

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of)	
Afriye Owusu)	
)	
Complainant)	
)	Case No. 16-1733-EL-CSS
v.)	
)	
Duke Energy Ohio, Inc.)	
)	
Respondent)	

DIRECT TESTIMONY OF

ALICIA JONES

ON BEHALF OF

DUKE ENERGY OHIO, INC.

February 23, 2017

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Alicia Jones. My business address is 139 East Fourth Street,
3 Cincinnati, Ohio 45202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Duke Energy Business Services LLC (DEBS) as Customer
6 Affairs Specialist.

7 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL**
8 **QUALIFICATIONS.**

9 A. I have been employed by Duke Energy Ohio, Inc. or its affiliates or predecessors
10 in various positions since 1979. I graduated from Aiken High School in 1975. I
11 have an Associate of Arts Degree from Xavier University. I have worked in
12 various positions in the credit and customer service departments and I was
13 transferred in 2008 to my present position of Consumer Affairs Specialist.

14 I have extensive training regarding credit and collection procedures. This
15 training is typically done on an annual basis and includes the following topics:

- 16 • Rates and billing issues and disputes
- 17 • Service Orders
- 18 • Energy usage and energy audits
- 19 • Metering
- 20 • Investigations
- 21 • Handling escalated customer complaints
- 22 • Payments

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC**
2 **UTILITIES COMMISSION OF OHIO?**

3 A. Yes

4 **Q. PLEASE SUMMARIZE YOUR DUTIES AS CONSUMER AFFAIRS**
5 **SPECIALIST.**

6 A. I have extensive background in customer service, working with a wide variety of
7 customers. My work includes handling a wide range of issues, including rate
8 matters, metering, billing and energy usage. As a Consumer Affair Specialist, I
9 am responsible for customer service inquiries for the three Midwest states: Ohio,
10 Indiana and Kentucky. Examples of some of the types of inquiries include service
11 requests, complaints, general questions, and billing disputes. I research and
12 attempt to resolve any issues escalated from various sources, including the utility
13 commissions, customer advocacy groups and other sources.

14 I work with the Public Utilities Commission of Ohio (Commission) as a
15 liaison for specific customer requests. I have a working knowledge of all existing
16 tariffs, programs and policies of Duke Energy Ohio, Inc. (Duke Energy Ohio) and
17 communicate this information to customers on a frequent basis. I also interact
18 with gas and electric operating departments, meter reading and various other
19 departments on a daily basis, for many reasons, including responding to and
20 attempting to resolve customer inquiries or concerns. I have a working
21 knowledge of current federal/state regulations for Ohio, Kentucky, and Indiana.

22 In addition to my day-to-day responsibilities, I also attend annual
23 conferences, such as the Duke Energy Community Workshop and Collaborative

1 Meetings to stay engaged with needs of low income customers. I also work
2 extensively with local community and social service agencies and provide
3 educational presentations on credit/billing and customer service topics.

4 I serve as a subject matter expert on committees and teams involving
5 billing, credit and collection and field operations issues within Duke Energy Ohio.
6 I also serve as Duke Energy Ohio's liaison with various regulatory, governmental
7 and customer advocacy groups. In addition, I exchange information with
8 counterparts in other companies and utilities, and participate in identified
9 benchmarking opportunities.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
11 **PROCEEDING?**

12 **A.** The purpose of my testimony is to respond to the allegations contained in the
13 complaint filed by Mr. Afriye Owusu and to provide accurate information
14 regarding this complaint, including but not limited to, billing, payments and
15 account history for Mr. Owusu's electric service at 20 Bent Tree Drive Fairfield,
16 OH 45014 (Fairfield Account).

17 **II. DISCUSSION**

18 **Q. ARE YOU FAMILIAR WITH THE COMPLAINT FILED BY MR.**
19 **OWUSU?**

20 **A.** Yes.

21 **Q. ARE THE FACTS RELATED TO THE COMPLAINT FILED BY MR.**
22 **OWUSU KNOWN TO YOU AS A RESULT OF YOUR WORK FOR DUKE**

1 **ENERGY OHIO AND PART OF YOUR OVERALL RESPONSIBILITY AS**
2 **AN A CONSUMER AFFAIRS SPECIALIST?**

3 A. Yes.

4 **Q. PLEASE EXPLAIN HOW YOU ARE FAMILIAR WITH MR. OWUSU’S**
5 **ACCOUNT.**

6 A. In September of 2016, I was asked to research records as a result of Mr. Owusu
7 filing this complaint against Duke Energy Ohio.

8 **Q. PLEASE BRIEFLY SUMMARIZE YOUR UNDERSTANDING OF MR.**
9 **OWUSU’S COMPLAINT.**

10 A. The complaint filed by Mr. Owusu on August 16, 2016, alleges that “Duke
11 Energy failed to turn on the electrical power at the agreed-upon time, leaving
12 [him] to feel around in the dark.” As a result, Mr. Owusu allegedly fell and
13 injured himself.

14 **Q. WHAT DO THE COMPANY’S RECORDS SHOW WITH RESPECT TO**
15 **AFRIYE OWUSU’S ACCOUNT?**

16 A. Electric service was initiated by Mr. Owusu on April 26, 2011. After Mr. Owusu
17 failed to timely pay his Duke Energy Ohio utility bills on time and in full, the
18 account was eligible for disconnection for nonpayment. The Company issued the
19 required notifications and thereafter, on February 29, 2012, the service was
20 disconnected for nonpayment.

21 Mr. Owusu contacted the Company on March 2, 2012, and made a
22 payment pursuant to the Winter Rule to restore service. It is my understanding,
23 based on the rules in the Ohio Administrative Code and advice of counsel, that the

1 Company may restore service within twenty-four hours of such a payment. Mr.
2 Owusu alleges that he tripped over items placed in his home in the evening
3 between March 2 and March 3, 2012. Since Mr. Owusu fell well inside of the
4 time within which service could be restored, his fall is unrelated to any action by
5 the Company with respect to service restoration.

6 The service was restored on March 3, 2012. The service was disconnected
7 again for non-payment on May 30, 2012. Since that time, Mr. Owusu has had no
8 service in his name. The current past due account balance on this account is
9 \$210.59.

10 **III. CONCLUSION**

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

12 A. Yes, this concludes my direct testimony.

13

1 CERTIFICATE OF SERVICE

2
3 The undersigned hereby certifies that a copy of the foregoing testimony was
4 served mail, first class U.S. Mail, postage prepaid, upon Afriye Owusu, this 23rd day of
5 February, 2017.

6
7
8
9 /s/ Elizabeth H. Watts
10 Elizabeth H. Watts

11
12 Afriye Owusu
13 P.O. Box 181571
14 Fairfield, Ohio 45014

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