digital non-emitting meter at any time. The various communication hardware referenced in YOUNG-INT-01-001 can only be factory installed by the Company's meter vendor.

**OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION OF
DOCUMENTS**

YOUNG-RPD-01-001: Provide any records of AEP's internal mechanism or policy in place specifically regarding voicemail from its customers when requesting a service.

ANSWER:

AEP Ohio objects to this request because it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AEP Ohio also objects to this request as vague and ambiguous. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio states that it has no records or documents responsive to this request. The AEP Ohio gridSMART team does not have a written internal mechanism or policy regarding voicemails left by customers. However, once the team receives or hears a voicemail from a customer requesting service, it follow ups with the customer, typically within two-business days. In this instance, Complainants allege they left a voicemail on August 20, 2018. That same day, Complainants sent an email to the Company related to opting out of AMI installation. The Company responded to Complainants via email on August 21, 2018.

YOUNG-RPD-01-002: If AEP is able to confirm this voicemail was left on AEP's voicemail system, please provide a record of this either in text or audible file format.

ANSWER:

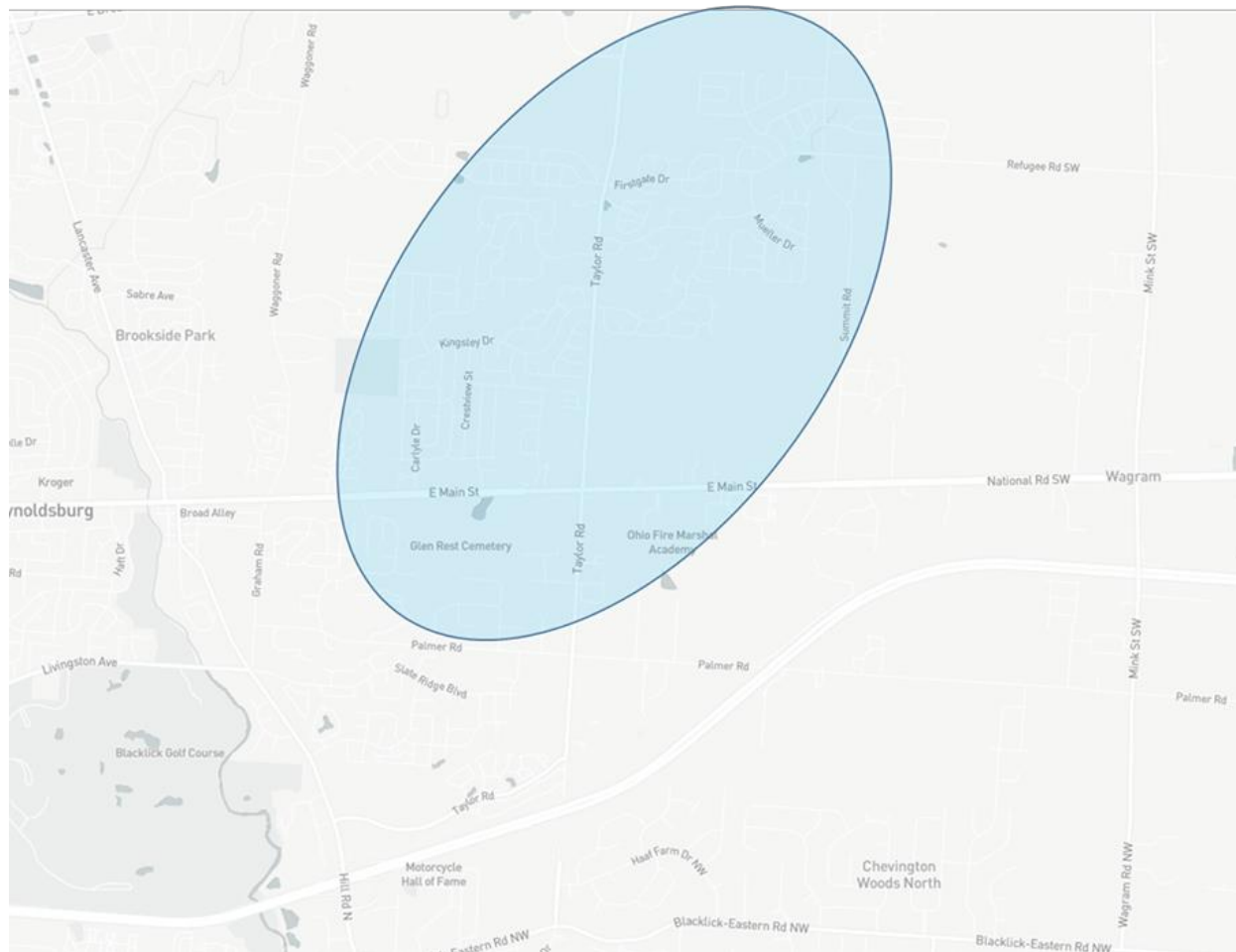
AEP Ohio objects to this request because it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AEP Ohio also objects to this request as vague and ambiguous. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio states that it has no documents or records responsive to this request and cannot confirm that Complainants left a voicemail on August 20, 2018

