

93

FILE

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Evelyn and John Keller,

Complainants,

v.

Ohio Power Company,

Respondent.

Case No. 12-2177-EL-CSS

PUCO

RECEIVED-DOCKETING DIV
2013 MAY -1 PM 1:25

**COMPLAINANTS' MEMORANDUM IN OPPOSITION
TO RESPONDENT'S MOTION TO DISMISS**

Introduction

Complainants commenced this action seeking to recover the value of food lost during the summer of 2012 when the electric power to their residence was unavailable for more than six days due to one tree which fell across a power line and also blocked S.R. 315 in southern Delaware County. Complainants allege that Respondent was negligent and that Respondent is thus liable pursuant to Paragraph 19, Terms and Conditions of Service of its tariff (**Exhibit 1**). Respondent filed a motion to dismiss this complaint. For the reasons set forth below, Respondent's motion is without merit and this matter should proceed to hearing.

This case is not about a storm, it is about Respondent's negligence before and after a storm. Contrary to Respondent's position, the June storm did not take down all trees in its path; the evidence will be that within the approximately one-half mile stretch of heavily forested S.R. 315 here at issue, only one tree fell, and that was the tree which caused Complainant's power outage. This case is about the reason the tree fell and the reason Respondent delayed the repairs.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician fe Date Processed MAY 01 2013

Standard for Motion to Dismiss

A motion to dismiss is designed to test a complaint to determine whether, if the facts alleged are established, the complaint states a claim as a matter of law. A motion to dismiss is procedural and tests the sufficiency of a complaint. *Hunt v. Mercy Medical Center*, 5th Dist. No. 2011-Ohio-3678, ¶ 11. To sustain a motion to dismiss, “it must appear beyond doubt that the plaintiff can prove no set of facts in support of the claim that would entitle the plaintiff to relief.” *Id.* at ¶ 12 (citations omitted); *see also Scardina v. Ghannam*, 7th Dist. No. 04-MA-81, 2005-Ohio-3315, ¶ 12 (citing *Fahnbulleh v. Strahan*, 73 Ohio St.3d 666, 667 (1995)). “The factual allegations in the complaint as well as all reasonable inferences to be derived therefrom must be taken as true when addressing a motion to dismiss pursuant to Civ. R. 12(B)(6).” *Helman v. EPL Prolong, Inc.*, 139 Ohio App.3d 231, 235 (7th Dist. 2000) (citing *Vail v. Plain Dealer Publishing Co.*, 72 Ohio St.3d 279, 280 (1995)). The court “must determine whether the complaint’s allegations constitute a statement of a claim under Civ. R. 8(A).” *Id.* at ¶ 13 (citations omitted). Indeed, “[a]ll that the civil rules require is a short, plain statement of the claim that will give the defendant fair notice of the plaintiff’s claim and the grounds upon which it is based.” *Id.* (citations omitted).

Argument

1. Complainants need not prove negligence at this stage of this action, merely establish that, if negligence is proven at hearing, as a matter of law Complainants are entitled to the relief sought.

As set forth above, the purpose of a motion to dismiss is to test not whether the facts alleged in the complaint are correct or established, but rather to determine whether the complaining party has alleged a claim which, if one assumes the factual allegations are true, entitles the complaining parties to the relief sought. Here, Complainants have met that burden.

The tariff prepared by Respondent and approved by this Commission expressly provides that Respondent is liable to lost food resulting from its negligence. That is the basis for this complaint; Complainants lost food in their residence as a result of Respondent's negligence. Without question, if negligence is established, Respondent is liable for such damages. On this basis alone, the motion to dismiss should be denied.

2. Complainants are required to respond to this motion without the benefit of reasonable discovery, due to refusal of Respondent to respond to or permit relevant discovery.

Complainants' efforts to conduct discovery have been frustrated by Respondent.

Three examples will illustrate Respondent's efforts to frustrate discovery:

- a. First, the largest document produced by Respondent is a printout of the time and order of outage repairs following the June 2012 storm. (The first five pages of this 216-page document is attached as **Exhibit 2**). However, the document is not self explanatory and the witnesses which Respondent allowed to be deposed had no knowledge of this document or what it means. (Deposition of Selwyn Dias, April 4, 2013, herein "D.T." p. 60) Respectfully, to the extent Respondent is expected to claim that it followed its standard restoration priorities, Complainants are entitled to discovery to "test" Respondent's claims.

- b. Second, in December 2012 Complainants properly served a request for documents documenting Respondent's internal procedure governing the prioritization of outage repairs following a storm or other widespread event. In response, Respondent produced a three-page printout from its website (attached **Exhibit 3**) which gives a broad summary of goals, but no details. In April, 2013, during the deposition of Respondent's vice president, Complainants learned for the first time that there is in fact a much more detailed restoration plan which sets forth procedures for prioritization of outage repairs. This document should have been produced

in response to Complainants' December request, but wasn't.¹ Further, the witness who identified this complete plan in April, 2013 was unfamiliar with its contents, wasn't even sure if it was a written document (D.T. p.22) and did not even know who at AEP would have a copy of the plan. (D.T. p. 24) Complainants have not had a reasonable opportunity to conduct discovery with respect to whether Respondent complied with its own restoration plan.

c. Third, Respondent has refused to permit reasonable discovery by oral depositions. In response to Complainants' interrogatories, Respondent identified ten individuals with knowledge of the substance of this complaint. However, when Complainants asked to depose these knowledgeable persons, Respondent refused to produce them for deposition (even though Respondent had not obtained a protective order) and instead said it would produce only two individuals of its selection. One of the persons which Respondent allowed to be deposed, Mr. LaJeunesse, did actually have some pertinent information, but the second, Mr. Dias, knew nothing about either the facts underlying this complaint or the manner in which the relevant decisions were made following the June 2012 storm. (D.T. p. 84) Following the depositions of these two persons on April 3 and 4 of 2013, Complainants immediately requested depositions of four additional persons who had been identified during the two depositions as persons having relevant depositions, and, again, Respondent said it would not produce any of these individuals to be deposed.

Respondent clearly believes that it gets to make the rules which relate to discovery in a complaint proceeding. Complainants wish for the record to clearly reflect that

¹ Following the Dias deposition which first disclosed this document, Complainants filed an additional request for this document and a copy of Respondent's Service Restoration Plan – 93 pages – was ultimately produced one week before the filing of this brief.

they are responding to the motion to dismiss without the benefit of having the ability to conduct relevant discovery.

3. Based upon the information Complainants have been able to obtain, there is a high likelihood they will be able to establish that Respondent was negligent.

a. Respondent was negligent failing to identify the tree which fell as a “hazard tree” or a “danger tree” which should have been removed.

i. Respondent’s internal Forestry Guidelines define a “hazard tree” as “a tree considered a potential threat to the safety and reliability of AEP’s facilities growing within the normally maintained right-of-way” and a “danger tree” as “a tree considered a potential hazard to AEP’s facilities growing outside of the normally cleared right-of-way.” Here, the power outage at issue was caused by one tree falling across a power line. Respondent’s forester, Steve LaJeunesse, who actually was present when the tree was removed and the power outage repaired more than six days after the tree fell, opined that the tree was in poor condition and should have been marked for removal. (Deposition of Steve LaJeunesse, April 3, 2013, herein “L.T.” p. 65 and 68.² Mr. LaJeunesse testified that he looked and did not find any indication on the tree that fell that it had been marked as a hazard tree. (L.T. p. 66) This tree was, in fact, not marked for removal by Respondent when that section of line was inspected in April or May of 2012.³ If the tree was in poor condition, and inasmuch as it was located in a position where its failure caused a power outage, it certainly is likely that someone working for Respondent was negligent in not marking this particular tree as being in need of removal.

² The stump of the tree which fell and caused the outage is in fact dead and entirely rotten. See photograph **Exhibit 4**. Complainants have recovered a piece of the stump showing its condition and can allow the Commission to examine that upon request.

³ **Exhibit 5** is a detail sheet prepared by Respondent’s tree inspector. This does not indicate any trees to be removed in the area where the tree which fell was actually located (see arrow on Exhibit).

ii. Surprisingly, Respondent's negligence continues. Respondent's forester LaJeunesse testified the tree which fell was one trunk of a tree which consisted of three similarly sized trunks. (L.T. p. 57). Complainants inspected the location on April 27, 2013 and, to their surprise, the remaining two trunks of the same tree are without question and have never been either removed or marked for removal by Respondent. See photographs **Exhibit 6** (showing the two remaining trunks from the ground looking up – and showing they are dead - and **Exhibit 7** (showing the proximity of this dead tree to Respondent's new power line. Respectfully, when (not if) the remaining trunks fall and again cause a power outage, will Respondent then concede negligence?

- b. Respondent was negligent by failing to remove the tree within a reasonable time.

It appears that the tree which actually fell would not have been removed before the storm even if Respondent had properly performed the vegetation control along the section of S.R. 315 between Powell and Jewett Roads and marked that tree for removal, because of other decisions by Respondent. Electric service to Complainants' residence comes via Ohio Power circuit #3101. Respondent's forester testified that this circuit was inspected for needed vegetation control in April and May 2012 (he did not know when during that period the area on S.R. 315 between Powell Rd and Jewett Rd was inspected). The necessary vegetation control on the remainder of Circuit 3101 was done before the June storm. However, the vegetation control for the section along S.R. 315 between Powell and Jewett Roads was delayed and was not performed before the June storm because Respondent decided that the vegetation control for that section should be combined with another unrelated project, namely changing the electric wire along S.R. 315 from a three-phase to a single phase wire. See **Exhibits 8 and 9**. Complainants have not yet been allowed to depose a person who can explain the rationale for combining these

two projects into one, but the only logical explanation is that AEP wanted to save money on traffic control. This decision of Respondent to delay vegetation control – and thus jeopardize system reliability – to save money on traffic control could well be determined to constitute negligence.

- c. Respondent was negligent by delaying repairs to the outage on S.R. 315 out of a desire to combine such repairs with two other non-emergency projects not related to the storm.

The event which serves as the basis for this complaint was that a single tree fell across S.R. 315 between Powell and Jewett Road, and not only blocked that busy state road, but also took down the electric line which served Complainants and their neighbors. ODOT promptly put up barriers and stationed two pickup trucks – one on each side of the downed tree and power line – and had those trucks manned by ODOT employees 24/7 until more than six days later when Respondent finally came out to repair the power line.⁴ Respondent has admitted that one of the criteria it uses to prioritize repairs to power outages is whether a downed power line is blocking a public road. The area of the blockage, S.R. 315 in southern Delaware County, is without question a very busy highway and its blockage for more than six days caused widespread inconvenience. If, as it appears, the delay in repairing this one outage was in violation of Respondent's own plans, then that fact alone would be sufficient to constitute negligence.

However, it appears that the actual facts were even more outrageous.

Respondent's forester testified in deposition that notwithstanding that its downed line was known

⁴ Complainants will testify that they often during that period of more than six days talked with the ODOT employees sitting in their trucks, who said that they could easily cut and remove the downed tree, but they were forbidden to do so until Respondent removed the downed power line. The ODOT employees continually said they had been told Respondent had promised to come out promptly, but that never occurred.

to be blocking S.R. 315 (and causing power outage to Complainants and their neighbors, Respondent nevertheless still delayed responding to that outage until it could coordinate three distinct actions: first, the power outage needed to be fixed (which would have allowed ODOT to reopen S.R. 315); second, Respondent still wanted to replace the three-phase wire with a single phase line (although such replacement was not necessary to restore power and re-open S.R. 315; and third, since Respondent had never performed the vegetation control on this section along S.R. 315, it desired to perform that trimming work at the same time. L.T. p. 54 and 68. The evidence will be that when Respondent finally arrived at the location of this downed tree on Thursday evening, the downed line was repaired and power restored in about one hour. Thus, it appears that rather than finding one hour to repair this one line and allow S.R. 315 to be reopened, Respondent waiting more than six days to do this work so that it could combine this repair with two other desired projects. This decision appears not only to violate Respondent's own restoration plans, but also caused significant disruption and inconvenience for many members of the traveling public.⁵ These flawed decisions by Respondent can well be considered negligence.

4. Comments upon the complaint process.

If the purpose of the Commission's complaint procedure is to provide consumers a fair and reasonable method of obtaining redress against the regulated utility, then Complainants respectfully submit that the process is flawed. In this action Complainants have the distinct – and very unusual – benefit of having in the family an experienced lawyer with the ability and willingness to take the time to pursue this complaint action. Even so, this proceeding has

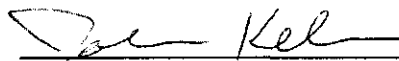
⁵ To say nothing about the expense to ODOT and Ohio taxpayers to station two ODOT employees and vehicles next to this downed power line for six days while waiting for Respondent.

continued for almost ten months and is not near completion. Moreover, Complainants, even with the benefit of counsel, have been unable thus far to obtain necessary or reasonable discovery. Even the discovery obtained to date – including two depositions of persons selected by Respondent – has cost Complainants almost \$1,000 for a court reporter and transcript. Very, very few consumers possess the knowledge, time, and financial resources to pursue a claim against Respondent. Respectfully, perhaps this explains the attitude of Respondent in and toward consumer complaints.

Conclusion

For the reasons set forth hereinabove, Respondent's motion to dismiss should be denied. Complainants believe that based on the information developed on discovery, Respondent was negligent. However, at this stage in the proceedings Complainants need not establish negligence; at this stage all Complainants need show is that there is a legal basis for them to prevail, if they ultimately establish negligence at the ultimate hearing in this action. Without question, based upon Respondent's tariff, Complainants have established that as a matter of law, they have stated in this action a viable claim and cause of action. Therefore, the motion to dismiss should be denied and this action should proceed to a hearing.

Respectfully submitted,



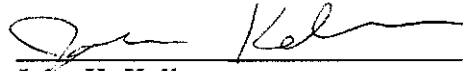
John K. Keller (0019957)
1424 Jewett Road
Powell, Ohio 43065
(614) 477.2087
jkev@columbus.rr.com

Attorney for Complainants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail and regular U.S. mail on the following persons this 1st day of May 2013:

Steven T. Nourse
Yazen Alami
American Electric Power Service Corp.
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
stnourse@aep.com
yalami@aep.com



John K. Keller

P.U.C.O. NO. 20

TERMS AND CONDITIONS OF SERVICE

1. CONTENTS

PARAGRAPH	SECTION
2	APPLICATION FOR SERVICE
3	CONDITIONS OF SERVICE
4	AVAILABLE RATES
5	COMPANY'S AGENTS NOT EMPOWERED TO CHANGE TARIFFS
6	CHANGE OF RATES OR REGULATIONS
7	INSPECTIONS
8	LOCATION & MAINTENANCE OF COMPANY'S EQUIPMENT
9	SERVICE CONNECTIONS
10	EXTENSION OF LOCAL FACILITIES
11	TEMPORARY AND SPECIAL SERVICE
12	WORK PERFORMED ON COMPANY'S FACILITIES AT CUSTOMER'S REQUEST
13	NOMINAL VOLTAGE LEVELS
14	METER REGISTRATION AND TESTING
15	INTERVAL METERING INSTALLATIONS
16	USE OF ENERGY BY CUSTOMER
17	RESALE OF ENERGY
18	CUSTOMER'S LIABILITY
19	COMPANY'S LIABILITY
20	RESIDENTIAL SERVICE
21	DEPOSITS
22	BILLING AND BILLS PAYABLE
23	CHANGE OF ADDRESS BY CUSTOMER
24	DENIAL OR DISCONTINUATION OF SERVICE
25	DISCONNECT PROVISIONS - NON-RESIDENTIAL
26	PRE-ENROLLMENT CUSTOMER INFORMATION LIST
27	MINIMUM REQUIREMENTS FOR DISTRIBUTION SYSTEM INTERCONNECTION

2. APPLICATION FOR SERVICE

These Terms and Conditions of Service apply to service under the Company's schedules which provide for generation, transmission and distribution service. Customers requesting only distribution service from the Company, irrespective of the voltage level at which service is taken, as provided for in Section 4928.40(E), Ohio Revised Code, shall be served under the Company's open access distribution schedules and the Terms and Conditions of Open Access Distribution Service shall apply.

Electric service shall be made available to a prospective customer within this Company's area of service upon request or execution of a contract therefore and its acceptance by an officer or authorized representative of the Company.

Filed pursuant to Orders dated December 14, 2011 in Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-351-EL-AIR and 11-352-EL-AIR

Issued: December 22, 2011

Effective: January 1, 2012

Issued by
Pablo Vegas, President
AEP Ohio



P.U.C.O. NO. 20

TERMS AND CONDITIONS OF SERVICE

19. COMPANY'S LIABILITY

The Company will use reasonable diligence in furnishing a regular and uninterrupted supply of energy but does not guarantee uninterrupted service. The Company shall not be liable for damages in case such supply should be interrupted or fail by reason of an act of God, the public enemy, accidents, labor disputes, orders or acts of civil or military authority, breakdowns or injury to the machinery, transmission lines, distribution lines or other facilities of the Company, extraordinary repairs, or any act of the Company, including the interruption of service to any customer, taken to prevent or limit the extent or duration of interruption, instability or disturbance on the electric system of the Company or any electric system interconnected, directly or indirectly, with the Company's system, whenever such act is necessary or indicated in the sole judgment of the Company.

The Company shall not be liable for any loss, injury, or damage resulting from the customer's use of the customer's equipment or occasioned by the energy furnished by the Company beyond the delivery point. Unless otherwise provided in a contract between the Company and customer, the point at which service is delivered by the Company to the customer, to be known as "delivery point", shall be the point at which the customer's facilities are connected to the Company's facilities. The metering device is the property of the Company; however, the meter base and all internal parts inside the meter base are customer owned and are the responsibility of the customer to install and maintain. The Company shall not be liable for any loss, injury, or damage caused by equipment which is not owned, installed and maintained by the Company.

The customer shall provide and maintain suitable protective devices on the customer's equipment to prevent any loss, injury, or damage that might result from single phasing conditions or any other fluctuation or irregularity in the supply of energy. The Company shall not be liable for any loss, injury, or damage resulting from a single phasing condition or any other fluctuation or irregularity in the supply of energy which could have been prevented by the use of such protective devices. The Company shall not be liable for any damages, whether direct or consequential, including, without limitations, loss of profits, loss of revenue, or loss of production capacity occasioned by interruptions, fluctuations or irregularity in the supply of energy.

The Company is not responsible for loss or damage caused by the disconnection or reconnection of its facilities. The Company is not responsible for loss or damages caused by the theft or destruction of Company facilities by a third party.

Except as otherwise provided in this Section, the Company shall be liable to the customer for damage directly resulting from interruptions, irregularities, delays, or failures of electric service, caused by the negligence of the Company or its employees or agents, but any such liability shall not exceed the cost of repairing, or actual cash value, whichever is less, of equipment, appliances, and perishable food stored in a customer's residence damaged as a direct result of such negligence. The customer must notify the Company of any claim based on such negligence within thirty days after the interruption, irregularity, delay or failure begins. The Company shall not be liable for consequential damages of any kind. This limitation shall not relieve the Company from liability which might otherwise be imposed by law with respect to any claims for personal injuries to the customer.

The Company will provide and maintain the necessary line or service connections, transformers (when same are required by conditions of contract between the parties thereto), meters and other apparatus which may be required for the proper measurement of and protection to its service. All such apparatus shall be and remain the property of the Company and the Company shall

Filed pursuant to Orders dated December 14, 2011 in Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-351-EL-AIR and 11-352-EL-AIR

Issued: December 22, 2011

Effective: January 1, 2012

Issued by
Pablo Vegas, President
AEP Ohio

Outage Nbr	Total Customer Affected	Interruption End Date & Time
3872491	32	6/29/2012 1:45
3872091	40	6/29/2012 2:00
3872591	10	6/29/2012 3:59
3872601	33	6/29/2012 4:58
3872551	31	6/29/2012 5:52
3872631	1	6/29/2012 6:15
3872621	23	6/29/2012 7:00
3872721	1	6/29/2012 7:18
3872771	7	6/29/2012 7:39
3872821	2	6/29/2012 7:50
3872791	1	6/29/2012 7:51
3872801	3	6/29/2012 8:00
3872811	2	6/29/2012 8:10
3872931	10	6/29/2012 8:23
3872901	72	6/29/2012 8:32
3872691	4	6/29/2012 8:50
3872841	2	6/29/2012 9:00
3872881	1	6/29/2012 9:00
3872991	1	6/29/2012 9:04
3873011	1	6/29/2012 9:15
3873031	3	6/29/2012 9:17
3873171	3	6/29/2012 9:31
3873221	5	6/29/2012 9:35
3873311	6	6/29/2012 9:36
3872861	7	6/29/2012 10:00
3873491	111	6/29/2012 10:05
3873411	19	6/29/2012 10:06
3873071	3	6/29/2012 10:07
3872951	1	6/29/2012 10:08
3873291	4	6/29/2012 10:10
3873281	5	6/29/2012 10:30
3872961	12	6/29/2012 10:45
3873241	1	6/29/2012 10:55
3873731	1	6/29/2012 11:00
3872941	1	6/29/2012 11:04
3873581	17	6/29/2012 11:08
3873671	1	6/29/2012 11:25
3874241	4	6/29/2012 11:36
3873301	1,080	6/29/2012 11:40
3872971	1,802	6/29/2012 11:46
3874101	3	6/29/2012 11:48
3873961	4	6/29/2012 11:50
3873511	2	6/29/2012 11:50
3874071	1	6/29/2012 11:50
3874001	22	6/29/2012 11:51
3873891	1	6/29/2012 12:05
3874021	76	6/29/2012 12:15
3872851	7	6/29/2012 12:20



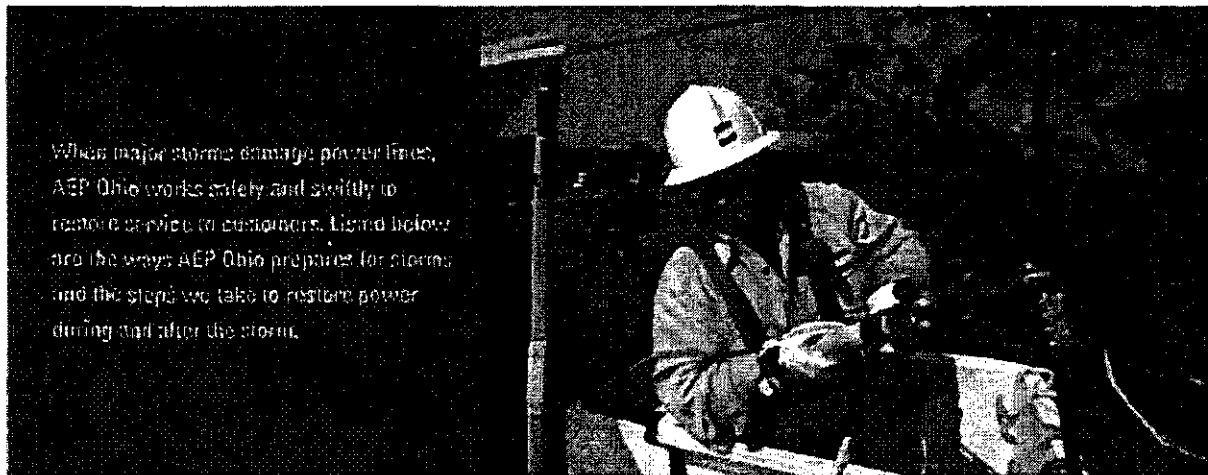
3873841	1	6/29/2012 12:20
3873941	3	6/29/2012 12:22
3873611	1	6/29/2012 12:30
3873831	1	6/29/2012 12:50
3874531	100	6/29/2012 13:03
3874471	5	6/29/2012 13:05
3874461	1	6/29/2012 13:05
3874631	2	6/29/2012 13:10
3874791	2	6/29/2012 13:12
3874361	2	6/29/2012 13:15
3874601	1	6/29/2012 13:15
3874561	14	6/29/2012 13:26
3872831	1	6/29/2012 13:30
3872891	8	6/29/2012 13:30
3874621	1	6/29/2012 13:44
3874661	1	6/29/2012 13:45
3874691	7	6/29/2012 13:52
3874831	8	6/29/2012 14:00
3874611	6	6/29/2012 14:06
3874481	2	6/29/2012 14:12
3873761	22	6/29/2012 14:14
3874351	9	6/29/2012 14:17
3874711	8	6/29/2012 14:20
3874931	1	6/29/2012 14:20
3874901	11	6/29/2012 14:30
3874971	1	6/29/2012 14:50
3875001	1	6/29/2012 15:00
3874111	1,713	6/29/2012 15:10
3875141	15	6/29/2012 15:12
3875151	17	6/29/2012 15:14
3875031	12	6/29/2012 15:21
3875111	1	6/29/2012 15:36
3875221	2	6/29/2012 15:45
3875431	78	6/29/2012 16:00
3875171	12	6/29/2012 16:20
3875591	47	6/29/2012 16:30
3875251	3	6/29/2012 16:45
3875601	1	6/29/2012 16:45
3876451	1	6/29/2012 16:58
3876161	10	6/29/2012 17:00
3875131	2	6/29/2012 17:05
3887681	126	6/29/2012 17:15
3889261	4,938	6/29/2012 17:16
3875191	1	6/29/2012 17:17
3874451	8	6/29/2012 17:30
3875381	14	6/29/2012 17:44
3880421	1	6/29/2012 17:50
3881401	1	6/29/2012 17:55
3875071	2	6/29/2012 18:15
3916421	1	6/29/2012 18:23
3893561	13	6/29/2012 18:39
3878211	60	6/29/2012 19:03

3921911	378	6/29/2012 19:30
3888641	2,711	6/29/2012 19:51
3890501	1,263	6/29/2012 20:03
3935421	120	6/29/2012 20:03
3936841	50	6/29/2012 20:04
3890631	83	6/29/2012 20:05
H1171916-1	54	6/29/2012 20:15
3883301	85	6/29/2012 20:21
3939001	19	6/29/2012 20:36
3919291	53	6/29/2012 20:40
3995061	1	6/29/2012 20:40
3995071	1	6/29/2012 20:40
3995081	26	6/29/2012 20:40
3995051	1	6/29/2012 20:40
3888501	1,420	6/29/2012 20:48
3873021	1	6/29/2012 20:50
3887241	410	6/29/2012 20:55
3918041	10	6/29/2012 20:59
3890071	1,601	6/29/2012 21:00
3903491	509	6/29/2012 21:11
3889561	1,769	6/29/2012 21:18
3910601	1,174	6/29/2012 21:24
3937751	148	6/29/2012 21:35
3900541	2,311	6/29/2012 21:40
3916201	373	6/29/2012 21:50
3903961	1,118	6/29/2012 21:54
3888751	2	6/29/2012 22:00
3952191	19	6/29/2012 22:00
3879181	348	6/29/2012 22:05
H3899351	416	6/29/2012 22:09
3899351	1,197	6/29/2012 22:09
3890921	3,484	6/29/2012 22:10
3891531	21	6/29/2012 22:17
3959661	312	6/29/2012 22:20
3914481	1,192	6/29/2012 22:25
3915101	2,340	6/29/2012 22:26
3893541	477	6/29/2012 22:30
3890411	55	6/29/2012 22:39
3990151	5	6/29/2012 22:39
3912861	891	6/29/2012 22:40
3958221	477	6/29/2012 22:40
3952491	1,356	6/29/2012 23:00
3924941	3	6/29/2012 23:00
3958821	101	6/29/2012 23:24
3925951	1,875	6/29/2012 23:25
3886631	956	6/29/2012 23:30
3983141	2	6/29/2012 23:30
3931661	1,396	6/29/2012 23:36
3961791	793	6/29/2012 23:41
3899471	1,068	6/29/2012 23:44
3906971	1,265	6/29/2012 23:44
3952011	614	6/30/2012 0:03

3938041	44	6/30/2012 0:04
3954341	57	6/30/2012 0:05
3957691	1,356	6/30/2012 0:10
3953371	22	6/30/2012 0:35
3903491A	517	6/30/2012 0:35
3981281	2,262	6/30/2012 0:36
3889001	564	6/30/2012 0:37
3914871	1,887	6/30/2012 0:38
3955381	791	6/30/2012 0:50
3960731	10	6/30/2012 0:55
3937931	96	6/30/2012 1:00
3952471	837	6/30/2012 1:00
3969901	85	6/30/2012 1:00
3941591	719	6/30/2012 1:01
3977841	1,284	6/30/2012 1:10
3983341	30	6/30/2012 1:10
3969861	427	6/30/2012 1:20
3973611	195	6/30/2012 1:20
3969781	702	6/30/2012 1:30
3935231	411	6/30/2012 1:33
3892481	721	6/30/2012 1:43
3953331	115	6/30/2012 1:50
3961201	370	6/30/2012 1:50
3961261	2	6/30/2012 1:50
3978981	1	6/30/2012 1:50
3963811	744	6/30/2012 1:58
3967351	560	6/30/2012 2:00
3913941	239	6/30/2012 2:02
3964241	12	6/30/2012 2:05
3980811	9	6/30/2012 2:22
3916051	732	6/30/2012 2:27
3969871	71	6/30/2012 2:30
3976961	251	6/30/2012 2:41
3894021	1,670	6/30/2012 2:52
3969441	1,874	6/30/2012 2:54
3959941	1,071	6/30/2012 2:56
3966351	1,447	6/30/2012 2:57
3958171	1,366	6/30/2012 3:00
3920351	1	6/30/2012 3:09
3913051	10	6/30/2012 3:10
3888471	253	6/30/2012 3:37
3914591	989	6/30/2012 3:58
3918461	1,151	6/30/2012 4:05
3960561	10	6/30/2012 4:05
3969841	7	6/30/2012 4:45
3899781	2,184	6/30/2012 4:46
3964341	1,747	6/30/2012 5:11
3944841	1	6/30/2012 5:19
3922351	177	6/30/2012 5:27
3909521	1,648	6/30/2012 6:18
3968891	29	6/30/2012 6:26
3967271	257	6/30/2012 6:30

3930981	386	6/30/2012 6:50
3891121	524	6/30/2012 7:00
3889181	387	6/30/2012 7:22
3930051	34	6/30/2012 7:24
3916361	100	6/30/2012 7:26
3963141	14	6/30/2012 7:45
3986151	34	6/30/2012 7:46
3915241	1,455	6/30/2012 7:47
3960601	183	6/30/2012 7:54
3996531	5	6/30/2012 7:58
3879081	604	6/30/2012 8:11
3878491	1,261	6/30/2012 8:29
3003801	62	6/30/2012 9:00
3001221	4	6/30/2012 9:20
3900901	1,716	6/30/2012 9:34
3979251	32	6/30/2012 9:39
3946351	222	6/30/2012 9:48
3981291	688	6/30/2012 9:49
3958971	1,707	6/30/2012 9:50
3945241	719	6/30/2012 9:59
3999721	1	6/30/2012 10:00
3948991	578	6/30/2012 10:01
3003551	513	6/30/2012 10:13
3004921	2	6/30/2012 10:13
3889541	2,060	6/30/2012 10:18
3920331	5	6/30/2012 10:26
3984141	13	6/30/2012 10:29
3937431	55	6/30/2012 10:30
3994071	3	6/30/2012 10:30
3143821	97	6/30/2012 10:30
3010161	22	6/30/2012 10:30
3957101	1	6/30/2012 10:35
3939531	143	6/30/2012 10:40
3962971	200	6/30/2012 10:43
3948771	107	6/30/2012 10:45
3986701	79	6/30/2012 10:45
3893151	417	6/30/2012 10:50
3996261	316	6/30/2012 10:59
3003621	6	6/30/2012 11:00
3905801	508	6/30/2012 11:08
3916901	12	6/30/2012 11:15
3989961	53	6/30/2012 11:15
3008521	11	6/30/2012 11:27
3010961	677	6/30/2012 11:31
3905071	581	6/30/2012 11:32
3886161	1,581	6/30/2012 11:32
3009661	407	6/30/2012 11:39
3890881	2,932	6/30/2012 11:40
3994951	98	6/30/2012 11:40
3014341	15	6/30/2012 11:40
3977991	31	6/30/2012 11:42
3893971	333	6/30/2012 11:43

How AEP Ohio Manages Major Storms



What does AEP Ohio do to manage a major storm?

AEP Ohio continually monitors weather forecasts via the National Weather Service and local weather communications networks so that we are aware of impending storms. This allows us to work on staffing for restoration efforts even before the storm hits.

During a major storm, workers from portions of our 11-state service territory are called in to assist local employees. We also enlist the help of contract workers as well as personnel from other electric companies through mutual assistance agreements.

In addition, customer solutions centers operate in "storm mode," using extra telephone lines and bringing in additional representatives to better serve our customers. They also employ advanced telephone technologies to handle the unusually large volume of customer calls. These systems provide updates regarding the restoration effort and allow customers to report an outage without speaking to a representative.

What is the best way to get information on the restoration effort?

Battery-operated radios and televisions are the best ways for you to be informed of storm restoration progress. Informational releases are sent to the news media regarding restoration progress at least three times a day during major power outages.

You also can get information online at www.AEPOhio.com/news/outages if you have a laptop or other battery-powered Internet-connected device.

Why can't I talk directly with a customer services representative?

During major outages, you may be connected to an automated outage reporting system due to the high volume of calls. In addition, our communications systems give priority to outage calls dealing with safety concerns — such as fallen power lines — so that they receive service as quickly as possible.

Why can't an agent tell me when my power will be restored?

It is impossible to accurately predict restoration times of specific circuits serving particular residences because of the many challenges that restoration workers face.

What is AEP Ohio's restoration process?

In all outages, we work to restore power as safely and quickly as possible. Outages during storm events often are extended and can last for several days due to damage to all facilities located in the area hit by the storm.

In every storm restoration plan, we implement a basic process. Hazards, such as fallen power lines, are attended to first. Then emergency facilities, such as fire and police stations, hospitals, and calls from 911 agencies, receive top priority.

After these locations are restored, we work on main lines, or circuits, that will restore the largest number of customers in the shortest period of time. After main lines are restored, secondary power lines that serve smaller clusters of homes are repaired. Finally, lines that feed service drops to individual homes are repaired.

Why would service trucks pass by my house without repairing anything?

Work may need to be completed at a nearby location in order to restore service to you and your neighbors.

Why can my home be the only one on the block without power?

Fuses or circuit breakers in your home could have tripped and

(continued)

AEP OHIO
A unit of American Electric Power



hatted power; tree limbs could have fallen on the line serving your home; fuses on the transformer that serves your home may have tripped or could be damaged, and the primary line feeding the transformer could be damaged.

Why would I lose electricity in only part of my house?

You could have tripped a circuit breaker, blown a fuse or have a broken connector or wire at one of the service leads to your house. Sometimes damage to these leads leaves only the 120-volt outlets (or some of them) working. In this case, larger appliances that need 240-volt service — such as water heaters, air conditioners and ovens — may be inoperable until repairs are made. It is safe to use the outlets you have available while you check with an electrician. However, if some of your lights are extremely bright or extremely dim, you should avoid using outlets connected to these circuits to avoid potential damage to equipment. If there is a problem with a service lead to your home, our crews will repair the wires when they arrive to restore service.

Why do I sometimes experience brief outages that call for resetting appliances?

Usually, these outages occur when a protective device, called a recloser, detects interference on the line. If interference is detected, the line will de-energize briefly to determine if the problem is prolonged or only temporary. If the problem is temporary, the line will re-energize quickly. If the problem is prolonged, the line will de-energize.

How does AEP Ohio handle tree damage?

AEP Ohio contractors clear trees throughout the year to keep power lines free of limbs and debris. Following a storm, our contractors do not remove fallen limbs or branches caused by the storm from your property. For tree and debris removal, you will need to call a landscape or tree contractor.

Do not attempt to remove tree limbs or debris within 10 feet of a power line. Stay completely away from any fallen power line or sparking equipment. If you notice fallen lines or sparking equipment, please call us at the number on your electric bill as soon as possible.

Backup generators

Some customers use backup, or standby, generators to provide power during outages. Please notify us if you are using a backup generator. Operating a generator poses a potential safety hazard for line workers and you.

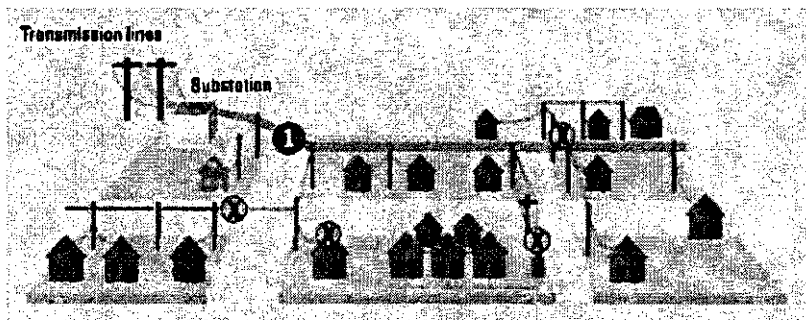
The problem arises when power from the backup generators feed power onto distribution lines, which can electrocute personnel working on the lines. On the other hand, power from electric company lines can feed into the generator and cause a fire at your residence. To avoid these hazards, be sure to have your generator installed by an electrician, and be sure that it has a manual transfer switch to isolate the device from the power grid. Remember that appliances can be connected directly to the generator independent of the household wiring. Make sure that all manufacturers' instructions are followed and that only the recommended number of appliances is plugged into the generator. ■



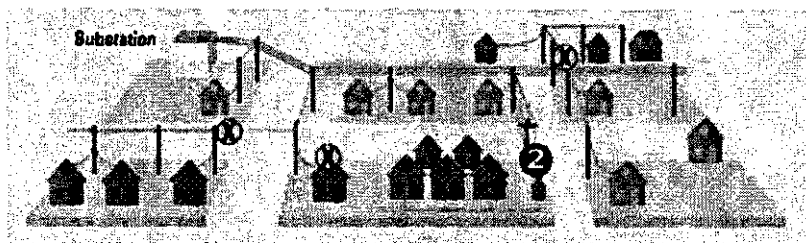
AEP Ohio's Distribution Restoration Process

During outages, AEP Ohio works to restore power as safely and quickly as possible. In every storm restoration plan, we implement a basic process. Special priority is given to: reported hazards such as downed power lines, 911 agency calls and emergency facilities such as fire and police stations. In restoring customers' electric service, AEP Ohio works on main lines, or circuits, that will restore the largest number of customers in the shortest period of time. A main line feeds power to thousands of homes and is the source of power for secondary and service drop lines. After main lines are restored, power lines that serve smaller clusters of homes are repaired. Finally, lines that feed service drops to individual homes are repaired.

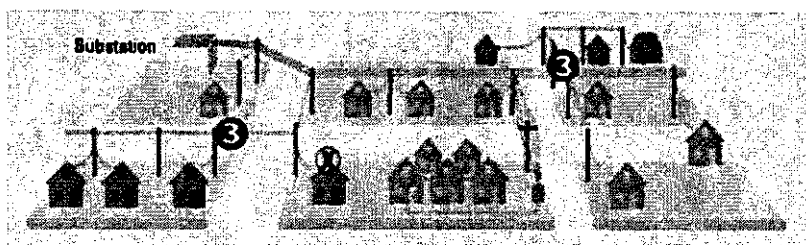
① The distribution main line from a substation is damaged, leaving most customers served from that line without power. No other line will be restored until the main line feeding power to that line is repaired.



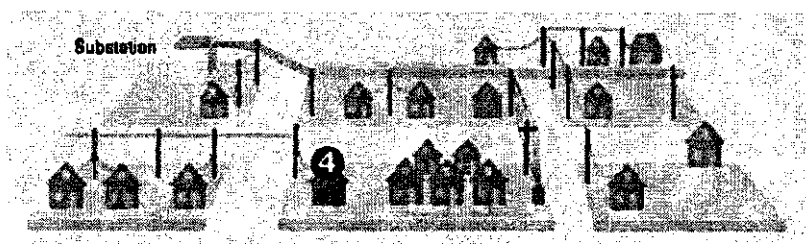
② Once the distribution main line is restored, a distribution line crew is dispatched to the damage site affecting the next largest group of customers.



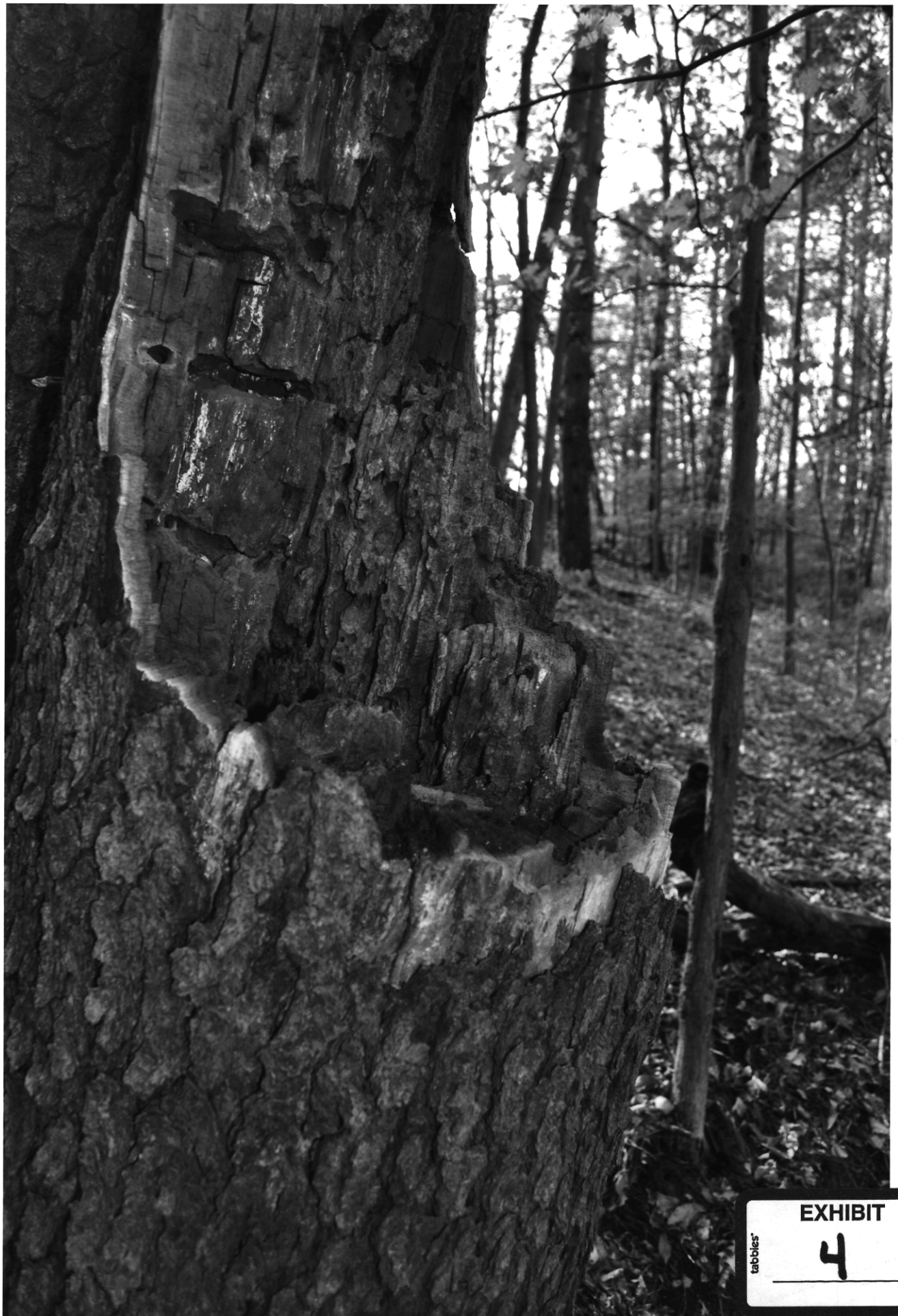
③ Smaller capacity lines that serve clusters of homes are repaired next.



