

Code. Such supplementary responses are to be filed and served upon CEI within five (5) days after receipt of such information.

DEFINITIONS

A. “Document” or “documents” means the original and all copies that are different in any way from the original (whether by interlineation, receipt stamp, notation, indication of copies sent or received or otherwise, and drafts) of any printed, typewritten, handwritten, or otherwise recorded matter of whatever character (including, without limitation, telegraphs, personal notes, diaries, statements, photographs, videotapes, tape recordings, motion pictures, computer tapes or discs, and any Xerox, carbon, magnetic, digital or photographic copies of any such material if Complainant does not have custody and control of the original). The enumeration of various specific items as included within the definition of the term “document” or “documents” shall not be taken to limit the generality of the terms, and the Document Requests herein are intended to obtain all documents in the broadest and most comprehensive sense and meaning of the term.

B. “Identify,” with respect to any natural person, shall mean to provide the following information about the person: full name; present or last known address; employer; and relationship, if any, to the Complainant. If any of this information is not available to Complainant, state any other means of identifying such natural person.

C. “Identify,” with respect to any document, shall mean to provide the following information about the document: general description; subject matter; date; title; author; recipients; and, if the document is not in Complainant’s possession, the location of the document. If any of this information is not available to Complainant, state any other means of identifying the document.

D. As used herein, the terms “you,” “your,” and “Complainant” refers to Michael S. Roote, and each person acting or purporting to act on behalf of Michael S. Roote.

E. As used herein, the terms the “Company” and “CEI” refer to The Cleveland Electric Illuminating Company and each person acting or purporting to act on behalf of The Cleveland Electric Illuminating Company.

F. As used herein, the term “Complaint” refers to the Complaint filed by Complainant with the Public Utilities Commission of Ohio, Case No. 21-0011-EL-CSS.

G. As used herein, the term “Property” refers to 12935 Rockhaven Road, Chesterland, Ohio 44026.

INTERROGATORIES

INTERROGATORY NO. 1: Identify all persons who have knowledge or information, or may have knowledge or information, regarding your claims in the Complaint.

ANSWER:

Christina Cassady

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Lead Customer Service Investigator
(800) 686-PUCO (7826)

Drake Riley

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Chief, Consumer Services Division
(800) 686-PUCO (7826)

Diane Grendell

77 South High Street

13th Floor
Columbus, OH 43215
(614) 644-5088
www.ohiohouse.gov/diane-v-grendell

Nancy Roote
12935 Rockhaven Road
Chesterland Ohio 44026
440-749-0253

Jeffrey Roote
1771 Forster Dr
Lakeside Marblehead OH 43440
440-251-3057

INTERROGATORY NO. 2: Identify any and all exhibits or demonstrative evidence that you intend to present at any hearing of this matter.

ANSWER:

Photographs of damage. Refer to responses
Telephone call logs. Refer to responses

INTERROGATORY NO. 3: Identify each and every person you expect to call as a witness at any hearing of this matter, their address and phone number, and the substance of the facts to which each such witness is expected to testify.

ANSWER:

Jeffrey Roote
1771 Forster Dr
Lakeside Marblehead OH 43440
440-251-3057

Mr. J. Roote will testify as to the condition of the wiring, connections, and conduit he witnessed while assisting with the repairs on December 8, 2020. He will also testify to telephone conversations with complainant discussing the dangers presented by the actions of CEI. Mr. Roote will discuss his qualifications for assisting with the repair and his observations.

INTERROGATORY NO. 4: Identify and describe the location of any wires that your Complaint alleges were down on your Property between December 1, 2020 and December 8, 2020.

ANSWER: Power wires from CEI Transformer mounted on pole nearest the home. The two 110V hot wires and stranded cable steel neutral and support cable. Windstream Fiber optic cable from same pole to house. Spectrum CAT 5 cable from same pole to house.

INTERROGATORY NO. 5: With respect to the wires that your Complaint alleges were down on your Property, state when the wires were repaired and/or restored to their proper position.

ANSWER: The repairs were completed on December 8, 2020 between approximately 1:00 PM and 3:30 PM.

INTERROGATORY NO. 6: With respect to the wires that your Complaint alleges were down on your Property, identify anyone that repaired and/or restored the wires to their proper position.

ANSWER: Power to complainant's home was disconnected at the street by unknown CEI Lineman. He also removed CEI meter from Complainant's meter box. All repairs to wires and damaged conduit were made by Michael Roote and Jeffrey Roote. Inspection and power restoration was performed by unknown CEI personnel.

INTERROGATORY NO. 7: If anyone other than CEI personnel has inspected, examined, tested, measured, or otherwise made any assessment of the electric service and/or electrical equipment at the Property from December 1, 2020 to the present, state the following for each person:

- a. his or her full name;
- b. the company he or she works for;
- c. his or her address;
- d. his or her phone number;
- e. the date of each inspection, examination, test, measurement, or other assessment;
- f. a description of the work performed in each inspection, examination, test, measurement, or other assessment;
- g. the results of the inspection, examination, test, measurement, or other assessment.

