

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Edison :
Company, The Cleveland Electric Illuminating : Case No. 07-551-EL-AIR
Company and The Toledo Edison Company for : Case No. 07-552-EL-ATA
Authority to Increase Rates for Distribution : Case No. 07-553-EL-AAM
Service, Modify Certain Accounting Practices and : Case No. 07-554-EL-UNC
for Tariff Approvals. :

PREFILED TESTIMONY
OF
BARBARA BOSSART
SERVICE MONITORING & ENFORCEMENT DEPARTMENT
INVESTIGATION & AUDIT DIVISION
UTILITIES DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO

STAFF EXHIBIT _____

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February 1, 2008

1 1. Q. Please state your name and business address.

2 A. My name is Barbara Bossart. My business address is 180 E. Broad Street,
3 Columbus, Ohio 43215-3793.

4

5 2. Q. By who are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio.

7

8 3. Q. What is your present position with the Public Utilities Commission of Ohio
9 and what are your duties?

10 A. I am a Utility Specialist 2 in the Reliability and Service Analysis Division
11 of the Service Monitoring and Enforcement Department. I am responsible
12 for analyzing service quality performance as well as recommending and
13 enforcing service-quality and consumer-protection policies and rules for
14 non-competitive gas and electric utilities.

15

16 4. Q. Would you briefly state your education background and work experience.

17 A. I have a bachelor's degree from Marshall University and I have been
18 employed by the Public Utilities Commission of Ohio since 1999. For six
19 years, I worked as an Investigator in the Investigation and Audits Division
20 of the Service Monitoring and Enforcement Department. As an Investi-
21 gator my duties included interacting with the consumers to investigate their
22 concerns about utility companies' policies and practices. I also performed

1 Customer Service Audits to identify customer service issues or non-com-
2 pliance with rules. In May 2005 I was promoted to my current position and
3 duties.

4
5 5. Q. What is the purpose of your testimony in this case?

6 A. My testimony responds to Company Objections V. a6, a7, a9, a10, a11, and
7 d3, which all relate to Staff's recommendation concerning the Companies'
8 tariffs. I will also respond to Ohio Partners for Affordable Energy's
9 Objection X.

10
11 6. Q. Can you address Company Objection V. a6?

12 A. Yes, Staff had recommended that the Companies add language to their tar-
13 iffs stating that customers can request a Company employee to provide
14 Company ID as required by Rule 4901:1-10-13. O.A.C. , which states,
15 "Any EDU employee or agent seeking access to the customer's or land-
16 lord's premises shall, upon request, identify himself/herself, provide com-
17 pany photo identification, and state the reason for the visit." Staff recom-
18 mends that the Company's tariff disclose to customers their right to request
19 company photo identification as required by the above mentioned rule,
20 when access is required. If an agent of First Energy (FE) is seeking access,
21 he/she should present a photo identification which identifies him/her as an
22 agent of FE, as required by rule.

1 7. Q. If there is a future change in Rule 4901:1-10-13. O.A.C., will FE's tariff be
2 in non-compliance?

3 A. Typically when there has been a change made in a rule which may affect
4 the Companies' tariffs, the Commission will allow Companies time to
5 make the appropriate changes to its tariffs.
6

7 8. Q. Typically, how often are changes made to Chapter 4901:1-10.

8 A. The rule review process is every five years.
9

10 9. Q. Can you address Company Objection V. a7?

11 A. Yes, FE added language to its tariff regarding failure of the customer or
12 landlord to grant access to premises, and used the term "judicial redress."
13 Staff had recommended that the company change language from "judicial
14 redress" to "court order", which staff believes is more customer friendly
15 language. According to the testimony of Company witness Kevin Norris,
16 Staff's proposal failed to address actions not ending with a court order. FE
17 suggested using the term "legal process" which would be more accurate and
18 address the Staff's concerns.
19

1 10. Q. Are you in agreement with this suggestion?

2 A. Yes, Staff would agree to change the term “judicial redress” to “legal
3 process” on the understanding that this term only encompasses a formal
4 ruling, arbitration decision or stipulation as described by FE.
5

6 11. Q Can you address *Company Objection V. a9*?

7 A. Yes, Staff had recommended adding language that would allow FE to
8 assess its field collection charge only once prior to either collecting the
9 delinquent amount or disconnecting a customer’s electric service. Staff
10 recommended this restriction because it did not want the company to make
11 repeated trips to the premise without collecting the delinquent amount or
12 disconnecting service but increasing the customer’s bill upon each visit. FE
13 objected to limiting the number of times the company can assess this charge
14 to a delinquent account.
15

16 12. Q. After reviewing FE’s testimony regarding its *Objection V. a9*, has staff
17 changed its position on restricting how many times FE may assess this
18 charge?