④ Individual service lines are repaired only after all lines are restored. If a home or business is without power, while others around have service, additional work by an electrical contractor may be needed.



- energized power lines
- electrical distribution lines w/out power
- ⓧ damage or repair site



EXHIBIT

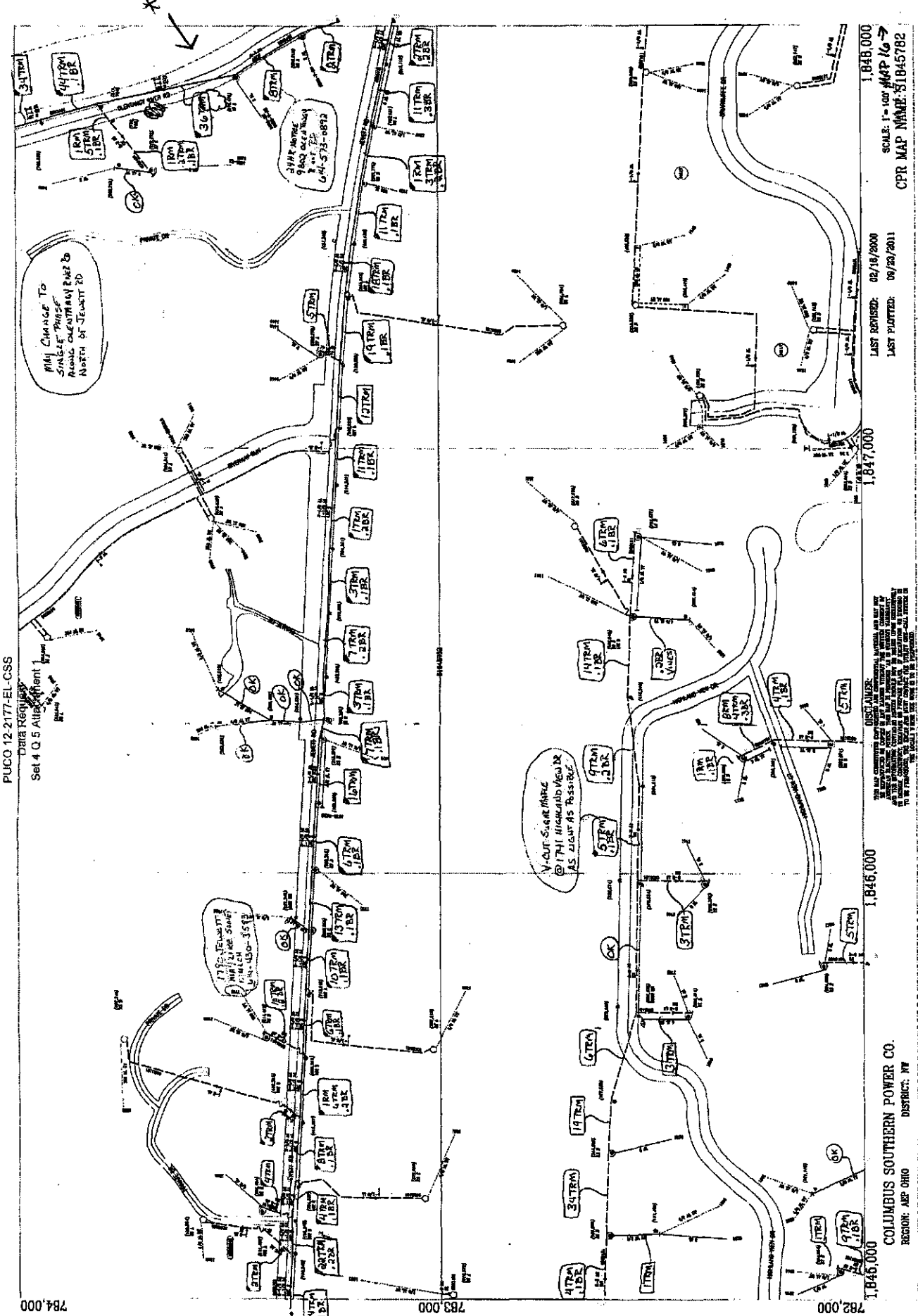
4

tabbles®

MAP 15
TRIMS - 509
BRUSH - 4.6
REMOVING - 13

EXHIBIT
5

Circuit 3101
MAP 14
MAP 13
MAP 12





tabbles®

EXHIBIT

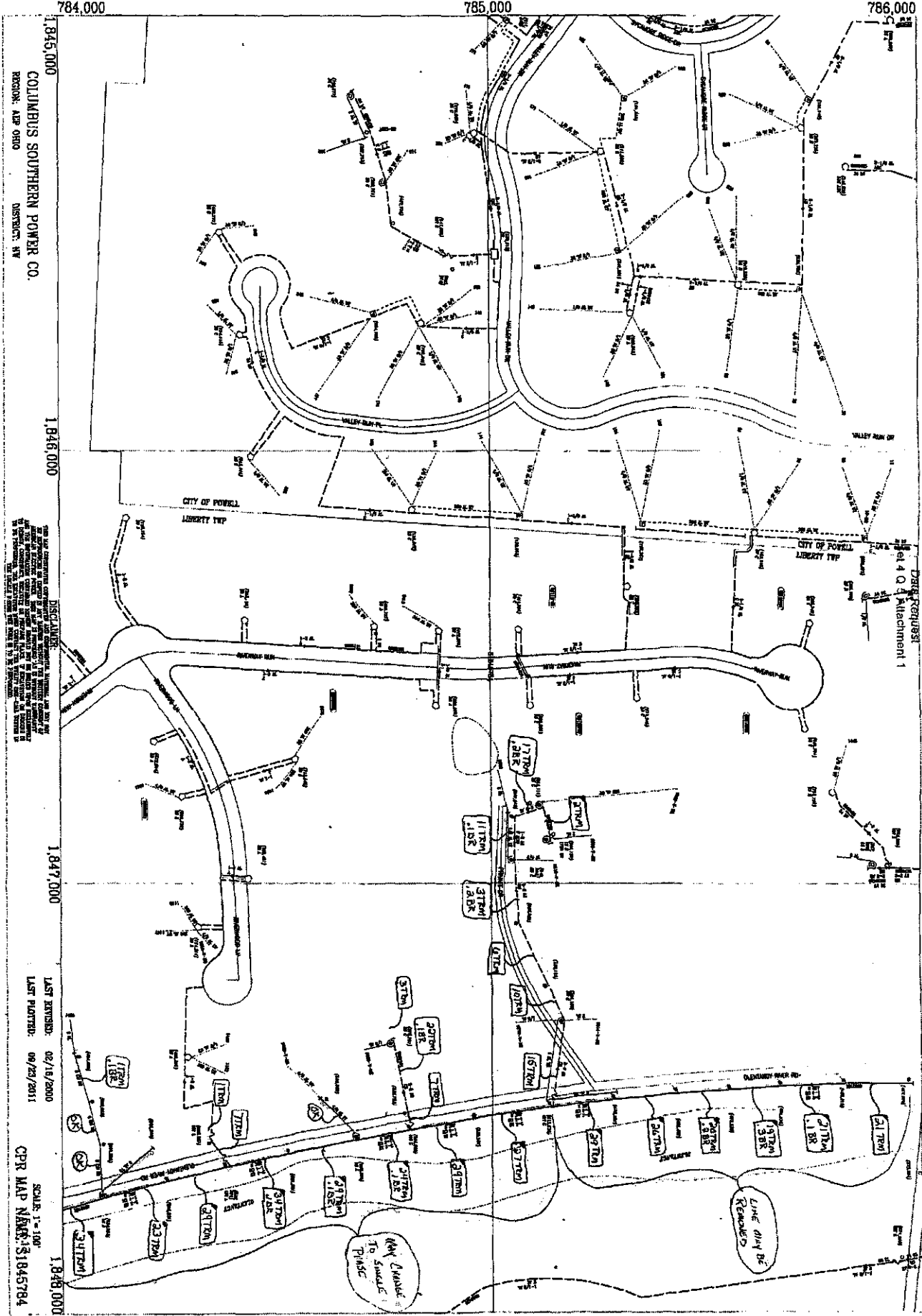
6



tabbles®
EXHIBIT
7



SCALE: 1"=100'
1,848,000
CPR MAP NUMBER: S1845784



WR 44575971

ENGINEERING	Substation: <u>Sawmill</u>	Pole Number: <u>VARIOUS</u>	Primary Voltage: <u>13.2 Kv</u>
	Circuit: <u>3101</u>		Secondary Voltage: _____
	Work Order # <u>DOP 0178614</u>	Location: <u>Olentangy River Rd</u>	
	PSP Backlog # _____	OPS # _____	Hold _____ Ready _____
	Do we have customer permission to drive vehicle on property? YES _____ NO _____		
	Job Description: <u>Remove Framing and 2 phases - A phase To stay on poles / PTP's Last 6 spans to be Removed (3P)</u>		
	Join use proposal: YES _____ NO _____ Number(s) <u>1</u>		
	Other utilities needed? Cable _____ Gas _____ Phone _____ Other _____		
	Other departments required? YES _____ NO _____ Department: _____		
	Tree trimming required? YES <input checked="" type="checkbox"/> NO _____ <u>P. Rehrig</u>		
LINE	Customer Contact # _____ Engineering Contact # <u>883-6837</u> Scheduling Contact # _____		
	Log date in line: _____		Stores request date: _____
	Date field checked: _____		Checked by: _____
	Outage? YES _____ NO _____		Customer notified of outage? YES _____ NO _____
	Road detours? YES _____ NO _____		
	Road load limit? YES _____ TON _____ % _____ NO _____		Bridge load limit? YES _____ TON _____ % _____ NO _____
	Direction of approach and nearest crossroad: _____		
	State Highway Permit # _____		Road crossing necessary? YES _____ NO _____
	Parking problems? YES _____ NO _____ Explain: _____		
	Flagperson needed? YES _____ NO _____ # Needed: _____		
Switching required? YES _____ NO _____ Permit # _____			
Access to property: Curves _____ Ditches _____ Fences _____ Gates _____ Hills _____			
Private undergrounds _____ Septic systems _____ Wells _____			
Ground conditions: Anytime _____ Must be dry _____ Must be frozen _____			
Will customer allow us on yard? YES _____ NO _____ If no, reason: _____			
Can mopads be used? YES _____ NO _____ # Needed _____		Crew size: _____	
Special equipment needed: Backhoe _____ Boat _____ Bulldozer _____ Electric capstan _____			
Flatbed 2-WD _____ Flatbed 4-WD _____ Go-Tract _____			
Line truck _____ Material handler _____ Pickup truck _____			
Service truck _____ Transformer cart _____ Transformer gin _____			
Trencher _____ Trash pump _____ Yard dog _____ 2-Man bucket _____			
4-WD Digger _____ 34.5 Trailer _____			
Underground pulling string installed? YES _____ NO _____			
Underground channel 9" _____ 24" _____			
Is underground rodder necessary? YES _____ NO _____			
Life support? YES _____ NO _____			
Name and address: _____			
Remarks: _____			
OUPS # _____	Dig date: _____	Dig time: _____	

* Coordinate w/ Tree Trimming on Circuit.

EXHIBIT

9

1 PUBLIC UTILITIES COMMISSION OF OHIO
2 EVELYN AND JOHN KELLER,)
3 Complainants,)
4 vs.) Case No.
5 COLUMBUS SOUTHERN POWER) 12-2177-EL-CSS
6 COMPANY,)
7 Respondent.)

8
9
10 DEPOSITION OF
11 SELWYN J. DIAS

12
13 Taken at the offices of
14 Law Offices of Kevin Maloney
22 East Gay Street, Suite 401
15 Columbus, Ohio 43215

16 on April 4, 2013, at 8:53 a.m.

17
18 Reported by: Sara S. Clark, RPR, CRR, CCP, CBC

19
20 --0--

21

22

23

24

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 John Keller 3 ATTORNEY-AT-LAW 4 1424 Jewett Road 5 Powell, Ohio 43065 6 614.477.2087 7 jkeller@vorys.com 8 9 on behalf of the Complainants. 10 11 Steven T. Nourse 12 Yazen Alami 13 AMERICAN ELECTRIC POWER 14 1 Riverside Plaza 15 Columbus, Ohio 43215 16 614.716.2470 17 stnourse@aep.com 18 yalami@aep.com 19 20 on behalf of the Respondent. 21 22 --0-- 23 24</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX OF EXAMINATION 2 PAGE 3 BY MR. KELLER: 5 4 INDEX OF EXHIBITS 5 EXHIBIT DESCRIPTION PAGE 6 1 Circuit 3101 One-Line Map 47 7 2 AEP Forestry Goals, 47 8 Procedures, and Guidelines 9 10 5 Document titled, "How AEP 45 11 Ohio Manages Major Storms" 12 6 Two-page document, "AEP 48 13 Requests Summer Storm Damage 14 Recovery Through PUCO" 15 7 Document titled, "Terms and 57 16 Conditions of Service" 17 18 8 217-page document re: outages 60 19 20 9 AEP Web page printout 85 21 22 23 24</p>
<p style="text-align: right;">Page 3</p> <p>1 STIPULATIONS 2 It is stipulated by and among counsel 3 for the respective parties that the deposition 4 of SELWYN J. DIAS, a Witness herein, called by 5 the Complainants under the applicable Rules of 6 Civil Procedure may be taken at this time by the 7 notary pursuant to notice and by agreement; that 8 said deposition may be reduced to writing in 9 stenotypy by the notary, whose notes thereafter 10 may be transcribed out of the presence of the 11 witness, and that the proof of the official 12 character and qualification of the notary is 13 waived. 14 --0-- 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 5</p> <p>1 SELWYN J. DIAS 2 being first duly sworn, as hereinafter 3 certified, deposes and says as follows: 4 EXAMINATION 5 BY MR. KELLER: 6 Q. State your name for the record, please. 7 A. Selwyn J -- middle initial J., Dias, 8 D-i-a-s. 9 Q. Where do you live, Mr. Dias? 10 A. I live in Lewis Center, Ohio. 11 Q. By whom are you currently employed? 12 A. I'm employed by Ohio Power Company. 13 Q. In what position currently? 14 A. I believe my title is vice president of 15 distribution operations. 16 Q. I'm sorry. You said American Electric 17 Power was your employer? 18 A. Well, I'm employed directly by Ohio 19 Power Company, which is a subsidiary of American 20 Electric Power. 21 Q. Okay. Have you ever been deposed 22 before? 23 A. I have. 24 Q. On how many occasions?</p>

<p style="text-align: right;">Page 6</p> <p>1 A. I don't recall. Two or three. 2 Q. And what was the nature of those 3 proceedings? 4 A. I recall one of them was an employee 5 matter in a prior position. 6 Q. Okay. 7 A. And the others would have been in my 8 capacity as -- in regulatory. 9 Q. In connection with PUCO regulatory 10 efforts? 11 A. Correct. 12 Q. If at any time you want to take a break 13 or something, just say so and we'll do that. 14 A. Sure. Thank you. 15 Q. Can you briefly tell me about your 16 family. 17 A. In what regard? 18 Q. Are you a married man? 19 MR. NOURSE: I'm just going to object. 20 That's completely irrelevant. 21 Q. Let me ask you this: In your family, 22 are you the person primarily responsible to buy 23 the family groceries, food items? 24 A. No.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Have you had any formal education since 2 that time? 3 A. Would you please describe formal 4 education? 5 Q. What does that mean to you? 6 A. I'm sorry? 7 Q. Do you have any graduate degrees? 8 A. I do not have a graduate degree. 9 Q. Okay. I assume you've gone to various 10 classes and courses in the -- through your 11 employment. 12 A. I have attended executive management 13 programs at -- one I completed was at University 14 of Virginia Darden School of Business. 15 Q. Do you receive any kind of degree or 16 certification as a result of that program? 17 A. I don't recall it being called a 18 certification, but I completed the program 19 successfully. 20 Q. Okay. And that was in management -- 21 business management issues? 22 A. Correct. 23 Q. Okay. Do you have any specific training 24 in vegetation control issues?</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. If you were asked today to produce 2 receipts for the food items in your house, do 3 you know if your family maintains those? 4 MR. NOURSE: Objection. 5 A. I don't know. 6 Q. You don't personally make a practice of 7 keeping grocery store receipts after you buy 8 groceries, do you, you personally? 9 A. I don't buy the groceries for the 10 family. 11 Q. That's fair. 12 Where is your office located? 13 A. Gahanna, Ohio. 14 Q. Would you briefly take me through your 15 educational background. 16 A. Can you explain what you're asking? 17 Q. Formal education after high school, 18 where, when. 19 A. I received my bachelor's degree from 20 University of Central Oklahoma, graduated in 21 1981. 22 Q. What was your degree? 23 A. Had a major in accounting and a minor in 24 business management.</p>	<p style="text-align: right;">Page 9</p> <p>1 A. No. 2 Q. What about specific training in power 3 restoration after a storm event? 4 A. I've not had formal training, but I've 5 had experience in that regard. 6 Q. Can you tell me about your experience, 7 please, in that area. 8 A. In my tenure with American Electric 9 Power, and on occasions when we've had major 10 weather events, I've been involved in those 11 restoration efforts. 12 Q. With respect to the storm in central 13 Ohio in June of 2012, what was your involvement 14 in connection with that storm? 15 A. I don't recall specifics, but I was 16 generally participating and assisting with the 17 overall restoration effort, assisting the 18 president and the vice president of operations. 19 Q. I don't understand what you just said. 20 In what way were you assisting? I'm trying to 21 find out -- I don't expect you were out there 22 trimming trees, you know, cutting up trees. Can 23 you tell me in a little more detail about what 24 you were doing in response to that storm?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. As you would expect in a major event, 2 it's a tremendous effort to -- depending on the 3 significance, you specifically cited the June -- 4 or the summer of 2012 derecho, d-e-r-e-c-h-o, 5 storm, the major storm event. 6 Q. The storm that came through in late 7 June. 8 A. Related to your complaint? 9 Q. Yes. 10 A. Correct. It was a significant event, 11 and we were working that storm 24/7, as you 12 could imagine. And I was involved with the vice 13 president and president in the efforts that they 14 were involved in to bring customers back on. 15 Q. And I'm just trying to get some 16 understanding of what you personally were doing 17 during that period of time. 18 A. I see. At that time, I was in a 19 different position than I am in today, and I was 20 the primary contact between Ohio Power Company 21 and the PUCO and the State EMA. 22 Q. What role did the PUCO have in the 23 response to the storm? I mean, during this 24 power restoration period, immediately following</p>	<p style="text-align: right;">Page 12</p> <p>1 contractor standpoint, estimated times of 2 restoration from a global standpoint for various 3 communities. 4 Q. Who was your principal contact at the 5 PUCO staff during that event? 6 A. I don't recall a specific name because 7 they rotated staff that were based at the State 8 EMA. 9 Q. And what was your -- what was the nature 10 of your discussions with the State EMA during 11 that period of time? 12 A. Very similar to what I just shared with 13 you related to the PUCO staff. 14 Q. Were you involved in prioritizing 15 restoration efforts, which outage would be 16 addressed before which other outage, during that 17 storm? 18 A. No. 19 Q. During that storm, do you recall any 20 instances where the PUCO made requests to Ohio 21 Power through you to restore something before 22 something else, or change the priority to get 23 something repaired? 24 A. I do not recall.</p>
<p style="text-align: right;">Page 11</p> <p>1 the storm, what role did the PUCO have in that 2 process? 3 A. You will have to ask them. 4 Q. Well, if you interacted with the PUCO 5 during that period of time, let's say in the two 6 weeks following the storm, I mean, what was the 7 nature of that interaction? 8 A. I was sharing with the PUCO staff and, 9 in some instances, commissioners, the overall 10 restoration efforts that we were going through, 11 that is, customers that originally were without 12 power, the progress we were making, and the 13 things we were doing to help bring customers 14 back on. 15 Q. So you would periodically say, you know, 16 as of 10:00 this morning, we have X number of 17 people still without power? 18 A. That's one example. 19 Q. Okay. What other types of examples can 20 you give me, just so I can understand what your 21 involvement was? 22 A. As I said earlier, I gave them 23 information on the number of resources we had 24 working, both from an employee standpoint,</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. What about the State EMA agency, do you 2 recall any instances where they made requests or 3 urged you to change the priority of repair work? 4 A. I do not recall them ever asking us to 5 change a priority, but I do recall them asking 6 about our priorities and giving me situations 7 where there were critical customers that were 8 without power. 9 Q. Can you give me some examples of the 10 types of critical customers that were without 11 power? 12 A. There was just one specific example that 13 I remember, and that was a hospital or two. 14 Q. Okay. And hospitals, I would expect, 15 would be high on your list of priorities to 16 restore power to anyway. Isn't that correct? 17 A. Hospitals is one of the highest 18 prioritization on the restoration effort. 19 Q. So as you sit here today, nine months 20 later, is it correct to say that Ohio Power was 21 not -- as far as you know, was not receiving 22 political pressure to do something versus 23 something else? 24 A. Oh, I don't know if I could say that we</p>

<p style="text-align: right;">Page 14</p> <p>1 didn't receive political pressure.</p> <p>2 Q. Well, I understand -- I'm sure there was</p> <p>3 pressure to restore everybody.</p> <p>4 A. Every customer wanted to be restored,</p> <p>5 correct.</p> <p>6 Q. But in terms of prioritizing customers,</p> <p>7 did you feel that there was political pressure</p> <p>8 to do one customer or one group of customers</p> <p>9 over another one?</p> <p>10 A. I was not involved in any of those -- if</p> <p>11 there was such political pressures, I was not</p> <p>12 aware of them.</p> <p>13 Q. Okay. So the prioritization of the</p> <p>14 power restoration efforts was done by AEP and</p> <p>15 its affiliates; is that correct?</p> <p>16 A. No.</p> <p>17 Q. Who was it done by?</p> <p>18 A. In addition to AEP and its affiliates,</p> <p>19 we also had other resources.</p> <p>20 Q. What were those other resources?</p> <p>21 A. Resources outside AEP and its</p> <p>22 affiliates.</p> <p>23 Q. Such as?</p> <p>24 A. Contractors.</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Well, Ohio Power Company is run by the</p> <p>2 president and chief operating officer.</p> <p>3 Q. Right. And I understand they have</p> <p>4 ultimate responsibility for everything. But</p> <p>5 there were approximately how many power outages</p> <p>6 after that storm? Do you recall the approximate</p> <p>7 number?</p> <p>8 A. It was one of the largest I'd ever seen.</p> <p>9 I'm not sure. It was well over 650 -- I really</p> <p>10 don't know.</p> <p>11 Q. Let's say six-hundred-and-some-thousand</p> <p>12 individual power outages, or customers that were</p> <p>13 without power, right?</p> <p>14 A. Generally, I'd say that's correct.</p> <p>15 Q. Okay. Now, at some point, somebody had</p> <p>16 to say -- someone had to prioritize which</p> <p>17 outages were addressed before other outages,</p> <p>18 correct?</p> <p>19 A. Well, that's why I say it's not</p> <p>20 somebody, it's collectively Ohio Power Company's</p> <p>21 operations personnel followed the restoration</p> <p>22 plan.</p> <p>23 Q. Okay. And who would you consider to be</p> <p>24 the head of that operations department or area?</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. I understand you had contractors and you</p> <p>2 had cooperative arrangements with other</p> <p>3 utilities who send in crews, certainly. Were</p> <p>4 those people making decisions as to which outage</p> <p>5 was addressed in what order, or were they told</p> <p>6 where to go and what to do?</p> <p>7 A. I believe we give them instructions as</p> <p>8 to where to go.</p> <p>9 Q. Okay. And by we, AEP, or its</p> <p>10 affiliates?</p> <p>11 A. Ohio Power Company, correct.</p> <p>12 Q. Who within the AEP organization was in</p> <p>13 charge of making decisions as far as</p> <p>14 prioritizing repair after the June 2012 storm?</p> <p>15 A. I don't believe there is any one</p> <p>16 individual that makes those decisions.</p> <p>17 Q. I believe that is probably true, but</p> <p>18 within the chain of command, the organizational</p> <p>19 structure of AEP, who would have been in charge</p> <p>20 of that effort?</p> <p>21 A. Could you please explain what effort</p> <p>22 you're referring to?</p> <p>23 Q. Prioritizing repairs caused by the</p> <p>24 storm.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. Well, the position that is responsible</p> <p>2 for distribution operations and restoration</p> <p>3 directly below the president is the vice</p> <p>4 president of distribution operations.</p> <p>5 Q. Who was that person in June and July of</p> <p>6 2012?</p> <p>7 A. Tom Kirkpatrick.</p> <p>8 Q. Can you spell his last name, please?</p> <p>9 A. I'm not sure I'm going to get this</p> <p>10 correct, but I'm going to try.</p> <p>11 Q. You know him better than I do, so give</p> <p>12 it your best shot.</p> <p>13 A. K-i-r-k-p-a-t-r-i-c-k.</p> <p>14 Q. Thank you.</p> <p>15 Is he still with the company?</p> <p>16 A. As far as I know.</p> <p>17 Q. After you graduated from college, can</p> <p>18 you take me through your employment history from</p> <p>19 that time up until the present.</p> <p>20 A. You want me to walk you through what</p> <p>21 aspects of my career path after I graduated from</p> <p>22 college? I'm just curious how it's relevant to</p> <p>23 your complaint.</p> <p>24 Q. Let's start with, what was your first</p>

Page 18	Page 20
<p>1 job after college? Who did you work for?</p> <p>2 A. I worked for a retail supermarket chain</p> <p>3 called Allied Supermarkets.</p> <p>4 Q. How long did you work for them,</p> <p>5 approximately?</p> <p>6 A. Less than a year.</p> <p>7 Q. What was the next job you had after</p> <p>8 that?</p> <p>9 MR. NOURSE: Are you asking for his</p> <p>10 utility background, or you just want to know his</p> <p>11 life story?</p> <p>12 MR. KELLER: I'm trying to find out what</p> <p>13 employment history he has had up to this point</p> <p>14 which may contribute to his knowledge at this</p> <p>15 time.</p> <p>16 MR. NOURSE: So you're asking about his</p> <p>17 utility background?</p> <p>18 MR. KELLER: I don't know what other</p> <p>19 background he has. I mean, we all bring our</p> <p>20 life experiences.</p> <p>21 Q. If you could just run me through briefly</p> <p>22 the other employment you had before you started</p> <p>23 working for a utility.</p> <p>24 A. After the retail experience, I worked</p>	<p>1 Texas, moved to -- took another position with a</p> <p>2 company in Tulsa, Oklahoma. And then I</p> <p>3 relocated back to Dallas, Texas.</p> <p>4 Q. Were you in internal audit all that</p> <p>5 period of time?</p> <p>6 A. No.</p> <p>7 Q. After you left internal auditing, what</p> <p>8 area of the company did you go into?</p> <p>9 A. I went to corporate services.</p> <p>10 Q. What does that mean? What do corporate</p> <p>11 services do?</p> <p>12 A. It ran the facilities and other major</p> <p>13 components of the operations. When I say major,</p> <p>14 it was the corporate kind of facilities. So we</p> <p>15 had buildings and fleet and --</p> <p>16 Q. Okay. How long were you doing the</p> <p>17 corporate services work?</p> <p>18 A. I don't recall. It wasn't very long.</p> <p>19 Q. After that, what area of the business</p> <p>20 did you go into?</p> <p>21 A. I went into pricing.</p> <p>22 Q. Pricing for electricity?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And how long did you work in that</p>
Page 19	Page 21
<p>1 for an oil and gas -- two oil and gas companies,</p> <p>2 and then I came over to the electric utility</p> <p>3 industry.</p> <p>4 Q. Okay. What type of work were you doing</p> <p>5 for the oil and gas companies?</p> <p>6 A. Financial work. I was an internal</p> <p>7 auditor.</p> <p>8 Q. When did you first start in the electric</p> <p>9 utility industry?</p> <p>10 A. 1985.</p> <p>11 Q. What was the first position you had in</p> <p>12 the electric industry?</p> <p>13 A. I don't recall the specific title, but</p> <p>14 it was internal audit work.</p> <p>15 Q. What company was that with?</p> <p>16 A. Central and Southwest Corporation.</p> <p>17 Q. How long did you work for that company?</p> <p>18 A. Up until American Electric Power merged</p> <p>19 with Central and Southwest, and I'm thinking it</p> <p>20 was around 2000.</p> <p>21 Q. Okay. What city were you working out of</p> <p>22 when you worked for that company before the</p> <p>23 merger?</p> <p>24 A. I moved around. I started in Dallas,</p>	<p>1 area?</p> <p>2 A. Two years.</p> <p>3 Q. And after that, what area did you go</p> <p>4 into?</p> <p>5 A. Regulatory services.</p> <p>6 Q. I assume that's interaction with the</p> <p>7 various governmental regulators.</p> <p>8 A. Well, when I started in regulatory</p> <p>9 service, I did not have any direct interaction</p> <p>10 with the utility regulators. I was more in the</p> <p>11 administrative aspects of regulatory.</p> <p>12 Q. Okay. How long did you have that</p> <p>13 position?</p> <p>14 A. About four years.</p> <p>15 Q. At the end of that four years,</p> <p>16 approximately what year does that take us to?</p> <p>17 A. About 2003.</p> <p>18 Q. And then after that?</p> <p>19 A. I was asked to move to Columbus, Ohio to</p> <p>20 take over the regulatory function for Columbus</p> <p>21 Southern Power Company and Ohio Power Company.</p> <p>22 Q. And at that point, you began to interact</p> <p>23 with the PUCO on behalf of both of those</p> <p>24 companies; is that correct?</p>

<p style="text-align: right;">Page 22</p> <p>1 A. That is correct. 2 Q. How long did you have that position? 3 A. My title changed, but I was in that 4 position, in that capacity, from 2003 until the 5 end of 2012. 6 Q. What position did you take beginning in 7 2013? 8 A. Vice president, distribution operations. 9 Q. So you took over the position that 10 Mr. Kirkpatrick had in the summer of 2012; is 11 that correct? 12 A. That is correct. 13 Q. You mentioned earlier that after the 14 storm, the company followed its restoration 15 plan. What do you mean by its restoration plan? 16 A. I don't understand the question. 17 Q. Do you recall saying that in order to 18 prioritize the outage recovery work, that AEP 19 people followed its restoration plan? 20 A. The emergency restoration plan, correct. 21 Q. Tell me what the emergency restoration 22 plan is. Is that a set of papers, or is it a 23 general understanding, is it something announced 24 by the PUCO? I mean, what is the emergency</p>	<p style="text-align: right;">Page 24</p> <p>1 wanted to find out about that plan at that 2 period of time, who would you go to today? 3 A. Depending on what aspect of the plan I 4 was interested in. 5 Q. Assume it was prioritizing the 6 restoration service. 7 A. I generally know that aspect of it. I 8 don't know if I'd go to anybody for that. 9 Q. Okay. If you wanted to physically get 10 your hands on the emergency restoration plan for 11 Ohio Power Company as it existed in June and 12 July of 2006, where would you go to find that 13 document? 14 A. I don't know. 15 Q. Is there, like, a company librarian, 16 somebody that functions in that purpose? 17 A. I don't know. 18 Q. Is the restoration under the authority 19 of the vice president of distribution and 20 operations? 21 A. I can't tell you that with any 22 certainty. 23 Q. But you said back in the summer of 2012, 24 it was under the responsibility of</p>
<p style="text-align: right;">Page 23</p> <p>1 restoration plan? 2 A. It's an operational plan to bring 3 customers who have been outaged, typically from 4 a major event -- weather event, back in service 5 as safely and as quickly as possible. 6 Q. Before getting into the substance of 7 that plan, let's just talk about the mechanical 8 aspects of it. Is this something that's a 9 written document? 10 A. I believe it is a written document. 11 Q. And is it called or understood to be 12 referred to as the emergency restoration plan? 13 A. I don't know. 14 Q. Is that what you refer to it as? 15 A. Yes. 16 Q. Would there be a separate one for Ohio 17 Power Company versus AEP, or is it an AEP-wide 18 plan? 19 A. Keep in mind, at the time you were -- 20 that goes back to your complaint from the major 21 derecho event, I was in a different position, 22 and I'm just not that familiar with the details 23 of that plan. 24 Q. Okay. Who at the current -- if you</p>	<p style="text-align: right;">Page 25</p> <p>1 Mr. Kirkpatrick, that was your understanding? 2 A. He has -- that position had distribution 3 operations. 4 Q. But you also said that you understood he 5 was in charge of the restoration. 6 A. That's correct. 7 Q. So you currently are in charge of 8 restoration, since you have that same position, 9 correct? 10 A. Today, I am. 11 Q. Yes. 12 So the fulfillment of the emergency 13 restoration plan comes under your current 14 responsibility? 15 A. My organization has responsibility for 16 the restoration efforts. 17 Q. But you're saying you don't know where 18 you could get your hands on the emergency 19 restoration plan document today? 20 A. As I'm sitting here this moment, I do 21 not. 22 Q. If you wanted to find that, who would 23 you ask within your organization? 24 A. I would start with my people that report</p>

<p style="text-align: right;">Page 26</p> <p>1 to me.</p> <p>2 Q. Anybody in particular?</p> <p>3 A. No.</p> <p>4 Q. What is your familiarity with the</p> <p>5 emergency restoration plan as it existed in the</p> <p>6 June and July time period in 2012?</p> <p>7 A. I'm familiar with it enough that I know</p> <p>8 it is a -- it follows the Public Utilities</p> <p>9 Commission's guidelines on restoration in</p> <p>10 general. It has a prioritization of how we</p> <p>11 prioritize the restoration efforts. My</p> <p>12 familiarity is from discussions during events --</p> <p>13 major events, depending on what I may be</p> <p>14 involved in.</p> <p>15 Q. Have you ever seen this emergency</p> <p>16 restoration plan document?</p> <p>17 A. I have.</p> <p>18 Q. Approximately how thick is it, or how</p> <p>19 many pages would you estimate it covers?</p> <p>20 A. I don't know.</p> <p>21 Q. More than one?</p> <p>22 A. More than one page?</p> <p>23 Q. Yes.</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 those types of essential services?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. And then the next level, general, would</p> <p>5 be all other customers that -- the</p> <p>6 prioritization would be the facilities that</p> <p>7 would bring the largest number of customers back</p> <p>8 on, into service, from a repair. And it starts</p> <p>9 from highest number of customers being restored,</p> <p>10 down to the lowest level, which could be</p> <p>11 streetlights.</p> <p>12 Q. What about reopening public roads, is</p> <p>13 that a factor?</p> <p>14 A. I'm not familiar with that part.</p> <p>15 Q. Who within AEP would know that?</p> <p>16 A. I don't know.</p> <p>17 Q. Would it seem sensible to you that doing</p> <p>18 a repair that would reopen a public road would</p> <p>19 be a factor in prioritizing the work?</p> <p>20 MR. NOURSE: Objection. Are you asking</p> <p>21 about the service restoration plan still, or are</p> <p>22 you just asking a general question? I don't</p> <p>23 understand.</p> <p>24 MR. KELLER: I guess I'm asking both</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. More than a hundred pages, would you</p> <p>2 estimate?</p> <p>3 A. I don't think so, but I'm not sure.</p> <p>4 Q. Okay. What does that plan provide as to</p> <p>5 how restoration projects are prioritized?</p> <p>6 A. It's a general guideline on the</p> <p>7 prioritization. Is that what you just asked me?</p> <p>8 Q. I'm trying to figure out what that plan</p> <p>9 says as to how prioritization occurs.</p> <p>10 A. I see.</p> <p>11 Q. What are the factors that go into</p> <p>12 prioritizing the restoration? I mean --</p> <p>13 A. Sure.</p> <p>14 Q. -- I've never seen it, so you have to</p> <p>15 tell me what it says.</p> <p>16 A. Generally, my understanding -- again,</p> <p>17 this is from when I was in regulatory, at the</p> <p>18 time of the storm -- the highest priority is</p> <p>19 hazardous conditions, such as a wire down that's</p> <p>20 energized.</p> <p>21 Q. Okay.</p> <p>22 A. A next broad category I would place the</p> <p>23 priorities on is essential services.</p> <p>24 Q. Such as hospitals, fire departments,</p>	<p style="text-align: right;">Page 29</p> <p>1 since I haven't seen that document.</p> <p>2 MR. NOURSE: Could you rephrase it?</p> <p>3 BY MR. KELLER:</p> <p>4 Q. So you don't know whether the emergency</p> <p>5 restoration plan has as a factor to go into that</p> <p>6 analysis the reopening of public roads, is that</p> <p>7 what you're telling me?</p> <p>8 A. As vice president of regulatory and</p> <p>9 finance at the time, I had no dealings with any</p> <p>10 of that.</p> <p>11 Q. What about today, do you know whether</p> <p>12 that's a factor in the plan today?</p> <p>13 A. I do not.</p> <p>14 Q. Do you feel that that should be a factor</p> <p>15 used to analyze the prioritization of repairs?</p> <p>16 MR. NOURSE: I'd object. That's not</p> <p>17 relevant. His opinion on what it should say is</p> <p>18 not relevant.</p> <p>19 Q. The way this works is the lawyers make</p> <p>20 objections, but unless he specifically tells you</p> <p>21 not to answer --</p> <p>22 MR. NOURSE: He understands that, but</p> <p>23 you can't -- if he doesn't have an opinion, then</p> <p>24 he doesn't have an opinion. So he can answer if</p>

Page 30	Page 32
<p>1 he wants to. If he doesn't have an opinion, he 2 can state that. 3 Q. Do you have an opinion on that? 4 A. I don't. 5 THE WITNESS: Mr. Keller, earlier you 6 offered me a break if I needed one. 7 MR. KELLER: Any time you need a break, 8 go ahead. 9 THE WITNESS: I'd like to take a quick 10 break. 11 MR. KELLER: Please. 12 THE WITNESS: Thank you. 13 (Recess taken.) 14 BY MR. KELLER: 15 Q. Does Ohio Power have a vegetation 16 control policy? 17 A. I don't know. 18 Q. Let me ask you this: Does the -- is 19 Ohio Power required to have -- to obtain PUCO 20 approval for a vegetation control procedure or 21 policy? 22 A. I'm not sure whether Ohio Power has to 23 have PUCO approval, but the PUCO is very 24 familiar and monitors our vegetation control</p>	<p>1 that question, who in your company would you 2 ask? 3 A. I would go to my old regulatory services 4 group to find out. 5 Q. Can you give me the name of that 6 group -- or the head of that group currently? 7 A. Well, that position has not been filled 8 yet since I moved over. It's vacant right now. 9 Q. Who is the number two person in that 10 group? 11 A. Well, I don't know there is a number 12 two. We're a very small group. There are a 13 handful, four or five people, in that group. I 14 would just go find one of them to ask them. 15 Q. Give me the names of a couple people in 16 that group. 17 A. Michelle Jeunelot, Andrea Moore. 18 Q. Could you spell Ms. Jeunelot's last 19 name? 20 A. You ask me only the difficult names to 21 spell. J-e-u-n-e-l-o-t, I think. 22 MR. NOURSE: That's close. 23 THE WITNESS: That's not correct? 24 MR. NOURSE: I don't know. That's</p>
Page 31	Page 33
<p>1 practices. 2 Q. Is there a written vegetation control 3 policy document or practices document at Ohio 4 Power Company? 5 A. I don't know. 6 Q. Who would know that? 7 A. I don't know that, either. 8 Q. I thought you were the guy in charge of 9 the regulatory affairs for Ohio Power in Ohio. 10 A. For regulatory affairs, yes. 11 Q. But that would not include PUCO 12 oversight over your vegetation control 13 practices? 14 A. That's correct. As I said earlier, they 15 do -- they're familiar with our program and our 16 plan. We have ongoing discussions with them. 17 They monitor very closely. 18 Q. What I'm trying to find out is whether 19 you're aware whether there is a written plan or 20 policy or practice document which has been given 21 to the PUCO at some point in time. 22 A. And that's what I'm not sure. I don't 23 know. 24 Q. If you wanted to find out the answer to</p>	<p>1 either right or close. 2 A. Do you want me to spell Moore? 3 Q. If you have other names in that group. 4 A. That's an easy one, M-o-o-r-e. 5 Q. Does Ohio Power Company submit periodic 6 reports to the PUCO about compliance with its 7 regulatory -- excuse me, its vegetation control 8 practices? 9 A. Yes. 10 Q. How often are those reports filed? 11 A. I think they're done annually. 12 Q. What are they called? What's the report 13 called that's filed, or is it on a form number, 14 or how do you identify it? 15 A. I don't know those details. 16 Q. When you were in charge of that 17 department, did you have any responsibility for 18 the filing of those forms? 19 A. My group had responsibility for that 20 reporting, for all of the administrative 21 reporting. 22 Q. I assume that you were involved in 23 discussions concerning those reports. 24 A. I only got involved if there were</p>