ANSWER:

a. Michael Roote

b. Retired

c. 12935 Rockhaven Road Chesterland OH 44026

d. 440-645-0519

e. 12/01/2020

f. Visual inspection of CEI and Complainant's overhead wires from CEI power pole to complainant's house. Visual inspection of damaged conduit.

g. Concluded wires were hanging dangerously low over driveway. (approximately 3 feet above ground). Concluded damage to conduit and wire mounting and property meant any connections of power wires to house were highly questionable. As such it would be unsafe to have power reconnected to the house with the wires and service equipment in such a damaged condition.

Determined it was necessary to advise CEI of the unsafe condition and warn them not to reapply power until repairs were made. Advised CEI via telephone call on December 1 2020

a. Jeffrey Roote

b. Retired

c. 1771 Forster Dr Lakeside Marblehead OH 43440

d. 440-251-3057

e. 12/08/2020

f. Inspected wires and meter box connections. Reconnected complainant's neutral wire to complainant's incoming neutral wire meter box connector. Inspected and retightened complainant's two 110 V power wires on incoming meter box connections. Assisted with rehangng CEI power wires and attaching neutral/support cable to house. Assisted with replacing damaged weatherhead on top of conduit with new weatherhead. Assisted with removing

damaged steel conduit from meter box and retaining straps connected to house and attaching new 1-1/4" steel conduit to meter box and reinstalling retaining straps to house and conduit.

g. Concluded that having power restored to the property with the service in the condition first observed upon arrival, created a very dangerous condition. Advised complainant that after completing repairs, it would be safe to have CEI return to reconnect power.

a. Michael Roote

b. Retired

c. 12935 Rockhaven Road Chesterland OH 44026

d. 440-645-0519

e. 12/08/2020

f. Discussed power disconnection and observed meter removal from meter box by CEI personnel. Discussed with said CEI worker that the neutral wire had been pulled completely from its connection on the incoming meter box side. Discussed with CEI repairmen the danger that presented. Inspected wires and meter box connections. Assisted with rehanging CEI power wires and attaching neutral/support cable to house. Assisted with removing damaged steel conduit from meter box and retaining straps connected to house and attaching new 1-1/4" steel conduit to meter box and reinstalling retaining straps to house and conduit. Assisted with replacing damaged weatherhead on top of conduit with new weatherhead. Later, observed reinstallation of CEI meter into complainant's meter box performed by CEI personnel.

g. Concluded that after repairs were completed, it would be safe to have CEI return to restore power connections. Concluded that complainant's decision to vacate property was warranted.

Concluded concerns over CEI having resupplied service prior to repairs having been made presented a very real danger to life and property.

INTERROGATORY NO. 8: State the relief you seek in this case, including the amount of damages you are claiming in this case, if any. If you are claiming damages, please also explain your calculation for said damages.

ANSWER: After hearing from the PUCO attorney that this process does not allow for collecting damages, complainant no longer seeks damages with this process. A civil claims proceeding is being prepared.

INTERROGATORY NO. 9: Identify anyone who prepared or assisted with the preparation of the answers and responses to these Discovery Requests.

ANSWER:

Michael Roote provided all the responses to these questions.

REQUESTS FOR PRODUCTION

REQUEST NO. 1: Produce all documents you identified, referred to, or relied upon in providing answers and responses to these Discovery Requests.

RESPONSE:

Referred to photographs, notes, and call records supplied under separate cover. Identified as “response 1” in document title. Addresses and contact information from publicly available records.

REQUEST NO. 2: Produce all documents that you intend to rely upon, refer to, or use as exhibits at any deposition or at any hearing in this matter.

RESPONSE:

Photographs, notes and call records provided under separate cover. Previously supplied as part of response NO. 1

REQUEST NO. 3: Produce all photographs and any other documentation which refers, relates, or in any way pertains to the wires that your Complaint alleges were down on your Property between December 1, 2020 and December 8, 2020.

RESPONSE:

Addressed in response to requests 1 and 2

REQUEST NO. 4: Produce all documents which refer, relate, or in any way pertain to discussions you had with representatives of CEI regarding your electric service at the Property

between December 1, 2020 and December 8, 2020, including but not limited to all notes, correspondence, and emails.

RESPONSE:

Provided under separate cover identified by “response 4” in the document title.

REQUEST NO. 5: Produce all documents related to any inspection, examination, test, measurement, or other assessment identified in your response to Interrogatory No. 7.

RESPONSE:

Complainant and the others who assisted with the repair and performed inspections on complainant's behalf made no notes or records of measurements other than previously supplied in response 1. Other documents are in the possession of CEI.

REQUEST NO. 6: Produce all documents and work papers that reflect, explain, or support your calculation of the damages you claim in this case.

RESPONSE:

Not applicable. I have been informed by PUCO Attorney Examiner that these proceedings whether they proceed to a hearing or not, do not provide for the awarding of damages.

Date: 3/4/2021

Response Date: 3/19/2021

Respectfully,
Michael S. Roote
Complainant
12935 Rockhaven Road
Chesterland OH 44026
216-645-0519
m_roote@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing The Cleveland Electric Illuminating Company's First Set of Combined Discovery Requests was served upon the following by regular U.S. mail, on this 4th day of March, 2021. An electronic Word copy of the foregoing was also served to the Complainant via electronic mail at m_roote@yahoo.com on this 4th day of March, 2021.

Michael S. Roote
12935 Rockhaven Rd.
Chesterland, Ohio 44026

/s/ Gretchen L. Jewell _____
One of the Attorneys for The Cleveland
Electric Illuminating Company