19 A. No, FE’s examples strengthened staff’s position that language should be
20 added to the tariff which would limit repeated charges for premise visits.
21 Staff believes that this charge is a collection charge, as the title indicates,
22 not a trip charge. Currently the Companies tariffs only assess a collection

1 charge if payment was made to the collector to prevent disconnection of
2 service. Staff believes this is the purpose of this fee.

3
4 13. Q. After reviewing FE's testimony does Staff want to change its recommenda-
5 tion?

6 A. Yes, Staff's proposed language did not clearly state its intent. Staff did not
7 intend for this charge to be assessed as a trip charge if another action was
8 preformed other than a collection attempt, such as disconnecting service.
9 As FE examples indicated, its proposed language could allow FE to assess
10 this fee up to three times on to a customer's account during the winter
11 heating season. Also, if the company chooses not to disconnect, such as
12 during a moratorium on disconnections, the company could make collection
13 attempts for months without collecting. Staff now believes that to prevent
14 repeated attempts, which may only increase the customer bill, this fee
15 should only be assessed if the delinquent amount was collected to prevent
16 disconnection of service. Staff would like to recommend new language to
17 clarify its position: "The Company may assess the fee when during a
18 premise visit it collected on a delinquent account to prevent disconnection
19 of service."

20
21 14. Q. Can you address Company Objection V. a10?

1 A. Yes, Staff believes that the tariff should disclose that customers will not be
2 charged for the first requested meter test within a 36 month period, as stated
3 in Rule 4901:1-10-05 (F) and recommended in the staff report. The Com-
4 panies want to refer customers to the O.A.C. to find the rule that will dis-
5 close the time period when they will not be charged for a requested meter
6 test. Staff believes this is an unnecessary step for customers to have to
7 undertake to find out their rights and the companies' responsibilities con-
8 cerning meter tests.

9
10 15. Q. Can you address Company Objection V. a l l?

11 A. Yes, Staff had recommended that the tariff disclose the time of day before
12 which a customer must provide proof of payment and notify the company
13 in order to have service restored that same day after service was discon-
14 nected for non-payment. The Companies claim that excluding such disclo-
15 sure would avoid the need to make future modifications to its tariff when
16 the O.A.C. changes. Staff believes that the time requirement to request
17 same day reconnection is an important piece of information that the com-
18 pany should disclose to its customer in its tariff. Staff does not know what
19 part of the O.A.C. may change in future rule making proceedings; it can
20 only make sure customers are aware of the current requirements of the
21 rules.

1 16. Q. Can you address Company Objection V. d3?

2 A. Yes, Staff had recommended that the Companies provide notice to custom-
3 ers affected by the Multi-Family provisions that are not currently serviced
4 under that provision in TE and CEI's territories. The Companies object to
5 this recommendation, arguing that such a proposal would be burdensome to
6 implement due to the very few customers being served under this rate. FE
7 recommended removing this provision from the Companies' residential
8 tariffs. .

9
10 17. Q. Are you in agreement with FE's suggestion?

11 A. Yes, Staff accepts the Companies offer to remove the Multi-Family provi-
12 sion from the residential tariffs of OE, CEI, and TE.

13
14 18. Q. Does this conclude your testimony?

15 A. No, I would like to also address the Ohio Partners for Affordable Energy's
16 (OPAE's) Objection X.

17
18 19. Q. Can you address the OPAE's Objection X?

19 A. Yes, OPAE stated that Staff's recommendation would require the Com-
20 panies to charge low-income customers who are receiving health and safety
21 service under a utility-funded program for a temporary service drops.

1 20. Q. After reviewing OP&E's objection has staff changed its recommendation?

2 A. Yes, Staff agrees with OP&E's objection.

3

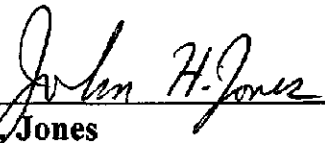
4 21. Q. Does this conclude your testimony?

5 A. Yes, this concludes my testimony.

6

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Barbara Bossart, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 1st day of February, 2008.