<p style="text-align: right;">Page 34</p> <p>1 questions that the PUCO staff may have come to 2 me specifically for. They could have gone 3 directly to my staff. So, no, not everything 4 was funneled through me. 5 Q. Generally what were those reports 6 referred to as? What were they called? 7 A. In my words, I would describe them as 8 the administrative reporting reports related to 9 our actual versus plan results. 10 Q. For vegetation control? 11 A. For vegetation control. 12 Q. Okay. Thank you very much. 13 Was there one person over the last 14 couple of years at the PUCO who focused on those 15 types of reports with respect to Ohio Power? 16 A. I don't know if there was one person. 17 Q. Can you give me the names of some people 18 that you've discussed vegetation reports with at 19 the PUCO over the last couple of years? 20 A. I don't recall specifically discussing 21 the reports, but the vegetation plan in general, 22 during the year, there may have been discussions 23 that took place, would have been head of the 24 group that I can think of, his name is John</p>	<p style="text-align: right;">Page 36</p> <p>1 A. In my capacity as vice president of 2 regulatory and finance, I had conversations with 3 the commission staff about an overall -- about 4 overall objectives on vegetation clearing. 5 Q. How would you describe the company's 6 overall goals with respect to that issue? 7 A. Well, it was -- it has been centered 8 over the last few years around an agreement we 9 have with the PUCO. 10 Q. What's the nature of that agreement, 11 sir? 12 A. The agreement Ohio Power Company or AEP 13 Ohio has with the PUCO is that we have an 14 objective to get to do vegetation clearing on 15 circuits -- electric circuits -- on a cycle 16 basis. 17 Q. So that every X number of years, you 18 would address each circuit? 19 A. Yeah, I would describe it as generally 20 the plan is that we would do end-to-end review 21 and clearing of a circuit within a four-year 22 cycle. 23 Q. Is that agreement a written agreement 24 between your companies and the PUCO?</p>
<p style="text-align: right;">Page 35</p> <p>1 Williams. 2 Q. And which group would that have been? 3 A. I think they're called service 4 monitoring and enforcement division. 5 Q. Can you describe the Ohio Power 6 vegetation control plan? 7 MR. NOURSE: I'd object. I think he 8 said earlier he didn't know if there was a 9 written plan, if that's what you're asking 10 about. 11 MR. KELLER: Now I'm talking about the 12 substance of it. 13 A. I mean, vegetation control is a broad 14 subject. Is there something specific you want 15 to ask me about? 16 Q. Tree trimming and removal. 17 A. That's a pretty broad subject. 18 Q. You know more about it than I do, so -- 19 A. I'm not sure, so if you can ask me 20 something more specific, I'll be able to tell 21 you if I do. 22 Q. I'm trying to find out what the plan is. 23 I mean, does that plan set forth the company's 24 goals as far as trimming trees, removing trees?</p>	<p style="text-align: right;">Page 37</p> <p>1 A. I don't know if I would call it -- when 2 I think of agreement, I think of a contract, and 3 I don't recall it being a contract. But that's 4 a -- it's an agreement in principle around 5 funding for the costs associated with the 6 program and the performance against the 7 actual -- you know, how much progress we make in 8 a given year. 9 Q. But there is a -- what you referred to 10 as the agreement, regardless of its legal 11 effect, that is a written document that exists 12 someplace? 13 A. I don't know if it's a written document. 14 I really don't know that. 15 Q. Okay. Who in the company would know 16 that? 17 A. Perhaps our legal folks, legal 18 department. 19 Q. Who is the -- vegetation control, does 20 that activity come under the vice president of 21 distribution and operations? 22 A. At the highest level, yes. 23 Q. Can you expand upon that answer? 24 A. Well, there are employees within</p>

<p style="text-align: right;">Page 38</p> <p>1 distribution operations that execute on the 2 vegetation program. 3 Q. So the vegetation program activities are 4 underneath the vice president of distribution 5 operations, organizationally; is that correct? 6 A. I believe that's correct. 7 Q. And is there a -- I don't imagine that 8 you are the person currently who is primarily in 9 charge of implementing that vegetation control 10 plan. Am I correct on that, that there are 11 people below you who have more involvement in 12 that than you do? 13 A. That's correct. 14 Q. And who would you say within the company 15 is most knowledgeable of the company's 16 vegetation control plan? 17 A. I would expect it's managers over that 18 area. 19 Q. How many managers would there be? 20 A. I don't know. 21 Q. Approximately? 22 A. It's not a large number. I would guess 23 one or two. 24 Q. And who would those managers report to?</p>	<p style="text-align: right;">Page 40</p> <p>1 in the distribution support function? 2 A. I think so. 3 Q. Do you know how long he has held that 4 position? 5 A. Austin has just started that position. 6 Q. Do you know who held that position in 7 2012? 8 A. I'm getting outside my knowledge of what 9 happened during 2012. I was in a totally 10 different position, and we've had some changes 11 that took place late in 2012 and early into 2013 12 that I don't know. 13 Q. So you don't know who held that position 14 in 2012? 15 A. Well, I know there was a gentleman that 16 retired, but I'm not sure he had vegetation 17 control. That may have been -- there was a 18 position eliminated, there was a person that 19 retired, there was some consolidation, so it 20 gets complicated, and I don't know the answer. 21 Q. What's the name of the person who 22 retired that you were thinking of? 23 A. Tom Lukowski. You're going to ask me to 24 spell Lukowski.</p>
<p style="text-align: right;">Page 39</p> <p>1 A. When I say manager, I would use that 2 term generally speaking, perhaps their 3 supervisors. I don't know. 4 Q. Sure. That may not be their job 5 title -- 6 A. Correct. 7 Q. -- but they are managing that activity. 8 Who would they report to? 9 A. I believe they report to a manager that 10 reports to me. 11 Q. So if there are two or three of the 12 managers or supervisors, they report to one 13 individual who then reports to you, is that the 14 way it works? 15 A. I believe that's correct. 16 Q. And who is that one individual 17 currently? 18 A. Austin McMillion. 19 Q. Can you spell his last name? 20 A. M-c-M-i-l-l-i-o-n. 21 Q. What is his job title? 22 A. I think it's manager of distribution 23 support. 24 Q. And vegetation control would be included</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Yes. 2 A. L-u-k-o-w-s-k-i, I think. 3 Q. Thank you. 4 Are you familiar with the reports -- 5 strike that. 6 To your knowledge, when was the last 7 report filed by Ohio Power with the PUCO, 8 detailing your progress toward meeting the 9 vegetation control goal? 10 A. I don't know. 11 Q. Has there been one filed since you took 12 on your current position? 13 A. I don't know. 14 Q. Who would know that at the company? 15 A. Someone in the regulatory group. 16 Q. The people you mentioned earlier? 17 A. Correct. 18 Q. What is your personal knowledge of the 19 circumstances involved in this particular 20 complaint? 21 A. I'm aware of the complaint. 22 Q. Do you have any -- let me ask you this: 23 Did you have any personal involvement in 24 decisions on how to deal with vegetation in the</p>

<p style="text-align: right;">Page 42</p> <p>1 area subject to this complaint before the storm 2 in June 2012? 3 A. No. 4 Q. Did you have any personal involvement in 5 determining when the repair of that outage would 6 occur? 7 A. No. 8 Q. Do you know who made decisions in June 9 or July 2012 about when that outage would be 10 repaired? 11 A. No. 12 Q. Do you know what factors went into 13 prioritizing repair of that particular outage? 14 A. I shared with you my knowledge of 15 prioritization of outage restorations earlier. 16 Q. Generally speaking, but -- 17 A. Correct. 18 Q. -- do you have any personal knowledge as 19 tot factors that went into prioritizing the 20 repair of this particular outage? 21 A. The factors I shared with you earlier 22 are what I understand as being the 23 prioritization of restoration efforts. And 24 beyond that, I don't have any knowledge of</p>	<p style="text-align: right;">Page 44</p> <p>1 A. I would agree that the terrain is -- has 2 got a lot of trees in it. It is a very 3 challenging terrain around that area. 4 Q. If this complaint goes to trial or 5 affidavits are required, do you expect to 6 provide testimony? 7 A. I don't know. 8 Q. Do you have any idea as to what you 9 might be expected to provide testimony about? 10 A. I don't know. 11 Q. Am I correct that you were not -- your 12 position in June and July 2012 was in regulatory 13 and finance for Ohio Power Company? 14 THE WITNESS: Would you please repeat 15 the question? 16 (Record read as requested.) 17 A. That is correct. 18 Q. So at that time, you were not directly 19 involved in efforts to prioritize or restore 20 power outage, correct? 21 A. That is correct. 22 Q. And similarly, in 2012, you were not 23 involved directly in vegetation control 24 practices for the company, correct?</p>
<p style="text-align: right;">Page 43</p> <p>1 specific outages. 2 Q. So you don't know what factors beyond 3 the ones you mentioned earlier went into 4 prioritizing the repair of this particular 5 outage? 6 A. Oh, no. I was in regulatory and finance 7 at that time. 8 Q. Who have you discussed this complaint 9 with and the issues involved in this complaint, 10 beyond your lawyers? 11 A. Nobody. 12 Q. Were you ever out at the area of this 13 outage during the outage? 14 A. No. 15 Q. How often do you travel 315? You know 16 where State Route 315 is, I assume. 17 A. Yes. 18 Q. How often do you travel the section of 19 315, south of Powell Road? 20 A. Three or four times a year. 21 Q. It's not a part of your normal travels? 22 A. No. 23 Q. You would agree that that's a heavily 24 wooded, treed area?</p>	<p style="text-align: right;">Page 45</p> <p>1 A. That is correct. 2 Q. Approximately how many customers does 3 Ohio Power Company have currently? 4 A. I think it's about, approximately, 1.4 5 million customers. 6 Q. 1.4 million, is that what you said? 7 A. I think that's correct. 8 Q. And when was the Ohio Power/Columbus 9 Southern combination, when did that occur, 10 approximately? 11 A. I think the merger was closed in 12 December of 2011. 13 Q. Do you know how many employees Ohio 14 Power Company has? 15 A. I don't. 16 Q. How many people work under your area 17 currently? 18 A. Approximately 1,300. 19 Q. And -- strike that. 20 --0-- 21 (Exhibit 5 marked.) 22 --0-- 23 BY MR. KELLER: 24 Q. Handing you what's marked as Exhibit 5,</p>

Page 46	Page 48
<p>1 can you identify that document, please. 2 MR. NOURSE: Do you have another copy? 3 MR. KELLER: I just have these two. 4 MR. NOURSE: Okay. 5 MR. KELLER: I believe your colleague 6 has a copy. 7 MR. NOURSE: Can you represent what this 8 is -- where you obtained this? 9 MR. KELLER: It is Bates stamped as 10 three pages produced by AEP. 11 MR. NOURSE: Thank you. 12 BY MR. KELLER: 13 Q. Are you familiar with this three-page 14 document? 15 A. I am not. 16 Q. Okay. Earlier, you referred to an 17 emergency restoration plan. Do you recall that? 18 A. Correct. 19 Q. Am I correct that this three-page 20 document is not that emergency restoration plan? 21 A. I don't know. It could be part of the 22 restoration plan. I'm just not familiar with 23 these pages. 24 Q. But am I correct that you think the</p>	<p>1 circuit? 2 A. No. 3 Q. Okay. So you personally could not tell 4 whether there are devices on that circuit which 5 would allow, for example, power to be restored 6 to part of the circuit but not all of the 7 circuit? 8 THE WITNESS: Can you repeat the 9 question? 10 Q. Let me try that again. I'm expressing 11 my ignorance of your business, so I'm trying to 12 get educated through you. 13 Can you tell from Exhibit 1 whether 14 there is any device on the circuit which would 15 allow power to be restored to a portion of the 16 circuit without having power restored to the 17 entire circuit? 18 A. No, I could not. 19 Q. Okay. Thank you. 20 --0-- 21 (Exhibit 6 marked.) 22 --0-- 23 BY MR. KELLER: 24 Q. Handing you a report published relating</p>
Page 47	Page 49
<p>1 emergency restoration plan is -- contains more 2 pages than this three-page document? 3 A. Oh, I agree. 4 Q. Okay. I'm handing you what was marked 5 yesterday as Exhibit 2. 6 MR. NOURSE: For the Lajeunesse 7 deposition, correct? 8 MR. KELLER: Yes. 9 Q. Are you familiar with that document? 10 (Pause in proceedings.) 11 A. I'm not familiar with this document. 12 Q. Handing you what was marked as Exhibit 1 13 yesterday in the deposition, are you familiar 14 with that type of document? 15 A. I think this is what I would call a 16 one-line circuit layout, but I'm not familiar 17 with this document. 18 Q. So you recognize the type of document it 19 is, but you're not familiar with that particular 20 document? 21 A. That's correct. 22 Q. Can you interpret a document of that 23 sort to tell where there are -- what types of 24 facilities are located at what part on the</p>	<p>1 to a PUCO filing. Are you familiar with the 2 subject of this report? This is Exhibit 6. 3 MR. NOURSE: When you say report, you're 4 talking about a news report, news -- 5 MR. KELLER: This is a news publication 6 that came out, talking about an AEP request 7 filed at the PUCO. 8 MR. NOURSE: Okay. 9 BY MR. KELLER: 10 Q. And I'm asking whether you're familiar 11 with that AEP request. 12 A. I'm aware that Ohio Power Company has 13 requested a cost recovery. 14 Q. And is that request within your area 15 of -- is that included -- is the regulatory 16 affairs department within -- under your control 17 currently? 18 A. No. 19 Q. It's not? Who is the vice president 20 over regulatory affairs? 21 A. That position is currently vacant. 22 Q. I know, but what's it called? 23 A. Vice president of regulatory and 24 finance.</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. Okay. In the third -- but you're</p> <p>2 generally familiar with the request discussed in</p> <p>3 this article, Exhibit 6, correct?</p> <p>4 A. Generally, yes.</p> <p>5 Q. Okay. And in the third paragraph, if</p> <p>6 you look at that, it indicates the amount of</p> <p>7 damage that AEP customers and property --</p> <p>8 A. I'm sorry. Let me catch up with you.</p> <p>9 Third paragraph starting from the top, or --</p> <p>10 Q. No, of this article.</p> <p>11 A. Okay.</p> <p>12 Q. It mentions the amount of damage that</p> <p>13 AEP customers and properties sustained during</p> <p>14 the storms. I assume that AEP suffered damage</p> <p>15 during the storm, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And this indicates that AEP understands</p> <p>18 that its customers also suffered damage during</p> <p>19 the storm, correct?</p> <p>20 MR. NOURSE: Are you asking whether</p> <p>21 suffered damages equals knocked-out power? Is</p> <p>22 that what --</p> <p>23 MR. KELLER: Suffered damages as a</p> <p>24 result of power outages.</p>	<p style="text-align: right;">Page 52</p> <p>1 article, Exhibit 6, includes a request that the</p> <p>2 customers be compensated for the damage they</p> <p>3 incurred as a result of those power outages?</p> <p>4 A. I have no knowledge.</p> <p>5 Q. Whether or not it does?</p> <p>6 A. That's correct.</p> <p>7 Q. Who would know that?</p> <p>8 A. I wouldn't expect it does, but I</p> <p>9 would -- you would need to check with the legal</p> <p>10 department.</p> <p>11 Q. Or the regulatory affairs department.</p> <p>12 A. Okay.</p> <p>13 Q. Would that filing have been made by the</p> <p>14 regulatory affairs department that you discussed</p> <p>15 earlier?</p> <p>16 A. They would have been involved in it,</p> <p>17 yes.</p> <p>18 Q. I believe you said earlier that the</p> <p>19 actual storm restoration activities would come</p> <p>20 under the vice president of distribution and</p> <p>21 operations.</p> <p>22 A. The overall responsibility would come to</p> <p>23 the top of the vice president of distribution</p> <p>24 and operations and the president and chief</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I don't know if I'm reading anything</p> <p>2 into this third paragraph other than what it</p> <p>3 says.</p> <p>4 Q. Well, you understand, do you not, that</p> <p>5 AEP customers suffered damage as a result of</p> <p>6 power outages during the storm, correct?</p> <p>7 A. I know AEP's customers were</p> <p>8 inconvenienced when our facilities were</p> <p>9 destroyed as a result of the event.</p> <p>10 Q. At least some of those customers</p> <p>11 suffered damages in terms of their food spoiled,</p> <p>12 correct?</p> <p>13 A. I would expect that is correct.</p> <p>14 Q. Okay. Do you know whether the filing</p> <p>15 made by AEP requesting cost recovery is broad</p> <p>16 enough to compensate your customers for damages</p> <p>17 they may have incurred as a result of those</p> <p>18 power outages?</p> <p>19 A. In my role as vice president of</p> <p>20 regulatory and finance, my dealings were -- in</p> <p>21 the past have been very specific to company</p> <p>22 facilities.</p> <p>23 Q. My question is: Do you know whether the</p> <p>24 request for cost recovery described in the</p>	<p style="text-align: right;">Page 53</p> <p>1 operating officer.</p> <p>2 Q. Right. But you're the vice president.</p> <p>3 That activity falls within your general</p> <p>4 governance, correct?</p> <p>5 MR. NOURSE: Again, I'll object. He's</p> <p>6 here because of his role last summer, not</p> <p>7 because of his current role. So he can answer</p> <p>8 general questions, but we're not offering him as</p> <p>9 a witness to talk about his current job and</p> <p>10 future storms or whatever you want to get into.</p> <p>11 MR. KELLER: Okay. I was not aware of</p> <p>12 that.</p> <p>13 Q. Just organizationally, if you look at</p> <p>14 the company's organization chart -- I assume</p> <p>15 companies still have organization charts,</p> <p>16 correct?</p> <p>17 A. (Nods head.)</p> <p>18 Q. You understand what I mean by</p> <p>19 organization chart?</p> <p>20 A. I do.</p> <p>21 Q. The restoration work to get power</p> <p>22 restored after a storm comes under your vice</p> <p>23 presidency, correct, currently?</p> <p>24 A. Today, if there was a major event, I</p>

<p style="text-align: right;">Page 54</p> <p>1 would be responsible for that, yes.</p> <p>2 Q. Okay. And within that responsibility</p> <p>3 comes the responsibility to prioritize the</p> <p>4 restoration work, correct?</p> <p>5 A. Following the restoration plan and the</p> <p>6 prioritization I set forth earlier.</p> <p>7 Q. Right.</p> <p>8 Do you understand that there is some</p> <p>9 discretion as to if there are two outages which</p> <p>10 are similarly situated, have similar facts, that</p> <p>11 somebody has to make a decision whether you do</p> <p>12 number one first or number two first?</p> <p>13 A. Was there a question in there? Maybe I</p> <p>14 need to have it read back.</p> <p>15 Q. Am I correct that if there are two</p> <p>16 similarly situated outages, that somebody has to</p> <p>17 make a decision whether you repair number one</p> <p>18 first or number two first?</p> <p>19 MR. NOURSE: Does that question assume</p> <p>20 that there's only one crew that's waiting to be</p> <p>21 directed to repair work?</p> <p>22 Q. Let me ask it this way: How are</p> <p>23 decisions made as to which outage gets addressed</p> <p>24 in which priority? Is all the data fed into a</p>	<p style="text-align: right;">Page 56</p> <p>1 do in the summer of 2012 that has relevance to</p> <p>2 the complaint currently pending at the PUCO,</p> <p>3 filed by my wife and I? What could you testify</p> <p>4 about that has -- in your view, has relevance to</p> <p>5 that complaint?</p> <p>6 MR. NOURSE: I'll just direct him to</p> <p>7 respond to his -- based on his general</p> <p>8 understanding and not based on conversations</p> <p>9 that we've had about potential areas of</p> <p>10 testimony because there's no decision made on</p> <p>11 that at this time.</p> <p>12 A. In my position as vice president of</p> <p>13 regulatory and finance, I had overall</p> <p>14 responsibility to work with the PUCO on tariffs,</p> <p>15 terms and conditions, general expectations on</p> <p>16 our service reliability. The administrative</p> <p>17 reporting that we do to the Public Utility</p> <p>18 Commission on whatever frequency the rules may</p> <p>19 require related to overall system performance</p> <p>20 and reliability, reporting of how our</p> <p>21 distribution system performed, including things</p> <p>22 you asked about on vegetation programs, our</p> <p>23 following of the programs. And we've worked</p> <p>24 with the commission staff on that. The terms</p>
<p style="text-align: right;">Page 55</p> <p>1 computer and the computer spits out the list of</p> <p>2 priorities, or is this done manually by</p> <p>3 somebody, or do you know how those decisions are</p> <p>4 physically made?</p> <p>5 A. At the time of the storm, this derecho,</p> <p>6 I was not involved in those -- in any of that.</p> <p>7 Q. Okay. But if a similar storm hit next</p> <p>8 week, I assume that you have given some thought</p> <p>9 as to how you would respond to that, since</p> <p>10 you're the person who would be organizationally</p> <p>11 in charge, have overall responsibility, correct?</p> <p>12 A. (Nods head.)</p> <p>13 Q. Correct?</p> <p>14 A. What was the correct -- what was the</p> <p>15 question?</p> <p>16 Q. I assume you have given some thought as</p> <p>17 to how the process works.</p> <p>18 MR. NOURSE: Again, I'm going to object</p> <p>19 because, again, you're getting into future</p> <p>20 storms and his current role, which has nothing</p> <p>21 to do with last summer, or your claim, or his</p> <p>22 position during the time period when your claim</p> <p>23 arose.</p> <p>24 Q. Let me follow up on that. What did you</p>	<p style="text-align: right;">Page 57</p> <p>1 and conditions of our electric service does not</p> <p>2 guarantee perfection of reliability, and that</p> <p>3 storms that came through, like the one we're</p> <p>4 discussing in the summer of 2012, was an act of</p> <p>5 God and had nothing -- that was not associated</p> <p>6 with our performance of our system reliability.</p> <p>7 Q. Anything else?</p> <p>8 A. That's just generally speaking.</p> <p>9 --0--</p> <p>10 (Exhibit 7 marked.)</p> <p>11 --0--</p> <p>12 BY MR. KELLER:</p> <p>13 Q. Let me hand you what's marked as</p> <p>14 Exhibit 7. Can you identify that document.</p> <p>15 A. Yep.</p> <p>16 Q. What is Exhibit 7?</p> <p>17 A. This is Ohio Power Company's terms and</p> <p>18 conditions of service.</p> <p>19 Q. And what is your familiarity with this</p> <p>20 document?</p> <p>21 A. I've seen it a few times, had to refer</p> <p>22 to it on occasions dealing with specific</p> <p>23 customer situations.</p> <p>24 Q. And was Exhibit 7 the terms and</p>

<p style="text-align: right;">Page 58</p> <p>1 conditions that would have been applicable in 2 June and July of 2012? 3 A. I'm looking at the bottom of the first 4 page, and it indicates it was issued on December 5 22nd, 2011, effective January 1, 2012. 6 Q. So to the best of your knowledge, this 7 is the document which would have been effective 8 over June and July of 2012? 9 A. It appears so. 10 Q. Would you turn to Section 19 of 11 Exhibit 7. I don't believe the pages are -- I 12 believe it is on Page 16, it looks like. 13 MR. NOURSE: 103-16, yes. 14 A. I'm there. 15 Q. Would you focus on the 16 second-to-the-last paragraph on this page, 17 particularly the first sentence. 18 A. I've read that paragraph. 19 Q. Am I correct that this provides that 20 upon negligent acts by the company or its 21 employees or agents, the company may be liable 22 to a customer for loss of perishable food? 23 MR. NOURSE: I'm going to object because 24 you're asking a legal conclusion. While it may</p>	<p style="text-align: right;">Page 60</p> <p>1 A. I do not have an opinion. 2 Q. Okay. 3 A. Am I done with this document? 4 Q. Yes. 5 --0-- 6 (Exhibit 8 marked.) 7 --0= 8 BY MR. KELLER: 9 Q. Handing you what's marked as Exhibit 8, 10 can you identify that document. 11 A. That's a big document. 12 It's not obvious to me, Mr. Keller, what 13 this document is. 14 Q. Okay. Let me represent to you that this 15 was provided by your company to me as something 16 that indicates -- identifies outages and the 17 number of customers affected by the outages and 18 when they were -- power was restored. 19 A. Okay. 20 Q. Are you familiar with this type of 21 document, I mean, a printout containing that 22 type of information? 23 A. No. 24 Q. No?</p>
<p style="text-align: right;">Page 59</p> <p>1 be guided, in part, by this language, there is 2 other provisions and other principles that 3 apply. 4 With that, you can give your general 5 understanding. 6 MR. KELLER: That's all I'm asking for. 7 MR. NOURSE: Are you asking whether 8 under some circumstance, the company might be 9 responsible for perishable food if -- during an 10 outage? 11 MR. KELLER: Yes. 12 Q. Is that your understanding? 13 A. My interpretation of this paragraph is 14 that only, and only under negligence of the 15 company, would there be a responsibility of the 16 company for the damages. 17 Q. And would that include negligence of the 18 company's contractors? 19 A. I don't know. 20 Q. What would you think? 21 A. I would have to seek legal counsel. 22 Q. So you have no opinion as to whether or 23 not this would include negligence by the 24 company's agents -- I mean, contractors?</p>	<p style="text-align: right;">Page 61</p> <p>1 A. No. 2 Q. You haven't worked with anything that 3 looks like this in your job responsibility? 4 A. No. 5 Q. If you wanted to obtain this type of 6 information, who would you go to at the company? 7 A. I have no idea. 8 Q. Who would you start with? 9 A. I don't know. 10 (Pause in proceedings.) 11 Q. Have you ever had any discussions with 12 Ohio Department of Transportation concerning the 13 outage on State Route 315 during June and July 14 2012? 15 A. No. 16 Q. During the aftermath of the storm in 17 June of 2012, did you have any conversations 18 with ODOT that you recall? 19 A. Not directly. 20 Q. What do you mean, indirectly? 21 A. I said earlier my role as vice president 22 of regulatory and finance during the derecho 23 storm was communications with the PUCO staff and 24 the State EMA. I was present during much of</p>

Page 62	Page 64
<p>1 that event at the EMA, and ODOT was there, along 2 with a lot of other State agencies. 3 Q. Were you in any discussions with ODOT 4 concerning State Route 315? 5 A. No. 6 Q. Were you, at that time, involved in any 7 discussions with ODOT concerning road closures, 8 generally? 9 A. No. 10 Q. Do you recall who from ODOT was present 11 during that storm? 12 A. No. 13 Q. Any of the people? 14 A. I don't. 15 Q. You indicated that you were the person 16 tasked by AEP with interacting with ODOT -- 17 excuse me, with the PUCO. Do you know if there 18 was someone tasked by your company with 19 interacting with ODOT at that time? 20 A. I do not. 21 Q. Who would know that? 22 A. I do not know. 23 Q. Who asked you to fill the function -- 24 fulfill the function that you did fulfill during</p>	<p>1 officials were present, where would those 2 meetings be held? 3 A. I attended meetings at the State EMA. 4 Q. And where is that located? 5 A. I don't know the address. I know how to 6 get there. 7 Q. What road is it off of? 8 MR. NOURSE: Is it 161? 9 A. I think it's 161, yes. 10 Q. West of Linworth? 11 A. West of Sawmill. I don't know where 12 Linworth is. 13 Q. You think it's west of Sawmill? 14 A. I'm not sure. 15 Q. Okay. 16 A. I'm turned around now. 17 Q. South of -- 18 A. In that direction. 19 Q. -- south of 161 in northwestern Ohio? 20 A. South of 270, on 161. I can't recall if 21 it's east or west of Sawmill. 22 Q. Okay. And who told you to go to those 23 meetings? 24 A. Actually, I think it's between Sawmill</p>
Page 63	Page 65
<p>1 that storm aftermath? 2 A. I don't recall anybody asking me to do 3 that. It was part of what I felt was my 4 responsibility as vice president of regulatory 5 and finance and my interaction with the PUCO. 6 Q. Was there like a war room someplace in 7 the aftermath of the storm, where you worked out 8 of it? 9 A. Can you be more specific? 10 Q. Physically, where were you located while 11 you were dealing with the storm aftermath? 12 A. I was a lot of places. 13 Q. Primarily? Was there -- headquarters, I 14 mean, some location, room, building, where 15 people came together to address the storm 16 aftermath? 17 A. We had regular meetings, conference 18 calls, discussions. Our headquarters for Ohio 19 Power Company is in Gahanna, so those kind of 20 discussions typically took place in Gahanna. 21 Q. Were those discussions normally attended 22 by AEP people primarily? 23 A. Yes. 24 Q. What about meetings where other state</p>	<p>1 and 315 on 161. 2 Q. I do, too. I think I know what you're 3 talking about. 4 Who directed you to go to those 5 meetings? 6 A. Nobody directed me to go to those 7 meetings. 8 Q. Who invited you to go to those meetings? 9 A. I'm not sure anybody invited me to go to 10 those meetings. 11 Q. Who else from AEP would normally have 12 been present at those meetings? 13 A. I believe the president/chief operating 14 officer attended at least one with me. 15 Q. When you attended, did you have any 16 staff people with you, any people on your staff? 17 A. No. 18 Q. Do you know an AEP employee by the name 19 of Paul Roahrig, who works at the tech center in 20 Gahanna? 21 A. I think I do. 22 Q. What do you understand his job 23 responsibility is? 24 A. I don't. In fact, I'm not even sure --</p>

<p style="text-align: right;">Page 66</p> <p>1 I said I think I do. You said AEP employee. 2 I'm not even sure the Paul Roahrig I'm thinking 3 of is even an employee. 4 Q. You think he may be -- 5 A. Contractor. 6 Q. What type of contractors work at that 7 location? 8 A. Various kinds of contractors. 9 Q. Including? 10 A. Engineering design, right-of-way. 11 Q. Some of those functions are served by 12 contractors? 13 A. Staff augmented by contractors, yes. 14 Q. Okay. Thank you. 15 What is the goal of AEP or Ohio Power's 16 vegetation control policy? 17 A. I think I stated earlier in my capacity 18 as vice president of regulatory and finance, my 19 knowledge of the vegetation program -- I don't 20 even know if I would call it a policy, but the 21 vegetation program, as I understand it, 22 objective is to provide safe and reliable 23 electric service. And as it specifically 24 relates to vegetation, we're on a program to do</p>	<p style="text-align: right;">Page 68</p> <p>1 A. I think we had a discussion earlier in 2 my deposition related to administrative 3 reporting and that Ohio Power Company does 4 administrative reporting on performance. 5 Q. My question is: Do you know how, in 6 2012, Ohio Power Company compared to other Ohio 7 electric utilities? 8 A. And I said earlier, I do not know. 9 Q. What about 2011, any recollection of 10 that? 11 A. I do not know. 12 Q. You don't know whether your results are 13 better than the other companies, or worse, or 14 right in the middle of the pack; is that what 15 you're telling me? 16 A. Yes, that's what I'm telling you, I do 17 not know. 18 Q. Do you know who at AEP made the decision 19 when the outage affecting my house would be 20 repaired? 21 MR. NOURSE: I thought you asked that 22 earlier and he said he didn't know. 23 Q. Do you know who made that decision? 24 A. Mr. Keller, I don't know. We follow our</p>
<p style="text-align: right;">Page 67</p> <p>1 cycle-based vegetation clearing. 2 Q. How was it done previously? 3 A. I'm not familiar with that aspect of it. 4 Q. Is it your understanding that the PUCO 5 approves the Ohio Power Company vegetation 6 control policy or procedures? 7 A. Yes. 8 Q. How does Ohio Power Company compare with 9 other Ohio utilities with respect to the 10 reliability of its service? 11 MR. NOURSE: For what time period? I 12 object to the form and the subject. It's not 13 relevant to your claim. 14 Q. Let's say for 2012. 15 A. I don't know. 16 Q. There was a reported -- report yesterday 17 of a recent filing at the PUCO dealing with 18 electric utility reliability. Are you not 19 familiar at all that that report was recently 20 filed? 21 MR. NOURSE: Again, I object to the 22 relevance. It has nothing to do with last year 23 or your claim. 24 If you know, you can answer.</p>	<p style="text-align: right;">Page 69</p> <p>1 general operating guidelines on the restoration 2 efforts. I don't know or have any knowledge of 3 decisions being made on specific customers or 4 house-by-house basis. 5 Q. So you don't have that type of 6 information with respect to any of the 7 particular outages that occurred last summer? 8 A. I do not. 9 Q. I may have asked this, but I don't 10 remember your answer. Who would I need to talk 11 to to find out who made decisions as to 12 prioritizing outage repairs in June and July of 13 2012? 14 A. I think you did ask me that question 15 earlier, and my response is the same, that it's 16 the employees of Ohio Power Company and the 17 contractors in which instructions are given to 18 that follow the prioritization of restoration 19 effort, I believe that I've described -- that 20 I've discussed earlier. 21 Q. I'm looking for the name of an 22 individual or position within your company who 23 would have made those decisions. 24 A. I don't know if anybody makes a specific</p>

<p style="text-align: right;">Page 70</p> <p>1 decision.</p> <p>2 Q. Well, certainly somebody tells a</p> <p>3 contractor where to go at what point in time,</p> <p>4 don't they?</p> <p>5 MR. NOURSE: Are you saying that -- are</p> <p>6 you asking about the decision to follow the</p> <p>7 policy, or do you believe there is some</p> <p>8 discretionary decision that involved your house?</p> <p>9 MR. KELLER: Both. I think there's --</p> <p>10 MR. NOURSE: It's unclear what you're</p> <p>11 asking.</p> <p>12 MR. KELLER: Somebody had to make a</p> <p>13 decision when to send trucks out to repair this</p> <p>14 particular outage. I'm trying to find out who</p> <p>15 that would be.</p> <p>16 Q. And I'm asking you if you know who I</p> <p>17 would inquire from to --</p> <p>18 A. I don't know.</p> <p>19 Q. Again, what department would be</p> <p>20 responsible for making those prioritization</p> <p>21 decisions in responding to a power outage?</p> <p>22 MR. NOURSE: I would just, again, object</p> <p>23 to your characterization of prioritization</p> <p>24 decisions. It is unclear what you're referring</p>	<p style="text-align: right;">Page 72</p> <p>1 A. The entire organization of 1,300 people</p> <p>2 is not -- my expectation that the entire</p> <p>3 organization of 1,300 people would follow the</p> <p>4 service restoration plan that we've been</p> <p>5 discussing --</p> <p>6 Q. Okay.</p> <p>7 A. -- and use the prioritization that I've</p> <p>8 discussed.</p> <p>9 Q. And it's your testimony that that plan</p> <p>10 is detailed enough that it allows for the</p> <p>11 specific decisions where to send the tree crews</p> <p>12 and the line crews?</p> <p>13 A. I'm not testifying to the details of the</p> <p>14 plan. I don't have specific knowledge of the</p> <p>15 details of the plan. I'm only responding to</p> <p>16 your question around --</p> <p>17 Q. Who do you understand within your</p> <p>18 department is the most knowledgeable person as</p> <p>19 to the details of that plan and the way that</p> <p>20 that plan is to be implemented?</p> <p>21 MR. NOURSE: Again, you're going back</p> <p>22 and forth between the 2012 storm and currently.</p> <p>23 Can you clarify what you're asking? And I would</p> <p>24 object to the --</p>
<p style="text-align: right;">Page 71</p> <p>1 to.</p> <p>2 Q. I'm talking about specific decisions</p> <p>3 dealing with specific outages. What person or</p> <p>4 position or department at AEP would make those</p> <p>5 decisions -- would have made those decisions in</p> <p>6 the summer of 2012?</p> <p>7 A. Can you ask the question again or have</p> <p>8 it reread, please?</p> <p>9 (Record read as requested.)</p> <p>10 A. I don't know.</p> <p>11 Q. Would those decisions be made by someone</p> <p>12 within the distribution and operations area of</p> <p>13 the company?</p> <p>14 A. That would make sense that it would be.</p> <p>15 Q. But you don't know, and you're in charge</p> <p>16 of that area, correct, as a vice president?</p> <p>17 A. Not in the summer of 2012, I was not.</p> <p>18 Q. But currently, you are in charge of --</p> <p>19 ultimately, you have responsibility for that</p> <p>20 effort?</p> <p>21 A. Today I am, correct.</p> <p>22 Q. And within your department, what</p> <p>23 individual would be responsible for that</p> <p>24 activity?</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. Do you know who those people were in</p> <p>2 2012?</p> <p>3 A. I do not.</p> <p>4 Q. So since you don't know anything about</p> <p>5 2012, I'm asking you about currently. Who</p> <p>6 within your department is the most knowledgeable</p> <p>7 person, to your knowledge, as to contents of</p> <p>8 that plan and the way that it is supposed to be</p> <p>9 implemented?</p> <p>10 MR. NOURSE: I'll object for relevancy.</p> <p>11 If you know, you can answer.</p> <p>12 (Pause in proceedings.)</p> <p>13 A. I'm sorry?</p> <p>14 Q. I'm waiting for an answer.</p> <p>15 A. Oh, I'm sorry. I misunderstood. I</p> <p>16 thought he said if I know, I can answer. And I</p> <p>17 do not know. I'm sorry.</p> <p>18 Q. Do you know anybody within your -- under</p> <p>19 your supervision who is more knowledgeable about</p> <p>20 that restoration plan and how it is to be</p> <p>21 implemented than you are?</p> <p>22 A. My expectation in my current role is</p> <p>23 that my direct reports, the folks that report to</p> <p>24 me and the organizations below them, are</p>

<p style="text-align: right;">Page 74</p> <p>1 familiar with the plan and they follow the</p> <p>2 guidelines that we've discussed in the plan.</p> <p>3 Q. Okay. That's helpful.</p> <p>4 So how many direct reports do you have?</p> <p>5 A. I have 13 direct reports.</p> <p>6 Q. And I don't care about their names at</p> <p>7 this point, but what -- I assume they all don't</p> <p>8 do exactly the same thing. I assume they have</p> <p>9 different areas of responsibility; is that</p> <p>10 correct?</p> <p>11 A. Generally speaking, yes.</p> <p>12 Q. Okay. So take me through the areas of</p> <p>13 responsibility for your direct reports.</p> <p>14 MR. NOURSE: I'm going to object for</p> <p>15 relevancy. Can you guide it toward what you're</p> <p>16 really looking for here now that relates to your</p> <p>17 complaint?</p> <p>18 MR. KELLER: I'm trying to find out who</p> <p>19 is the most knowledgeable person under his</p> <p>20 supervision with knowledge about the restoration</p> <p>21 report and how it is implemented.</p> <p>22 MR. NOURSE: Okay.</p> <p>23 A. Okay. So can you tell me again the</p> <p>24 question you have?</p>	<p style="text-align: right;">Page 76</p> <p>1 questions?</p> <p>2 A. Okay. And I --</p> <p>3 Q. If you're not the person with knowledge</p> <p>4 of that, I have to believe there is somebody at</p> <p>5 Ohio Power Company that is more knowledgeable</p> <p>6 than you, since you're not knowledgeable at all.</p> <p>7 So I'm trying to identify an individual or -- an</p> <p>8 individual who is more knowledgeable about that</p> <p>9 plan than you are.</p> <p>10 A. Okay.</p> <p>11 Q. And I have to believe you have an idea</p> <p>12 of someone who you believe is likely to be more</p> <p>13 knowledgeable about the implementation of that</p> <p>14 plan than you are. So tell me who that person</p> <p>15 is, or persons.</p> <p>16 A. My responsibility for our service</p> <p>17 territory in Ohio today, which is, again, quite</p> <p>18 different from where it was back in the summer</p> <p>19 of 2012, I have seven districts for our service</p> <p>20 territory, and each district has a manager.</p> <p>21 Q. Okay.</p> <p>22 A. Those managers -- each manager has</p> <p>23 responsibility for that district, and they</p> <p>24 follow the plan we've been discussing for</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. Sure. I'm trying to find out, since you</p> <p>2 have no expertise or knowledge about the details</p> <p>3 of that restoration plan and how it is</p> <p>4 implemented, and you said that you would expect</p> <p>5 your direct reports to have knowledge of that,</p> <p>6 I'm trying to find out which of your direct</p> <p>7 reports is most knowledgeable about that</p> <p>8 restoration plan and how it is to be</p> <p>9 implemented.</p> <p>10 A. I don't know if I have any one direct</p> <p>11 report that I would say is most knowledgeable.</p> <p>12 We're all responsible for providing safe,</p> <p>13 reliable electric service to our customers. And</p> <p>14 during a major weather event, an act of God, our</p> <p>15 task is to bring customers back in service as</p> <p>16 safely and as quickly as possible.</p> <p>17 Q. In accordance with that plan?</p> <p>18 A. As a guideline, yes. It's a plan,</p> <p>19 that's correct.</p> <p>20 Q. And since you don't know anything about</p> <p>21 that plan, and I don't know anything about that</p> <p>22 plan, I'm trying to identify somebody that I</p> <p>23 could talk to to learn about that plan. Do you</p> <p>24 understand what I'm -- the purpose of these</p>	<p style="text-align: right;">Page 77</p> <p>1 restoration.</p> <p>2 Q. That's helpful. Thank you.</p> <p>3 A. Okay.</p> <p>4 Q. And I assume those seven people are</p> <p>5 seven of the 13 direct reports that you have.</p> <p>6 A. Correct.</p> <p>7 Q. Would you expect those managers to be</p> <p>8 more knowledgeable about the restoration plan</p> <p>9 than the other six direct reports? I don't</p> <p>10 know, I mean, what are the other six direct</p> <p>11 reports who are not district managers?</p> <p>12 A. How is this relevant to your complaint,</p> <p>13 Mr. Keller?</p> <p>14 Q. That's my concern, not yours.</p> <p>15 What are the titles of the other six</p> <p>16 direct reports?</p> <p>17 A. You want me to go through all 13 direct</p> <p>18 reports?</p> <p>19 Q. Well, seven of them are district</p> <p>20 managers. What are the other six?</p> <p>21 A. Okay. The seven are -- they're not</p> <p>22 district managers, they're the equivalent of a</p> <p>23 district manager, but their title is manager of</p> <p>24 distribution systems.</p>

Page 78	Page 80
<p>1 Q. Fine. What are the other six?</p> <p>2 A. I have -- I believe there's two of them</p> <p>3 that are called -- that are titled managers of</p> <p>4 region support, or distribution support. One is</p> <p>5 a manager of distribution dispatch. One is a</p> <p>6 manager of meter revenue operations. How many</p> <p>7 have we got so far?</p> <p>8 Q. We're missing two.</p> <p>9 A. Okay. I've got a -- one of those six is</p> <p>10 a newly created position that I just actually --</p> <p>11 the role hasn't even started yet -- is a manager</p> <p>12 of emergency preparedness. And I have an</p> <p>13 administrative assistant.</p> <p>14 Q. So the administrative assistant, that's</p> <p>15 a secretarial position; is that right?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And the emergency preparedness,</p> <p>18 there isn't anybody in that position currently?</p> <p>19 A. I just named a position person, but they</p> <p>20 haven't even started yet.</p> <p>21 Q. Was there anyone in a similar position</p> <p>22 in 2012?</p> <p>23 A. No.</p> <p>24 Q. The meter revenue, I can't believe that</p>	<p>1 Q. So by dispatch, you're not talking about</p> <p>2 dispatching electric power, you're talking about</p> <p>3 dispatching people; is that, generally, correct?</p> <p>4 A. That's correct. Dispatching people and</p> <p>5 the assurances that when they're working on a</p> <p>6 circuit, the circuit is properly controlled.</p> <p>7 Q. Seems prudent to do that.</p> <p>8 Do you know, in terms of a storm</p> <p>9 restoration, does that dispatch person, are they</p> <p>10 in charge of dispatching work crews out to do</p> <p>11 particular repairs when responding to a storm?</p> <p>12 A. No, they do not dispatch the workers.</p> <p>13 Q. During a storm?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. So we can forget about that</p> <p>16 person.</p> <p>17 You said there is a regional or district</p> <p>18 support. What is the function of those two</p> <p>19 individuals?</p> <p>20 A. One of them, his normal responsibility</p> <p>21 is managing the organization and does all the</p> <p>22 engineering design.</p> <p>23 Q. Okay.</p> <p>24 A. And the other manages the contractors</p>
Page 79	Page 81
<p>1 has any impact on what we're talking about.</p> <p>2 Dispatch -- district dispatch person, I</p> <p>3 assume he's responsible for making sure that</p> <p>4 there is sufficient supply to meet your</p> <p>5 requirements. I mean, is he in the supply</p> <p>6 department, or what does the dispatch person do?</p> <p>7 A. We have a whole operation that --</p> <p>8 Q. I understand. You said one of your</p> <p>9 direct reports is in charge of dispatch.</p> <p>10 Generally, what do you mean by dispatch?</p> <p>11 A. That's where I was starting to go.</p> <p>12 Q. Take your time.</p> <p>13 A. We have a whole operation that has</p> <p>14 responsibility for radio communications with the</p> <p>15 workforce and assure that they are -- that when</p> <p>16 they're going to get onto a circuit, work a</p> <p>17 circuit, it is properly de-energized or it is</p> <p>18 switched properly or it has been isolated, or if</p> <p>19 they're going to re-energize it, that there's no</p> <p>20 other crews working on it.</p> <p>21 Q. Okay.</p> <p>22 A. So those are the -- they do all of the</p> <p>23 radio communications to the central organization</p> <p>24 on the circuits.</p>	<p>1 that we have on our property, including</p> <p>2 forestry. That's the one we had talked about</p> <p>3 earlier in the discussion.</p> <p>4 Q. What's that individual's name that deals</p> <p>5 with contractors, including forestry?</p> <p>6 A. Austin McMillion.</p> <p>7 Q. Okay. And you believe he was in that</p> <p>8 position in 2012?</p> <p>9 A. No.</p> <p>10 Q. Do you recall who was in that position?</p> <p>11 A. This is where I get really confused,</p> <p>12 Mr. Keller, because I was not in my position.</p> <p>13 Q. If you don't know who it was, that's</p> <p>14 fine.</p> <p>15 A. I don't know.</p> <p>16 Q. Now, that takes us back to the seven</p> <p>17 district managers. I assume these are</p> <p>18 geographic districts.</p> <p>19 A. Uh-huh, yes.</p> <p>20 Q. And who would be the current manager for</p> <p>21 the district that includes southern Delaware</p> <p>22 County?</p> <p>23 A. Would you repeat the question?</p> <p>24 Q. Who is the current manager of the</p>