YOUNG-RPD-01-003: Provide a map or other geographical information in which AEP illustrates, defines or designates the particular meter-reading route associated with the Youngs' account.

ANSWER:

AEP Ohio objects to this request because it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AEP Ohio also objects to this request as vague and ambiguous, and because it seeks to impose obligations beyond those that Ohio Adm. Code 4901-1-20 imposes inasmuch as it requests that AEP Ohio create a document. Subject to and without waiving the foregoing

objections and the general objections set forth above, the area within the blue oval on the map below reflects the area of the meter-reading route associated with the Youngs' service address.



YOUNG-RPD-01-004:

Provide record(s) of evidence which show the percentage of AMI and/or AMR meters in which AEP had installed on this meter reading route on the day of August 21, 2018.

ANSWER:

AEP Ohio objects to this request because it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AEP Ohio also objects to this request as vague and ambiguous, and because it seeks to impose obligations beyond those that Ohio Adm. Code 4901-1-20 imposes inasmuch as it requests that AEP Ohio create a document. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio ran a data query by meter type using AEP Ohio's Marketing Accounting Customer Services System (MACSS). The query identified 299 meters within the meter-reading route that includes the Youngs' service address. On August 21, 2018,

five residences along the Youngs' meter-reading route had either an AMI or AMR meter installed at their premises.

YOUNG-RPD-01-005:

Provide record(s) of evidence which show the actual day in which AEP had installed 85% percent of AMI and/or AMR meters on this meter reading route.

ANSWER:

AEP Ohio objects to this request because it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AEP Ohio also objects to this request as vague and ambiguous, and because it seeks to impose obligations beyond those that Ohio Adm. Code 4901-1-20 imposes inasmuch as it requests that AEP Ohio create a document. Subject to and without waiving the foregoing objections and the general objections set forth above, AEP Ohio ran a data query by meter type using MACSS. According to the data query, as of October 25, 2018, the Company had installed 255 AMI and/or AMR meters along the Youngs' meter-reading route.

As to objections to interrogatories:

/s/ Tanner S. Wolffram

Tanner S. Wolffram (0097789)

Respectfully submitted,

/s/ Tanner S. Wolffram

Christen M. Blend (0086881), Counsel of Record

Tanner S. Wolffram (0097789)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Telephone: (614) 716-1915

(614) 716-2914

Fax: (614) 716-2014

Email: tswolffram@aep.com

cblend@aep.com

(willing to accept service by e-mail)

Counsel for Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on June 10, 2019.

Thaah Young
Aaron Young
9164 Taylor Rd. SW
Reynoldsburg, Ohio 43065
aaron2457@sbcglobal.net
th2457@sbcglobal.net

/s/ Tanner S. Wolffram
Tanner S. Wolffram

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/21/2019 1:00:37 PM

in

Case No(s). 18-1832-EL-CSS

Summary: Exhibit Discovery Responses from AEP Ohio electronically filed by Mr. Aaron Young on behalf of YOUNG, THAAH AND AARON