John H. Jones
Assistant Attorney General

Parties of Record:

Kathy Kolich
James Burk
Stephen Feld
Arthur Korkosz
Ebony Miller
Mark Hayden
FirstEnergy Corp.
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com
burkj@firstenergycorp.com
felds@firstenergycorp.com
korkosza@firstenergycorp.com
emiller@firstenergycorp.com
haydenm@firstenergycorp.com

Mark A Whitt
Jones Day
P.O. Box 165017
325 John H. McConnell Blvd.
Suite 600
Columbus, OH 43216-5017
mawhitt@jonesday.com

Jeffrey Small
Richard Reese
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
small@occ.state.oh.us
reese@occ.state.oh.us

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour & Pease
52 East Gay Street
Columbus, Oh 43215
mhpetricoff@vorys.com
smhoward@vorys.com

Joseph Meissner
Director of Urban Development
1223 West Sixth Street
Cleveland, Oh 44113
jpmeyssn@lawsclv.org

Lisa McAlister
Samuel C. Randazzo
Dan Neilsen
Joe Clark
Thomas Froehle
McNees, Wallace & Nurik
21 East State Street, 17th Floor
Columbus, Oh 43215-4228
lmcalister@mwncmh.com
sam@mwncmh.com
dneilsen@mwncmh.com
jclark@mwncmh.com
tfroehle@mwncmh.com

Sally Bloomfield
Thomas O'Brien
Bricker & Eckler
100 South Third Street
Columbus, OH 43215-4291
sbloomfield@bricker.com
tobrien@bricker.com

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone
1025 Thomas Jefferson Street N.W.
8th Floor, West Tower
Washington, D.C. 20007
gas@bbrslaw.com
mkl@bbrslaw.com

Leslie A Kovacik
Kerry Bruce
City of Toledo
420 Madison Avenue
Suite 100
Toledo, Oh 43614-1219
leslie.kovacik@toledo.oh.gov
kerry.bruce@toledo.oh.gov

Bobby Singh
Integrus Energy Services, Inc.
300 West Wilson Bridge Road
Suite 350
Worthington, OH 43085
bsingh@integrusenergy.com

David Boehm
Michael Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202-4454
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com

Mark S. Yurick
John Bentine
Chester Willcox & Saxbe
65 East State Street
Suite 1000
Columbus, OH 43215-4213
myurick@cwsllaw.com
jbentine@cwsllaw.com

Lance Keiffer
Assistant Prosecuting Attorney
711 Adams Street, 2nd Floor
Toledo, OH 43624-1680
lkeiffer@co.lucas.oh.us

Glenn Krassen
Bricker & Eckler
1375 East Ninth Street
Suite 1500
Cleveland, OH 44114-1718
gkrassen@bricker.com

Cynthia A. Fonner
David I. Fein
Constellation Energy Group, Inc.
550 West Washington Street
Suite 300
Chicago, IL 60661
cynthia.a.fonner@constellation.com
david.fein@constellation.com

David Rinebolt
Colleen L. Mooney
231 West Lima Street
P.O. Box 1793
Findlay, OH 45939-1793
drinebolt@aol.com
cmooney2@columbus.rr.com

Paul S. Goldberg
City of Oregon Law Director
6800 West Central Avenue
Toledo, OH 43617-1135
pgoldberg@ci.oregon.oh.us

Peter D. Gwyn
City of Perrysburg Law Director
110 West Second Street
Perrysburg, OH 43551
pgwyn@ci.perrysburg.oh.us

James E. Moan
City of Sylvania Law Director
4930 Holland-Sylvania Road
Sylvania, OH 43560
jimmoan@hotmail.com

Paul Skaff
Assistant Village Solicitor
Leatherman, Witzler, Dombrey & Hart
353 Elm Street
Perrysburg, OH 43551
paulskaff@justice.com

Robert Triozzi
Director of Law
City of Cleveland
601 Lakeside Avenue
Room 196
Cleveland, OH 44114
rtriozzi@city.cleveland.oh.us

Terry S. Harvill
Constellation NewEnergy, Inc.
111 Market Place
Baltimore, MD 21202
terry.harvill@constellation.com

Sheilah H. McAdams
City of Maumee Law Director
Marsh & McAdams
204 West Wayne Street
Maumee, OH 43537
sheilahmca@aol.com

Thomas R. Hays, Solicitor
3315 Centennial Road
Suite A-2
Sylvania, OH 43560
hayslaw@buckeye-express.com

Brian J. Ballenger
City of Northwood Law Director
3401 Woodville Road
Suite C
Toledo, OH 43619
ballengerlawbjb@sbcglobal.net