<p style="text-align: right;">Page 82</p> <p>1 district that includes southern Delaware County?</p> <p>2 A. His name is Randy Knight.</p> <p>3 Q. K-n-i-g-h-t?</p> <p>4 A. Correct.</p> <p>5 Q. And do you know if he held that position</p> <p>6 in 2012?</p> <p>7 A. He did not.</p> <p>8 Q. Do you know who did?</p> <p>9 A. Yes. It was Ron Winrod.</p> <p>10 Q. W-i-n-r-o-d?</p> <p>11 A. Correct.</p> <p>12 Q. Is Mr. Winrod still with the company, to</p> <p>13 the best of your knowledge?</p> <p>14 A. He is.</p> <p>15 Q. Do you know what his current position</p> <p>16 is?</p> <p>17 A. He's one of the -- he's now a district</p> <p>18 manager at another one of the districts.</p> <p>19 Q. Same job, different district?</p> <p>20 A. Correct.</p> <p>21 Q. What district does he have currently?</p> <p>22 A. Newark district.</p> <p>23 Q. Would you expect that the district</p> <p>24 managers would be more knowledgeable than you</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. There is a statement in something that</p> <p>2 your company sent back to me that says that the</p> <p>3 order of work after the June 2012 storm was</p> <p>4 completed according to AEP's policies which were</p> <p>5 created pursuant to Commission Rule</p> <p>6 4901:1-10-08. Would that have been the storm</p> <p>7 restoration plan that you were talking about?</p> <p>8 A. I don't know. I'll have to -- I don't</p> <p>9 know what was sent.</p> <p>10 Q. Do you know of any AEP policies dealing</p> <p>11 with the order of storm restoration other than</p> <p>12 the plan that you referred to?</p> <p>13 A. I don't know.</p> <p>14 Q. Just to clarify, do you have any</p> <p>15 knowledge of the specific facts dealing with the</p> <p>16 outage that affected my house in June and July</p> <p>17 of 2012?</p> <p>18 A. No.</p> <p>19 Q. Am I correct that you have no specific</p> <p>20 knowledge as to AEP's storm restoration efforts</p> <p>21 in June of -- June and July 2012 as it affects</p> <p>22 the particular outage affecting my house?</p> <p>23 A. That's correct.</p> <p>24 ==0==</p>
<p style="text-align: right;">Page 83</p> <p>1 are as to the details and implementation of the</p> <p>2 storm restoration plan?</p> <p>3 A. I don't know. I would hope so.</p> <p>4 Q. They couldn't be less knowledgeable than</p> <p>5 you are.</p> <p>6 Do you know what role those district</p> <p>7 managers had during the storm restoration in</p> <p>8 summer of 2012?</p> <p>9 A. I do not.</p> <p>10 Q. Would they have been actively involved</p> <p>11 in restoring power after the June 2012 storm?</p> <p>12 A. I do not know.</p> <p>13 Q. Is there anything else regarding the</p> <p>14 complaint action that we're here on that you</p> <p>15 have knowledge of that we have not discussed</p> <p>16 here today?</p> <p>17 A. I don't know.</p> <p>18 Q. Nothing comes to mind?</p> <p>19 A. Not at this moment.</p> <p>20 Q. Are you familiar with PUCO Commission</p> <p>21 Rule 4901:1-10-08?</p> <p>22 A. The number sounds familiar, but I'll</p> <p>23 have to refresh as to what that particular code</p> <p>24 rule is about.</p>	<p style="text-align: right;">Page 85</p> <p>1 (Exhibit 9 marked.)</p> <p>2 ==0==</p> <p>3 BY MR. KELLER:</p> <p>4 Q. Are you familiar with what's marked as</p> <p>5 Exhibit 9?</p> <p>6 A. I think I've seen this Web page, or</p> <p>7 something similar to this, before.</p> <p>8 Q. Did you have any involvement in the</p> <p>9 preparation of Exhibit 9?</p> <p>10 A. I did not.</p> <p>11 Q. Do you know if this is a document which</p> <p>12 is filed when they're approved by the PUCO?</p> <p>13 A. I do not know.</p> <p>14 Q. If you would look at the last paragraph</p> <p>15 on the first page, is that a correct description</p> <p>16 of the restoration plan?</p> <p>17 A. Is that the paragraph that says "How</p> <p>18 does AEP decide which customers to restore</p> <p>19 first"?</p> <p>20 Q. Yes, sir.</p> <p>21 (Pause in proceedings.)</p> <p>22 A. Yes. Generally, it makes sense.</p> <p>23 Q. Any aspects of that paragraph that you</p> <p>24 believe are not correct?</p>

<p style="text-align: right;">Page 86</p> <p>1 A. Based on my familiarity of our 2 restoration guidelines, this makes sense. 3 Q. How do budgetary factors affect 4 vegetation control practices at Ohio Power? 5 A. Can you be more specific? 6 Q. Sure. It costs money to perform 7 vegetation control, correct? 8 A. Sure, it does. 9 Q. And is there a budget established each 10 year or each month or each quarter as to how 11 much money can be spent on vegetation control? 12 A. In my role as vice president of 13 regulatory and finance, I was aware that we have 14 overall operational budgets. That includes a 15 lot of things, including vegetation. 16 Q. And I assume that budget would be broken 17 down into separate categories or line items. 18 A. We keep track of costs by various line 19 items. 20 Q. Okay. I'm talking now about the budget. 21 And what I'm asking is, is there a budget each 22 year for vegetation control within Ohio Power 23 Company? 24 A. I believe that's correct.</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. I'm sure, as you've been driving around 2 personally or on business, you've seen areas 3 where a road or half of a road is blocked and 4 there are flagmen and they're directing traffic. 5 A. Sure. 6 Q. And I would expect that sometimes when 7 vegetation control is being performed along the 8 side of a road, that traffic control would be 9 necessary. Would that also be your 10 understanding? 11 A. If it's needed to safely do the work, I 12 would expect that is correct. 13 Q. Okay. And do you know whether the cost 14 of that traffic control would be included in the 15 vegetation control budget, or would that be 16 handled by a different... 17 A. I don't know. 18 Q. You were in charge of finance, weren't 19 you? 20 A. Yes. 21 Q. But you don't know whether that is a 22 separate budget item or whether that would be 23 included in the vegetation control? 24 A. No, I don't.</p>
<p style="text-align: right;">Page 87</p> <p>1 Q. And then I assume that's broken down by 2 region or district. 3 A. I don't know that. 4 Q. And I assume the size of the budget has 5 an impact on how much work can be done during 6 that period of time in terms of vegetation 7 control. 8 A. I guess I don't typically look at it 9 that way. 10 Q. My question is, would you agree that it 11 is accurate that the amount of the budget 12 affects how much vegetation control work can 13 actually be done during that period of time? 14 A. Well, generally speaking, we manage 15 against a budget, that's correct. 16 Q. So if the budget is higher, more work 17 can be done, and if the budget is lower, less 18 work can be done. Isn't that the way the budget 19 works? 20 A. Generally speaking, yes. 21 Q. What about traffic control, if traffic 22 control -- do you understand what I mean by 23 traffic control? 24 A. No.</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Okay. So you've got one group of people 2 that do vegetation control. I assume there's 3 another set of people at the company who deal 4 with the actual power lines on poles, correct? 5 A. Yes. 6 Q. Can I call that the line function? 7 A. Sure. 8 Q. Would the line function have a different 9 budget than the vegetation control? 10 A. As I said earlier, there are budgets for 11 different line items, correct. 12 Q. And the control of the power lines is a 13 different function from vegetation control? Let 14 me give you an example. Let's say there was a 15 section of electric line strung on poles in an 16 area, and that section of line needed to be 17 replaced or repaired. Do you understand the 18 example? 19 A. Yes, I do. 20 Q. And that's something that occurs from 21 time to time, I assuming. 22 A. I agree. 23 Q. Would the -- and it costs money to do 24 that work, correct?</p>

Page 90

1 A. I agree.

2 Q. Would the cost of doing that power line
3 replacement or repair come out of the vegetation
4 control budget, or would that be a separate
5 budget item?

6 A. I don't know. I don't know whether we
7 tracked traffic control by line or whether it is
8 a separate line item altogether. I don't know.
9 That's a level of detail I would not get
10 involved in.

11 Q. Ignoring traffic control, though, the
12 work on the power lines themselves would be a
13 separate budget item than vegetation control?

14 A. That's correct.

15 Q. Does the repair or replacement of
16 electric lines, is that a function that comes
17 under your responsibility currently?

18 A. Currently, it does.

19 Q. And would that also be under the
20 responsibility of the district managers?

21 A. Partly.

22 Q. Would the district managers be
23 knowledgeable about scheduling repair or
24 replacement work for power lines within their

Page 91

1 districts?

2 A. Generally speaking, I would say yes.

3 MR. KELLER: I don't have any other
4 questions. Thank you very much.

5 THE WITNESS: You're welcome.

6 MR. NOURSE: Okay. So we're done.
7 We'll review and sign the transcript.

8 --O--

9 Thereupon, the testimony of April 4,
10 2013, was concluded at 11:07 a.m.

11 --O--

Page 92

1 CERTIFICATE

2 STATE OF OHIO :

3 SS:

4 COUNTY OF FRANKLIN :

5 I, Sara S. Clark, RPR, CRR, CCP, CBC,
6 a Notary Public in and for the State of Ohio,
7 duly commissioned and qualified, do hereby
8 certify that the within-named SELWYN J. DIAS was
9 first duly sworn to testify to the truth, the
10 whole truth, and nothing but the truth in the
11 cause aforesaid; that the testimony then given
12 was reduced to stenotypy in the presence of said
13 witness, afterwards transcribed; that the
14 foregoing is a true and correct transcript of
15 the testimony; that this deposition was taken at
16 the time and place in the foregoing caption
17 specified.

18 I do further certify that I am not a
19 relative, employee or attorney of any of the
20 parties hereto; that I am not a relative or
21 employee of any attorney or counsel employed by
22 the parties hereto; that I am not financially
23 interested in the action; and further, I am not,
24 nor is the court reporting firm with which I am
affiliated, under contract as defined in Civil
Rule 28(D).

In witness whereof, I have hereunto
set my hand and affixed my seal of office at
Columbus, Ohio, on this 16th day
of April, 2013.

Sara S. Clark

Digitally signed by Sara S. Clark
DN: cn=Sara S. Clark, o=PRI Court Reporting, LLC,
ou=Notary Public,
email=PRIproduction@priohio.com, c=US
Date: 2013.04.16 10:57:01 -0400

Sara S. Clark, RPR, CRR, CCP, CBC
Notary Public, State of Ohio.

My commission expires: March 10, 2018

<p>A</p> <p>able 35:20 accounting 7:23 accurate 87:11 act 57:4 75:14 action 83:14 92:13 actively 83:10 activities 38:3 52:19 activity 37:20 39:7 53:3 71:24 acts 58:20 actual 34:9 37:7 52:19 89:4 addition 14:18 address 36:18 63:15 64:5 addressed 12:16 15:5 16:17 54:23 administrative 21:11 33:20 34:8 56:16 68:2,4 78:13,14 AEP 4:7,8,10,14 14:14,18,21 15:9 15:12,19 22:18 23:17 28:15 36:12 46:10 49:6,11 50:7 50:13,14,17 51:5 51:15 62:16 63:22 65:11,18 66:1,15 68:18 71:4 84:10 85:18 AEP's 51:7 84:4,20 AEP-wide 23:17 affairs 31:9,10 49:16 49:20 52:11,14 affect 86:3 affidavits 44:5 affiliated 92:14 affiliates 14:15,18,22 15:10 affixed 92:16 aforesaid 92:7 aftermath 61:16 63:1 63:7,11,16 agencies 62:2 agency 13:1 agents 58:21 59:24 agree 43:23 44:1 47:3 87:10 89:22 90:1 agreement 3:7 36:8 36:10,12,23,23 37:2,4,10 ahead 30:8 Alami 2:7</p>	<p>Allied 18:3 allow 48:5,15 allows 72:10 altogether 90:8 American 2:8 5:16 5:19 9:8 19:18 amount 50:6,12 87:11 analysis 29:6 analyze 29:15 Andrea 32:17 announced 22:23 annually 33:11 answer 29:21,24 31:24 37:23 40:20 53:7 67:24 69:10 73:11,14,16 anybody 24:8 26:2 63:2 65:9 69:24 73:18 78:18 anyway 13:16 APPEARANCES 2:1 appears 58:9 applicable 3:5 58:1 apply 59:3 approval 30:20,23 approved 85:12 approves 67:5 approximate 16:6 approximately 16:5 18:5 21:16 26:18 38:21 45:2,4,10,18 April 1:16 91:9 92:17 area 9:7 16:24 20:8 20:19 21:1,3 38:18 42:1 43:12,24 44:3 45:16 49:14 71:12 71:16 89:16 areas 56:9 74:9,12 88:2 arose 55:23 arrangements 15:2 article 50:3,10 52:1 asked 7:1 21:19 27:7 56:22 62:23 68:21 69:9 asking 7:16 13:4,5 18:9,16 28:20,22 28:24 35:9 49:10 50:20 58:24 59:6,7 63:2 70:6,11,16 72:23 73:5 86:21 aspect 24:3,7 67:3 aspects 17:21 21:11 23:8 85:23</p>	<p>assistant 78:13,14 assisting 9:16,17,20 associated 37:5 57:5 assume 8:9 21:6 24:5 33:22 43:16 50:14 53:14 54:19 55:8 55:16 74:7,8 77:4 79:3 81:17 86:16 87:1,4 89:2 assuming 89:21 assurances 80:5 assure 79:15 attended 8:12 63:21 64:3 65:14,15 attorney 92:11,12 ATTORNEY-AT-LA... 2:2 audit 19:14 20:4 auditing 20:7 auditor 19:7 augmented 66:13 Austin 39:18 40:5 81:6 authority 24:18 aware 14:12 31:19 41:21 49:12 53:11 86:13 a.m 1:16 91:10</p> <p>B</p> <p>bachelor's 7:19 back 10:14 11:14 20:3 23:4,20 24:23 28:7 54:14 72:21 75:15 76:18 81:16 84:2 background 7:15 18:10,17,19 based 12:7 56:7,8 86:1 basis 36:16 69:4 Bates 46:9 began 21:22 beginning 22:6 behalf 2:5,11 21:23 believe 5:14 15:7,15 15:17 23:10 38:6 39:9,15 46:5 52:18 58:11,12 65:13 69:19 70:7 76:4,11 76:12 78:2,24 81:7 85:24 86:24 best 17:12 58:6 82:13 better 17:11 68:13 beyond 42:24 43:2</p>	<p>43:10 big 60:11 blocked 88:3 bottom 58:3 break 6:12 30:6,7,10 briefly 6:15 7:14 18:21 bring 10:14 11:13 18:19 23:2 28:7 75:15 broad 27:22 35:13,17 51:15 broken 86:16 87:1 budget 86:9,16,20,21 87:4,11,15,16,17 87:18 88:15,22 89:9 90:4,5,13 budgetary 86:3 budgets 86:14 89:10 building 63:14 buildings 20:15 business 7:24 8:14 8:21 20:19 48:11 88:2 buy 6:22 7:7,9</p> <p>C</p> <p>call 37:1 47:15 66:20 89:6 called 3:4 8:17 18:3 23:11 33:12,13 34:6 35:3 49:22 78:3 calls 63:18 capacity 6:8 22:4 36:1 66:17 caption 92:9 care 74:6 career 17:21 Case 1:4 catch 50:8 categories 86:17 category 27:22 cause 92:7 caused 15:23 CBC 1:18 92:4,22 CCP 1:18 92:4,22 center 5:10 65:19 centered 36:7 central 7:20 9:12 19:16,19 79:23 certainly 15:3 70:2 certainty 24:22 CERTIFICATE 92:1 certification 8:16,18</p>	<p>certified 5:3 certify 92:5,11 chain 15:18 18:2 challenging 44:3 change 12:22 13:3,5 changed 22:3 changes 40:10 character 3:12 characterization 70:23 charge 15:13,19 25:5 25:7 31:8 33:16 38:9 55:11 71:15 71:18 79:9 80:10 88:18 chart 53:14,19 charts 53:15 check 52:9 chief 16:2 52:24 circuit 4:6 36:18,21 47:16 48:1,4,6,7,14 48:16,17 79:16,17 80:6,6 circuits 36:15,15 79:24 circumstance 59:8 circumstances 41:19 cited 10:3 city 19:21 Civil 3:6 92:14 claim 55:21,22 67:13 67:23 clarify 72:23 84:14 Clark 1:18 92:4,22 classes 8:10 clearing 36:4,14,21 67:1 close 32:22 33:1 closed 45:11 closely 31:17 closures 62:7 code 83:23 colleague 46:5 collectively 16:20 college 17:17,22 18:1 Columbus 1:5,14 2:9 21:19,20 92:17 combination 45:9 come 34:1 37:20 52:19,22 90:3 comes 25:13 53:22 54:3 83:18 90:16 command 15:18 commission 1:1 36:3 56:18,24 83:20</p>
---	--	--	---	---

<p>84:5 92:23 commissioned 92:5 commissioners 11:9 Commission's 26:9 communications 61:23 79:14,23 communities 12:3 companies 19:1,5 21:24 36:24 53:15 68:13 company 1:5 5:12,19 10:20 15:11 16:1 17:15 19:15,17,22 20:2,8 21:21,21 22:14 23:17 24:11 24:15 31:4 32:1 33:5 36:12 37:15 38:14 41:14 44:13 44:24 45:3,14 49:12 51:21 58:20 58:21 59:8,15,16 60:15 61:6 62:18 63:19 67:5,8 68:3,6 69:16,22 71:13 76:5 82:12 84:2 86:23 89:3 company's 16:20 35:23 36:5 38:15 53:14 57:17 59:18 59:24 compare 67:8 compared 68:6 compensate 51:16 compensated 52:2 Complainants 1:3 2:5 3:5 complaint 10:8 17:23 23:20 41:20,21 42:1 43:8,9 44:4 56:2,5 74:17 77:12 83:14 completed 8:13,18 84:4 completely 6:20 compliance 33:6 complicated 40:20 components 20:13 computer 55:1,1 concern 77:14 concerning 33:23 61:12 62:4,7 concluded 91:10 conclusion 58:24 conditions 4:12 27:19 56:15 57:1</p>	<p>57:18 58:1 conference 63:17 confused 81:11 connection 6:9 9:14 consider 16:23 consolidation 40:19 contact 10:20 12:4 containing 60:21 contains 47:1 contents 73:7 contract 37:2,3 92:14 contractor 12:1 66:5 70:3 contractors 14:24 15:1 59:18,24 66:6 66:8,12,13 69:17 80:24 81:5 contribute 18:14 control 8:24 30:16,20 30:24 31:2,12 33:7 34:10,11 35:6,13 37:19 38:9,16 39:24 40:17 41:9 44:23 49:16 66:16 67:6 86:4,7,11,22 87:7,12,21,22,23 88:7,8,14,15,23 89:2,9,12,13 90:4,7 90:11,13 controlled 80:6 conversations 36:2 56:8 61:17 cooperative 15:2 copy 46:2,6 corporate 20:9,10,14 20:17 Corporation 19:16 correct 6:11 8:22 10:10 13:16,20 14:5,15 15:11 16:14,18 17:10 20:23 21:24 22:1 22:11,12,20 25:6,9 31:14 32:23 38:5,6 38:10,13 39:6,15 41:17 42:17 44:11 44:17,20,21,24 45:1,7 46:18,19,24 47:7,21 50:3,15,19 51:6,12,13 52:6 53:4,16,23 54:4,15 55:11,13,14 58:19 71:16,21 74:10 75:19 77:6 78:16 80:3,4,14 82:4,11</p>	<p>82:20 84:19,23 85:15,24 86:7,24 87:15 88:12 89:4 89:11,24 90:14 92:8 cost 49:13 51:15,24 88:13 90:2 costs 37:5 86:6,18 89:23 counsel 3:2 59:21 92:12 County 81:22 82:1 92:3 couple 32:15 34:14 34:19 courses 8:10 court 92:14 covers 26:19 created 78:10 84:5 crew 54:20 crews 15:3 72:11,12 79:20 80:10 critical 13:7,10 CRR 1:18 92:4,22 curious 17:22 current 23:24 25:13 41:12 53:7,9 55:20 73:22 81:20,24 82:15 currently 5:11,13 25:7 32:6 38:8 39:17 45:3,17 49:17,21 53:23 56:2 71:18 72:22 73:5 78:18 82:21 90:17,18 customer 14:4,8 57:23 58:22 customers 10:14 11:11,13 13:7,10 14:6,8 16:12 23:3 28:5,7,9 45:2,5 50:7,13,18 51:5,7 51:10,16 52:2 60:17 69:3 75:13 75:15 85:18 cutting 9:22 cycle 36:15,22 cycle-based 67:1</p>	<p>51:11,16 59:16 Darden 8:14 data 54:24 day 92:17 deal 41:24 89:3 dealing 57:22 63:11 67:17 71:3 84:10 84:15 dealings 29:9 51:20 deals 81:4 December 45:12 58:4 decide 85:18 decision 54:11,17 56:10 68:18,23 70:1,6,8,13 decisions 15:4,13,16 41:24 42:8 54:23 55:3 69:3,11,23 70:21,24 71:2,5,5 71:11 72:11 defined 92:14 degree 7:19,22 8:8 8:15 degrees 8:7 Delaware 81:21 82:1 department 16:24 33:17 37:18 49:16 52:10,11,14 61:12 70:19 71:4,22 72:18 73:6 79:6 departments 27:24 depending 10:2 24:3 26:13 deposed 5:21 deposes 5:3 deposition 1:10 3:3,8 47:7,13 68:2 92:9 derecho 10:4 23:21 55:5 61:22 describe 8:3 34:7 35:5 36:5,19 described 51:24 69:19 description 4:5 85:15 design 66:10 80:22 destroyed 51:9 detail 9:23 90:9 detailed 72:10 detailing 41:8 details 23:22 33:15 72:13,15,19 75:2 83:1 determining 42:5 device 48:14</p>	<p>devices 48:4 de-energized 79:17 Dias 1:11 3:4 5:1,7,9 92:5 different 10:19 23:21 40:10 74:9 76:18 82:19 88:16 89:8 89:11,13 difficult 32:20 direct 21:9 56:6 73:23 74:4,5,13 75:5,6,10 77:5,9,10 77:16,17 79:9 directed 54:21 65:4,6 directing 88:4 direction 64:18 directly 5:18 17:3 34:3 44:18,23 61:19 discretion 54:9 discretionary 70:8 discussed 34:18 43:8 50:2 52:14 69:20 72:8 74:2 83:15 discussing 34:20 57:4 72:5 76:24 discussion 68:1 81:3 discussions 12:10 26:12 31:16 33:23 34:22 61:11 62:3,7 63:18,20,21 dispatch 78:5 79:2,2 79:6,9,10 80:1,9,12 dispatching 80:2,3,4 80:10 distribution 5:15 17:2,4 22:8 24:19 25:2 37:21 38:1,4 39:22 40:1 52:20 52:23 56:21 71:12 77:24 78:4,5 district 76:20,23 77:11,19,22,23 79:2 80:17 81:17 81:21 82:1,17,19 82:21,22,23 83:6 87:2 90:20,22 districts 76:19 81:18 82:18 91:1 division 35:4 document 4:8,10,12 4:13 23:9,10 24:13 25:19 26:16 29:1 31:3,3,20 37:11,13</p>
--	--	--	---	---

<p>46:1,14,20 47:2,9 47:11,14,17,18,20 47:22 57:14,20 58:7 60:3,10,11,13 60:21 85:11 doing 9:24 10:16 11:13 19:4 20:16 28:17 90:2 driving 88:1 duly 5:2 92:5,6 d-e-r-e-c-h-o 10:4 D-i-a-s 5:8</p> <hr/> <p>E</p> <p>earlier 11:22 22:13 30:5 31:14 35:8 41:16 42:15,21 43:3 46:16 52:15 52:18 54:6 61:21 66:17 68:1,8,22 69:15,20 81:3 89:10 early 40:11 east 1:14 64:21 easy 33:4 educated 48:12 education 7:17 8:1,4 educational 7:15 effect 37:11 effective 58:5,7 effort 9:17 10:2 13:18 15:20,21 69:19 71:20 efforts 6:10 9:11 10:13 11:10 12:15 14:14 25:16 26:11 42:23 44:19 69:2 84:20 either 31:7 33:1 electric 2:8 5:16,20 9:8 19:2,8,12,18 36:15 57:1 66:23 67:18 68:7 75:13 80:2 89:15 90:16 electricity 20:22 eliminated 40:18 EMA 10:21 12:8,10 13:1 61:24 62:1 64:3 emergency 22:20,21 22:24 23:12 24:10 25:12,18 26:5,15 29:4 46:17,20 47:1 78:12,17 employed 5:11,12,18</p>	<p>92:12 employee 6:4 11:24 65:18 66:1,3 92:11 92:12 employees 37:24 45:13 58:21 69:16 employer 5:17 employment 8:11 17:18 18:13,22 end-to-end 36:20 energized 27:20 enforcement 35:4 engineering 66:10 80:22 entire 48:17 72:1,2 equals 50:21 equivalent 77:22 essential 27:23 28:1 established 86:9 estimate 26:19 27:2 estimated 12:1 EVELYN 1:2 event 9:3 10:1,5,10 12:5 23:4,4,21 51:9 53:24 62:1 75:14 events 9:10 26:12,13 everybody 14:3 exactly 74:8 EXAMINATION 4:1 5:4 example 11:18 13:12 48:5 89:14,18 examples 11:19 13:9 excuse 33:7 62:17 execute 38:1 executive 8:12 Exhibit 4:5 45:21,24 47:5,12 48:13,21 49:2 50:3 52:1 57:10,14,16,24 58:11 60:6,9 85:1,5 85:9 EXHIBITS 4:4 existed 24:11 26:5 exists 37:11 expand 37:23 expect 9:21 10:1 13:14 38:17 44:5 51:13 52:8 75:4 77:7 82:23 88:6,12 expectation 72:2 73:22 expectations 56:15 expected 44:9 experience 9:5,6</p>	<p>18:24 experiences 18:20 expertise 75:2 expires 92:23 explain 7:16 15:21 expressing 48:10</p> <hr/> <p>F</p> <p>facilities 20:12,14 28:6 47:24 51:8,22 fact 65:24 factor 28:13,19 29:5 29:12,14 factors 27:11 42:12 42:19,21 43:2 86:3 facts 54:10 84:15 fair 7:11 falls 53:3 familiar 23:22 26:7 28:14 30:24 31:15 41:4 46:13,22 47:9 47:11,13,16,19 49:1,10 50:2 60:20 67:3,19 74:1 83:20 83:22 85:4 familiarity 26:4,12 57:19 86:1 family 6:16,21,23 7:3 7:10 far 13:21 15:13 17:16 35:24 78:7 fed 54:24 feel 14:7 29:14 felt 63:3 figure 27:8 filed 33:10,13 41:7,11 49:7 56:3 67:20 85:12 filing 33:18 49:1 51:14 52:13 67:17 fill 62:23 filled 32:7 finance 29:9 36:2 43:6 44:13 49:24 51:20 56:13 61:22 63:5 66:18 86:13 88:18 Financial 19:6 financially 92:13 find 9:21 18:12 24:1 24:12 25:22 31:18 31:24 32:4,14 35:22 69:11 70:14 74:18 75:1,6 fine 78:1 81:14</p>	<p>fire 27:24 firm 92:14 first 5:2 17:24 19:8 19:11 54:12,12,18 54:18 58:3,17 85:15,19 92:6 five 32:13 flagmen 88:4 fleet 20:15 focus 58:15 focused 34:14 folks 37:17 73:23 follow 55:24 68:24 69:18 70:6 72:3 74:1 76:24 followed 16:21 22:14 22:19 following 10:24 11:6 54:5 56:23 follows 5:3 26:8 food 6:23 7:2 51:11 58:22 59:9 foregoing 92:8,9 forestry 4:7 81:2,5 forget 80:15 form 33:13 67:12 formal 7:17 8:1,3 9:4 forms 33:18 forth 35:23 54:6 72:22 four 21:14,15 32:13 43:20 four-year 36:21 FRANKLIN 92:3 frequency 56:18 fulfill 62:24,24 fulfillment 25:12 function 21:20 40:1 62:23,24 80:18 89:6,8,13 90:16 functions 24:16 66:11 funding 37:5 funneled 34:4 further 92:11,13 future 53:10 55:19</p> <hr/> <p>G</p> <p>Gahanna 7:13 63:19 63:20 65:20 gas 19:1,1,5 Gay 1:14 general 22:23 26:10 27:6 28:4,22 34:21 53:3,8 56:7,15 59:4</p>	<p>69:1 generally 9:16 16:14 24:7 27:16 34:5 36:19 39:2 42:16 50:2,4 57:8 62:8 74:11 79:10 80:3 85:22 87:14,20 91:2 gentleman 40:15 geographic 81:18 getting 23:6 40:8 55:19 give 11:20 13:9 15:7 17:11 32:5,15 34:17 59:4 89:14 given 31:20 37:8 55:8 55:16 69:17 92:7 giving 13:6 global 12:2 go 15:6,8 20:8,20 21:3 24:2,8,12 27:11 29:5 30:8 32:3,14 61:6 64:22 65:4,6,8,9 70:3 77:17 79:11 goal 41:9 66:15 goals 4:7 35:24 36:6 God 57:5 75:14 goes 23:20 44:4 going 6:19 11:10 17:9,10 40:23 55:18 58:23 72:21 74:14 79:16,19 governance 53:4 governmental 21:7 graduate 8:7,8 graduated 7:20 17:17 17:21 groceries 6:23 7:8,9 grocery 7:7 group 14:8 32:4,6,6 32:10,12,13,16 33:3,19 34:24 35:2 41:15 89:1 guarantee 57:2 guess 28:24 38:22 87:8 guide 74:15 guided 59:1 guideline 27:6 75:18 guidelines 4:7 26:9 69:1 74:2 86:2 guy 31:8</p> <hr/> <p>H</p>
---	--	---	--	--

<p>half 88:3 hand 57:13 92:16 handful 32:13 hanging 45:24 47:4 47:12 48:24 60:9 handled 88:16 hands 24:10 25:18 happened 40:9 hazardous 27:19 head 16:24 32:6 34:23 53:17 55:12 headquarters 63:13 63:18 heavily 43:23 held 40:3,6,13 64:2 82:5 help 11:13 helpful 74:3 77:2 hereinafter 5:2 hereto 92:12,13 hereunto 92:16 high 7:17 13:15 higher 87:16 highest 13:17 27:18 28:9 37:22 history 17:18 18:13 hit 55:7 hope 83:3 hospital 13:13 hospitals 13:14,17 27:24 house 7:2 68:19 70:8 84:16,22 house-by-house 69:4 hundred 27:1</p> <hr/> <p>I</p> <p>idea 44:8 61:7 76:11 identifies 60:16 identify 33:14 46:1 57:14 60:10 75:22 76:7 ignorance 48:11 ignoring 90:11 imagine 10:12 38:7 immediately 10:24 impact 79:1 87:5 implementation 76:13 83:1 implemented 72:20 73:9,21 74:21 75:4 75:9 implementing 38:9 include 31:11 59:17</p>	<p>59:23 included 39:24 49:15 88:14,23 includes 52:1 81:21 82:1 86:14 including 56:21 66:9 81:1,5 86:15 inconvenienced 51:8 incurred 51:17 52:3 INDEX 4:1,4 indicated 62:15 indicates 50:6,17 58:4 60:16 indirectly 61:20 individual 15:16 16:12 39:13,16 69:22 71:23 76:7,8 individuals 80:19 individual's 81:4 industry 19:3,9,12 information 11:23 60:22 61:6 69:6 initial 5:7 inquire 70:17 instances 11:9 12:20 13:2 instructions 15:7 69:17 interact 21:22 interacted 11:4 interacting 62:16,19 interaction 11:7 21:6 21:9 63:5 interested 24:4 92:13 internal 19:6,14 20:4 20:7 interpret 47:22 interpretation 59:13 invited 65:8,9 involved 9:10 10:12 10:14 12:14 14:10 26:14 33:22,24 41:19 43:9 44:19 44:23 52:16 55:6 62:6 70:8 83:10 90:10 involvement 9:13 11:21 38:11 41:23 42:4 85:8 irrelevant 6:20 isolated 79:18 issue 36:6 issued 58:4 issues 8:21,24 43:9 item 88:22 90:5,8,13</p>	<p>items 6:23 7:2 86:17 86:19 89:11</p> <hr/> <p>J</p> <p>J 1:11 3:4 5:1,7,7 92:5 January 58:5 Jeunelot 32:17 Jeunelot's 32:18 Jewett 2:3 jkeller@vorys.com 2:4 job 18:1,7 39:4,21 53:9 61:3 65:22 82:19 John 1:2 2:2 34:24 July 17:5 24:12 26:6 42:9 44:12 58:2,8 61:13 69:12 84:16 84:21 June 9:13 10:3,7 15:14 17:5 24:11 26:6 42:2,8 44:12 58:2,8 61:13,17 69:12 83:11 84:3 84:16,21,21 J-e-u-n-e-l-o-t 32:21</p> <hr/> <p>K</p> <p>keep 23:19 86:18 keeping 7:7 Keller 1:2 2:2 4:3 5:5 18:12,18 28:24 29:3 30:5,7,11,14 35:11 45:23 46:3,5 46:9,12 47:8 48:23 49:5,9 50:23 53:11 57:12 59:6,11 60:8 60:12 68:24 70:9 70:12 74:18 77:13 81:12 85:3 91:3 Kevin 1:13 kind 8:15 20:14 63:19 kinds 66:8 Kirkpatrick 17:7 22:10 25:1 Knight 82:2 knocked-out 50:21 know 7:3,5 9:22 11:15 13:21,24 16:10 17:11,16 18:10,18 23:13 24:7,8,14,17 25:17 26:7,20 28:15,16 29:4,11 30:17 31:5</p>	<p>31:6,7,23 32:11,24 33:15 34:16 35:8 35:18 37:1,7,13,14 37:15 38:20 39:3 40:3,6,12,13,15,20 41:10,13,14 42:8 42:12 43:2,15 44:7 44:10 45:13 46:21 49:22 51:1,7,14,23 52:7 55:3 59:19 61:9 62:17,21,22 64:5,5,11 65:2,18 66:20 67:15,24 68:5,8,11,12,17,18 68:22,23,24 69:2 69:24 70:16,18 71:10,15 73:1,4,11 73:16,17,18 75:10 75:20,21 77:10 80:8 81:13,15 82:5 82:8,15 83:3,6,12 83:17 84:8,9,10,13 85:11,13 87:3 88:13,17,21 90:6,6 90:8 knowledge 18:14 40:8 41:6,18 42:14 42:18,24 52:4 58:6 66:19 69:2 72:14 73:7 74:20 75:2,5 76:3 82:13 83:15 84:15,20 knowledgeable 38:15 72:18 73:6 73:19 74:19 75:7 75:11 76:5,6,8,13 77:8 82:24 83:4 90:23 K-i-r-k-p-a-t-r-i-c-k 17:13 K-n-i-g-h-t 82:3</p> <hr/> <p>L</p> <p>Lajeunesse 47:6 language 59:1 large 38:22 largest 16:8 28:7 late 10:6 40:11 Law 1:13 lawyers 29:19 43:10 layout 47:16 learn 75:23 left 20:7 legal 37:10,17,17 52:9 58:24 59:21</p>	<p>let's 11:5 16:11 17:24 23:7 67:14 89:14 level 28:4,10 37:22 90:9 Lewis 5:10 liable 58:21 librarian 24:15 life 18:11,20 line 72:12 86:17,18 89:6,8,11,15,16 90:2,7,8 lines 89:4,12 90:12 90:16,24 Linworth 64:10,12 list 13:15 55:1 little 9:23 live 5:9,10 located 7:12 47:24 63:10 64:4 location 63:14 66:7 long 18:4 19:17 20:16,18,24 21:12 22:2 40:3 look 50:6 53:13 85:14 87:8 looking 58:3 69:21 74:16 looks 58:12 61:3 loss 58:22 lot 44:2 62:2 63:12 86:15 lower 87:17 lowest 28:10 Lukowski 40:23,24 L-u-k-o-w-s-k-i 41:2</p> <hr/> <p>M</p> <p>maintains 7:3 major 4:9 7:23 9:9 10:1,5 20:12,13 23:4,20 26:13 53:24 75:14 making 11:12 15:4 15:13 70:20 79:3 Maloney 1:13 man 6:18 manager 87:14 management 7:24 8:12,20,21 manager 39:1,9,22 76:20,22 77:23,23 78:5,6,11 81:20,24 82:18 managers 38:17,19 38:24 39:12 76:22</p>
---	---	---	--	---

77:7,11,20,22 78:3 81:17 82:24 83:7 90:20,22 manages 4:9 80:24 managing 39:7 80:21 manually 55:2 Map 4:6 March 92:23 marked 45:21,24 47:4,12 48:21 57:10,13 60:6,9 85:1,4 married 6:18 matter 6:5 McMillion 39:18 81:6 mean 8:5 10:23 11:6 18:19 20:10 22:15 22:24 27:12 35:13 35:23 53:18 59:24 60:21 61:20 63:14 77:10 79:5,10 87:22 mechanical 23:7 meet 79:4 meeting 41:8 meetings 63:17,24 64:2,3,23 65:5,7,8 65:10,12 mentioned 22:13 41:16 43:3 mentions 50:12 merged 19:18 merger 19:23 45:11 meter 78:6,24 Michelle 32:17 middle 5:7 68:14 million 45:5,6 mind 23:19 83:18 minor 7:23 missing 78:8 misunderstood 73:15 moment 25:20 83:19 money 86:6,11 89:23 monitor 31:17 monitoring 35:4 monitors 30:24 month 86:10 months 13:19 Moore 32:17 33:2 morning 11:16 move 21:19 moved 19:24 20:1 32:8 M-c-M-i-l-l-i-o-n	39:20 M-o-o-r-e 33:4 N name 5:6 12:6 17:8 32:5,19 34:24 39:19 40:21 65:18 69:21 81:4 82:2 named 78:19 names 32:15,20 33:3 34:17 74:6 nature 6:2 11:7 12:9 36:10 necessary 88:9 need 30:7 52:9 54:14 69:10 needed 30:6 88:11 89:16 negligence 59:14,17 59:23 negligent 58:20 never 27:14 Newark 82:22 newly 78:10 news 49:4,4,5 nine 13:19 Nods 53:17 55:12 normal 43:21 80:20 normally 63:21 65:11 northwestern 64:19 notary 3:7,9,12 92:4 92:22 notes 3:9 notice 3:7 Nourse 2:7 6:19 7:4 18:9,16 28:20 29:2 29:16,22 32:22,24 35:7 46:2,4,7,11 47:6 49:3,8 50:20 53:5 54:19 55:18 56:6 58:13,23 59:7 64:8 67:11,21 68:21 70:5,10,22 72:21 73:10 74:14 74:22 91:6 number 11:16,23 16:7 28:7,9 32:9,11 33:13 36:17 38:22 54:12,12,17,18 60:17 83:22 O O 91:8,11 object 6:19 29:16 35:7 53:5 55:18	58:23 67:12,21 70:22 72:24 73:10 74:14 Objection 7:4 28:20 objections 29:20 objective 36:14 66:22 objectives 36:4 obtain 30:19 61:5 obtained 46:8 obvious 60:12 occasions 5:24 9:9 57:22 occur 42:6 45:9 occurred 69:7 occurs 27:9 89:20 ODOT 61:18 62:1,3,7 62:10,16,19 offered 30:6 offering 53:8 office 7:12 92:16 officer 16:2 53:1 65:14 offices 1:13,13 official 3:11 officials 64:1 Oh 13:24 43:6 47:3 73:15 Ohio 1:1,14 2:3,9 4:9 5:10,12,18 7:13 9:13 10:20 12:20 13:20 15:11 16:1 16:20 21:19,21 23:16 24:11 30:15 30:19,22 31:3,9,9 33:5 34:15 35:5 36:12,13 41:7 44:13 45:3,8,13 49:12 57:17 61:12 63:18 64:19 66:15 67:5,8,9 68:3,6,6 69:16 76:5,17 86:4 86:22 92:2,4,17,22 oil 19:1,1,5 Okay 5:21 6:6 8:9,20 8:23 11:19 13:14 14:13 15:9 16:15 16:23 19:4,21 20:16,24 21:12 23:24 24:9 27:4,21 28:3 34:12 37:15 46:4,16 47:4 48:3 48:19 49:8 50:1,5 50:11 51:14 52:12 53:11 54:2 55:7	60:2,14,19 64:15 64:22 66:14 72:6 74:3,12,22,23 76:2 76:10,21 77:3,21 78:9,17 79:21 80:15,23 81:7 86:20 88:13 89:1 91:6 Oklahoma 7:20 20:2 old 32:3 ones 43:3 one-line 4:6 47:16 ongoing 31:16 operating 16:2 53:1 65:13 69:1 operation 79:7,13 operational 23:2 86:14 operations 5:15 9:18 16:21,24 17:2,4 20:13 22:8 24:20 25:3 37:21 38:1,5 52:21,24 71:12 78:6 opinion 29:17,23,24 30:1,3 59:22 60:1 order 15:5 22:17 84:3 84:11 organization 15:12 25:15,23 53:14,15 53:19 72:1,3 79:23 80:21 organizational 15:18 organizationally 38:5 53:13 55:10 organizations 73:24 originally 11:11 outage 12:15,16 15:4 22:18 42:5,9,13,15 42:20 43:5,13,13 44:20 54:23 59:10 61:13 68:19 69:12 70:14,21 84:16,22 outaged 23:3 outages 4:13 16:5,12 16:17,17 43:1 50:24 51:6,18 52:3 54:9,16 60:16,17 69:7 71:3 outside 14:21 40:8 overall 9:17 11:9 36:3,4,6 52:22 55:11 56:13,19 86:14 oversight 31:12	P pack 68:14 page 4:2,5,14 26:22 58:4,12,16 85:6,15 pages 26:19 27:1 46:10,23 47:2 58:11 papers 22:22 paragraph 50:5,9 51:2 58:16,18 59:13 85:14,17,23 part 28:14 43:21 46:21 47:24 48:6 59:1 63:3 participating 9:16 particular 26:2 41:19 42:13,20 43:4 47:19 69:7 70:14 80:11 83:23 84:22 particularly 58:17 parties 3:3 92:12,13 Partly 90:21 path 17:21 Paul 65:19 66:2 Pause 47:10 61:10 73:12 85:21 pending 56:2 people 11:17 15:4 22:19 25:24 32:13 32:15 34:17 38:11 41:16 45:16 62:13 63:15,22 65:16,16 72:1,3 73:1 77:4 80:3,4 89:1,3 perfection 57:2 perform 86:6 performance 37:6 56:19 57:6 68:4 performed 56:21 88:7 period 10:17,24 11:5 12:11 20:5 24:2 26:6 55:22 67:11 87:6,13 periodic 33:5 periodically 11:15 perishable 58:22 59:9 person 6:22 17:5 32:9 34:13,16 38:8 40:18,21 55:10 62:15 71:3 72:18 73:7 74:19 76:3,14 78:19 79:2,6 80:9 80:16
--	--	---	--	---

