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July 1, 2009

Ms. Renee J. Jenkins
Director, Administration Department
Secretary to the Commission
Docketing Division
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

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PUCO

Dear Ms. Jenkins:

**Re: Direct Expert Testimony of Robert J. Greene Filed on Behalf of Ohio Edison
Company
Case No. 09-0094-EL-CSS**

Enclosed for filing, please find the original and twelve (12) copies of the Direct Expert Testimony of Robert J. Greene Filed on Behalf of Ohio Edison Company. Please file the enclosed Testimony in the above-referenced docket, time-stamping the two extras and returning them to the undersigned in the enclosed envelope.

Thank you for your assistance in this matter. Please contact me if you have any questions concerning this matter.

Very truly yours,

kag
Enclosures

cc: Parties of Record

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

NLW Properties Business Development Inc.,)

Complainant,)

vs.)

Ohio Edison Company,)


Respondent.)

Case No. 09-0094-EL-CSS

DIRECT EXPERT TESTIMONY OF ROBERT J. GREENE

FILED ON BEHALF OF OHIO EDISON COMPANY

Company Exhibit 1



Ebony L. Miller (077063)

Attorney

FirstEnergy Service Company

76 South Main Street

Akron, Ohio 44308

Phone: 330-384-5969

Fax: 330-384-3875

Attorneys for Ohio Edison Company

1 Q. Please state your name and business address for the record.

2

3 A. Robert J. Greene, 1910 West Market Street, Akron, Ohio 44313

4

5 Q. By whom are you employed and in what capacity?

6

7 A. I am employed by Ohio Edison Company. My title is Manager, Meter Services.

8

9 Q. How long have you been employed by Ohio Edison?

10

11 A. I have been employed by Ohio Edison or one of FirstEnergy Corp.'s subsidiaries
12 for the past 16 years.

13

14 Q. Please briefly describe your work experience during those 16 years.

15

16 I began my career as a Laboratory Technician for Ohio Edison in 1994, in that
17 position I was responsible for the operation of meter revenue data collection
18 system, programming and testing advanced meters, developing electronic meter
19 programs and providing field meter staff support. I then advanced to the position
20 of Staff Technical Specialist for Ohio Edison/FirstEnergy in 1998. In that
21 position I oversaw the operation of meter data collection systems, and helped
22 develop the meter data storage system. In 2000, I assumed the position of Meter
23 Systems Engineer for FirstEnergy Service Company. In that position I was
24 primarily involved with developing metering systems for customer end use
25 monitoring. In 2001 through 2007, I held the positions of Business Liaison for
26 SAP integration project; Information Systems Business Analyst; Meter Revenue
27 Data Collection Supervisor; and Field Supervisor. Currently I am responsible for
28 managing the Meter Services Department, which includes budgeting, staffing, and
29 the other day-to-day operations of the group. My past work experience includes a
30 business analyst in the intellectual technology department; supervisor in the
31 central meter support department; and also served as a meter engineer.

32

33 Q. And you're familiar with the NLW Properties case, correct?

34

35 A. That's correct.

36

37 Q. Are you aware of the timeframe in which NLW Properties was the customer
38 of record?

39

40 A. Yes, based on my review of our customer service system, which is maintained in
41 the ordinary course of business, I learned that NLW Properties became the
42 customer of record at 2597 Market Street on October 23, 2008.

43

44 Q. So is it correct to say that NLW Properties was not a customer of Ohio
45 Edison before October 23, 2008.

46

47 A. To my knowledge not at that address.

48

49 Q. Is that the same address in which NLW Properties has now alleged damage?

50

51 A. Yes.

52

53 Q. Is that the same address in which Ohio Edison received a call on or about
54 August 24, 2007 to disconnect service.

55

56 A. Yes.

57

58 Q. Did Ohio Edison disconnect service on or around August 24, 2007?

59

60 A. No. Ohio Edison made several attempts to disconnect service but the premise was
61 locked.

62

63 Q. When did Ohio Edison disconnect service?

64

65 A. February 4, 2008.

66

67 Q. You state that the premise was locked. Ohio Edison did not have a key to
68 that account?

69

70 A. No. It is my understanding that our Meter Services Department did not have a
71 key to that account.

72

73 Q. Did any other department of Ohio Edison have a key to that account?

74

75 A. No. However, in investigating this matter further I have learned that our Meter
76 Reading Department had a key to another related account which provided access
77 to the account in question.

78

79 Q. What do you mean Meter Reading had a key to another related account?

80

81 A. As I understand, there are four meters located on the premise, each with a separate
82 account number. I have learned that two of the four accounts indicated at the time
83 that a key was on file to gain access. Meter Reading gained access to all four
84 accounts by using the key noted on one account. However, there was only one
85 account subject to disconnection on August 27, 2007 that account did not note a
86 key and Meter Services had no way of knowing at the time that there were several
87 adjoining accounts.

88

89 Q. In your expert opinion was there anything different that Ohio Edison could
90 have done to gain access to the premise.

91

92 A. No. Meter Services made several attempts to access the meter in question. Such
93 attempts included a number of field visits and letters sent to the premise.

94 Q. **Why didn't Meter Services just check with Meter Reading?**
95

96 A. There was just no way of knowing at the time that there were related accounts to
97 the meter.
98

99 Q. **Couldn't Meter Services just look up the account to find that there were**
100 **related accounts?**
101

102 A. No. Based on my years of experience and expertise I know that the account would
103 not have notated that there were other related accounts. That's why it is so
104 important for customers to inform the Company of any unique access issues for
105 each account that they may have.

106 Q. **Are you aware that the Complaint alleges that Ohio Edison left the premise**
107 **door open?**


108 A. Yes, I am aware that the Compliant makes that allegation. However, when our
109 meter service department personnel arrived the door was open. Ohio Edison did
110 not leave any door open.

111 Q: **Mr. Greene, is there anything that you would like to add to your testimony?**

112 A: Yes. Ohio Edison at all times complied with its policies and procedures, as well
113 as its tariffs and the PUCO rules and regulations.
114

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing Direct Expert Testimony of Robert J. Greene was served by U.S. mail, postage prepaid, upon NLW Properties Business Development, Inc., 114 Javit Court, Youngstown, Ohio 44515; and David M. Moore., 19 East Front Street, Youngstown, Ohio 44503, this 1st day of July, 2009.



Ebony Miller
Attorney