

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Thaah and Aaron Young,

Complainants,

v.

Ohio Power Company,

Respondent.

Case No. 18-1832-EL-CSS

THAAH AND AARON YOUNG RESPONSES TO "DIRECT TESTIMONY OF PAULA S. IGO ON BEHALF OF OHIO POWER COMPANY" FILED AUGUST 27, 2019

1. Complainants object to testimony under "WILL THE COMPANY ALLOW THE ANALOG METER AT THE YOUNGS' PREMISES TO REMAIN IN PLACE?" on the grounds that the discussion taking place was involved in settlement discussions, and as such is not appropriate to be discussed in this filing. Additionally, the question is outside the scope of Ms. Igo's purpose for this testimony, which is not to negotiate a settlement of this case.
2. Complainants object to testimony under "HOW DOES THE COMPANY RESPOND TO THE YOUNGS' COMPLAINT REGARDING THE ACKNOWLEDGMENT'S INDEMNIFICATION LANGUAGE?" also on the grounds that the discussion taking place was involved in settlement discussions, and as such is not appropriate to be discussed in this filing. Also again, the question is outside the scope of Ms. Igo's purpose for this testimony, which is not to negotiate a settlement of this case. Further, this is not the response the company filed in response to the complaint after the complaint was filed.
3. Complainants object to testimony under "PLEASE BRIEFLY DESCRIBE THE NATURE OF THE YOUNGS' COMPLAINT." on the grounds where "the Youngs do not believe they should be subject to the Company's Commission-approved Advanced Meter Opt Out tariff provisions and opt-out fee" is inadmissible hearsay as this is not the nature of the complaint or relief sought within the complaint.
4. Complainants object to testimony under "DOES A CUSTOMER WHO DECLINES THE INSTALLATION OF AN AMI METER HAVE THE RIGHT TO KEEP HIS OR HER EXISTING METER?" on the grounds that Ms. Igo is not employed as or practicing as an attorney for American Electric Power Company ("AEP") or AEP Ohio. Also again, the question is outside the scope of Ms. Igo's purpose for this testimony. Ms. Igo is not testifying address any of the legal issues presented in this proceeding.

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Summary: Objection RESPONSES TO "DIRECT TESTIMONY OF PAULA S. IGO ON BEHALF OF OHIO POWER COMPANY" electronically filed by Mr. Aaron Young on behalf of YOUNG, THAAH AND AARON