<p>personal 41:18,23 42:4,18 personally 7:6,8 10:16 48:3 88:2 personnel 16:21 persons 76:15 physically 24:9 55:4 63:10 place 27:22 34:23 40:11 63:20 92:9 places 63:12 plan 16:22 22:15,15 22:19,20,22 23:1,2 23:7,12,18,23 24:1 24:3,10 25:13,19 26:5,16 27:4,8 28:21 29:5,12 31:16,19 34:9,21 35:6,9,22,23 36:20 38:10,16 46:17,20 46:22 47:1 54:5 72:4,9,14,15,19,20 73:8,20 74:1,2 75:3 75:8,17,18,21,22 75:23 76:9,14,24 77:8 83:2 84:7,12 85:16 Plaza 2:8 please 5:6 8:3 9:7 15:21 17:8 30:11 44:14 46:1 71:8 point 16:15 18:13 21:22 31:21 70:3 74:7 poles 89:4,15 policies 84:4,10 policy 30:16,21 31:3 31:20 66:16,20 67:6 70:7 political 13:22 14:1,7 14:11 portion 48:15 position 5:13 6:5 10:19 17:1 19:11 20:1 21:13 22:2,4,6 22:9 23:21 25:2,8 32:7 40:4,5,6,10,13 40:18 41:12 44:12 49:21 55:22 56:12 69:22 71:4 78:10 78:15,18,19,21 81:8,10,12 82:5,15 possible 23:5 75:16 potential 56:9 Powell 2:3 43:19</p>	<p>power 1:5 2:8 5:12 5:17,19,20 9:2,9 10:20,24 11:12,17 12:21 13:8,11,16 13:20 14:14 15:11 16:1,5,12,13,20 19:18 21:21,21 23:17 24:11 30:15 30:19,22 31:4,9 33:5 34:15 35:5 36:12 41:7 44:13 44:20 45:3,14 48:5 48:15,16 49:12 50:21,24 51:6,18 52:3 53:21 57:17 60:18 63:19 67:5,8 68:3,6 69:16 70:21 76:5 80:2 83:11 86:4,22 89:4,12 90:2,12,24 Power's 66:15 Power/Columbus 45:8 practice 7:6 31:20 practices 31:1,3,13 33:8 44:24 86:4 preparation 85:9 preparedness 78:12 78:17 presence 3:10 92:7 present 17:19 61:24 62:10 64:1 65:12 presidency 53:23 president 5:14 9:18 9:18 10:13,13 16:2 17:3,4 22:8 24:19 29:8 36:1 37:20 38:4 49:19,23 51:19 52:20,23,24 53:2 56:12 61:21 63:4 66:18 71:16 86:12 president/chief 65:13 pressure 13:22 14:1 14:3,7 pressures 14:11 pretty 35:17 previously 67:2 pricing 20:21,22 primarily 6:22 38:8 63:13,22 primary 10:20 principal 12:4 principle 37:4</p>	<p>principles 59:2 printout 4:14 60:21 prior 6:5 priorities 13:6,15 27:23 55:2 prioritization 13:18 14:13 26:10 27:7,9 28:6 29:15 42:15 42:23 54:6 69:18 70:20,23 72:7 prioritize 16:16 22:18 26:11 44:19 54:3 prioritized 27:5 prioritizing 12:14 14:6 15:14,23 24:5 27:12 28:19 42:13 42:19 43:4 69:12 priority 12:22 13:3,5 27:18 54:24 probably 15:17 procedure 3:6 30:20 procedures 4:7 67:6 proceedings 6:3 47:10 61:10 73:12 85:21 process 11:2 55:17 produce 7:1 produced 46:10 program 8:16,18 31:15 37:6 38:2,3 66:19,21,24 programs 8:13 56:22 56:23 progress 11:12 37:7 41:8 projects 27:5 proof 3:11 properly 79:17,18 80:6 properties 50:13 property 50:7 81:1 provide 27:4 44:6,9 66:22 provided 60:15 provides 58:19 providing 75:12 provisions 59:2 prudent 80:7 public 1:1 26:8 28:12 28:18 29:6 56:17 92:4,22 publication 49:5 published 48:24 PUCO 4:11 6:9 10:21 10:22 11:1,4,8 12:5</p>	<p>12:13,20 21:23 22:24 30:19,23,23 31:11,21 33:6 34:1 34:14,19 36:9,13 36:24 41:7 49:1,7 56:2,14 61:23 62:17 63:5 67:4,17 83:20 85:12 purpose 24:16 75:24 pursuant 3:7 84:5</p> <hr/> <p>Q</p> <p>qualification 3:12 qualified 92:5 quarter 86:10 question 22:16 28:22 32:1 44:15 48:9 51:23 54:13,19 55:15 68:5 69:14 71:7 72:16 74:24 81:23 87:10 questions 34:1 53:8 76:1 91:4 quick 30:9 quickly 23:5 75:16 quite 76:17</p> <hr/> <p>R</p> <p>radio 79:14,23 ran 20:12 Randy 82:2 read 44:16 54:14 58:18 71:9 reading 51:1 really 16:9 37:14 74:16 81:11 recall 6:1,4 8:17 9:15 12:6,19,24 13:2,4,5 16:6 19:13 20:18 22:17 34:20 37:3 46:17 61:18 62:10 63:2 64:20 81:10 receipts 7:2,7 receive 8:15 14:1 received 7:19 receiving 13:21 Recess 30:13 recognize 47:18 recollection 68:9 record 5:6 44:16 71:9 recovery 4:11 22:18 49:13 51:15,24 reduced 3:8 92:7 refer 23:14 57:21 referred 23:12 34:6</p>	<p>37:9 46:16 84:12 referring 15:22 70:24 refresh 83:23 regard 6:17 9:5 regarding 83:13 regardless 37:10 region 78:4 87:2 regional 80:17 regular 63:17 regulators 21:7,10 regulatory 6:8,9 21:5 21:8,11,20 27:17 29:8 31:9,10 32:3 33:7 36:2 41:15 43:6 44:12 49:15 49:20,23 51:20 52:11,14 56:13 61:22 63:4 66:18 86:13 related 10:8 12:13 34:8 56:19 68:2 relates 66:24 74:16 relating 48:24 relative 92:11,12 relevance 56:1,4 67:22 relevancy 73:10 74:15 relevant 17:22 29:17 29:18 67:13 77:12 reliability 56:16,20 57:2,6 67:10,18 reliable 66:22 75:13 relocated 20:3 remember 13:13 69:10 removal 35:16 removing 35:24 reopen 28:18 reopening 28:12 29:6 repair 13:3 15:14 28:8,18 42:5,13,20 43:4 54:17,21 70:13 90:3,15,23 repaired 12:23 42:10 68:20 89:17 repairs 15:23 29:15 69:12 80:11 repeat 44:14 48:8 81:23 rephrase 29:2 replaced 89:17 replacement 90:3,15 90:24 report 25:24 33:12</p>
---	--	---	--	---

<p>38:24 39:8,9,12 41:7 48:24 49:2,3,4 67:16,19 73:23 74:21 75:11 reported 1:18 67:16 reporting 33:20,21 34:8 56:17,20 68:3 68:4 92:14 reports 33:6,10,23 34:5,8,15,18,21 39:10,13 41:4 73:23 74:4,5,13 75:5,7 77:5,9,11,16 77:18 79:9 represent 46:7 60:14 request 49:6,11,14 50:2 51:24 52:1 requested 44:16 49:13 71:9 requesting 51:15 requests 4:10 12:20 13:2 require 56:19 required 30:19 44:5 requirements 79:5 reread 71:8 resources 11:23 14:19,20,21 respect 9:12 34:15 36:6 67:9 69:6 respective 3:3 respond 55:9 56:7 Respondent 1:6 2:11 responding 70:21 72:15 80:11 response 9:24 10:23 69:15 responsibility 16:4 24:24 25:14,15 33:17,19 52:22 54:2,3 55:11 56:14 59:15 61:3 63:4 65:23 71:19 74:9 74:13 76:16,23 79:14 80:20 90:17 90:20 responsible 6:22 17:1 54:1 59:9 70:20 71:23 75:12 79:3 restoration 9:3,11,17 10:24 11:10 12:2 12:15 13:18 14:14 16:21 17:2 22:14 22:15,19,20,21</p>	<p>23:1,12 24:6,10,18 25:5,8,13,16,19 26:5,9,11,16 27:5 27:12 28:21 29:5 42:23 46:17,20,22 47:1 52:19 53:21 54:4,5 69:1,18 72:4 73:20 74:20 75:3,8 77:1,8 80:9 83:2,7 84:7,11,20 85:16 86:2 restorations 42:15 restore 12:21 13:16 14:3 44:19 85:18 restored 14:4 28:9 48:5,15,16 53:22 60:18 restoring 83:11 result 8:16 50:24 51:5,9,17 52:3 results 34:9 68:12 retail 18:2,24 retired 40:16,19,22 revenue 78:6,24 review 36:20 91:7 re-energize 79:19 right 16:3,13 32:8 33:1 53:2 54:7 68:14 78:15 right-of-way 66:10 Riverside 2:8 road 2:3 28:18 43:19 62:7 64:7 88:3,3,8 roads 28:12 29:6 Roahrig 65:19 66:2 role 10:22 11:1 51:19 53:6,7 55:20 61:21 73:22 78:11 83:6 86:12 Ron 82:9 room 63:6,14 rotated 12:7 Route 43:16 61:13 62:4 RPR 1:18 92:4,22 rule 83:21,24 84:5 92:15 rules 3:5 56:18 run 16:1 18:21</p>	<p>Sara 1:18 92:4,22 Sawmill 64:11,13,21 64:24 saying 22:17 25:17 70:5 says 5:3 27:9,15 51:3 84:2 85:17 scheduling 90:23 school 7:17 8:14 seal 92:16 second-to-the-last 58:16 secretarial 78:15 section 43:18 58:10 89:15,16 see 10:18 27:10 seek 59:21 seen 16:8 26:15 27:14 29:1 57:21 85:6 88:2 Selwyn 1:11 3:4 5:1 5:7 92:5 send 15:3 70:13 72:11 sense 71:14 85:22 86:2 sensible 28:17 sent 84:2,9 sentence 58:17 separate 23:16 86:17 88:22 90:4,8,13 served 66:11 service 4:12 21:9 23:4 24:6 28:8,21 35:3 56:16 57:1,18 66:23 67:10 72:4 75:13,15 76:16,19 services 20:9,11,17 21:5 27:23 28:1 32:3 set 22:22 35:23 54:6 89:3 92:16 seven 76:19 77:4,5 77:19,21 81:16 shared 12:12 42:14 42:21 sharing 11:8 shot 17:12 side 88:8 sign 91:7 significance 10:3 significant 10:10 similar 12:12 54:10 55:7 78:21 85:7 similarly 44:22 54:10</p>	<p>54:16 sir 36:11 85:20 sit 13:19 sitting 25:20 situated 54:10,16 situations 13:6 57:23 six 77:9,10,15,20 78:1,9 six-hundred-and-s... 16:11 size 87:4 small 32:12 somebody 16:15,20 24:16 54:11,16 55:3 70:2,12 75:22 76:4 someplace 37:12 63:6 sorry 5:16 8:6 50:8 73:13,15,17 sort 47:23 sounds 83:22 south 43:19 64:17,19 64:20 southern 1:5 21:21 45:9 81:21 82:1 Southwest 19:16,19 speaking 39:2 42:16 57:8 74:11 87:14 87:20 91:2 specific 8:23 9:2 12:6 13:12 19:13 35:14 35:20 43:1 51:21 57:22 63:9 69:3,24 71:2,3 72:11,14 84:15,19 86:5 specifically 10:3 29:20 34:2,20 66:23 specifics 9:15 specified 92:10 spell 17:8 32:18,21 33:2 39:19 40:24 spent 86:11 spits 55:1 spoiled 51:11 SS 92:2 staff 11:8 12:5,7,13 34:1,3 36:3 56:24 61:23 65:16,16 66:13 stamped 46:9 standpoint 11:24 12:1,2 start 17:24 19:8</p>	<p>25:24 61:8 started 18:22 19:24 21:8 40:5 78:11,20 starting 50:9 79:11 starts 28:8 state 5:6 10:21 12:7 12:10 13:1 30:2 43:16 61:13,24 62:2,4 63:24 64:3 92:2,4,22 stated 66:17 statement 84:1 stenotypy 3:9 92:7 Steven 2:7 stipulated 3:2 STIPULATIONS 3:1 stnourse@aep.com 2:10 store 7:7 storm 4:10 9:3,12,14 9:24 10:5,5,6,11,23 11:1,6 12:17,19 15:14,24 16:6 22:14 27:18,42:1 50:15,19 51:6 52:19 53:22 55:5,7 61:16,23 62:11 63:1,7,11,15 72:22 80:8,11,13 83:2,7 83:11 84:3,6,11,20 storms 4:9 50:14 53:10 55:20 57:3 story 18:11 Street 1:14 streetlights 28:11 strike 41:5 45:19 structure 15:19 strung 89:15 subject 35:14,17 42:1 49:2 67:12 submit 33:5 subsidiary 5:19 substance 23:6 35:12 successfully 8:19 suffered 50:14,18,21 50:23 51:5,11 sufficient 79:4 Suite 1:14 summer 4:10 10:4 22:10 24:23 53:6 55:21 56:1 57:4 69:7 71:6,17 76:18 83:8 supermarket 18:2</p>
--	--	--	--	---

<p>Supermarkets 18:3 supervision 73:19 74:20 supervisors 39:3,12 supply 79:4,5 support 39:23 40:1 78:4,4 80:18 supposed 73:8 sure 6:14 14:2 16:9 17:9 27:3,13 30:22 31:22 35:19 39:4 40:16 64:14 65:9 65:24 66:2 75:1 79:3 86:6,8 88:1,5 89:7 sustained 50:13 switched 79:18 sworn 5:2 92:6 system 56:19,21 57:6 systems 77:24</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 2:7 take 6:12 7:14 17:18 21:16,20 22:6 30:9 74:12 79:12 taken 1:13 3:6 30:13 92:9 takes 81:16 talk 23:7 53:9 69:10 75:23 talked 81:2 talking 35:11 49:4,6 65:3 71:2 79:1 80:1 80:2 84:7 86:20 tariffs 56:14 task 75:15 tasked 62:16,18 tech 65:19 tell 6:15 9:6,23 22:21 24:21 27:15 35:20 47:23 48:3,13 74:23 76:14 telling 29:7 68:15,16 tells 29:20 70:2 tenure 9:8 term 39:2 terms 4:12 14:6 51:11 56:15,24 57:17,24 80:8 87:6 terrain 44:1,3 territory 76:17,20 testify 56:3 92:6 testifying 72:13 testimony 44:6,9</p>	<p>56:10 72:9 91:9 92:7,9 Texas 20:1,3 Thank 6:14 17:14 30:12 34:12 41:3 46:11 48:19 66:14 77:2 91:4 thick 26:18 thing 74:8 things 11:13 56:21 86:15 think 27:3 32:21 33:11 34:24 35:3,7 37:2,2 39:22 40:2 41:2 45:4,7,11 46:24 47:15 59:20 64:9,13,24 65:2,21 66:1,4,17 68:1 69:14 70:9 85:6 thinking 19:19 40:22 66:2 third 50:1,5,9 51:2 thought 31:8 55:8,16 68:21 73:16 three 6:1 39:11 43:20 46:10 three-page 46:13,19 47:2 time 3:6 6:12 8:2 10:17,18 11:5 12:11 17:19 18:15 20:5 23:19 24:2 26:6 27:18 29:9 30:7 31:21 43:7 44:18 55:5,22 56:11 62:6,19 67:11 70:3 79:12 87:6,13 89:21,21 92:9 times 12:1 43:20 57:21 title 5:14 19:13 22:3 39:5,21 77:23 titled 4:8,12 78:3 titles 77:15 today 7:1 10:19 13:19 24:2 25:10 25:19 29:11,12 53:24 71:21 76:17 83:16 told 15:5 64:22 Tom 17:7 40:23 top 50:9 52:23 tot 42:19 totally 40:9</p>	<p>track 86:18 tracked 90:7 traffic 87:21,21,23 88:4,8,14 90:7,11 training 8:23 9:2,4 transcribed 3:10 92:8 transcript 91:7 92:8 Transportation 61:12 travel 43:15,18 travels 43:21 tree 35:16 72:11 treed 43:24 trees 9:22,22 35:24 35:24 44:2 tremendous 10:2 trial 44:4 trimming 9:22 35:16 35:24 trucks 70:13 true 15:17 92:8 truth 92:6,6,6 try 17:10 48:10 trying 9:20 10:15 18:12 27:8 31:18 35:22 48:11 70:14 74:18 75:1,6,22 76:7 Tulsa 20:2 turn 58:10 turned 64:16 two 6:1 11:5 13:13 19:1 21:2 32:9,12 38:23 39:11 46:3 54:9,12,15,18 78:2 78:8 80:18 Two-page 4:10 type 19:4 47:14,18 60:20,22 61:5 66:6 69:5 types 11:19 13:10 28:1 34:15 47:23 typically 23:3 63:20 87:8</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>Uh-huh 81:19 ultimate 16:4 ultimately 71:19 unclear 70:10,24 underneath 38:4 understand 9:19 11:20 14:2 15:1 16:3 22:16 28:23 42:22 51:4 53:18</p>	<p>54:8 65:22 66:21 72:17 75:24 79:8 87:22 89:17 understanding 10:16 22:23 25:1 27:16 56:8 59:5,12 67:4 88:10 understands 29:22 50:17 understood 23:11 25:4 University 7:20 8:13 urged 13:3 use 39:1 72:7 utilities 1:1 15:3 26:8 67:9 68:7 utility 18:10,17,23 19:2,9 21:10 56:17 67:18</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vacant 32:8 49:21 various 8:9 12:2 21:7 66:8 86:18 vegetation 8:24 30:15,20,24 31:2 31:12 33:7 34:10 34:11,18,21 35:6 35:13 36:4,14 37:19 38:2,3,9,16 39:24 40:16 41:9 41:24 44:23 56:22 66:16,19,21,24 67:1,5 86:4,7,11,15 86:22 87:6,12 88:7 88:15,23 89:2,9,13 90:3,13 versus 13:22 23:17 34:9 vice 5:14 9:18 10:12 17:3 22:8 24:19 29:8 36:1 37:20 38:4 49:19,23 51:19 52:20,23 53:2,22 56:12 61:21 63:4 66:18 71:16 86:12 view 56:4 Virginia 8:14 vs 1:4</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>waiting 54:20 73:14 waived 3:13 walk 17:20</p>	<p>want 6:12 17:20 18:10 33:2 35:14 53:10 77:17 wanted 14:4 24:1,9 25:22 31:24 61:5 wants 30:1 war 63:6 wasn't 20:18 way 9:20 29:19 39:14 54:22 72:19 73:8 87:9,18 weather 9:10 23:4 75:14 Web 4:14 85:6 week 55:8 weeks 11:6 welcome 91:5 went 20:9,21 42:12 42:19 43:3 weren't 88:18 west 64:10,11,13,21 we'll 6:13 91:7 we're 32:12 53:8 57:3 66:24 75:12 78:8 79:1 83:14 91:6 we've 9:9 40:10 56:9 56:23 72:4 74:2 76:24 whereof 92:16 wife 56:3 Williams 35:1 Winrod 82:9,12 wire 27:19 within-named 92:5 witness 3:4,11 30:5,9 30:12 32:23 44:14 48:8 53:9 91:5 92:8 92:16 wooded 43:24 words 34:7 work 13:3 18:1,4 19:4,6,14,17 20:17 20:24 22:18 28:19 45:16 53:21 54:4 54:21 56:14 66:6 79:16 80:10 84:3 87:5,12,16,18 88:11 89:24 90:12 90:24 worked 18:2,24 19:22 56:23 61:2 63:7 workers 80:12 workforce 79:15 working 10:11 11:24</p>
--	--	---	--	---

18:23 19:21 79:20 80:5 works 29:19 39:14 55:17 65:19 87:19 worse 68:13 wouldn't 52:8 writing 3:8 written 23:9,10 31:2 31:19 35:9 36:23 37:11,13 W-i-n-r-o-d 82:10	24:7 47:5 2000 19:20 2003 21:17 22:4 2006 24:12 2011 45:12 58:5 68:9 2012 9:13 10:4 15:14 17:6 22:5,10 24:23 26:6 40:7,9,11,14 42:2,9 44:12,22 56:1 57:4 58:2,5,8 61:14,17 67:14 68:6 69:13 71:6,17 72:22 73:2,5 76:19 78:22 81:8 82:6 83:8,11 84:3,17,21 2013 1:16 22:7 40:11 91:10 92:17 2018 92:23 217-page 4:13 22 1:14 22nd 58:5 24/7 10:11 270 64:20 28(D) 92:15	58:11		
<hr/> X <hr/>		<hr/> 8 <hr/>		
X 11:16 36:17		8 4:13 60:6,9 8:53 1:16 85 4:14		
<hr/> Y <hr/>		<hr/> 9 <hr/>		
yalami@aep.com 2:10 Yazen 2:7 Yeah 36:19 year 18:6 21:16 34:22 37:8 43:20 67:22 86:10,22 years 21:2,14,15 34:14,19 36:8,17 Yep 57:15 yesterday 47:5,13 67:16	3101 4:6 315 43:15,16,19 61:13 62:4 65:1	9 4:14 85:1,5,9		
<hr/> 0 <hr/>	<hr/> 3 <hr/>			
0 1:20 2:13 3:14 45:20,22 48:20,22 57:9,11 60:5,7 84:24 85:2	3101 4:6 315 43:15,16,19 61:13 62:4 65:1			
<hr/> 1 <hr/>	<hr/> 4 <hr/>			
1 2:8 4:6 47:12 48:13 58:5 1,300 45:18 72:1,3 1.4 45:4,6 10 92:23 10:00 11:16 103-16 58:13 11:07 91:10 12-2177-EL-CSS 1:4 13 74:5 77:5,17 1424 2:3 16 58:12 16th 92:17 161 64:8,9,19,20 65:1 19 58:10 1981 7:21 1985 19:10	4 1:16 91:9 401 1:14 43065 2:3 43215 1:14 2:9 45 4:8 47 4:6,7 48 4:10 4901:1-10-08 83:21 84:6			
<hr/> 2 <hr/>	<hr/> 5 <hr/>			
	5 4:3,8 45:21,24 57 4:12			
	<hr/> 6 <hr/>			
	6 4:10 48:21 49:2 50:3 52:1 60 4:13 614,477,2087 2:4 614,716,2470 2:9 650 16:9			
	<hr/> 7 <hr/>			
	7 4:12 57:10,14,16,24			

1 PUBLIC UTILITIES COMMISSION OF OHIO
2 EVELYN AND JOHN KELLER,)
3 Complainants,)
4 vs.) Case No.
5 COLUMBUS SOUTHERN POWER) 12-2177-EL-CSS
6 COMPANY,)
7 Respondent.)

8
9
10 DEPOSITION OF
11 STEVEN M. LAJEUNESSE

12
13 Taken at the offices of
14 Law Offices of Kevin Maloney
22 East Gay Street, Suite 401
15 Columbus, Ohio 43215

16 on April 3, 2013, at 8:55 a.m.

17
18 Reported by: Sara S. Clark, RPR, CRR, CCP, CBC

19
20 --0--

21

22

23

24

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 John Keller</p> <p>3 ATTORNEY-AT-LAW</p> <p>4 1424 Jewett Road</p> <p>5 Powell, Ohio 43065</p> <p>6 614.477.2087</p> <p>7 jkeller@vorys.com</p> <p>8</p> <p>9 on behalf of the Complainants.</p> <p>10</p> <p>11 Yazen Alami</p> <p>12 Steven T. Nourse</p> <p>13 AMERICAN ELECTRIC POWER</p> <p>14 1 Riverside Plaza</p> <p>15 Columbus, Ohio 43215</p> <p>16 614.716.2470</p> <p>17 yalami@aep.com</p> <p>18 stnourse@aep.com</p> <p>19</p> <p>20 on behalf of the Respondent.</p> <p>21</p> <p>22 --0--</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX OF EXAMINATION</p> <p>2 PAGE</p> <p>3 BY MR. KELLER: 5</p> <p>4 INDEX OF EXHIBITS</p> <p>5 EXHIBIT DESCRIPTION PAGE</p> <p>6 1 Circuit 3101 One-Line Map 31</p> <p>7 2 AEP Forestry Goals, 37</p> <p>8 Procedures, and Guidelines</p> <p>9</p> <p>10 3 E-mail re: Road Closure 72</p> <p>11</p> <p>12 4 Time Sheets 75</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 3</p> <p>1 STIPULATIONS</p> <p>2 It is stipulated by and among counsel</p> <p>3 for the respective parties that the deposition</p> <p>4 of STEVEN M. LAJEUNESSE, a Witness herein,</p> <p>5 called by the Complainants under the applicable</p> <p>6 Rules of Civil Procedure may be taken at this</p> <p>7 time by the notary pursuant to notice and by</p> <p>8 agreement; that said deposition may be reduced</p> <p>9 to writing in stenotypy by the notary, whose</p> <p>10 notes thereafter may be transcribed out of the</p> <p>11 presence of the witness, and that the proof of</p> <p>12 the official character and qualification of the</p> <p>13 notary is waived.</p> <p>14 --0--</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 STEVE M. LAJEUNESSE</p> <p>2 being first duly sworn, as hereinafter</p> <p>3 certified, deposes and says as follows:</p> <p>4 EXAMINATION</p> <p>5 BY MR. KELLER:</p> <p>6 Q. Would you state your name for the</p> <p>7 record, please.</p> <p>8 A. Steve Lajeunesse.</p> <p>9 Q. And what is your business address?</p> <p>10 A. Business address is 5721 Shier Rings</p> <p>11 Road, S-h-i-e-r, second word Rings, Road.</p> <p>12 That's in Dublin, Ohio 43015.</p> <p>13 Q. Have you been deposed previously, sir?</p> <p>14 A. No, sir.</p> <p>15 Q. Would you spell your name again, please.</p> <p>16 A. Yes. Last name is Lajeunesse,</p> <p>17 L-a-j-e-u-n-e-s-s-e.</p> <p>18 Q. Okay. By whom are you currently</p> <p>19 employed?</p> <p>20 A. American Electric Power.</p> <p>21 Q. In what position?</p> <p>22 A. I'm a utility forester.</p> <p>23 Q. Briefly take me through your educational</p> <p>24 background.</p>

<p style="text-align: right;">Page 6</p> <p>1 A. Graduated from Kent State with a 2 bachelor of conservation -- bachelor of science 3 in conservation in '89. Currently certified 4 herbicide applicator, also certified arborist, 5 and a certified utility arborist. Those are 6 through the ISA, International Society of 7 Arboriculture. 8 Q. And please take me through your 9 employment history -- let me ask you this: Did 10 you go to college right after high school? 11 A. Yes, I did. 12 Q. Okay. So starting from when you 13 graduated from college, take me through your 14 employment up to today, please. 15 A. Okay. So after college in '89, 16 graduated in the fall of '89, I worked as a park 17 ranger in Blue Hills Reservation. I'm sorry. 18 That was actually the summer before I graduated 19 in '89. I then worked as a -- at a ski resort 20 in Sugar Bush, Vermont, for a season. And then 21 I worked as a -- 22 Q. Decided to come back to Columbus for the 23 weather? 24 A. For the weather, yeah. And then I left</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Can you take it up to today. 2 A. So I did a lateral move as a utility 3 forester in West Virginia to Columbus, Ohio in 4 '98 -- spring of 1998. I've been in northwest 5 Columbus ever since. 6 Q. In the same position? 7 A. Yes, sir. 8 Q. Okay. Your conservation degree, did any 9 of that involve training in inspecting or 10 trimming or removing trees? 11 A. No, sir. 12 Q. What type of things were involved in the 13 conservation program up there? 14 A. Conservation of natural resources, soil, 15 water, trees, air, that kind of thing. A lot of 16 science courses. Local flora and fauna courses, 17 tree ID and so forth. 18 Q. And your certifications as an arborist, 19 what did that involve? 20 A. I'm not sure I understand the question. 21 Q. Well, you indicated that you're 22 certified as an arborist. 23 A. Yes. 24 Q. I'm trying to find out what that</p>
<p style="text-align: right;">Page 7</p> <p>1 Columbus -- actually, I'm from northern Ohio -- 2 northeast Ohio. Then I went to Canada and 3 worked as a fishing and hunting guide for 4 approximately five years, living up there in the 5 spring through fall and coming back, and I had a 6 painting and remodeling business up in northern 7 Ohio that I did in the winter months. 8 So after that, I worked at a vet clinic 9 in Macedonia, Ohio, so I could go back to vet 10 school. And then moved down to Huntington, West 11 Virginia and was a planner for American Electric 12 Power, planner for the tree crews. 13 Q. When did you start that? Was that your 14 first employment with AEP, or AEP affiliate? 15 A. Actually at that time, I was not 16 employed with AEP. I was employed with a 17 company called ACRT, which was a contract 18 company, working for AEP. 19 Q. When did you start that job? 20 A. 1997, I believe. 21 Q. Okay. Continue. 22 A. Then I was hired on with AEP as a 23 utility forester in the fall of 1997 in West 24 Virginia.</p>	<p style="text-align: right;">Page 9</p> <p>1 involves, what type of training, what testing 2 was done for you. 3 A. Right. The process of becoming 4 certified is you have to -- you need to take a 5 test, and -- you're given a large amount of 6 study material, and you have to take and pass a 7 test. 8 Q. What type of topics are covered in that 9 program? 10 A. Tree ID, tree pruning, tree removal 11 practices, safety equipment, climbing equipment, 12 that sort of thing. 13 Q. Is that particular certification geared 14 toward the utility industry, or is it the same 15 type of program that somebody that comes out to 16 my house to trim trees would do? 17 A. At that level in the ISA certification, 18 it's not tied to the utility industry, which is 19 why I went back and got my utility specialist 20 certification, which is directly tied to 21 electrical industry. 22 Q. In the second certification, the utility 23 arborist, what additional matters are covered in 24 that certification?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. In addition to what was offered at the 2 ISA regular certification -- arborist 3 certification, you learn all about the 4 electrical industry, substations, line voltages, 5 hardware, proper pruning practices, safety 6 practices around power lines, that sort of 7 thing. 8 Q. When you say proper pruning methods, 9 what does that involve? 10 A. Part of that is what was covered under 11 the initial certification, pruning to proper 12 lateral branches, proper pruning techniques on 13 the trees themselves. And the flip side of that 14 is how to safely trim trees around power lines, 15 remove overhang, approach distances to lines if 16 you're, you know, a certified tree trimmer and 17 so forth. 18 Q. You said that you were a planner for a 19 tree crew down in West Virginia. Can you tell 20 me what that job involved. 21 A. That job is the same job that I have 22 people doing for me right now, and that was 23 going in front of the -- at that time, there was 24 Asplundh tree crews working for American</p>	<p style="text-align: right;">Page 12</p> <p>1 with the customer? 2 A. His main job is to contact customers to 3 let them know that tree crews are coming. He 4 also marks trees that will be trimmed or 5 removed. Basically he's there to grease the 6 wheels for the tree crews coming through. 7 Q. And you said you have planners working 8 for you now? 9 A. Yes, sir. 10 Q. How many would that be? 11 A. Currently, I have four. 12 Q. Are those employees of your company, or 13 contractors? 14 A. Contractors. 15 Q. Do they all work for Asplundh? 16 A. They do. 17 Q. Do the contract planners that work for 18 you do the same type of work that you just 19 described that a planner does? 20 A. Yes. 21 Q. Has the procedure for tree control 22 changed over the last two or three years for 23 AEP? 24 A. I'm not sure I understand what you mean</p>
<p style="text-align: right;">Page 11</p> <p>1 Electric Power. 2 Q. Can you spell the name of the tree 3 company? 4 A. Asplundh, A-s-p-l-u-n-d-h. 5 Q. And how did you pronounce it? 6 A. Asplundh. 7 Q. Asplundh? 8 A. Yes. It's actually Asplundh Tree Expert 9 Company. 10 Q. I'm sorry. I interrupted you. 11 So what does the planner do? 12 A. Goes in -- a planner would move in front 13 of the tree crews, per a forester's direction, 14 and contact customers and make a basic outline 15 of the work to be performed when the tree crews 16 come through. 17 Q. How much in advance of the tree crews 18 would the planner normally work? I mean, is it 19 half an hour before, or two weeks before? 20 A. It can vary by large margins. I would 21 not say there is a typical time frame. 22 Q. How would you describe the job of the 23 planner? What does he do? He talks to the 24 customer, but what does he do when he interacts</p>	<p style="text-align: right;">Page 13</p> <p>1 by that. 2 Q. Well, let me ask you this: As a utility 3 forester, have your overall job duties changed 4 over the last two or three years? 5 A. No. 6 Q. And you indicated that you're employed 7 by AEP. A number of the lines that you service, 8 I believe, are owned by Ohio Power. Is that 9 your understanding? 10 A. That's -- I'm not sure I can answer that 11 question accurately the way it's stated. 12 Q. How would you state it? I mean, I'm 13 just trying to figure out which company we're 14 dealing with here. 15 A. My operating company currently is OPCo, 16 Ohio Power Company. It used to be Columbus 17 Southern. 18 Q. Okay. But you work for AEP? 19 A. Yes, sir. 20 Q. So your paycheck says AEP, not Ohio 21 Power? 22 A. My paycheck probably says Ohio Power. 23 Q. But you understand that's all under the 24 AEP umbrella?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. Yes, sir. 2 Q. Do you know who Asplundh works for? Is 3 it Ohio Power, or AEP? 4 A. I would not know what's in the contract 5 on that. 6 Q. For the purposes of this session today, 7 if I refer to it as AEP, will you understand 8 that I'm meaning AEP or its affiliates, Ohio 9 Power and any other affiliates? Is that okay, 10 just to save some time here? 11 A. Yes. 12 Q. And if you think that, in your answer, 13 it makes a difference whether we're talking 14 about AEP as an entity or Ohio Power as an 15 entity, will you point that out so we can 16 clarify that? 17 A. Yes. 18 Q. Okay. Thanks. 19 What is the relationship between AEP and 20 Asplundh? 21 A. Asplundh is a tree company that we have 22 contracted with to do our line clearance work. 23 Q. Do you know if there actually is a 24 written contract between AEP and Asplundh?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. What aspect of the vegetation control 2 does AEP do with its employees? 3 A. AEP employees, such as myself, are 4 responsible for the management of our tree 5 program, the movement of the tree crews, how 6 they do their work, and the type of work that 7 they do. 8 Q. But the actual marking, trimming, and 9 removal is done by a contractor? 10 A. Yes. 11 Q. And in your district, anyway, it is 12 Asplundh? 13 A. That's correct. 14 Q. Do you know how long the relationship 15 between AEP and Asplundh has continued, let's 16 say in your area? 17 A. I don't know that answer. 18 Q. At least five years or so? Let me ask 19 it this way, if you moved up here in '98, have 20 they been the exclusive contractor in your area 21 during that time period? 22 A. No. 23 Q. What other contractors has AEP used? 24 A. In my area specifically, we've had</p>
<p style="text-align: right;">Page 15</p> <p>1 A. Yes. 2 Q. And do you have a copy of that contract 3 available to you? 4 A. No, sir. 5 Q. If you wanted to see that contract, who 6 would you ask? 7 A. I don't know. 8 Q. Who is your immediate supervisor? 9 A. Rich Simpson. 10 Q. S-i-m-p-s-o-n? 11 A. Yes. 12 Q. What is his position? 13 A. He's a forestry supervisor. 14 Q. Do you know what geographic area he 15 covers? 16 A. He has nine foresters, which I am one, 17 and he covers central and southern Ohio. 18 Q. As far as the relationship between AEP 19 and Asplundh, how would you -- do they actually 20 do the marking, trimming, cutting work, or does 21 AEP have employees who do some of that work? 22 Let's say within the last 12 months' time frame. 23 A. Asplundh does the planning and the 24 trimming.</p>	<p style="text-align: right;">Page 17</p> <p>1 Nelson. 2 Q. Nelson? 3 A. Uh-huh. 4 Q. Where are they located, do you know? 5 A. Don't know where they're based out of. 6 Q. And the Asplundh people that you work 7 with in your area over the last year, where is 8 their base of operations? I'm not talking about 9 the corporate headquarters, I'm talking about -- 10 I assume they have some place local where they 11 keep the trucks and do those type of functions. 12 A. Asplundh has an office in Millersport, 13 Ohio, but their trucks are not kept there. 14 Trucks are kept as close as possible to where 15 we're working. 16 Q. The crews that you work with, where do 17 they keep their trucks? 18 A. We have several different pullouts, what 19 we call staging areas. Currently, there's a lot 20 in Delaware State Park, parking, and there is a 21 lot off of Roberts Road, and there is a lot down 22 by 4th Street, the Crew stadium, I think it is, 23 down there. 24 Q. Okay. So you are responsible for</p>

5 (Pages 14 to 17)

Page 18	Page 20
<p>1 directing the contractor as far as what areas to 2 work in; is that right? 3 A. Yes. 4 Q. How do you schedule that work and 5 communicate it to them? Is that done verbally, 6 or meetings, or via e-mail, or some other 7 method? 8 A. We establish a work plan at the 9 beginning of each year that is presented to the 10 Public Utilities Commission, and we work off 11 that work plan. The crews get direct -- 12 direction from me as far as where they go, and 13 that is by both verbal and written 14 communications. 15 Q. What form are the written 16 communications? 17 A. There is a big board in my room that has 18 our circuit list for the year, so they know 19 exactly where they're going. 20 Q. Where is your room? 21 A. At the address I gave you previously. 22 Q. Okay. Does someone from the contractor 23 come in there on a daily or at least a regular 24 basis to check the board?</p>	<p>1 Q. Okay. And what geographic area are you 2 assigned to? 3 A. I cover northwest Columbus and Delaware. 4 Q. All of Delaware County? 5 A. Yes, plus parts of Licking and Marion. 6 Q. And that hasn't changed in the last 7 year? 8 A. No, sir. 9 Q. When you assign work to be done, is it 10 generally done on a circuit-by-circuit basis? 11 A. Yes. 12 Q. Within your -- what do you call it, 13 service area that you're in charge of, is that 14 what -- I mean, what do you refer to it as? 15 A. We could call it a service area. 16 Q. Okay. Within your service area, how 17 many electric circuits are there, as you would 18 use that term? 19 A. Our system's constantly changing, but 20 approximately 160 circuits are in my area. 21 Q. And how many total customers, 22 approximately, are served from those 160 23 circuits? 24 A. I don't know that.</p>
Page 19	Page 21
<p>1 A. Yes, contractor's in my office daily. 2 Q. Over the last 12 months, who has been 3 your primary contact at Asplundh? 4 A. My primary contact with Asplundh are my 5 general foremen. 6 Q. How many general foremen are there? 7 Again, let's talk about the last year. 8 A. Right. 9 Four. 10 Q. Who are they? 11 A. Matt Knisley. 12 Q. Can you spell the last name? 13 A. K-n-i-s-l-e-y. 14 Ritchey Tuttle, T-u-t-t-l-e, Dennis 15 Elkins, and Jason McMahn, M-c-M-a-h-n. 16 Q. Have they all been there for the last 17 year? 18 A. Yes. 19 Q. Do each of them have one crew, or 20 multiple crews working for them? 21 A. Multiple. 22 Q. How many actual crews would, generally, 23 each of those individuals control? 24 A. It varies, but usually around six.</p>	<p>1 Q. What are your job responsibilities as a 2 utility forester? 3 A. My responsibilities are to manage the 4 forestry program for my service area. 5 Q. Okay. And what do you mean by the 6 forestry program? 7 A. It includes the planning of our work, 8 the movement of crews, communication with 9 customers, communication with city officials to 10 get our work done. 11 Q. And what do you mean by your work? What 12 I'm trying to get at is, starting from the big 13 and moving down to the little, is there a 14 vegetation control policy for AEP, or some other 15 overall program that you're trying to help 16 comply with? 17 A. Yes. AEP has a forestry program that I 18 implement in my service area. 19 Q. Okay. And is that forestry program in 20 writing? 21 A. Yes. 22 Q. What's it called? Is it called the AEP 23 forestry program, or is there some other title 24 for this?</p>

Page 22	Page 24
<p>1 A. Well, there is a policy, procedures, and 2 goals of our forestry program, which is in 3 writing. 4 Q. Is that all one document, or -- 5 A. Yes. 6 Q. Do you have a copy of that, not with 7 you, but in your office? 8 A. Yes. 9 Q. Is that a three-ring binder, or is it 10 a -- I mean, how is -- what's it look like? 11 A. I believe it's stapled, and quarter-inch 12 thick. 13 Q. And it is broken down into what 14 sections? I thought you indicated three 15 sections. 16 A. I haven't spoken on the policy that 17 we're speaking about now. It's broken into many 18 sections, all of which I'm not -- I won't be 19 able to recall without having a copy of that in 20 front of me. 21 Q. I thought a minute ago, you said there 22 were goals and two other general categories. 23 A. You asked me what it was called. And 24 the title on that is our goals, procedures, and</p>	<p>1 Q. How do you know every year what you're 2 supposed to be doing? Do you get like written 3 directions or budget for the year? I mean, how 4 does that work? 5 A. Are you asking about our budget, or our 6 work plan? 7 Q. I don't know what there is. If you get 8 both, tell me about both. 9 A. Our work plan is determined by cycle 10 trends presently, so circuits come up for 11 needing to be trimmed or worked on a regular 12 basis. Our budget is given to us by my 13 supervisor. 14 Q. Is that done annually? 15 A. Yes. 16 Q. First of the year? What time of the 17 year does that happen? 18 A. Our budget? 19 Q. Uh-huh, yes. 20 A. Beginning of the year. 21 Q. Have you received your budget for this 22 year? 23 A. Yes. 24 Q. And do you recall, approximately, when</p>
Page 23	Page 25
<p>1 policies. 2 Q. Is there a separate section called 3 goals, or is it all sort of just combined into 4 one thing? 5 A. It is broken into many sections. I 6 don't believe there is a section called goals. 7 Q. In addition to the forestry program 8 document, are you aware of any other documents 9 produced or established by AEP that covers 10 forestry issues as far as tree trimming, tree 11 removal, tree control, vegetation control? 12 A. We have trimming guidelines, which is a 13 single-page overview. 14 Q. What type of things does that cover? 15 A. That would cover distances we would like 16 to see cleared from our primary conductors, the 17 use of herbicides, how aggressive we would be on 18 tree removals, that type of thing. 19 Q. During your employment at AEP, have 20 those trimming guidelines changed? 21 A. No. 22 Q. Any other documents you're aware of that 23 govern your work? 24 A. No.</p>	<p>1 you received that? 2 A. Again, beginning -- around the beginning 3 of the year. 4 Q. The -- you said that there are cycles 5 for addressing these in the vegetation and 6 trees. Can you tell me what you mean by that. 7 A. Currently -- currently, we're in a 8 program. We're working towards getting on a 9 four-year cycle. In other words, your circuit 10 was trimmed last year. It would be due to be 11 trimmed again in 2016. That's our mode of 12 action right now. That's our goal that we're 13 working towards right now. 14 Q. What type of cycle have you been on? 15 A. It has varied greatly over the years. 16 Q. Over the last 10 years that you've 17 worked in this position, what cycles have been 18 used for various circuits? 19 A. AEP has operated under different 20 programs over the course of the last 10 years, 21 one of which was a breaker zone program, which 22 included trimming the breaker zones from the 23 substation to the first isolating -- major 24 isolating device on that circuit. That was the</p>

<p style="text-align: right;">Page 26</p> <p>1 type of cycle work we were on.</p> <p>2 That's -- I'm not sure I understand your</p> <p>3 question.</p> <p>4 Q. I don't know enough to ask it any</p> <p>5 more -- I'm just trying to find out what -- you</p> <p>6 said there were cycles. Your goal is to get</p> <p>7 them to four years. I'm trying to find out what</p> <p>8 it has been. Presumably it hasn't been on a</p> <p>9 four-year cycle or you wouldn't be trying to get</p> <p>10 on a four-year cycle, so I'm trying to find out</p> <p>11 what the cycles have been.</p> <p>12 A. They have varied greatly. There have</p> <p>13 been circuits that have been on a four-year, and</p> <p>14 it just has worked out that way. Other years --</p> <p>15 there are portions of that 10 years you're</p> <p>16 speaking of, you know, there are circuits that</p> <p>17 have certainly gone much longer than that.</p> <p>18 Q. Okay. You mentioned the circuit that my</p> <p>19 house is on was trimmed last year. Do you know</p> <p>20 when it was trimmed previous to that?</p> <p>21 A. Previous trim on your circuit was 2001.</p> <p>22 Q. Okay.</p> <p>23 A. There --</p> <p>24 Q. Go ahead.</p>	<p style="text-align: right;">Page 28</p> <p>1 scheduling of work?</p> <p>2 A. The reliability of all our circuits are</p> <p>3 important to us.</p> <p>4 Q. I understand that.</p> <p>5 A. Hospital circuits, circuits of that</p> <p>6 nature, are probably patrolled more frequently</p> <p>7 than more outlying circuits.</p> <p>8 Q. Looking for issues? I mean, when you</p> <p>9 say patrolled, what do you mean by patrolled?</p> <p>10 A. Looking for both hardware issues,</p> <p>11 tree-related issues and so forth.</p> <p>12 Q. Is there a specific program to patrol</p> <p>13 all of the lines?</p> <p>14 A. Not on the forestry side.</p> <p>15 Q. Okay. But do you know whether AEP has</p> <p>16 people whose primary responsibility is -- or who</p> <p>17 one of their responsibilities is to specifically</p> <p>18 patrol looking for hardware or vegetation</p> <p>19 issues?</p> <p>20 A. I don't know that.</p> <p>21 Q. Well, you said that some areas would be</p> <p>22 patrolled more, so I'm just trying to find out</p> <p>23 what you meant. I mean, who does the patrolling?</p> <p>24 A. I would say I don't have enough</p>
<p style="text-align: right;">Page 27</p> <p>1 A. It was also trimmed -- the breaker zone</p> <p>2 program was in operation in 2009, so we trimmed</p> <p>3 the breaker zone on your circuit in 2009.</p> <p>4 Q. And the breaker zone is the area from</p> <p>5 the substation to the first breaker?</p> <p>6 A. First reclosure, which on your circuit,</p> <p>7 is at the westernmost end of Jewett Road.</p> <p>8 In 2009, we also did some hotspot tree</p> <p>9 trimming, and in 2010, we also did some hotspot</p> <p>10 tree trimming.</p> <p>11 Q. What do you mean by hotspot tree trim?</p> <p>12 A. Portions of that circuit were identified</p> <p>13 as needing to have tree work done, and we sent</p> <p>14 crews in to do it.</p> <p>15 Q. When work is planned or scheduled, is</p> <p>16 there -- trimming and tree removal work, is</p> <p>17 there consideration given to the risks of a</p> <p>18 problem developing in that area? For example,</p> <p>19 if you're next to a hospital, does that area get</p> <p>20 greater attention than if you're in a country</p> <p>21 road in Morrow County?</p> <p>22 A. I'm not sure what you mean by attention.</p> <p>23 Q. Does the importance of the circuit --</p> <p>24 let me use that term -- factor into the</p>	<p style="text-align: right;">Page 29</p> <p>1 knowledge to answer that question accurately.</p> <p>2 The line may be patrolled by forestry personnel</p> <p>3 or by line personnel at varying times.</p> <p>4 Q. Do you ever patrol lines?</p> <p>5 A. Yes.</p> <p>6 Q. Does somebody call you and say, I want</p> <p>7 you to patrol X, Y, and Z, or do you just take</p> <p>8 it upon yourself to patrol every line in your</p> <p>9 area, you know, periodically?</p> <p>10 A. I don't receive direction from anybody</p> <p>11 to patrol my lines. I patrol on my own</p> <p>12 knowledge of my area.</p> <p>13 Q. You're saying if there was an area that</p> <p>14 you consider that an outage would cause more</p> <p>15 damage, then you would patrol that more often;</p> <p>16 is that true?</p> <p>17 A. Possibly.</p> <p>18 Q. So am I correct that there is not any</p> <p>19 specific program or procedures to patrol lines</p> <p>20 looking for either hardware or vegetation</p> <p>21 problems?</p> <p>22 MR. ALAMI: Objection. I think that</p> <p>23 question's been asked and answered before.</p> <p>24 Q. You need to answer.</p>

<p style="text-align: right;">Page 30</p> <p>1 MR. ALAMI: You can answer. 2 A. Not from the forestry side, other than 3 our cycle trim program. I don't have enough 4 knowledge to answer about the line department 5 and what their protocol is on that. 6 Q. Have there been occasions where the 7 budget presented to you constrained the amount 8 of tree or vegetation work that you were able to 9 get done during that year? 10 A. Our budget is in direct correlation with 11 the amount of work we get done. Reduced budget 12 is reduced work. 13 Q. So you get the budget and you decide how 14 much work you can do under that budget; is that 15 the way it works? 16 A. Yes. 17 Q. Are you required periodically to present 18 a request for how much you think your budget 19 should be in your area? 20 MR. ALAMI: I'll object to this whole 21 line of questioning about the budget. I believe 22 Mr. Lajeunesse stated previously that he 23 receives a budget from his supervisor, somewhere 24 around the beginning of the year. And frankly,</p>	<p style="text-align: right;">Page 32</p> <p>1 It also incorporates only one circuit. 2 Q. Okay. Is this the type of map that you 3 work with on a regular basis? 4 A. Yes. 5 Q. I notice there are two pages here. Do 6 you know how the second page ties into the first 7 page? 8 A. Yes. This is the remainder of the work 9 coming down 315. This ties in right at Jewett 10 Road (indicating). 11 Q. Why don't you, if you can, take a pen 12 and just mark on there on Page 2 where Jewett 13 Road is, just right on there. 14 A. (Indicating). 15 Q. I notice that there is some handwritten 16 material on the left-hand side of Page 1. Do 17 you know who wrote that? 18 A. Our planner, the gentleman that planned 19 the circuit, Ty Carpenter. 20 Q. Do you know when he wrote that on 21 there -- 22 A. No. 23 Q. -- at what stage of the process would he 24 have written that?</p>
<p style="text-align: right;">Page 31</p> <p>1 the budget or amount in the budget, I don't 2 think, is relevant to this proceeding. 3 You can answer, if you know. 4 Q. You still answer. This is lawyer stuff. 5 We make objections and stuff for the record. 6 But my question is: Do you -- as part 7 of your job responsibility, do you submit 8 something like a request for so much money for 9 the next year? 10 A. No. 11 Q. Okay. 12 --0-- 13 (Exhibit 1 marked.) 14 --0-- 15 BY MR. KELLER: 16 Q. Let me hand you what's been marked as 17 Exhibit 1 and ask you if you can identify what 18 that document is. 19 A. This is our one-line map for Circuit 20 3101. 21 Q. When you say one-line map, you mean this 22 covers only one circuit? I'm just trying to 23 find out what you meant by that term. 24 A. This has all primary conductors on it.</p>	<p style="text-align: right;">Page 33</p> <p>1 A. That's the total tree count for this 2 circuit. It would be written on there at the 3 end of the planning process. 4 Q. Okay. So after he finished the planning 5 but before the work was actually done -- 6 A. Yes. 7 Q. -- is that what that means? 8 And there are four categories listed 9 there at the top. Could you describe what each 10 of those means to you. 11 A. Trims is the tree that's scheduled to be 12 trimmed. Branches trimmed away from conductors. 13 Q. Do you know whether that's an estimate, 14 or does he actually count them? 15 A. That is an estimate. 16 Q. Okay. 17 A. Brush is any noncompatible tree species 18 coming up underneath our lines. It's a 19 tall-growing tree that is now the size of stick 20 and brush. Removals is anything that's marked 21 to be removed. DBX are large removals, over 18 22 inches. 23 Q. On the brush category, is that number 24 15.7, or 157?</p>

<p style="text-align: right;">Page 34</p> <p>1 A. 15.7. 2 Q. 15.7? 3 A. Yes. 4 Q. So I don't understand. Is that the 5 number of brushes that are being removed? 6 A. Number of units. 7 Q. What's a unit? 8 A. 50 by 10. 9 Q. Okay. 50 by 10? 10 A. (Nods head.) 11 Q. But the other ones are -- indicate 12 individual trees? 13 A. Yes. 14 Q. Now, the -- what instructions are given 15 to the planners to determine what trees need to 16 be trimmed or removed? 17 A. They work off our AEP forestry 18 guidelines. 19 Q. And is that the forestry program 20 document that you indicated? 21 A. Yes. 22 Q. And that's a quarter-inch thick? 23 A. Yes. 24 Q. Okay. And what are the criteria for</p>	<p style="text-align: right;">Page 36</p> <p>1 saying? 2 A. Yes. 3 Q. And what are the criteria for removal? 4 A. We try to remove trees that are under 5 our facilities if they're a tall-growing tree 6 species. Good tree in a bad spot. Improve 7 safety and reliability on our infrastructure. 8 Q. Is the planner told to mark for removal 9 all trees underneath your primary conductors? 10 A. No. 11 Q. So which -- again, I'm trying to figure 12 out, which trees is the planner told to mark for 13 removal versus trimming? 14 MR. ALAMI: Objection. I think we've 15 had this question now a couple of times, and I 16 believe Mr. Lajeunesse has referred to the AEP 17 policies as the instructions the planners follow 18 in determining what trees to either trim or 19 remove. And I believe, Mr. Keller, you are in 20 possession of that policy. It was turned over 21 to you -- 22 MR. KELLER: That's the 17-page 23 document? 24 MR. ALAMI: I believe so.</p>
<p style="text-align: right;">Page 35</p> <p>1 removal versus trimming for trees. 2 A. None other than are stated in that 3 document. 4 Q. We don't have it here, but, I mean, the 5 best of your recollection, what are those -- 6 what are the criteria? 7 A. Trees would be trimmed if they're within 8 10 feet of the conductors. 9 Q. By conductors, you mean the lines? 10 A. Primary conductors, that's correct. 11 Q. Again, just to educate myself, you say 12 primary conductors. Are there also secondary 13 conductors? 14 A. Yes. 15 Q. What's the difference? 16 A. Voltage. 17 Q. So secondary, they go up to a house, for 18 example? 19 A. That's correct. 20 Q. And the primary is the line that feeds a 21 number of properties? 22 A. Correct. 23 Q. Okay. So for primary, it's trim any 24 branches within 10 feet, is that what you're</p>	<p style="text-align: right;">Page 37</p> <p>1 MR. KELLER: He described it as a 2 quarter-inch thick. 3 THE WITNESS: I also said it was stapled 4 and gave you the general title on that document. 5 MR. ALAMI: That's fine. If you want to 6 discuss the document, we can discuss the 7 document. But he's referred to it as the 8 document containing the information responsive 9 to your questions here. 10 --0-- 11 (Exhibit 2 marked.) 12 --0-- 13 BY MR. KELLER: 14 Q. Let me show you what's marked as 15 Exhibit 2. Can you identify that document. 16 A. That's our Forestry Goals, Procedures, 17 and Guidelines. 18 Q. So that's the forestry program document 19 that you referred to earlier? 20 A. These are our forestry guidelines. 21 Q. But is there more to the forestry 22 program document you described earlier, or is 23 that it? 24 A. This is it.</p>

Page 38	Page 40
<p>1 Q. So this is, to your knowledge, the only 2 written instructions or guidelines given to the 3 planner to determine what needs to be trimmed or 4 removed? 5 A. There is also the clearance specs that I 6 mentioned earlier, the single-page clearance 7 guidelines that I mentioned earlier. 8 Q. Does that cover removal, as well as 9 trimming? 10 A. It gives the basic guidelines for what 11 we're looking for in our right-of-way. 12 Q. What do you refer to that document as, 13 the forestry guidelines? 14 A. I don't recall what the title is on 15 that, if there is one. 16 Q. What do you call it? 17 A. Clearance guidelines. 18 Q. Now, referring to Exhibit 2 -- well, let 19 me ask you this: Under the clearance 20 guidelines, what do you understand it says as to 21 when a tree is to be removed? 22 MR. ALAMI: I'll object. I think the 23 document will speak for itself. 24 You can answer the question.</p>	<p>1 Q. So that's part of your job, is to 2 receive reports directly from the planners -- 3 A. Yes. 4 Q. -- of hazard or danger trees? 5 A. Yes. 6 Q. And then what do you do when you receive 7 such a report? 8 A. Go out and inspect the trees. Some 9 trees don't need to be removed. Some trees can 10 be trimmed to make our lines safe. Some trees 11 don't need to have a thing done to them. 12 Q. So would that be a situation where the 13 planner was simply wrong, or you have a 14 different conclusion about it than he does? 15 A. Different conclusion. 16 Q. What type of training do the planners 17 have, to the best of your knowledge? 18 A. That would vary greatly. 19 Q. Do you know what type of training 20 Mr. Carpenter has? 21 A. I don't. 22 Q. Do you know how long he has worked as a 23 planner? 24 A. Approximately two years.</p>
Page 39	Page 41
<p>1 A. Again, we target trees for removal that 2 are under our facilities, adjacent to our 3 facilities. We also target danger trees, hazard 4 trees and so forth. 5 Q. What do you mean by a hazard or danger 6 tree? 7 A. Leaning, dead, diseased trees that could 8 affect our facility. 9 Q. And if there is a danger or hazard tree 10 in proximity to one of your primary conductor 11 lines, the planner is supposed to mark that for 12 removal, is that what you're saying? 13 A. Possibly. 14 Q. Why possibly and not yes? 15 A. They're to bring those to our attention. 16 Q. Okay. How do they bring it to your 17 attention? 18 A. Various ways. It could be written on a 19 map. It could be a phone call. It could be a 20 written sheet of paper on my desk. 21 Q. Do the planners in your area -- when you 22 say bring it to our attention, do they bring it 23 to your attention, or to -- 24 A. Yes.</p>	<p>1 Q. A minute ago, you said that trees would 2 be targeted for removal if they were under your 3 primary lines, or I think you said adjacent to. 4 What do you mean by adjacent to? 5 A. If this is our primary conductor, the 6 tree might be here (indicating). When we have 7 to remove more than 50 percent of the crown on 8 that tree to clear it for our primary 9 conductors, it's a good candidate for removal. 10 Q. Why would that be? 11 A. That would be because we're removing 12 more than 50 percent of the canopy of the tree. 13 It's not healthy for the tree. Aesthetically 14 unpleasing. 15 Q. Is a tree, for example, one side has 16 been removed of the branches, is that tree less 17 stable than a tree that the trimming has 18 occurred all around the tree -- do you 19 understand what I'm saying -- in a symmetrical 20 manner? 21 A. I can't answer that question. Every 22 tree is different. All of the different species 23 of trees respond differently to pruning and so 24 forth. You can't answer that with a yes-or-no</p>

<p style="text-align: right;">Page 42</p> <p>1 question -- or answer. 2 Q. When you look at trees for potentially 3 removal -- removing them, am I correct that the 4 area you look at are if a tree is close enough 5 that if it fell, it could affect one of your 6 primary lines? 7 A. We look at trees that have a potential 8 to reach our facilities if they fall. 9 Q. Okay. And if there is a tree that the 10 planner concludes has a potential of damaging 11 your lines if it falls and if he views that it 12 is a danger or hazard tree, then he should 13 either mark it for removal or contact you; is 14 that right? 15 A. He needs to first contact that customer. 16 Again, that's part of his process, is to contact 17 that customer, discuss the tree, and mark it for 18 removal, or at least bring it to my attention. 19 Q. In your district, how does a planner 20 physically mark trees, either for trimming or 21 removal? 22 A. With painted dots. 23 Q. Are there different colors? 24 A. Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 planner, part of his job is to prepare maps 2 showing where work needs to be done? 3 A. That's correct. 4 Q. And do they just prepare those maps on a 5 circuit-by-circuit basis? Let's take Circuit 6 3101 in 2012. Is this the map that he would 7 have returned to you? 8 A. This is the cover map. Each number here 9 represents an individual map that's also turned 10 in -- 11 Q. Okay. 12 A. -- at the time. 13 Q. The numbers you pointed to, 1, 2, 3, et 14 cetera, with the circles around them, 15 handwritten, do you think Mr. Carpenter would 16 have written those numbers on here? Is that 17 normally the way it occurs? 18 A. It happens several ways. Sometimes I 19 make up the map, and sometimes he does. In this 20 case, I couldn't answer. 21 Q. So there should be somewhere individual 22 maps for 1, 2, 3, 4, 5, et cetera, showing the 23 trees that he marked on there? 24 A. That's correct.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. What do the colors mean? 2 A. Blue means trim. Red, orange, or pink 3 means removal. 4 Q. Is there a difference between red, 5 orange, and pink? 6 A. No. 7 Q. Do you know when -- strike that. 8 Was Mr. Carpenter the planner for 9 Circuit 3101 in 2012? 10 A. Yes. 11 Q. And do you know when he began that work 12 and when he completed the work on this circuit? 13 A. I believe he began work planning the 14 circuit the second week of April and finished 15 somewhere around the third week of May. 16 Q. Do you know when he was working on 315? 17 A. No, I don't. Sometime in that window. 18 Q. What kind of reports do you receive from 19 the planners when they're out there working? 20 Monthly, weekly, daily, hourly? How does that 21 work? 22 A. I may receive no reports from them until 23 I get the finished maps back in my office. 24 Q. Okay. And you're saying that the</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Do those maps show each individual tree, 2 or just approximate areas where work is needed? 3 A. Approximate locations. 4 Q. And would you have those maps for this 5 circuit for 2012? 6 A. Yes. 7 Q. Other than provide you with those maps, 8 what type of report do you receive back from the 9 planner after he finishes the circuit? 10 A. There are no other reports associated 11 with the finished map product. 12 Q. So for Circuit 3101, when Mr. Carpenter 13 finished his planning work in 2012, he would 14 have returned to you this map, Exhibit 2, 15 together with 17 individual maps? 16 MR. ALAMI: Just for clarifying the 17 record, I believe you meant Exhibit 1. 18 MR. KELLER: I'm sorry. Exhibit 1, 19 thank you. 20 Q. Is that correct? 21 A. That's correct. 22 Q. Okay. Do the individual maps 23 specifically identify removals or DBX trees? 24 A. The maps will indicate a count per span,</p>

Page 46	Page 48
<p>1 pole to pole, the type of work that's needed to 2 be done in that span. 3 Q. Generally, how far apart are the poles? 4 Is there any standard distance? 5 A. No, no standard. 6 Q. You indicated that sometimes the planner 7 marks a tree for removal and you conclude that 8 the tree does not need to be removed, correct? 9 A. That's correct. 10 Q. Have there ever been instances where a 11 planner failed to mark a tree for removal and 12 you conclude that it should be removed? 13 A. Yes. 14 Q. So I assume like all of us, they can 15 make mistakes, the planners. 16 A. They make mistakes. They -- 17 Q. Again, let's use Circuit 3101 in 2012. 18 After the planner goes out and marks that and 19 turns the maps back in to you, does anyone else, 20 either from the contractor or from AEP, go out 21 and check his work? 22 A. The planning process is not inspected 23 prior to having the tree crews do the work. 24 Q. So the tree crews are then dispatched to</p>	<p>1 find a tree back here that can potentially cause 2 an outage or accident and you address it, that 3 can protect your whole circuit while you're 4 working on the rest of it. So we work from the 5 sub out to effect the greatest potential of 6 reliability and safety on that circuit. 7 Q. On a circuit such as 3101, is it 8 engineered so it can be divided into portions, 9 so portions of this circuit can have power and 10 portions cannot, or is it sort of you're all in 11 or you're all out? 12 A. This circuit has isolating devices on 13 it. I really couldn't speak to the ability for 14 this circuit to be back-fed from another 15 circuit, for example, if there was an outage on 16 this portion of that circuit. Sometimes power 17 can be back-fed from a different circuit to 18 energize a portion of that circuit while another 19 portion of that circuit is out. 20 THE WITNESS: Would this be a bad time 21 to ask to take a break? 22 MR. KELLER: Any time you want. 23 THE WITNESS: Thank you. 24 (Recess taken.)</p>
Page 47	Page 49
<p>1 do the work that the planner tells them to do? 2 A. Yes. 3 Q. Do you know, is that what happened on 4 Circuit 3101 in 2012? 5 A. Yes. 6 Q. Do you know when the tree crews actually 7 did the work on Circuit 3101? 8 A. Work began the last week of May, I 9 believe, and was concluded, except for this 10 section from Jewett to Powell Road, the third -- 11 last week in -- week ending the 23rd, I believe, 12 of June. 13 Q. Do you know how many different crews 14 worked on this circuit during that time period? 15 A. No, sir. 16 Q. Would they -- would it have been more 17 than one crew, generally? 18 A. Yes. 19 Q. Would they generally have started at map 20 point 1 and worked up to 17, or do they start at 21 different areas, or how does that generally 22 work? 23 A. Generally, we start at the substation 24 and work our way through the circuit. If you</p>	<p>1 MR. KELLER: Can you read back the last 2 question? 3 (Record read as requested.) 4 BY MR. KELLER: 5 Q. Did you have any personal involvement in 6 the planning work for Circuit 3101 in 2012? 7 A. No. 8 Q. And when there was an outage on that 9 circuit in late June, what was your involvement 10 in the power restoration effort? 11 A. Are you asking me to assume that the 12 outage you're speaking of is the one on 315 that 13 you're familiar with? 14 Q. Let's talk generally. You were aware 15 that there was a storm in late June, and a 16 number of circuits were -- there were a number 17 of outages, correct? 18 A. Yes. 19 Q. What is -- what was your personal role 20 in responding to that event? 21 A. That storm? 22 Q. Yes? 23 MR. ALAMI: I'll just object; relevance. 24 You can answer, if you know.</p>

Page 50	Page 52
<p>1 A. My job duties during a storm such as the 2 one that occurred in late June are to coordinate 3 tree crew movements to facilitate restoration 4 efforts. 5 Q. Okay. And were you involved in deciding 6 what locations got attention at any given time, 7 in other words, prioritizing the work, or did 8 somebody tell you, here's a list of the outages 9 we're going to address in this order and then 10 you then dispatched the crews to follow that 11 list of priorities? 12 A. During an event such as the storm in 13 June, I have no ability to send any tree crew to 14 any location without a line truck. Conditions 15 are such that lines are down, poles are down, 16 there's all kinds of hazards. So I do not have 17 any -- I do not make any determination as to 18 when -- what job or what outage gets worked. 19 Q. At some point in time, you have to 20 dispatch, I assume, your contractor's crews to a 21 certain location, right? 22 A. Yes. 23 Q. And who tells you what locations -- you 24 know, what the priority list is?</p>	<p>1 A. That's correct. 2 Q. You just went where the linemen told you 3 you needed to be; is that correct? 4 A. That's correct. 5 Q. Did you have any personal involvement in 6 the efforts to restore service to Circuit 3101 7 in June and July of 2012? 8 A. Yes. 9 Q. Tell me what that was. 10 A. I was on-site as we cleaned up that tree 11 on 315. 12 Q. Any other involvement prior to that 13 date? 14 A. None other than sending crews to various 15 locations on that circuit, I'm sure. 16 Q. But you personally weren't -- were 17 not -- you don't recall being out any place else 18 on the circuit during that period of time? 19 A. I really don't recall. 20 Q. Why were you present when the tree was 21 removed on 315? 22 A. Because it was brought to my attention, 23 and I just -- I went there. 24 Q. Just because it was 315?</p>
Page 51	Page 53
<p>1 A. No one tells me what the priority list 2 is. When I need to send a tree crew to a 3 location, the linemen, most generally speaking, 4 come into my office to say, I'm going here today 5 to work on this outage and I need two tree 6 crews, who can you get me. 7 Q. Okay. And in June and July of 2012, 8 that was generally done by somebody coming into 9 your office? 10 A. Generally, yes. 11 Q. As opposed to e-mails going around or 12 anything like that? 13 A. Some linemen have my phone number. They 14 may phone me in the morning and say, I'm going 15 back to this location today, can you send me the 16 same crews I had yesterday, or I'm going to this 17 location, can you send me additional crews. 18 Q. How many different linemen would you 19 have been contacted by during that period of 20 time? I mean, is it three, or 50? 21 A. Closer to 50. 22 Q. So the prioritizing of the work was done 23 by the linemen or their bosses, not by the 24 forestry team; is that correct?</p>	<p>1 A. Just because it was -- we were sending a 2 lot of trucks over there, and I wanted to make 3 sure everything ran smoothly and no one got hurt 4 and things were safe when we work. That is a 5 very hazardous stretch of road, I'm sure as 6 you're aware. 7 Q. Why do you consider it a hazardous 8 stretch of road? 9 A. Narrow, two-lane, fast-moving vehicles. 10 Q. At that period of time, was the road 11 open or closed? 12 A. That period of time, when we did the 13 outage, it was closed. 14 Q. Would you consider 315 more -- when 15 there is no traffic on it, to be more dangerous 16 than other two-lane roads in your area? 17 A. More dangerous than some, and not as 18 dangerous as others. 19 Q. Again, if there is no traffic, what made 20 that road dangerous for your type of work? 21 A. The large amount of trucks showing up at 22 that location, my knowing that it is a narrow 23 roadway with a guardrail on one side and a steep 24 bank on the other. The sheer amount of</p>

Page 54	Page 56
<p>1 resources that we were putting towards that 2 operation, I felt, mandated my presence on that 3 scene. 4 Q. And what work was done that day when you 5 were out there? 6 A. The outage was restored, the limb was 7 removed, lines were put back up. We also 8 stripped out two phases of line from Jewett Road 9 to just south of Powell Road. And we trimmed 10 that whole section, as well. 11 Q. Okay. You sort of lost me on some of 12 those things. Let's go through that list again 13 of what all was done that day. 14 A. So the downed power line was repaired. 15 Q. And that was done by an AEP line crew, 16 is that what you would -- 17 A. I don't recall who actually -- what 18 company actually repaired that line. 19 Q. But a line crew, not -- 20 A. Yes. 21 Q. -- a forestry crew? 22 A. Yes. 23 Q. Okay. And what else was done? 24 A. Prior to us being on that road that day,</p>	<p>1 A. Yes. That was in the process of being 2 planned. That was a job that was pending. 3 Q. What else was done that day? 4 A. Trees were trimmed the whole section of 5 road there from Jewett Road, just south of 6 Powell Road. 7 Q. Per Mr. Carpenter's planning 8 recommendations? 9 A. More or less, yes. 10 Q. Were there any other trees that had 11 fallen across 315 in that section between Jewett 12 and Powell Road at that time? 13 A. Not that I'm aware. 14 Q. And what else -- I think you said there 15 was a fourth thing that was done that day. You 16 removed the tree that had fallen. 17 A. Cleaned up the debris on the road. I'm 18 not sure -- I think we just ended up pushing it 19 off -- cleared the road for traffic, for our 20 trucks. 21 Q. But you had to remove the tree that had 22 actually fallen across the line, correct? 23 A. The part of the tree that fell across 24 the line we removed off the roadway.</p>
Page 55	Page 57
<p>1 that was a three-phase line running up that 2 road, meaning there was three primary conductors 3 on those poles from Jewett Road, just south of 4 Powell Road. And while that road was shut down, 5 we went ahead and removed two of those phases, 6 leaving one phase going down 315. That's an 7 effort to improve reliability in that area, 8 improve treeline contact situations, improve 9 safety and reliability. 10 Q. Okay. So there was a three-phase line, 11 and you didn't need a three-phase line, so you 12 replaced it with a one-phase line? 13 A. We removed two phases and left one 14 remaining. 15 Q. Does that involve actually physically 16 changing one wire for another wire, or do you 17 physically leave one in place and remove 18 something else? 19 A. You remove and leave one in place. 20 Q. Okay. And, again, was that done by the 21 line crew? 22 A. Yes. 23 Q. Was that something that had been planned 24 previous to this storm?</p>	<p>1 Q. And that was a tree, wasn't it? 2 A. That was a tree. 3 Q. What do you mean by a portion of a tree? 4 A. The tree in question has three leads 5 coming off -- out of the trunk. That was one of 6 those leads. 7 Q. And that -- there are three that 8 essentially came out of the ground? I mean, or 9 did it split into three 30 feet up in the air, 10 or -- I don't understand what you're saying. 11 A. It's more or less a single trunk at 12 ground level to a certain distance off the 13 ground, and then it splits off into three 14 separate leads. 15 Q. Okay. And how big around was it, do you 16 recall it? 17 A. I don't recall. 18 Q. Do you recall how long it -- strike 19 that. 20 What was the order of the work that was 21 done out there that day? What happened first, 22 what happened second, what happened third? 23 A. Let me correct something I said 24 previously.</p>

Page 58	Page 60
<p>1 Q. Sure.</p> <p>2 A. I was not there when that tree was</p> <p>3 removed off the roadway. That's why I showed</p> <p>4 some uncertainty in that response. I'm assuming</p> <p>5 my crews did it, but I might be wrong in</p> <p>6 assuming that.</p> <p>7 The order of events that day was pretty</p> <p>8 much simultaneous. Everything was happening</p> <p>9 together. The line was being repaired as I</p> <p>10 approached there, we were trimming trees, and</p> <p>11 they were removing phases.</p> <p>12 Q. Do you recall ODOT doing any work out</p> <p>13 there at the same time?</p> <p>14 A. ODOT was present to block the road, I</p> <p>15 believe, but I'm not aware of them doing any</p> <p>16 extra work out there that day.</p> <p>17 Q. And do you recall how long it took to</p> <p>18 repair the line once the crews arrived?</p> <p>19 A. Don't recall.</p> <p>20 Q. Are there records of something like that</p> <p>21 somewhere that you know of?</p> <p>22 A. The actual repair of that line, I don't</p> <p>23 know if those records exist or not.</p> <p>24 Q. Do you recall how long your crews were</p>	<p>1 A. I don't recall the exact number, no.</p> <p>2 Q. More than one, if you recall?</p> <p>3 A. Yes, there was more than one.</p> <p>4 Q. What I'm trying to get at, was the tree</p> <p>5 trimming work done in the same way it would have</p> <p>6 been done, but for the storm?</p> <p>7 A. I would say yes to that, the tree work</p> <p>8 was done the same as it would have been, except</p> <p>9 for the storm.</p> <p>10 Q. By the same number of crews and</p> <p>11 everything, or --</p> <p>12 A. We had more crews on-site during that</p> <p>13 storm --</p> <p>14 Q. But --</p> <p>15 A. -- than we would have had on a normal</p> <p>16 trimming.</p> <p>17 Q. That particular afternoon, you had more</p> <p>18 crews on-site, is that what you're saying, or</p> <p>19 just generally in the area, you had more crews?</p> <p>20 A. That's a two-part question. Certainly</p> <p>21 we have more crews in the area because we were</p> <p>22 in major storm restoration mode. We also had</p> <p>23 more crews on 315 that day than we would have</p> <p>24 sent down to do on a normal cycle trim, and we</p>
Page 59	Page 61
<p>1 out there on 315 on that day, that section of</p> <p>2 315?</p> <p>3 A. I really don't recall how long we were</p> <p>4 there.</p> <p>5 Q. And did they complete the trimming work</p> <p>6 that was -- that needed to be done?</p> <p>7 A. They completed the work to -- yes, that</p> <p>8 was -- that needed to be done at that point in</p> <p>9 time.</p> <p>10 Q. Was it work that needed to be done with</p> <p>11 the exception of the removing the tree that had</p> <p>12 fallen, or the portion of the tree that had</p> <p>13 fallen, was that the same work that had been</p> <p>14 planned by Mr. Carpenter previously?</p> <p>15 A. I didn't compare the work we were doing</p> <p>16 to the map that Mr. Carpenter had planned.</p> <p>17 Being on-site, I had them trim the trees to our</p> <p>18 specifications, in general. We didn't want to</p> <p>19 spend any more time out there than was</p> <p>20 necessary, but we wanted to clear the line as</p> <p>21 best we could at that point in time.</p> <p>22 Q. And do you recall how many crews -- how</p> <p>23 many tree crews were doing the work out there</p> <p>24 that day?</p>	<p>1 trimmed it much more quickly than we would have</p> <p>2 in a normal situation, saying that the storm had</p> <p>3 not occurred. We were trying to get it done</p> <p>4 quickly, get it cleaned up and get off the road,</p> <p>5 so we threw more resources at it.</p> <p>6 Q. Do you know why that work on 315 was not</p> <p>7 done before it was done?</p> <p>8 A. Yes. We're in the process of</p> <p>9 coordinating a joint-line department forestry</p> <p>10 approach to addressing that section of road,</p> <p>11 completing the tree trimming, as well as</p> <p>12 completing the line project that we worked on</p> <p>13 during that storm.</p> <p>14 Q. Changing the three line out --</p> <p>15 A. Yes, sir.</p> <p>16 Q. -- for the one phase?</p> <p>17 A. Yes.</p> <p>18 Q. Who was involved in that coordination</p> <p>19 process?</p> <p>20 A. Myself, Paul Roahrig was one of the</p> <p>21 engineers working on that, several of the folks</p> <p>22 in the line department in the northwest I had</p> <p>23 discussions with on that.</p> <p>24 Q. Mr. Roahrig is -- what's his job?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. I believe he's an engineer. 2 Q. Do you know what department at AEP he 3 works in? 4 A. No, sir, I don't. 5 Q. But was he involved because of the 6 changing the three phase to the one phase? 7 A. Yes. 8 Q. When did the discussion occur or begin 9 about planning the work on 315? 10 MR. ALAMI: Sorry to interrupt, but just 11 for clarification, when you say planning the 12 work, are you referring to the line work, or are 13 you referring to the tree trimming work? 14 MR. KELLER: I'm talking about what he 15 said, that there was a planning to do all of the 16 work they wanted to do on 315. So that's what 17 I'm referring to. 18 A. Sometime in early April, I believe, was 19 the first coordinated discussion on that, or 20 initial discussions on that. 21 Q. Okay. Who was in charge of that 22 coordination? 23 A. There were discussions between Paul and 24 myself, or at least communications that he had a</p>	<p style="text-align: right;">Page 64</p> <p>1 thought I was taking care of it, and then I 2 thought he was taking care of contacting ODOT. 3 Our crews were not to that location yet anyways. 4 We got towards the end of Jewett Road around the 5 end of June, as it were. 6 I can't speak for the line department, 7 whether they were ready to do that job yet or 8 not. I'm working several circuits at the same 9 time, and the line department's working multiple 10 jobs at the same time, as well. So it's -- we 11 had -- there was a lot of things going on. 12 Q. The tree or portion of tree that took 13 the line out on 315, was that marked for removal 14 by Mr. Carpenter? 15 A. My inspection of that tree following 16 this storm and the filing of this case, I found 17 no marks on that tree. 18 Q. But of all the trees along 315, that was 19 the only one that really fell, right, during 20 that storm? 21 A. Of all of the trees along 315 from 22 Jewett Road to Powell Road -- 23 Q. Yes. 24 A. -- that was the only tree that fell</p>
<p style="text-align: right;">Page 63</p> <p>1 line project and I had a forestry project. 2 There was no one in charge of the discussions. 3 Q. Was that done by e-mail or by phone, 4 or -- 5 A. Some e-mail and some phone. 6 Q. Okay. So do you know why that work was 7 not done before the storm hit? 8 A. Again, we were trying to coordinate a -- 9 make a coordinated effort to get out there and 10 do that work to eliminate either multiple-road 11 closures or interaction with the public on that 12 as far as -- I can't think of the word, but 13 trying to eliminate our effects to traffic and 14 so forth on that road. It made sense to try to 15 do it in one combined effort than to do it 16 multiple times. 17 Q. Because it's a busy, heavily traveled 18 road? 19 A. Yes. Yes, sir. 20 Q. Okay. But what was -- if you started in 21 early April, what was the problem in getting 22 that done before the end of June? 23 A. I don't think there was a problem. It 24 was in the process. I think for a while, he</p>	<p style="text-align: right;">Page 65</p> <p>1 during that storm that I'm aware of. 2 Q. Do you know why that particular tree 3 fell and the other trees didn't? 4 A. No, sir. 5 Q. Is it possible that that tree was 6 diseased or had some other problem and should 7 have been marked for removal? 8 A. The tree most likely was in decline, the 9 portion that fell, of what I witnessed. The 10 fact that the tree was not marked didn't bother 11 me. In an ideal situation, walking through 12 someone's back yard, easy access and so forth, I 13 think it would have been an easy try to identify 14 and mark. In that situation, and the way that 15 our program operates, I don't feel that the 16 issue that the tree was not marked was a -- was 17 of any concern. 18 The planning process is only one step in 19 the program. Once the tree crews arrive on 20 scene on any planned work, anywhere that we 21 work, they often will remove trees or trim trees 22 that have not been marked by the planner. They 23 also may not trim trees or remove trees that 24 have been marked by the planner. So the tree</p>

<p style="text-align: right;">Page 66</p> <p>1 crews are the second step in our process. Our</p> <p>2 work is also audited, both by myself, by an</p> <p>3 outside auditing company, and by the Public</p> <p>4 Utilities Commission, following our -- you know,</p> <p>5 following our completed work.</p> <p>6 So the fact that that tree wasn't</p> <p>7 marked, in my opinion, is not of concern to me.</p> <p>8 Q. So you're saying your tree crews might</p> <p>9 have removed that section of tree when they got</p> <p>10 out there, even though it wasn't marked?</p> <p>11 A. That is correct.</p> <p>12 Q. And are you positive that it was not</p> <p>13 marked?</p> <p>14 A. In my inspection, I saw no marks on that</p> <p>15 tree.</p> <p>16 Q. Had the tree been cut up by the time you</p> <p>17 got out there?</p> <p>18 A. It was off to the side of the road</p> <p>19 because trucks were moving through there. I did</p> <p>20 not inspect it.</p> <p>21 Q. Did you turn it over or anything?</p> <p>22 A. I did not inspect that.</p> <p>23 Q. You did not inspect the tree?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. I'm just -- well, humor me.</p> <p>2 A. A tree in decline that has the potential</p> <p>3 to take down our lines should be either marked</p> <p>4 for removal or picked up by the line crews, or</p> <p>5 picked up in an audit situation following our</p> <p>6 work.</p> <p>7 Q. Okay. The audit reports, you said those</p> <p>8 are done by AEP, and also by the PUCO, and there</p> <p>9 was a third auditing group?</p> <p>10 A. We have an outside company called ACRT</p> <p>11 that audits -- spot audits our work.</p> <p>12 Q. How often does the outside group audit,</p> <p>13 like, your geographic area?</p> <p>14 A. Once or twice a quarter.</p> <p>15 Q. Calendar quarter?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And do they submit written reports --</p> <p>18 written audit reports?</p> <p>19 A. Yes.</p> <p>20 Q. Are those in your possession?</p> <p>21 A. Most of those are, yes.</p> <p>22 Q. For the last couple of years?</p> <p>23 A. Yes.</p> <p>24 Q. The internal reports by AEP, who does</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. So it could have been marked and you</p> <p>2 just didn't see the mark?</p> <p>3 A. I can't answer that. I don't know the</p> <p>4 answer to that.</p> <p>5 Q. What I understand you're saying is you</p> <p>6 did not see a mark, but do you recall</p> <p>7 specifically looking for a mark on that tree?</p> <p>8 A. I'm not sure I understand your question.</p> <p>9 I did not look for a mark on the branch that was</p> <p>10 on the ground across 315.</p> <p>11 Q. That was my question.</p> <p>12 A. I did not look for a mark on that</p> <p>13 branch.</p> <p>14 Q. So it may have been marked, may not have</p> <p>15 been marked?</p> <p>16 A. I don't know.</p> <p>17 Q. Okay. And if the tree was likely in a</p> <p>18 state of decline, it's at least possible that it</p> <p>19 should have been marked for removal by</p> <p>20 Mr. Carpenter; is that correct?</p> <p>21 MR. ALAMI: Objection; assumes facts not</p> <p>22 in evidence.</p> <p>23 You can answer.</p> <p>24 A. I think I already answered that earlier.</p>	<p style="text-align: right;">Page 69</p> <p>1 that work?</p> <p>2 A. I do that work.</p> <p>3 Q. And do you submit a written audit report</p> <p>4 to someone?</p> <p>5 A. No. When I -- my audits are</p> <p>6 self-driven. They're not in any format.</p> <p>7 Q. Do you keep notes?</p> <p>8 A. No.</p> <p>9 Q. Do you find that it's more common that</p> <p>10 the planners mark too many trees, or too few</p> <p>11 trees?</p> <p>12 A. I would say neither is more common.</p> <p>13 Q. Some of each?</p> <p>14 A. That would be a true statement.</p> <p>15 Q. And what about the outside company,</p> <p>16 what -- would you say that they more often</p> <p>17 indicate that too many trees were marked for</p> <p>18 trimming and removal, or not enough?</p> <p>19 A. They're judging us to our line clearance</p> <p>20 efforts. They're not going to say that too many</p> <p>21 have been trimmed. In other words, they're not</p> <p>22 going to tell us we have too great of clearance</p> <p>23 from our facilities. They're going to tell us</p> <p>24 we didn't get adequate clearance. What they're</p>

<p style="text-align: right;">Page 70</p> <p>1 bringing to our attention, if there is any, that</p> <p>2 not enough trimming was done.</p> <p>3 Q. Does the outside company also audit</p> <p>4 whether sufficient dangerous or hazardous trees</p> <p>5 were removed, or is it just simply the</p> <p>6 clearance -- the trimming?</p> <p>7 A. They inspect our right-of-ways</p> <p>8 post-trimming for adherence to our guidelines.</p> <p>9 Q. Okay. What involvement do you have with</p> <p>10 the PUCO audits?</p> <p>11 A. The only involvement I have with</p> <p>12 those -- with the PUCO audits is handing maps,</p> <p>13 typically, to a Public Utilities representative.</p> <p>14 Q. Do you ever see the results of the PUCO</p> <p>15 audits?</p> <p>16 A. I can't recall. I don't -- it's not</p> <p>17 a -- I don't recall.</p> <p>18 Q. Okay. During the aftermath of the storm</p> <p>19 in June 2012, did you ever have any discussions</p> <p>20 with ODOT, from the time that tree fell until</p> <p>21 the time 315 was reopened in that section?</p> <p>22 A. No, sir.</p> <p>23 Q. Do you know who at AEP did?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 72</p> <p>1 right?</p> <p>2 A. That was Paul.</p> <p>3 --0--</p> <p>4 (Exhibit 3 marked.)</p> <p>5 --0--</p> <p>6 BY MR. KELLER:</p> <p>7 Q. I'm going to ask you to take a look at</p> <p>8 what's marked as Exhibit 3, please. Have you</p> <p>9 ever seen that before?</p> <p>10 A. I have never seen this before.</p> <p>11 Q. But is that the Paul that you were</p> <p>12 referring to? His name may be on the second</p> <p>13 page.</p> <p>14 A. Yes.</p> <p>15 Q. Are you aware of any other contact he</p> <p>16 made with ODOT regarding that work on that</p> <p>17 section of 315, either before or after the</p> <p>18 storm?</p> <p>19 A. No.</p> <p>20 Q. Does AEP ever cut back roads and widen</p> <p>21 the roads by sort of working in the ditch area</p> <p>22 on the side of the pavement? Is that something</p> <p>23 AEP ever does in connection with its forestry</p> <p>24 program?</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. Did you have any contact personally with</p> <p>2 ODOT prior to the storm regarding proposed work</p> <p>3 in that section of 315?</p> <p>4 A. No.</p> <p>5 Q. Do you know anybody who did?</p> <p>6 A. No.</p> <p>7 Q. In your coordination with the other AEP</p> <p>8 people about the work to be done between Jewett</p> <p>9 and Powell Road, who was tasked with</p> <p>10 coordinating with ODOT?</p> <p>11 A. Can you repeat that question, please?</p> <p>12 Q. Yes. Before the storm --</p> <p>13 A. Okay.</p> <p>14 Q. -- you talked about efforts with other</p> <p>15 AEP teams to coordinate the work that needed to</p> <p>16 be done between Jewett and Powell Road on 315.</p> <p>17 In that coordination process, who was tasked</p> <p>18 with coordinating with ODOT to close the road?</p> <p>19 A. This question was asked of me before, I</p> <p>20 believe, also, but Paul Roahrig and myself also</p> <p>21 have both projects to do out there. And the</p> <p>22 final step was that Paul was to contact ODOT for</p> <p>23 closure on that project.</p> <p>24 Q. So that wasn't you, that was Paul,</p>	<p style="text-align: right;">Page 73</p> <p>1 A. I don't know.</p> <p>2 Q. I mean, have you ever had any experience</p> <p>3 doing that?</p> <p>4 A. I'm not sure I understand the question.</p> <p>5 Q. Somebody goes out there with a backhoe</p> <p>6 and cuts away the side of the bank to widen the</p> <p>7 road area.</p> <p>8 A. That wouldn't be done as part of the</p> <p>9 forestry program.</p> <p>10 Q. Okay.</p> <p>11 A. I'm not sure about --</p> <p>12 Q. I didn't think it would be.</p> <p>13 If you look back at Exhibit 1, at the</p> <p>14 time that the tree was removed and the line was</p> <p>15 repaired on 315 between Jewett and Powell Road,</p> <p>16 what portions of Circuit 3101 were without</p> <p>17 power?</p> <p>18 A. I don't have the knowledge to answer</p> <p>19 that question.</p> <p>20 Q. Who would have that knowledge?</p> <p>21 A. I'm not -- I don't know.</p> <p>22 Q. That's fair.</p> <p>23 Do you know where Mr. Carpenter works</p> <p>24 out of?</p>

<p style="text-align: right;">Page 74</p> <p>1 A. He's currently working with Sara 2 Jackson, who is an AEP employee, out of the 3 northeast garage. Columbus, northeast garage. 4 Q. Who did you say he is working with? 5 A. Sara Jackson. 6 Q. Who is that? 7 A. That's an AEP forester. 8 Q. Similar position to you, just in a 9 different district? 10 A. Yes, sir. 11 Q. Do you know why he's working in that 12 district and not yours? 13 A. That's where he's been stationed. When 14 he came to work with me, he was helping us out. 15 Q. Do you know why he was temporarily 16 working for you? 17 A. Because we needed more work planners at 18 that point in time. 19 Q. Your district as opposed to other 20 districts? 21 A. My specific area of coverage. It 22 happens very frequently. 23 Q. So people move around? 24 A. Shifting of resources where needed.</p>	<p style="text-align: right;">Page 76</p> <p>1 30 hours for the week, for planning Circuit 2 3101. He's charged us for his computer and his 3 pickup truck for those hours. 4 Q. What's the length of Circuit 3101? 5 A. I believe it's 9.6 miles. 6 Q. Okay. And the next sheet, which ends in 7 5421, what does that show? 8 A. The same basic information, except he 9 turned in 40 hours for that week. He's also 10 turning in planned units on these time sheets, 11 which I'm not familiar with, because my planners 12 don't do that. Typically Sara must have him do 13 that in her area. 14 Q. What's a planned unit? 15 A. Down at the bottom here, he's turned in 16 170 planned units for 30 hours of work. 17 Q. What's a planned unit? 18 A. Tree trim or removal or unit of brush. 19 Q. Okay. So when it says there, for 20 example, on Monday, on Page 5423, 80, the 21 number -- see the number 80 down there? 22 A. Yes, sir. 23 Q. What does that represent? 24 A. That represents 80 units planned for</p>
<p style="text-align: right;">Page 75</p> <p>1 --0-- 2 (Exhibit 4 marked.) 3 --0-- 4 BY MR. KELLER: 5 Q. Let me ask you to look at what's marked 6 as Exhibit 4 and tell me if you can identify 7 those documents, please. 8 A. Looking at Exhibit 4, these are time 9 sheets for Ty Carpenter. 10 Q. What type of work does this relate to? 11 A. This -- these are his time sheets for 12 planning of Circuit 3101. 13 Q. So just the top sheet, what period of 14 time does this cover? 15 A. If you're referring to 665223 -- or 16 5423 -- 17 Q. Yes. 18 A. -- this would be week ending 5/19, 2012. 19 Q. What information can you get off this 20 one sheet that you just referred to, ending in 21 423, about what Mr. Carpenter was doing during 22 this time? 23 A. He's turning in 10 hours for Monday, 10 24 hours for Tuesday, and 10 hours for Wednesday,</p>	<p style="text-align: right;">Page 77</p> <p>1 that day. 2 Q. What's that mean? 3 A. 80 units, 80 trees. 4 Q. 80 trees? 5 A. 80 trims, 80 removals, 80 -- combination 6 of any of the above. 7 Q. So when you add all those up, it should 8 come up with the 1800 that's shown on Exhibit 1 9 here? 10 A. More or less. These numbers are not -- 11 these are not set in stone. These could very 12 well be rough estimates of his work for that 13 week. It's not something we judge him on, nor 14 do we hold him to as far as his accuracy of his 15 planned units. 16 Q. But that doesn't represent additional 17 work he did, that's just based on his 10 hours 18 of work that day, he figured there were 80 trees 19 or bushes or something that need some attention; 20 is that what you're saying? 21 A. Correct. 22 Q. So Exhibit 4 consists of six pages; is 23 that correct? 24 A. Yes.</p>

Page 78	Page 80
<p>1 Q. All dealing with Circuit 3101?</p> <p>2 A. Yes.</p> <p>3 Q. What's your experience about how long it</p> <p>4 takes to plan the work on a mile of line?</p> <p>5 A. There is no one answer to that. It</p> <p>6 could vary greatly.</p> <p>7 Q. Do they physically walk this, or do they</p> <p>8 drive it, or how is the planning work done?</p> <p>9 A. They walk every span of line.</p> <p>10 Q. Let's talk about tree removals. Are the</p> <p>11 standards for what trees should be removed</p> <p>12 different depending on where that tree is</p> <p>13 located and what the possible result would be if</p> <p>14 it fell?</p> <p>15 A. We seek out removals more aggressively</p> <p>16 on three-phase line, higher priority lines,</p> <p>17 higher voltage lines.</p> <p>18 Q. Why is that, just because those lines</p> <p>19 are more valuable to the company?</p> <p>20 A. It is affecting -- it has the ability to</p> <p>21 affect -- it is a better spend of our resources.</p> <p>22 It is a better -- you can affect more customers</p> <p>23 by removing that tree than you would on a</p> <p>24 single-phase line, for example, or secondary</p>	<p>1 A. I'm not sure I understand that question.</p> <p>2 Q. What I took from your previous answer is</p> <p>3 that if you have two trees of a similar type and</p> <p>4 condition, one is located in proximity to a</p> <p>5 single-phase line and one is in proximity to a</p> <p>6 three-phase line, that you would be more</p> <p>7 inclined to remove the tree which is in</p> <p>8 proximity to a three-phase line than the tree</p> <p>9 that's in proximity to a single-phase line.</p> <p>10 A. We aggressively seek removals on all of</p> <p>11 our facilities. We may or may not be more</p> <p>12 aggressive on that removal on a three-phase.</p> <p>13 Q. Okay. So criteria is the type of</p> <p>14 distribution line that can be affected if that</p> <p>15 tree fell, correct?</p> <p>16 A. Correct.</p> <p>17 Q. What other factors would go into whether</p> <p>18 a tree is removed or not?</p> <p>19 A. The type of tree it is, species of tree</p> <p>20 it is, the tree's condition, where it is in</p> <p>21 proximity to our facilities, would be some of</p> <p>22 the factors that go into play there.</p> <p>23 Q. I'm trying to find out what other</p> <p>24 factors would go -- would influence your</p>
Page 79	Page 81
<p>1 line.</p> <p>2 Q. Generally speaking, does a three-phase</p> <p>3 line serve more customers than a single phase</p> <p>4 line, to your knowledge?</p> <p>5 A. That would vary.</p> <p>6 Q. Okay. So I understand that there is --</p> <p>7 correct me if I'm wrong, but I'm paraphrasing --</p> <p>8 but it's -- it is worth more to the company to</p> <p>9 protect a three-phase line than a one-phase</p> <p>10 line, is that what you're saying?</p> <p>11 MR. ALAMI: Objection; assumes facts not</p> <p>12 in evidence.</p> <p>13 Q. How would you explain that again?</p> <p>14 A. That -- I don't believe that's what I</p> <p>15 said. I think removals are sought on</p> <p>16 three-phase lines because we have the ability to</p> <p>17 affect more customers' reliability than we would</p> <p>18 on a single-phase line.</p> <p>19 Q. What other factors affect the -- strike</p> <p>20 that.</p> <p>21 So you do recognize that the standard</p> <p>22 for when a tree should be removed depends on</p> <p>23 factors other than simply the condition of the</p> <p>24 tree, correct?</p>	<p>1 decision if you were the one making the decision</p> <p>2 whether a tree should be removed or not.</p> <p>3 MR. ALAMI: Objection. I think</p> <p>4 Mr. Lajeunesse answered the question, which I</p> <p>5 believe has been asked at least twice now.</p> <p>6 But you can answer again.</p> <p>7 A. Again, I would restate my previous</p> <p>8 answer, that I look at the species of tree, the</p> <p>9 condition of the tree, and its proximity to our</p> <p>10 facilities.</p> <p>11 Q. And those are the only factors that you</p> <p>12 look at in whether a tree should be removed?</p> <p>13 A. I believe that's correct.</p> <p>14 Q. What are some types of trees that you</p> <p>15 consider are more likely to need removal? I</p> <p>16 assume shallow-rooted trees.</p> <p>17 A. Are you referring to a danger tree, or a</p> <p>18 tree that I'm seeking to remove underneath our</p> <p>19 facilities that's a live, growing tree?</p> <p>20 Q. Let's talk about danger trees or hazard</p> <p>21 trees.</p> <p>22 A. Hazard trees. We look at -- I would</p> <p>23 look at the lean of the tree, the condition of</p> <p>24 the tree, and how -- and it's proximity to our</p>

<p style="text-align: right;">Page 82</p> <p>1 facilities.</p> <p>2 Q. Okay. But not the species of the tree?</p> <p>3 A. Species of the tree is in there, also.</p> <p>4 Q. What would be some species that would be</p> <p>5 more risky?</p> <p>6 A. If you walk down our lines today, it is</p> <p>7 the ash trees.</p> <p>8 Q. Because those are dying and --</p> <p>9 A. We know those are dying, and we have an</p> <p>10 aggressive program in place right now to address</p> <p>11 those trees.</p> <p>12 Q. What are some other common species in</p> <p>13 central Ohio that you consider higher risk</p> <p>14 trees?</p> <p>15 MR. ALAMI: Relevance; objection.</p> <p>16 You can answer, if you know.</p> <p>17 A. Each tree is different. You can't</p> <p>18 really pick a species and say they're more</p> <p>19 likely to fail than any other tree. If the tree</p> <p>20 is dead or diseased or dying, no matter what</p> <p>21 type of tree it is --</p> <p>22 Q. Well, a minute ago you said that the</p> <p>23 species of tree was one of the criteria you're</p> <p>24 looking at. I'm trying to find out what</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Is he in the forestry department?</p> <p>2 A. No.</p> <p>3 Q. How about Tim Flaherty?</p> <p>4 A. I know Tim.</p> <p>5 Q. Do you know what he does?</p> <p>6 A. I don't.</p> <p>7 Q. Tony Dicenzo, do you know him?</p> <p>8 A. Probably to look at him.</p> <p>9 Q. Does he work with you in forestry at</p> <p>10 all?</p> <p>11 A. None of those individuals that you've</p> <p>12 mentioned work in the forestry department.</p> <p>13 Q. How about Grady West?</p> <p>14 A. No, sir.</p> <p>15 Q. Would they have control over the -- I</p> <p>16 think what you called the line crews, the guys</p> <p>17 that fix the power lines?</p> <p>18 A. Cliff manages line operations at the</p> <p>19 northwest garage.</p> <p>20 Q. Did you work with him on the storm</p> <p>21 restoration process?</p> <p>22 A. We all work together during storm</p> <p>23 restoration. It is all hands on deck.</p> <p>24 Everybody does everything they can to assist</p>
<p style="text-align: right;">Page 83</p> <p>1 species.</p> <p>2 A. When I stated that, I was referring to a</p> <p>3 live tree, growing under our facilities. I</p> <p>4 thought you were talking about ones removed.</p> <p>5 When I'm looking at the live trees under our</p> <p>6 facilities, and we're talking about sycamore</p> <p>7 versus fir tree, the sycamore I am much more</p> <p>8 likely to seek removal on than the fir tree.</p> <p>9 Q. That's fair.</p> <p>10 Does the fact that a tree would fall</p> <p>11 across a busy state highway make it more likely</p> <p>12 that a tree should be removed as opposed to a</p> <p>13 tree that would fall across a township road?</p> <p>14 A. That has no bearing on what we do as far</p> <p>15 as protecting the lines.</p> <p>16 Q. So the goal is protect your lines?</p> <p>17 A. We're a utility company.</p> <p>18 Q. Do you know a Cliff Moritz?</p> <p>19 A. Yes.</p> <p>20 Q. What is his position?</p> <p>21 A. He's the manager at northwest Columbus,</p> <p>22 SDS, I believe what they call him, his title.</p> <p>23 Q. Do you know what SDS stands for?</p> <p>24 A. I should, but I don't.</p>	<p style="text-align: right;">Page 85</p> <p>1 with the restoration.</p> <p>2 Q. In June 2012, he was one of the people</p> <p>3 that you worked with?</p> <p>4 A. He was in our offices while we were</p> <p>5 working, yes.</p> <p>6 Q. Does he work -- generally work out of</p> <p>7 the same office you work in?</p> <p>8 A. Same building in northwest.</p> <p>9 Q. I've heard of something referred to as</p> <p>10 AEP's vegetation control policy. Are you</p> <p>11 familiar with that phrase?</p> <p>12 A. I've heard that.</p> <p>13 Q. What do you understand that phrase to</p> <p>14 refer to?</p> <p>15 A. It refers, I believe, to all of the</p> <p>16 policies we have in place as far as controlling</p> <p>17 our vegetation around our power lines.</p> <p>18 Q. Any documents included in that, other</p> <p>19 than what we've talked about here today?</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. Who have you discussed this legal</p> <p>22 proceeding with, other than your lawyers?</p> <p>23 A. I don't think I've discussed this</p> <p>24 proceeding with anybody except my lawyers.</p>

<p style="text-align: right;">Page 86</p> <p>1 Q. Do you know how soon after AEP arrived 2 on 315 between Jewett and Powell Road that the 3 service was restored -- the electric service was 4 restored? 5 A. I do not. 6 Q. Would you -- I mean, a day, an hour, or 7 what do you recall, or do you not know when the 8 service actually is restored? 9 A. I don't know when the service is 10 actually restored. 11 Q. That's all right. 12 I may have asked this, but you said you 13 did not have any contact with AEP about repairs 14 to that line on 315 after the storm? 15 A. I don't understand that question. 16 Q. That was not a good question. 17 After the June 2012 storm hit, do you 18 recall any direct communications with ODOT or 19 any of its officials that you had concerning the 20 tree that had fallen or the power line that had 21 fallen on 315 between Jewett and Powell Road? 22 A. I had no communications with ODOT. 23 Q. Were you aware that ODOT had stationed 24 trucks on both sides of that fallen tree for the</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Is there anything else about the 2 situation involving the fallen tree and power 3 line on 315 between Jewett and Powell Road that 4 you feel you have knowledge of that we have not 5 talked about here today? 6 A. No, sir. 7 Q. Do you recall what species of tree it 8 was that you saw had fallen? 9 A. I believe it was a cherry tree. 10 Q. That section of 315, you're familiar 11 with that section of road? 12 A. Yes, sir. 13 Q. Let me just ask you generally in your 14 life, how often do you drive that section of 15 road? 16 A. Not very often because of traffic 17 congestion. 18 Q. As infrequently as possible, I assume. 19 A. Pretty much. 20 Q. The electric lines are on one side of 21 the road, not both sides of the road? 22 A. That's not correct. They begin on the, 23 I believe, west side of the road and jump to the 24 east side of the road.</p>
<p style="text-align: right;">Page 87</p> <p>1 week after the storm? 2 A. I became aware of it. 3 Q. How did you become aware of that? 4 A. I don't recall. 5 Q. Do you recall when you became aware of 6 it? 7 A. No, I don't. 8 Q. Were you ever involved in any 9 discussions about any degree of urgency to 10 reopen 315 after the June 2012 storm? 11 MR. ALAMI: I'll object. I think 12 Mr. Lajeunesse has indicated he didn't have any 13 conversations with ODOT. So to the extent your 14 last question, Mr. Keller -- 15 MR. KELLER: I'm not limiting this to 16 discussion with ODOT. I meant internal 17 discussions about any urgency to get that road 18 reopened. 19 MR. ALAMI: I'm sorry. 20 You can answer, if you know. 21 A. At this point in time, I don't recall 22 any discussions on that situation up on 315. 23 Q. Prior to actually going out there? 24 A. Prior to actually going out there, yeah.</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. As you go north? 2 A. As you go north from Jewett Road. 3 Q. But at any given point, they're only on 4 one side of the road, right? 5 A. Yes. 6 Q. And would the planner only look to 7 examine or mark trees on the side of the road 8 where the power line is, or would he look at 9 both sides of the road? 10 A. Again, taking into consideration this is 11 a very hazardous area to even be out of the car 12 walking down and examining any trees in this 13 stretch of road, typically they would examine 14 trees on both sides of the road in a situation 15 like that. 16 Q. Okay. Your answer confuses me. This is 17 a more difficult area for the planner to work in 18 than if he were working on a quieter road, 19 that's the first part of what you're saying? 20 A. Correct. 21 Q. Now, because this is a more difficult 22 area to work in, would that mean that -- why 23 would that mean that he would mark both sides of 24 the road?</p>

Page 90	Page 92
<p>1 A. In an area such as this, he would be 2 more likely to mark the trees directly 3 underneath the power lines and not address the 4 trees on the other side of the road. 5 Q. Oh. So he would be more likely to only 6 mark one side of the road, not two sides of the 7 road? 8 A. (Nods head.) 9 Q. That, I understand. 10 A. Yes. 11 Q. Do you know whether that's what 12 Mr. Carpenter did when he marked that section of 13 315? 14 A. I don't know. 15 Q. Okay. Do you know what width easement 16 AEP has in that section of 315? 17 A. No, I don't. 18 Q. Is that ever an issue that you get 19 involved in, actually defining the boundaries of 20 your company's easement? 21 A. I do. 22 Q. Tell me how you get involved in that 23 type of issue. 24 A. Most typically -- and it has occurred</p>	<p>1 be more than five minutes, if that, but if we 2 can just take a minute. 3 MR. KELLER: Sure. 4 (Recess taken.) 5 MR. ALAMI: No questions. Thank you. 6 MR. NOURSE: We will review signature. 7 --O= 8 Thereupon, the testimony of April 3, 9 2013, was concluded at 11:12 a.m. 10 --O= 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
Page 91	Page 93
<p>1 frequently in this area we're discussing because 2 it is a very -- we tend to get a lot of kickback 3 from our customers as far as us even being out 4 doing necessary tree work to clear our lines. 5 But typically, I would approach our 6 right-of-way agents with a request for an 7 easement on certain property because that 8 customer has refused us the ability to come on 9 that property to do our work. So we look up our 10 easements, we take that to the customer and 11 attempt to be able to do the work that we need 12 to do to provide safe, reliable service. 13 Q. Does that occur more when you're working 14 outside of a road right-of-way? 15 A. I can't answer that. 16 Q. Do you have any idea what the easement 17 width is in the area where the tree fell on 315? 18 A. No, sir. 19 MR. KELLER: I don't have any other 20 questions. Thank you for your time. 21 THE WITNESS: Thank you. 22 MR. ALAMI: At this time, if we could 23 take a minute to see if there is any necessary 24 follow-up questions. I don't think there will</p>	<p>1 CERTIFICATE 2 STATE OF OHIO : 3 SS: 4 COUNTY OF FRANKLIN : 5 I, Sara S. Clark, RPR, CRR, CCP, CBC, 6 a Notary Public in and for the State of Ohio, 7 duly commissioned and qualified, do hereby 8 certify that the within-named STEVEN M. 9 LAJEUNESSE was first duly sworn to testify to 10 the truth, the whole truth, and nothing but the 11 truth in the cause aforesaid; that the testimony 12 then given was reduced to stenotypy in the 13 presence of said witness, afterwards 14 transcribed; that the foregoing is a true and 15 correct transcript of the testimony; that this 16 deposition was taken at the time and place in 17 the foregoing caption specified. 18 I do further certify that I am not a 19 relative, employee or attorney of any of the 20 parties hereto; that I am not a relative or 21 employee of any attorney or counsel employed by 22 the parties hereto; that I am not financially 23 interested in the action; and further, I am not, 24 nor is the court reporting firm with which I am affiliated, under contract as defined in Civil Rule 28(D). In witness whereof, I have hereunto set my hand and affixed my seal of office at Columbus, Ohio, on this 16th day of April, 2013. Sara S. Clark <small>Digitally signed by Sara S. Clark DN: cn=Sara S. Clark, o=PRI Court Reporting, LLC, ou=Notary Public, email=PRIproduction@priohio.com, c=US Date: 2013.04.16 10:15:05 -0400</small> Sara S. Clark, RPR, CRR, CCP, CBC Notary Public, State of Ohio. My commission expires: March 10, 2018</p>

<p>A</p> <p>ability 48:13 50:13 78:20 79:16 91:8 able 22:19 30:8 91:11 access 65:12 accident 48:2 accuracy 77:14 accurately 13:11 29:1 ACRT 7:17 68:10 action 25:12 93:13 actual 16:8 19:22 58:22 add 77:7 addition 10:1 23:7 additional 9:23 51:17 77:16 address 5:9,10 18:21 48:2 50:9 82:10 90:3 addressing 25:5 61:10 adequate 69:24 adherence 70:8 adjacent 39:2 41:3,4 advance 11:17 AEP 4:7 7:14,14,16 7:18,22 12:23 13:7 13:18,20,24 14:3,7 14:8,14,19,24 15:18,21 16:2,3,15 16:23 21:14,17,22 23:9,19 25:19 28:15 34:17 36:16 46:20 54:15 62:2 68:8,24 70:23 71:7 71:15 72:20,23 74:2,7 86:1,13 90:16 AEP's 85:10 Aesthetically 41:13 affect 39:8 42:5 78:21,22 79:17,19 affiliate 7:14 affiliated 93:14 affiliates 14:8,9 affixed 93:16 aforesaid 93:7 aftermath 70:18 afternoon 60:17 agents 91:6 aggressive 23:17 80:12 82:10 aggressively 78:15 80:10</p>	<p>ago 22:21 41:1 82:22 agreement 3:8 ahead 26:24 55:5 air 8:15 57:9 Alami 2:7 29:22 30:1 30:20 36:14,24 37:5 38:22 45:16 49:23 62:10 67:21 79:11 81:3 82:15 87:11,19 91:22 92:5 American 2:8 5:20 7:11 10:24 amount 9:5 30:7,11 31:1 53:21,24 annually 24:14 answer 13:10 14:12 16:17 29:1,24 30:1 30:4 31:3,4 38:24 41:21,24 42:1 44:20 49:24 67:3,4 67:23 73:18 78:5 80:2 81:6,8 82:16 87:20 89:16 91:15 answered 29:23 67:24 81:4 anybody 29:10 71:5 85:24 anyway 16:11 anyways 64:3 apart 46:3 APPEARANCES 2:1 applicable 3:5 applicator 6:4 approach 10:15 61:10 91:5 approached 58:10 approximate 45:2,3 approximately 7:4 20:20,22 24:24 40:24 April 1:16 43:14 62:18 63:21 92:8 93:17 Arboriculture 6:7 arborist 6:4,5 8:18,22 9:23 10:2 area 15:14 16:16,20 16:24 17:7 20:1,13 20:15,16,20 21:4 21:18 27:4,18,19 29:9,12,13 30:19 39:21 42:4 53:16 55:7 60:19,21 68:13 72:21 73:7</p>	<p>74:21 76:13 89:11 89:17,22 90:1 91:1 91:17 areas 17:19 18:1 28:21 45:2 47:21 arrive 65:19 arrived 58:18 86:1 ash 82:7 asked 22:23 29:23 71:19 81:5 86:12 asking 24:5 49:11 aspect 16:1 Asplundh 10:24 11:4 11:6,7,8 12:15 14:2 14:20,21,24 15:19 15:23 16:12,15 17:6,12 19:3,4 assign 20:9 assigned 20:2 assist 84:24 associated 45:10 assume 17:10 46:14 49:11 50:20 81:16 88:18 assumes 67:21 79:11 assuming 58:4,6 attempt 91:11 attention 27:20,22 39:15,17,22,23 42:18 50:6 52:22 70:1 77:19 attorney 93:11,12 ATTORNEY-AT-LA... 2:2 audit 68:5,7,12,18 69:3 70:3 audited 66:2 auditing 66:3 68:9 audits 68:11,11 69:5 70:10,12,15 available 15:3 aware 23:8,22 49:14 53:6 56:13 58:15 65:1 72:15 85:20 86:23 87:2,3,5 A-s-p-l-u-n-d-h 11:4 a.m 1:16 92:9</p> <p>B</p> <p>bachelor 6:2,2 back 6:22 7:5,9 9:19 43:23 45:8 46:19 48:1 49:1 51:15 54:7 65:12 72:20 73:13</p>	<p>background 5:24 backhoe 73:5 back-fed 48:14,17 bad 36:6 48:20 bank 53:24 73:6 base 17:8 based 17:5 77:17 basic 11:14 38:10 76:8 Basically 12:5 basis 18:24 20:10 24:12 32:3 44:5 bearing 83:14 becoming 9:3 began 43:11,13 47:8 beginning 18:9 24:20 25:2,2 30:24 behalf 2:5,11 believe 7:20 13:8 22:11 23:6 30:21 36:16,19,24 43:13 45:17 47:9,11 58:15 62:1,18 71:20 76:5 79:14 81:5,13 83:22 85:15 88:9,23 best 35:5 40:17 59:21 better 78:21,22 big 18:17 21:12 57:15 binder 22:9 block 58:14 Blue 6:17 43:2 board 18:17,24 bosses 51:23 bother 65:10 bottom 76:15 boundaries 90:19 branch 67:9,13 branches 10:12 33:12 35:24 41:16 break 48:21 breaker 25:21,22 27:1,3,4,5 Briefly 5:23 bring 39:15,16,22,22 42:18 bringing 70:1 broken 22:13,17 23:5 brought 52:22 brush 33:17,20,23 76:18 brushes 34:5 budget 24:3,5,12,18 24:21 30:7,10,11 30:13,14,18,21,23</p>	<p>31:1,1 building 85:8 Bush 6:20 bushes 77:19 business 5:9,10 7:6 busy 63:17 83:11</p> <p>C</p> <p>Calendar 68:15 call 17:19 20:12,15 29:6 38:16 39:19 83:22 called 3:5 7:17 21:22 21:22 22:23 23:2,6 68:10 84:16 Canada 7:2 candidate 41:9 canopy 41:12 caption 93:10 car 89:11 care 64:1,2 Carpenter 32:19 40:20 43:8 44:15 45:12 59:14,16 64:14 67:20 73:23 75:9,21 90:12 Carpenter's 56:7 case 1:4 44:20 64:16 categories 22:22 33:8 category 33:23 cause 29:14 48:1 93:7 CBC 1:18 93:4,22 CCP 1:18 93:4,22 central 15:17 82:13 certain 50:21 57:12 91:7 certainly 26:17 60:20 CERTIFICATE 93:1 certification 9:13,17 9:20,22,24 10:2,3 10:11 certifications 8:18 certified 5:3 6:3,4,5 8:22 9:4 10:16 certify 93:5,11 cetera 44:14,22 changed 12:22 13:3 20:6 23:20 changing 20:19 55:16 61:14 62:6 character 3:12 charge 20:13 62:21 63:2</p>
---	---	--	---	---

<p>charged 76:2 check 18:24 46:21 cherry 88:9 circles 44:14 circuit 4:6 18:18 25:9 25:24 26:18,21 27:3,6,12,23 31:19 31:22 32:1,19 33:2 43:9,12,14 44:5 45:5,9,12 46:17 47:4,7,14,24 48:3,6 48:7,9,12,14,15,16 48:17,18,19 49:6,9 52:6,15,18 73:16 75:12 76:1,4 78:1 circuits 20:17,20,23 24:10 25:18 26:13 26:16 28:2,5,5,7 49:16 64:8 circuit-by-circuit 20:10 44:5 city 21:9 Civil 3:6 93:14 clarification 62:11 clarify 14:16 clarifying 45:16 Clark 1:18 93:4,22 cleaned 52:10 56:17 61:4 clear 41:8 59:20 91:4 clearance 14:22 38:5 38:6,17,19 69:19 69:22,24 70:6 cleared 23:16 56:19 Cliff 83:18 84:18 climbing 9:11 clinic 7:8 close 17:14 42:4 71:18 closed 53:11,13 Closer 51:21 closure 4:8 71:23 closures 63:11 college 6:10,13,15 colors 42:23 43:1 Columbus 1:5,14 2:9 6:22 7:1 8:3,5 13:16 20:3 74:3 83:21 93:17 combination 77:5 combined 23:3 63:15 come 6:22 11:16 18:23 24:10 51:4 77:8 91:8 comes 9:15</p>	<p>coming 7:5 12:3,6 32:9 33:18 51:8 57:5 commission 1:1 18:10 66:4 93:23 commissioned 93:5 common 69:9,12 82:12 communicate 18:5 communication 21:8 21:9 communications 18:14,16 62:24 86:18,22 company 1:5 7:17,18 11:3,9 12:12 13:13 13:15,16 14:21 54:18 66:3 68:10 69:15 70:3 78:19 79:8 83:17 company's 90:20 compare 59:15 Complainants 1:3 2:5 3:5 complete 59:5 completed 43:12 59:7 66:5 completing 61:11,12 comply 21:16 computer 76:2 concern 65:17 66:7 concerning 86:19 conclude 46:7,12 concluded 47:9 92:9 concludes 42:10 conclusion 40:14,15 condition 79:23 80:4 80:20 81:9,23 Conditions 50:14 conductor 39:10 41:5 conductors 23:16 31:24 33:12 35:8,9 35:10,12,13 36:9 41:9 55:2 confuses 89:16 congestion 88:17 connection 72:23 conservation 6:2,3 8:8,13,14 consider 29:14 53:7 53:14 81:15 82:13 consideration 27:17 89:10 consists 77:22</p>	<p>constantly 20:19 constrained 30:7 contact 11:14 12:2 19:3,4 42:13,15,16 55:8 71:1,22 72:15 86:13 contacted 51:19 contacting 64:2 containing 37:8 Continue 7:21 continued 16:15 contract 7:17 12:17 14:4,24 15:2,5 93:14 contracted 14:22 contractor 16:9,20 18:1,22 46:20 contractors 12:13,14 16:23 contractor's 19:1 50:20 control 12:21 16:1 19:23 21:14 23:11 23:11 84:15 85:10 controlling 85:16 conversations 87:13 coordinate 50:2 63:8 71:15 coordinated 62:19 63:9 coordinating 61:9 71:10,18 coordination 61:18 62:22 71:7,17 copy 15:2 22:6,19 corporate 17:9 correct 16:13 29:18 35:10,19,22 42:3 44:3,24 45:20,21 46:8,9 49:17 51:24 52:1,3,4 56:22 57:23 66:11 67:20 77:21,23 79:7,24 80:15,16 81:13 88:22 89:20 93:9 correlation 30:10 counsel 3:2 93:12 count 33:1,14 45:24 country 27:20 County 20:4 27:21 93:3 couple 36:15 68:22 course 25:20 courses 8:16,16 court 93:14</p>	<p>cover 20:3 23:14,15 38:8 44:8 75:14 coverage 74:21 covered 9:8,23 10:10 covers 15:15,17 23:9 31:22 crew 10:19 17:22 19:19 47:17 50:3 50:13 51:2 54:15 54:19,21 55:21 crews 7:12 10:24 11:13,15,17 12:3,6 16:5 17:16 18:11 19:20,22 21:8 27:14 46:23,24 47:6,13 50:10,20 51:6,16,17 52:14 58:5,18,24 59:22 59:23 60:10,12,18 60:19,21,23 64:3 65:19 66:1,8 68:4 84:16 criteria 34:24 35:6 36:3 80:13 82:23 crown 41:7 CRR 1:18 93:4,22 currently 5:18 6:3 12:11 13:15 17:19 25:7,7 74:1 customer 11:24 12:1 42:15,17 91:8,10 customers 11:14 12:2 20:21 21:9 78:22 79:3,17 91:3 cut 66:16 72:20 cuts 73:6 cutting 15:20 cycle 24:9 25:9,14 26:1,9,10 30:3 60:24 cycles 25:4,17 26:6 26:11</p>	<p>58:16 59:1,24 60:23 77:1,18 86:6 93:17 DBX 33:21 45:23 dead 39:7 82:20 dealing 13:14 78:1 debris 56:17 decide 30:13 Decided 6:22 deciding 50:5 decision 81:1,1 deck 84:23 decline 65:8 67:18 68:2 defined 93:14 defining 90:19 degree 8:8 87:9 Delaware 17:20 20:3 20:4 Dennis 19:14 department 30:4 61:9,22 62:2 64:6 84:1,12 department's 64:9 depending 78:12 depends 79:22 deposed 5:13 deposes 5:3 deposition 1:10 3:3,8 93:9 describe 11:22 33:9 described 12:19 37:1 37:22 DESCRIPTION 4:5 desk 39:20 determination 50:17 determine 34:15 38:3 determined 24:9 determining 36:18 developing 27:18 device 25:24 devices 48:12 Dicenzo 84:7 difference 14:13 35:15 43:4 different 17:18 25:19 40:14,15 41:22,22 42:23 47:13,21 48:17 51:18 74:9 78:12 82:17 differently 41:23 difficult 89:17,21 direct 18:11 30:10 86:18 directing 18:1</p>
---	---	---	---	--

<p>direction 11:13 18:12 29:10 directions 24:3 directly 9:20 40:2 90:2 discuss 37:6,6 42:17 discussed 85:21,23 discussing 91:1 discussion 62:8,19 87:16 discussions 61:23 62:20,23 63:2 70:19 87:9,17,22 diseased 39:7 65:6 82:20 dispatch 50:20 dispatched 46:24 50:10 distance 46:4 57:12 distances 10:15 23:15 distribution 80:14 district 16:11 42:19 74:9,12,19 districts 74:20 ditch 72:21 divided 48:8 document 22:4 23:8 31:18 34:20 35:3 36:23 37:4,6,7,8,15 37:18,22 38:12,23 documents 23:8,22 75:7 85:18 doing 10:22 24:2 58:12,15 59:15,23 73:3 75:21 91:4 dots 42:22 downed 54:14 drive 78:8 88:14 Dublin 5:12 due 25:10 duly 5:2 93:5,6 duties 13:3 50:1 dying 82:8,9,20</p> <hr/> <p>E</p> <p>earlier 37:19,22 38:6 38:7 67:24 early 62:18 63:21 easement 90:15,20 91:7,16 easements 91:10 east 1:14 88:24 easy 65:12,13 educate 35:11</p>	<p>educational 5:23 effect 48:5 effects 63:13 effort 49:10 55:7 63:9 63:15 efforts 50:4 52:6 69:20 71:14 either 29:20 36:18 42:13,20 46:20 63:10 68:3 72:17 electric 2:8 5:20 7:11 11:1 20:17 86:3 88:20 electrical 9:21 10:4 eliminate 63:10,13 Elkins 19:15 employed 5:19 7:16 7:16 13:6 93:12 employee 74:2 93:11 93:12 employees 12:12 15:21 16:2,3 employment 6:9,14 7:14 23:19 ended 56:18 ends 76:6 energize 48:18 engineer 62:1 engineered 48:8 engineers 61:21 entity 14:14,15 equipment 9:11,11 essentially 57:8 establish 18:8 established 23:9 estimate 33:13,15 estimates 77:12 et 44:13,22 EVELYN 1:2 event 49:20 50:12 events 58:7 Everybody 84:24 evidence 67:22 79:12 exact 60:1 exactly 18:19 EXAMINATION 4:1 5:4 examine 89:7,13 examining 89:12 example 27:18 35:18 41:15 48:15 76:20 78:24 exception 59:11 exclusive 16:20 Exhibit 4:5 31:13,17</p>	<p>37:11,15 38:18 45:14,17,18 72:4,8 73:13 75:2,6,8 77:8 77:22 EXHIBITS 4:4 exist 58:23 experience 73:2 78:3 Expert 11:8 expires 93:23 explain 79:13 extent 87:13 extra 58:16 e-mail 4:8 18:6 63:3,5 e-mails 51:11</p> <hr/> <p>F</p> <p>facilitate 50:3 facilities 36:5 39:2,3 42:8 69:23 80:11 80:21 81:10,19 82:1 83:3,6 facility 39:8 fact 65:10 66:6 83:10 factor 27:24 factors 79:19,23 80:17,22,24 81:11 facts 67:21 79:11 fail 82:19 failed 46:11 fair 73:22 83:9 fall 6:16 7:5,23 42:8 83:10,13 fallen 56:11,16,22 59:12,13 86:20,21 86:24 88:2,8 falls 42:11 familiar 49:13 76:11 85:11 88:10 far 15:18 18:1,12 23:10 46:3 63:12 77:14 83:14 85:16 91:3 fast-moving 53:9 fauna 8:16 feeds 35:20 feel 65:15 88:4 feet 35:8,24 57:9 fell 42:5 56:23 64:19 64:24 65:3,9 70:20 78:14 80:15 91:17 felt 54:2 figure 13:13 36:11 figured 77:18 filing 64:16 final 71:22</p>	<p>financially 93:13 find 8:24 26:5,7,10 28:22 31:23 48:1 69:9 80:23 82:24 fine 37:5 finished 33:4 43:14 43:23 45:11,13 finishes 45:9 fir 83:7,8 firm 93:14 first 5:2 7:14 24:16 25:23 27:5,6 32:6 42:15 57:21 62:19 89:19 93:6 fishing 7:3 five 7:4 16:18 92:1 fix 84:17 Flaherty 84:3 flip 10:13 flora 8:16 folks 61:21 follow 36:17 50:10 following 64:15 66:4 66:5 68:5 follows 5:3 follow-up 91:24 foregoing 93:8,10 foremen 19:5,6 forester 5:22 7:23 8:3 13:3 21:2 74:7 foresters 15:16 forester's 11:13 forestry 4:7 15:13 21:4,6,17,19,23 22:2 23:7,10 28:14 29:2 30:2 34:17,19 37:16,18,20,21 38:13 51:24 54:21 61:9 63:1 72:23 73:9 84:1,9,12 form 18:15 format 69:6 forth 8:17 10:17 28:11 39:4 41:24 63:14 65:12 found 64:16 four 12:11 19:9 26:7 33:8 fourth 56:15 four-year 25:9 26:9 26:10,13 frame 11:21 15:22 FRANKLIN 93:3 frankly 30:24 frequently 28:6 74:22</p>	<p>91:1 front 10:23 11:12 22:20 functions 17:11 further 93:11,13</p> <hr/> <p>G</p> <p>garage 74:3,3 84:19 Gay 1:14 geared 9:13 general 19:5,6 22:22 37:4 59:18 generally 19:22 20:10 46:3 47:17 47:19,21,23 49:14 51:3,8,10 60:19 79:2 85:6 88:13 gentleman 32:18 geographic 15:14 20:1 68:13 getting 25:8 63:21 given 9:5 24:12 27:17 34:14 38:2 50:6 89:3 93:7 gives 38:10 go 6:10 7:9 18:12 26:24 35:17 40:8 46:20 54:12 80:17 80:22,24 89:1,2 goal 25:12 26:6 83:16 goals 4:7 22:2,22,24 23:3,6 37:16 goes 11:12 46:18 73:5 going 10:23 18:19 50:9 51:4,11,14,16 55:6 64:11 69:20 69:22,23 72:7 87:23,24 good 36:6 41:9 86:16 govern 23:23 graduated 6:1,13,16 6:18 Grady 84:13 grease 12:5 great 69:22 greater 27:20 greatest 48:5 greatly 25:15 26:12 40:18 78:6 ground 57:8,12,13 67:10 group 68:9,12 growing 81:19 83:3 guardrail 53:23</p>
---	--	---	---	---

<p>guide 7:3 guidelines 4:7 23:12 23:20 34:18 37:17 37:20 38:2,7,10,13 38:17,20 70:8 guys 84:16</p> <hr/> <p>H</p> <p>half 11:19 hand 31:16 93:16 handing 70:12 hands 84:23 handwritten 32:15 44:15 happen 24:17 happened 47:3 57:21 57:22,22 happening 58:8 happens 44:18 74:22 hardware 10:5 28:10 28:18 29:20 hazard 39:3,5,9 40:4 42:12 81:20,22 hazardous 53:5,7 70:4 89:11 hazards 50:16 head 34:10 90:8 headquarters 17:9 healthy 41:13 heard 85:9,12 heavily 63:17 help 21:15 helping 74:14 herbicide 6:4 herbicides 23:17 hereinafter 5:2 hereto 93:12,13 hereunto 93:16 high 6:10 higher 78:16,17 82:13 highway 83:11 Hills 6:17 hired 7:22 history 6:9 hit 63:7 86:17 hold 77:14 hospital 27:19 28:5 hotspot 27:8,9,11 hour 11:19 86:6 hourly 43:20 hours 75:23,24,24 76:1,3,9,16 77:17 house 9:16 26:19 35:17</p>	<p>humor 68:1 hunting 7:3 Huntington 7:10 hurt 53:3</p> <hr/> <p>I</p> <p>ID 8:17 9:10 idea 91:16 ideal 65:11 identified 27:12 identify 31:17 37:15 45:23 65:13 75:6 immediate 15:8 implement 21:18 importance 27:23 important 28:3 improve 36:6 55:7,8 55:8 inches 33:22 inclined 80:7 included 25:22 85:18 includes 21:7 incorporates 32:1 INDEX 4:1,4 indicate 34:11 45:24 69:17 indicated 8:21 13:6 22:14 34:20 46:6 87:12 indicating 32:10,14 41:6 individual 34:12 44:9 44:21 45:1,15,22 individuals 19:23 84:11 industry 9:14,18,21 10:4 influence 80:24 information 37:8 75:19 76:8 infrastructure 36:7 infrequently 88:18 initial 10:11 62:20 inspect 40:8 66:20 66:22,23 70:7 inspected 46:22 inspecting 8:9 inspection 64:15 66:14 instances 46:10 instructions 34:14 36:17 38:2 interaction 63:11 interacts 11:24 interested 93:13</p>	<p>internal 68:24 87:16 International 6:6 interrupt 62:10 interrupted 11:10 involve 8:9,19 10:9 55:15 involved 8:12 10:20 50:5 61:18 62:5 87:8 90:19,22 involvement 49:5,9 52:5,12 70:9,11 involves 9:1 involving 88:2 ISA 6:6 9:17 10:2 isolating 25:23,24 48:12 issue 65:16 90:18,23 issues 23:10 28:8,10 28:11,19</p> <hr/> <p>J</p> <p>Jackson 74:2,5 Jason 19:15 Jewett 2:3 27:7 32:9 32:12 47:10 54:8 55:3 56:5,11 64:4 64:22 71:8,16 73:15 86:2,21 88:3 89:2 jkeller@vorys.com 2:4 job 7:19 10:20,21,21 11:22 12:2 13:3 21:1 31:7 40:1 44:1 50:1,18 56:2 61:24 64:7 jobs 64:10 John 1:2 2:2 joint-line 61:9 judge 77:13 judging 69:19 July 51:7 52:7 jump 88:23 June 47:12 49:9,15 50:2,13 51:7 52:7 63:22 64:5 70:19 85:2 86:17 87:10</p> <hr/> <p>K</p> <p>keep 17:11,17 69:7 Keller 1:2 2:2 4:3 5:5 31:15 36:19,22 37:1,13 45:18 48:22 49:1,4 62:14 72:6 75:4 87:14,15</p>	<p>91:19 92:3 Kent 6:1 kept 17:13,14 Kevin 1:13 kickback 91:2 kind 8:15 43:18 kinds 50:16 Knisley 19:11 know 10:16 12:3 14:2 14:4,23 15:7,14 16:14,17 17:4,5 18:18 20:24 24:1,7 26:4,16,19 28:15 28:20 29:9 31:3 32:6,17,20 33:13 40:19,22 43:7,11 43:16 47:3,6,13 49:24 50:24 58:21 58:23 61:6 62:2 63:6 65:2 66:4 67:3 67:16 70:23 71:5 73:1,21,23 74:11 74:15 82:9,16 83:18,23 84:4,5,7 86:1,7,9 87:20 90:11,14,15 knowing 53:22 knowledge 29:1,12 30:4 38:1 40:17 73:18,20 79:4 88:4 K-n-i-s-l-e-y 19:13</p> <hr/> <p>L</p> <p>Lajeunesse 1:11 3:4 5:1,8,16 30:22 36:16 81:4 87:12 93:6 large 9:5 11:20 33:21 53:21 late 49:9,15 50:2 lateral 8:2 10:12 Law 1:13 lawyer 31:4 lawyers 85:22,24 leads 57:4,6,14 lean 81:23 Leaning 39:7 learn 10:3 leave 55:17,19 leaving 55:6 left 6:24 55:13 left-hand 32:16 legal 85:21 length 76:4 let's 15:22 16:15 19:7</p>	<p>44:5 46:17 49:14 54:12 78:10 81:20 level 9:17 57:12 Licking 20:5 life 88:14 limb 54:6 limiting 87:15 line 10:4 14:22 29:2,3 29:8 30:4,21 35:20 50:14 54:8,14,15 54:18,19 55:1,10 55:11,12,21 56:22 56:24 58:9,18,22 59:20 61:12,14,22 62:12 63:1 64:6,9 64:13 68:4 69:19 73:14 78:4,9,16,24 79:1,3,4,9,10,18 80:5,6,8,9,14 84:16 84:18 86:14,20 88:3 89:8 linemen 51:3,13,18 51:23 52:2 lines 10:6,14,15 13:7 28:13 29:4,11,19 33:18 35:9 39:11 40:10 41:3 42:6,11 50:15 54:7 68:3 78:16,17,18 79:16 82:6 83:15,16 84:17 85:17 88:20 90:3 91:4 list 18:18 50:8,11,24 51:1 54:12 listed 33:8 little 21:13 live 81:19 83:3,5 living 7:4 local 8:16 17:10 located 17:4 78:13 80:4 location 50:14,21 51:3,15,17 53:22 64:3 locations 45:3 50:6 50:23 52:15 long 16:14 40:22 57:18 58:17,24 59:3 78:3 longer 26:17 look 22:10 42:2,4,7 67:9,12 72:7 73:13 75:5 81:8,12,22,23 84:8 89:6,8 91:9 looking 28:8,10,18</p>
---	--	--	--	---

29:20 38:11 67:7 75:8 82:24 83:5 lost 54:11 lot 8:15 17:19,21,21 53:2 64:11 91:2 L-a-j-e-u-n-e-s-s-e 5:17	25:6 27:11,22 28:8 28:9,23 31:21 35:4 35:9 39:5 41:4 43:1 51:20 57:3,8 73:2 77:2 86:6 89:22,23 meaning 14:8 55:2 means 33:7,10 43:2,3 meant 28:23 31:23 45:17 87:16 meetings 18:6 mentioned 26:18 38:6,7 84:12 method 18:7 methods 10:8 mile 78:4 miles 76:5 Millersport 17:12 minute 22:21 41:1 82:22 91:23 92:2 minutes 92:1 mistakes 46:15,16 mode 25:11 60:22 Monday 75:23 76:20 money 31:8 Monthly 43:20 months 7:7 15:22 19:2 Moritz 83:18 morning 51:14 Morrow 27:21 move 8:2 11:12 74:23 moved 7:10 16:19 movement 16:5 21:8 movements 50:3 moving 21:13 66:19 multiple 19:20,21 63:16 64:9 multiple-road 63:10 M-c-M-a-h-n 19:15	needing 24:11 27:13 needs 38:3 42:15 44:2 neither 69:12 Nelson 17:1,2 never 72:10 nine 15:16 Nods 34:10 90:8 noncompatible 33:17 normal 60:15,24 61:2 normally 11:18 44:17 north 89:1,2 northeast 7:2 74:3,3 northern 7:1,6 northwest 8:4 20:3 61:22 83:21 84:19 85:8 notary 3:7,9,13 93:4 93:22 notes 3:10 69:7 notice 3:7 32:5,15 Nourse 2:7 92:6 number 13:7 33:23 34:5,6 35:21 44:8 49:16,16 51:13 60:1,10 76:21,21 numbers 44:13,16 77:10	Ohio 1:1,14 2:3,9 5:12 7:1,2,7,9 8:3 13:8,16,20,22 14:3 14:8,14 15:17 17:13 82:13 93:2,4 93:17,22 okay 5:18 6:12,15 7:21 8:8 13:18 14:9 14:18 17:24 18:22 20:1,16 21:5,19 26:18,22 28:15 31:11 32:2 33:4,16 34:9,24 35:23 39:16 42:9 43:24 44:11 45:22 50:5 51:7 54:11,23 55:10,20 57:15 62:21 63:6,20 67:17 68:7 70:9,18 71:13 73:10 76:6 76:19 79:6 80:13 82:2 89:16 90:15 once 58:18 65:19 68:14 ones 34:11 83:4 one-line 4:6 31:19,21 one-phase 55:12 79:9 on-site 52:10 59:17 60:12,18 OPCo 13:15 open 53:11 operated 25:19 operates 65:15 operating 13:15 operation 27:2 54:2 operations 17:8 84:18 opinion 66:7 opposed 51:11 74:19 83:12 orange 43:2,5 order 50:9 57:20 58:7 outage 29:14 48:2,15 49:8,12 50:18 51:5 53:13 54:6 outages 49:17 50:8 outline 11:14 outlying 28:7 outside 66:3 68:10 68:12 69:15 70:3 91:14 overall 13:3 21:15 overhang 10:15 overview 23:13	owned 13:8 <hr/> P page 4:2,5 32:6,7,12 32:16 72:13 76:20 pages 32:5 77:22 painted 42:22 painting 7:6 paper 39:20 paraphrasing 79:7 park 6:16 17:20 parking 17:20 part 10:10 31:6 40:1 42:16 44:1 56:23 73:8 89:19 particular 9:13 60:17 65:2 parties 3:3 93:12,13 parts 20:5 pass 9:6 patrol 28:12,18 29:4 29:7,8,11,11,15,19 patrolling 28:23 patrolled 28:6,9,9,22 29:2 Paul 61:20 62:23 71:20,22,24 72:2 72:11 pavement 72:22 paycheck 13:20,22 pen 32:11 pending 56:2 people 10:22 17:6 28:16 71:8 74:23 85:2 percent 41:7,12 performed 11:15 period 16:21 47:14 51:19 52:18 53:10 53:12 75:13 periodically 29:9 30:17 personal 49:5,19 52:5 personally 52:16 71:1 personnel 29:2,3 phase 55:6 61:16 62:6,6 79:3 phases 54:8 55:5,13 58:11 phone 39:19 51:13 51:14 63:3,5 phrase 85:11,13 physically 42:20
--	--	--	---	--

<p>55:15,17 78:7 pick 82:18 picked 68:4,5 pickup 76:3 pink 43:2,5 place 17:10 52:17 55:17,19 82:10 85:16 93:9 plan 18:8,11 24:6,9 78:4 planned 27:15 32:18 55:23 56:2 59:14 59:16 65:20 76:10 76:14,16,17,24 77:15 planner 7:11,12 10:18 11:11,12,18 11:23 12:19 32:18 36:8,12 38:3 39:11 40:13,23 42:10,19 43:8 44:1 45:9 46:6 46:11,18 47:1 65:22,24 89:6,17 planners 12:7,17 34:15 36:17 39:21 40:2,16 43:19 46:15 69:10 74:17 76:11 planning 15:23 21:7 33:3,4 43:13 45:13 46:22 49:6 56:7 62:9,11,15 65:18 75:12 76:1 78:8 play 80:22 Plaza 2:8 please 5:7,15 6:8,14 71:11 72:8 75:7 plus 20:5 point 14:15 47:20 50:19 59:8,21 74:18 87:21 89:3 pointed 44:13 pole 46:1,1 poles 46:3 50:15 55:3 policies 23:1 36:17 85:16 policy 21:14 22:1,16 36:20 85:10 portion 48:16,18,19 57:3 59:12 64:12 65:9 portions 26:15 27:12 48:8,9,10 73:16 position 5:21 8:6 15:12 25:17 74:8</p>	<p>83:20 positive 66:12 possession 36:20 68:20 possible 17:14 65:5 67:18 78:13 88:18 possibly 29:17 39:13 39:14 post-trimming 70:8 potential 42:7,10 48:5 68:2 potentially 42:2 48:1 Powell 2:3 47:10 54:9 55:4 56:6,12 64:22 71:9,16 73:15 86:2,21 88:3 power 1:5 2:8 5:20 7:12 10:6,14 11:1 13:8,16,21,22 14:3 14:9,14 48:9,16 49:10 54:14 73:17 84:17 85:17 86:20 88:2 89:8 90:3 practices 9:11 10:5,6 prepare 44:1,4 presence 3:11 54:2 93:8 present 30:17 52:20 58:14 presented 18:9 30:7 presently 24:10 Presumably 26:8 pretty 58:7 88:19 previous 26:20,21 55:24 80:2 81:7 previously 5:13 18:21 30:22 57:24 59:14 primary 19:3,4 23:16 28:16 31:24 35:10 35:12,20,23 36:9 39:10 41:3,5,8 42:6 55:2 prior 46:23 52:12 54:24 71:2 87:23 87:24 priorities 50:11 prioritizing 50:7 51:22 priority 50:24 51:1 78:16 probably 13:22 28:6 84:8 problem 27:18 63:21 63:23 65:6</p>	<p>problems 29:21 procedure 3:6 12:21 procedures 4:7 22:1 22:24 29:19 37:16 proceeding 31:2 85:22,24 process 9:3 32:23 33:3 42:16 46:22 56:1 61:8,19 63:24 65:18 66:1 71:17 84:21 produced 23:9 product 45:11 program 8:13 9:9,15 16:5 21:4,6,15,17 21:19,23 22:2 23:7 25:8,21 27:2 28:12 29:19 30:3 34:19 37:18,22 65:15,19 72:24 73:9 82:10 programs 25:20 project 61:12 63:1,1 71:23 projects 71:21 pronounce 11:5 proof 3:11 proper 10:5,8,11,12 properties 35:21 property 91:7,9 proposed 71:2 protect 48:3 79:9 83:16 protecting 83:15 protocol 30:5 provide 45:7 91:12 proximity 39:10 80:4 80:5,8,9,21 81:9,24 pruning 9:10 10:5,8 10:11,12 41:23 public 1:1 18:10 63:11 66:3 70:13 93:4,22 PUCO 68:8 70:10,12 70:14 pullouts 17:18 purposes 14:6 pursuant 3:7 pushing 56:18 put 54:7 putting 54:1</p>	<p>quarter-inch 22:11 34:22 37:2 question 8:20 13:11 26:3 29:1 31:6 36:15 38:24 41:21 42:1 49:2 57:4 60:20 67:8,11 71:11,19 73:4,19 80:1 81:4 86:15,16 87:14 questioning 30:21 questions 37:9 91:20 91:24 92:5 question's 29:23 quickly 61:1,4 quieter 89:18</p>	<p>refers 85:15 refused 91:8 regarding 71:2 72:16 regular 10:2 18:23 24:11 32:3 relate 75:10 relationship 14:19 15:18 16:14 relative 93:11,12 relevance 49:23 82:15 relevant 31:2 reliability 28:2 36:7 48:6 55:7,9 79:17 reliable 91:12 remainder 32:8 remaining 55:14 remodeling 7:6 removal 9:10 16:9 23:11 27:16 35:1 36:3,8,13 38:8 39:1 39:12 41:2,9 42:3 42:13,18,21 43:3 46:7,11 64:13 65:7 67:19 68:4 69:18 76:18 80:12 81:15 83:8 removals 23:18 33:20,21 45:23 77:5 78:10,15 79:15 80:10 remove 10:15 36:4 36:19 41:7 55:17 55:19 56:21 65:21 65:23 80:7 81:18 removed 12:5 33:21 34:5,16 38:4,21 40:9 41:16 46:8,12 52:21 54:7 55:5,13 56:16,24 58:3 66:9 70:5 73:14 78:11 79:22 80:18 81:2 81:12 83:4,12 removing 8:10 41:11 42:3 58:11 59:11 78:23 reopen 87:10 reopened 70:21 87:18 repair 58:18,22 repaired 54:14,18 58:9 73:15 repairs 86:13 repeat 71:11 replaced 55:12</p>
--	---	--	--	---

<p>report 40:7 45:8 69:3 Reported 1:18 reporting 93:14 reports 40:2 43:18,22 45:10 68:7,17,18 68:24 represent 76:23 77:16 representative 70:13 represents 44:9 76:24 request 30:18 31:8 91:6 requested 49:3 required 30:17 Reservation 6:17 resort 6:19 resources 8:14 54:1 61:5 74:24 78:21 respective 3:3 respond 41:23 Respondent 1:6 2:11 responding 49:20 response 58:4 responsibilities 21:1 21:3 28:17 responsibility 28:16 31:7 responsible 16:4 17:24 responsive 37:8 rest 48:4 restate 81:7 restoration 49:10 50:3 60:22 84:21 84:23 85:1 restore 52:6 restored 54:6 86:3,4 86:8,10 result 78:13 results 70:14 returned 44:7 45:14 review 92:6 Rich 15:9 right 6:10 9:3 10:22 18:2 19:8 25:12,13 32:9,13 42:14 50:21 64:19 72:1 82:10 86:11 89:4 right-of-way 38:11 91:6,14 right-of-ways 70:7 Rings 5:10,11 risk 82:13 risks 27:17</p>	<p>risky 82:5 Ritchey 19:14 Riverside 2:8 road 2:3 4:8 5:11,11 17:21 27:7,21 32:10,13 47:10 53:5,8,10,20 54:8,9 54:24 55:2,3,4,4 56:5,5,6,12,17,19 58:14 61:4,10 63:14,18 64:4,22 64:22 66:18 71:9 71:16,18 73:7,15 83:13 86:2,21 87:17 88:3,11,15 88:21,21,23,24 89:2,4,7,9,13,14,18 89:24 90:4,6,7 91:14 roads 53:16 72:20,21 roadway 53:23 56:24 58:3 Roahrig 61:20,24 71:20 Roberts 17:21 role 49:19 room 18:17,20 rough 77:12 RPR 1:18 93:4,22 Rule 93:15 Rules 3:6 running 55:1</p> <hr/> <p>S</p> <p>S 1:18 93:4,22 safe 40:10 53:4 91:12 safely 10:14 safety 9:11 10:5 36:7 48:6 55:9 Sara 1:18 74:1,5 76:12 93:4,22 save 14:10 saw 66:14 88:8 saying 29:13 36:1 39:12 41:19 43:24 57:10 60:18 61:2 66:8 67:5 77:20 79:10 89:19 says 5:3 13:20,22 38:20 76:19 scene 54:3 65:20 schedule 18:4 scheduled 27:15 33:11 scheduling 28:1</p>	<p>school 6:10 7:10 science 6:2 8:16 SDS 83:22,23 seal 93:16 season 6:20 second 5:11 9:22 32:6 43:14 57:22 66:1 72:12 secondary 35:12,17 78:24 section 23:2,6 47:10 54:10 56:4,11 59:1 61:10 66:9 70:21 71:3 72:17 88:10 88:11,14 90:12,16 sections 22:14,15,18 23:5 see 15:5 23:16 67:2,6 70:14 76:21 91:23 seek 78:15 80:10 83:8 seeking 81:18 seen 72:9,10 self-driven 69:6 send 50:13 51:2,15 51:17 sending 52:14 53:1 sense 63:14 sent 27:13 60:24 separate 23:2 57:14 serve 79:3 served 20:22 service 13:7 20:13,15 20:16 21:4,18 52:6 86:3,3,8,9 91:12 session 14:6 set 77:11 93:16 shallow-rooted 81:16 sheer 53:24 sheet 39:20 75:13,20 76:6 sheets 4:9 75:9,11 76:10 Shier 5:10 Shifting 74:24 show 37:14 45:1 76:7 showed 58:3 showing 44:2,22 53:21 shown 77:8 shut 55:4 side 10:13 28:14 30:2 32:16 41:15 53:23 66:18 72:22 73:6</p>	<p>88:20,23,24 89:4,7 90:4,6 sides 86:24 88:21 89:9,14,23 90:6 signature 92:6 similar 74:8 80:3 simply 40:13 70:5 79:23 Simpson 15:9 simultaneous 58:8 single 57:11 79:3 single-page 23:13 38:6 single-phase 78:24 79:18 80:5,9 sir 5:13,14 8:7,11 12:9 13:19 14:1 15:4 20:8 47:15 61:15 62:4 63:19 65:4 68:16 70:22 74:10 76:22 84:14 88:6,12 91:18 situation 40:12 61:2 65:11,14 68:5 87:22 88:2 89:14 situations 55:8 six 19:24 77:22 size 33:19 ski 6:19 smoothly 53:3 Society 6:6 soil 8:14 somebody 9:15 29:6 50:8 51:8 73:5 someone's 65:12 soon 86:1 sorry 6:17 11:10 45:18 62:10 87:19 sort 9:12 10:6 23:3 48:10 54:11 72:21 sought 79:15 south 54:9 55:3 56:5 southern 1:5 13:17 15:17 span 45:24 46:2 78:9 speak 38:23 48:13 64:6 speaking 22:17 26:16 49:12 51:3 79:2 specialist 9:19 species 33:17 36:6 41:22 80:19 81:8 82:2,3,4,12,18,23 83:1 88:7</p>	<p>specific 28:12 29:19 74:21 specifically 16:24 28:17 45:23 67:7 specifications 59:18 specified 93:10 specs 38:5 spell 5:15 11:2 19:12 spend 59:19 78:21 split 57:9 splits 57:13 spoken 22:16 spot 36:6 68:11 spring 7:5 8:4 SS 93:2 stable 41:17 stadium 17:22 stage 32:23 staging 17:19 standard 46:4,5 79:21 standards 78:11 stands 83:23 stapled 22:11 37:3 start 7:13,19 47:20 47:23 started 47:19 63:20 starting 6:12 21:12 state 5:6 6:1 13:12 17:20 67:18 83:11 93:2,4,22 stated 13:11 30:22 35:2 83:2 statement 69:14 stationed 74:13 86:23 steep 53:23 stenotypy 3:9 93:7 step 65:18 66:1 71:22 Steve 5:1,8 Steven 1:11 2:7 3:4 93:5 stick 33:19 stipulated 3:2 STIPULATIONS 3:1 stnourse@aep.com 2:10 stone 77:11 storm 49:15,21 50:1 50:12 55:24 60:6,9 60:13,22 61:2,13 63:7 64:16,20 65:1 70:18 71:2,12 72:18 84:20,22 86:14,17 87:1,10</p>
---	---	---	---	--

Street 1:14 17:22 stretch 53:5,8 89:13 strike 43:7 57:18 79:19 stripped 54:8 study 9:6 stuff 31:4,5 sub 48:5 submit 31:7 68:17 69:3 substation 25:23 27:5 47:23 substations 10:4 sufficient 70:4 Sugar 6:20 Suite 1:14 summer 6:18 supervisor 15:8,13 24:13 30:23 supposed 24:2 39:11 sure 8:20 12:24 13:10 26:2 27:22 52:15 53:3,5 56:18 58:1 67:8 73:4,11 80:1 92:3 sworn 5:2 93:6 sycamore 83:6,7 symmetrical 41:19 system's 20:19 S-h-i-e-r 5:11 S-i-m-p-s-o-n 15:10	techniques 10:12 tell 10:19 24:8 25:6 50:8 52:9 69:22,23 75:6 90:22 tells 47:1 50:23 51:1 temporarily 74:15 tend 91:2 term 20:18 27:24 31:23 test 9:5,7 testify 93:6 testimony 92:8 93:7 93:9 testing 9:1 thank 45:19 48:23 91:20,21 92:5 Thanks 14:18 themselves 10:13 thick 22:12 34:22 37:2 thing 8:15 9:12 10:7 23:4,18 40:11 56:15 things 8:12 23:14 53:4 54:12 64:11 think 14:12 17:22 29:22 30:18 31:2 36:14 38:22 41:3 44:15 56:14,18 63:12,23,24 65:13 67:24 73:12 79:15 81:3 84:16 85:23 87:11 91:24 third 43:15 47:10 57:22 68:9 thought 22:14,21 64:1,2 83:4 three 12:22 13:4 22:14 51:20 55:2 57:4,7,9,13 61:14 62:6 three-phase 55:1,10 55:11 78:16 79:2,9 79:16 80:6,8,12 three-ring 22:9 threw 61:5 tied 9:18,20 ties 32:6,9 Tim 84:3,4 time 3:7 4:9 7:15 10:23 11:21 14:10 15:22 16:21 24:16 44:12 47:14 48:20 48:22 50:6,19 51:20 52:18 53:10	53:12 56:12 58:13 59:9,19,21 64:9,10 66:16 70:20,21 73:14 74:18 75:8 75:11,14,22 76:10 87:21 91:20,22 93:9 times 29:3 36:15 63:16 title 21:23 22:24 37:4 38:14 83:22 today 6:14 8:1 14:6 51:4,15 82:6 85:19 88:5 told 36:8,12 52:2 Tony 84:7 top 33:9 75:13 topics 9:8 total 20:21 33:1 township 83:13 traffic 53:15,19 56:19 63:13 88:16 training 8:9 9:1 40:16 40:19 transcribed 3:10 93:8 transcript 93:9 traveled 63:17 tree 7:12 8:17 9:10 9:10,10 10:16,19 10:24 11:2,8,13,15 11:17 12:3,6,21 14:21 16:4,5 23:10 23:10,11,18 27:8 27:10,11,13,16 30:8 33:1,11,17,19 36:5,6 38:21 39:6,9 41:6,8,12,13,15,16 41:17,18,22 42:4,9 42:12,17 45:1 46:7 46:8,11,23,24 47:6 48:1 50:3,13 51:2,5 52:10,20 56:16,21 56:23 57:1,2,3,4 58:2 59:11,12,23 60:4,7 61:11 62:13 64:12,12,15,17,24 65:2,5,8,10,16,19 65:24 66:6,8,9,15 66:16,23 67:7,17 68:2 70:20 73:14 76:18 78:10,12,23 79:22,24 80:7,8,15 80:18,19,19 81:2,8 81:9,12,17,18,19	81:23,24 82:2,3,17 82:19,19,21,23 83:3,7,8,10,12,13 86:20,24 88:2,7,9 91:4,17 treeline 55:8 trees 8:10,15 9:16 10:13,14 12:4 25:6 34:12,15 35:1,7 36:4,9,12,18 39:1,3 39:4,7 40:4,8,9,9 40:10 41:1,23 42:2 42:7,20 44:23 45:23 56:4,10 58:10 59:17 64:18 64:21 65:3,21,21 65:23,23 69:10,11 69:17 70:4 77:3,4 77:18 78:11 80:3 81:14,16,20,21,22 82:7,11,14 83:5 89:7,12,14 90:2,4 tree's 80:20 tree-related 28:11 trends 24:10 trim 9:16 10:14 26:21 27:11 30:3 35:23 36:18 43:2 59:17 60:24 65:21,23 76:18 trimmed 12:4 24:11 25:10,11 26:19,20 27:1,2 33:12,12 34:16 35:7 38:3 40:10 54:9 56:4 61:1 69:21 trimmer 10:16 trimming 8:10 15:20 15:24 16:8 23:10 23:12,20 25:22 27:9,10,16 35:1 36:13 38:9 41:17 42:20 58:10 59:5 60:5,16 61:11 62:13 69:18 70:2,6 trims 33:11 77:5 truck 50:14 76:3 trucks 17:11,13,14 17:17 53:2,21 56:20 66:19 86:24 true 29:16 69:14 93:8 trunk 57:5,11 truth 93:6,6,7 try 36:4 63:14 65:13 trying 8:24 13:13	21:12,15 26:5,7,9 26:10 28:22 31:22 36:11 60:4 61:3 63:8,13 80:23 82:24 Tuesday 75:24 turn 66:21 turned 36:20 44:9 76:9,15 turning 75:23 76:10 turns 46:19 Tuttle 19:14 twice 68:14 81:5 two 11:19 12:22 13:4 22:22 32:5 40:24 51:5 54:8 55:5,13 80:3 90:6 two-lane 53:9,16 two-part 60:20 Ty 32:19 75:9 type 8:12 9:1,8,15 12:18 16:6 17:11 23:14,18 25:14 26:1 32:2 40:16,19 45:8 46:1 53:20 75:10 80:3,13,19 82:21 90:23 types 81:14 typical 11:21 typically 70:13 76:12 89:13 90:24 91:5 T-u-t-t-l-e 19:14
T T 2:7 take 5:23 6:8,13 8:1 9:4,6 29:7 32:11 44:5 48:21 68:3 72:7 91:10,23 92:2 taken 1:13 3:6 48:24 92:4 93:9 takes 78:4 talk 19:7 49:14 78:10 81:20 talked 71:14 85:19 88:5 talking 14:13 17:8,9 62:14 83:4,6 talks 11:23 tall-growing 33:19 36:5 target 39:1,3 targeted 41:2 tasked 71:9,17 team 51:24 teams 71:15	techniques 10:12 tell 10:19 24:8 25:6 50:8 52:9 69:22,23 75:6 90:22 tells 47:1 50:23 51:1 temporarily 74:15 tend 91:2 term 20:18 27:24 31:23 test 9:5,7 testify 93:6 testimony 92:8 93:7 93:9 testing 9:1 thank 45:19 48:23 91:20,21 92:5 Thanks 14:18 themselves 10:13 thick 22:12 34:22 37:2 thing 8:15 9:12 10:7 23:4,18 40:11 56:15 things 8:12 23:14 53:4 54:12 64:11 think 14:12 17:22 29:22 30:18 31:2 36:14 38:22 41:3 44:15 56:14,18 63:12,23,24 65:13 67:24 73:12 79:15 81:3 84:16 85:23 87:11 91:24 third 43:15 47:10 57:22 68:9 thought 22:14,21 64:1,2 83:4 three 12:22 13:4 22:14 51:20 55:2 57:4,7,9,13 61:14 62:6 three-phase 55:1,10 55:11 78:16 79:2,9 79:16 80:6,8,12 three-ring 22:9 threw 61:5 tied 9:18,20 ties 32:6,9 Tim 84:3,4 time 3:7 4:9 7:15 10:23 11:21 14:10 15:22 16:21 24:16 44:12 47:14 48:20 48:22 50:6,19 51:20 52:18 53:10	53:12 56:12 58:13 59:9,19,21 64:9,10 66:16 70:20,21 73:14 74:18 75:8 75:11,14,22 76:10 87:21 91:20,22 93:9 times 29:3 36:15 63:16 title 21:23 22:24 37:4 38:14 83:22 today 6:14 8:1 14:6 51:4,15 82:6 85:19 88:5 told 36:8,12 52:2 Tony 84:7 top 33:9 75:13 topics 9:8 total 20:21 33:1 township 83:13 traffic 53:15,19 56:19 63:13 88:16 training 8:9 9:1 40:16 40:19 transcribed 3:10 93:8 transcript 93:9 traveled 63:17 tree 7:12 8:17 9:10 9:10,10 10:16,19 10:24 11:2,8,13,15 11:17 12:3,6,21 14:21 16:4,5 23:10 23:10,11,18 27:8 27:10,11,13,16 30:8 33:1,11,17,19 36:5,6 38:21 39:6,9 41:6,8,12,13,15,16 41:17,18,22 42:4,9 42:12,17 45:1 46:7 46:8,11,23,24 47:6 48:1 50:3,13 51:2,5 52:10,20 56:16,21 56:23 57:1,2,3,4 58:2 59:11,12,23 60:4,7 61:11 62:13 64:12,12,15,17,24 65:2,5,8,10,16,19 65:24 66:6,8,9,15 66:16,23 67:7,17 68:2 70:20 73:14 76:18 78:10,12,23 79:22,24 80:7,8,15 80:18,19,19 81:2,8 81:9,12,17,18,19	81:23,24 82:2,3,17 82:19,19,21,23 83:3,7,8,10,12,13 86:20,24 88:2,7,9 91:4,17 treeline 55:8 trees 8:10,15 9:16 10:13,14 12:4 25:6 34:12,15 35:1,7 36:4,9,12,18 39:1,3 39:4,7 40:4,8,9,9 40:10 41:1,23 42:2 42:7,20 44:23 45:23 56:4,10 58:10 59:17 64:18 64:21 65:3,21,21 65:23,23 69:10,11 69:17 70:4 77:3,4 77:18 78:11 80:3 81:14,16,20,21,22 82:7,11,14 83:5 89:7,12,14 90:2,4 tree's 80:20 tree-related 28:11 trends 24:10 trim 9:16 10:14 26:21 27:11 30:3 35:23 36:18 43:2 59:17 60:24 65:21,23 76:18 trimmed 12:4 24:11 25:10,11 26:19,20 27:1,2 33:12,12 34:16 35:7 38:3 40:10 54:9 56:4 61:1 69:21 trimmer 10:16 trimming 8:10 15:20 15:24 16:8 23:10 23:12,20 25:22 27:9,10,16 35:1 36:13 38:9 41:17 42:20 58:10 59:5 60:5,16 61:11 62:13 69:18 70:2,6 trims 33:11 77:5 truck 50:14 76:3 trucks 17:11,13,14 17:17 53:2,21 56:20 66:19 86:24 true 29:16 69:14 93:8 trunk 57:5,11 truth 93:6,6,7 try 36:4 63:14 65:13 trying 8:24 13:13	21:12,15 26:5,7,9 26:10 28:22 31:22 36:11 60:4 61:3 63:8,13 80:23 82:24 Tuesday 75:24 turn 66:21 turned 36:20 44:9 76:9,15 turning 75:23 76:10 turns 46:19 Tuttle 19:14 twice 68:14 81:5 two 11:19 12:22 13:4 22:22 32:5 40:24 51:5 54:8 55:5,13 80:3 90:6 two-lane 53:9,16 two-part 60:20 Ty 32:19 75:9 type 8:12 9:1,8,15 12:18 16:6 17:11 23:14,18 25:14 26:1 32:2 40:16,19 45:8 46:1 53:20 75:10 80:3,13,19 82:21 90:23 types 81:14 typical 11:21 typically 70:13 76:12 89:13 90:24 91:5 T-u-t-t-l-e 19:14
				U Uh-huh 17:3 24:19 umbrella 13:24 uncertainty 58:4 underneath 33:18 36:9 81:18 90:3 understand 8:20 12:24 13:23 14:7 26:2 28:4 34:4 38:20 41:19 57:10 67:5,8 73:4 79:6 80:1 85:13 86:15 90:9 understanding 13:9 unit 34:7 76:14,17,18 units 34:6 76:10,16 76:24 77:3,15 unpleasing 41:14 urgency 87:9,17 use 20:18 23:17 27:24 46:17 usually 19:24

Utilities 1:1 18:10 66:4 70:13 utility 5:22 6:5 7:23 8:2 9:14,18,19,22 13:2 21:2 83:17 <hr/> V valuable 78:19 varied 25:15 26:12 varies 19:24 various 25:18 39:18 52:14 vary 11:20 40:18 78:6 79:5 varying 29:3 vegetation 16:1 21:14 23:11 25:5 28:18 29:20 30:8 85:10,17 vehicles 53:9 verbal 18:13 verbally 18:5 Vermont 6:20 versus 35:1 36:13 83:7 vet 7:8,9 views 42:11 Virginia 7:11,24 8:3 10:19 voltage 35:16 78:17 voltages 10:4 vs 1:4 <hr/> W waived 3:13 walk 78:7,9 82:6 walking 65:11 89:12 want 29:6 37:5 48:22 59:18 wanted 15:5 53:2 59:20 62:16 wasn't 57:1 66:6,10 71:24 water 8:15 way 13:11 16:19 26:14 30:15 44:17 47:24 60:5 65:14 ways 39:18 44:18 weather 6:23,24 Wednesday 75:24 week 43:14,15 47:8 47:11,11 75:18 76:1,9 77:13 87:1 weekly 43:20 weeks 11:19	went 7:2 9:19 52:2,23 55:5 weren't 52:16 west 7:10,23 8:3 10:19 84:13 88:23 westernmost 27:7 we're 13:13 14:13 17:15 22:17 25:7,8 25:12 38:11 41:11 50:9 61:8 83:6,17 91:1 we've 16:24 36:14 85:19 wheels 12:6 whereof 93:16 widen 72:20 73:6 width 90:15 91:17 window 43:17 winter 7:7 wire 55:16,16 within-named 93:5 witness 3:4,11 37:3 48:20,23 91:21 93:8,16 witnessed 65:9 word 5:11 63:12 words 25:9 50:7 69:21 work 11:15,18 12:15 12:17,18 13:18 14:22 15:20,21 16:6,6 17:6,16 18:2 18:4,8,10,11 20:9 21:7,10,11 23:23 24:4,6,9 26:1 27:13 27:15,16 28:1 30:8 30:11,12,14 32:3,8 33:5 34:17 43:11 43:12,13,21 44:2 45:2,13 46:1,21,23 47:1,7,8,22,24 48:4 49:6 50:7 51:5,22 53:4,20 54:4 57:20 58:12,16 59:5,7,10 59:13,15,23 60:5,7 61:6 62:9,12,12,13 62:16 63:6,10 65:20,21 66:2,5 68:6,11 69:1,2 71:2 71:8,15 72:16 74:14,17 75:10 76:16 77:12,17,18 78:4,8 84:9,12,20 84:22 85:6,6,7 89:17,22 91:4,9,11	worked 6:16,19,21 7:3,8 24:11 25:17 26:14 40:22 47:14 47:20 50:18 61:12 85:3 working 7:18 10:24 12:7 17:15 19:20 25:8,13 43:16,19 48:4 61:21 64:8,9 72:21 74:1,4,11,16 85:5 89:18 91:13 works 14:2 30:15 62:3 73:23 worth 79:8 wouldn't 26:9 73:8 writing 3:9 21:20 22:3 written 14:24 18:13 18:15 24:2 32:24 33:2 38:2 39:18,20 44:16 68:17,18 69:3 wrong 40:13 58:5 79:7 wrote 32:17,20 <hr/> X X 29:7 <hr/> Y Y 29:7 yalami@aep.com 2:10 yard 65:12 Yazen 2:7 yeah 6:24 87:24 year 17:7 18:9,18 19:7,17 20:7 24:1,3 24:16,17,20,22 25:3,10 26:19 30:9 30:24 31:9 years 7:4 12:22 13:4 16:18 25:15,16,20 26:7,14,15 40:24 68:22 yesterday 51:16 yes-or-no 41:24 <hr/> Z Z 29:7 zone 25:21 27:1,3,4 zones 25:22 <hr/> 0 0 1:20 2:13 3:14	31:12,14 37:10,12 72:3,5 75:1,3 <hr/> 1 1 2:8 4:6 31:13,17 32:16 44:13,22 45:17,18 47:20 73:13 77:8 10 25:16,20 26:15 34:8,9 35:8,24 75:23,23,24 77:17 93:23 11:12 92:9 12 15:22 19:2 12-2177-EL-CSS 1:4 1424 2:3 15.7 33:24 34:1,2 157 33:24 16th 93:17 160 20:20,22 17 45:15 47:20 17-page 36:22 170 76:16 18 33:21 1800 77:8 1997 7:20,23 1998 8:4 <hr/> 2 2 4:7 32:12 37:11,15 38:18 44:13,22 45:14 2001 26:21 2009 27:2,3,8 2010 27:9 2012 43:9 44:6 45:5 45:13 46:17 47:4 49:6 51:7 52:7 70:19 75:18 85:2 86:17 87:10 2013 1:16 92:9 93:17 2016 25:11 2018 93:23 22 1:14 23rd 47:11 28(D) 93:15 <hr/> 3 3 1:16 4:8 44:13,22 72:4,8 92:8 30 57:9 76:1,16 31 4:6 3101 4:6 31:20 43:9 44:6 45:12 46:17 47:4,7 48:7 49:6	52:6 73:16 75:12 76:2,4 78:1 315 32:9 43:16 49:12 52:11,21,24 53:14 55:6 56:11 59:1,2 60:23 61:6 62:9,16 64:13,18,21 67:10 70:21 71:3,16 72:17 73:15 86:2 86:14,21 87:10,22 88:3,10 90:13,16 91:17 37 4:7 <hr/> 4 4 4:9 44:22 75:2,6,8 77:22 4th 17:22 40 76:9 401 1:14 423 75:21 43015 5:12 43065 2:3 43215 1:14 2:9 <hr/> 5 5 4:3 44:22 5/19 75:18 50 34:8,9 41:7,12 51:20,21 5421 76:7 5423 75:16 76:20 5721 5:10 <hr/> 6 614.477.2087 2:4 614.716.2470 2:9 665223 75:15 <hr/> 7 72 4:8 75 4:9 <hr/> 8 8:55 1:16 80 76:20,21,24 77:3,3 77:4,5,5,18 89 6:3,15,16,19 <hr/> 9 9.6 76:5 98 8:4 16:19
--	---	--	---	--