

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Dean A. Robinson,)	
)	
Complainant,)	
)	
v.)	Case No: 18-1539-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

**DIRECT TESTIMONY OF
JEFFREY A. ABELE
ON BEHALF OF
OHIO POWER COMPANY**

1 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

2 A. My name is Jeffrey A. Abele. My business address is 6558 Glenn Highway, Cambridge,
3 Ohio 43725.

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

5 A. I am employed by Ohio Power Company (“AEP Ohio” or the “Company”) as a
6 Distribution System Supervisor.

7 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

8 A. I am a graduate of John Glenn High School and attended approximately 1 year of college
9 courses at Ohio University’s Zanesville campus. I have been employed by Ohio Power
10 Company for approximately 34 years. I started with the Company in 1985 as a line
11 mechanic. I advanced over the years to a line crew supervisor. I was promoted to my
12 current position in 2014.

13 **Q. WHAT ARE YOUR RESPONSIBILITIES AS A DISTRIBUTION SYSTEM
14 SUPERVISOR?**

15 A. I am responsible for supervising the inspection and maintenance of AEP Ohio’s
16 distribution system throughout Company’s service territory in Cambridge and the
17 surrounding area.

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

19 A. The purpose of my testimony is to address the factual issues raised in the complaint filed
20 by Complainant Dean A. Robinson on October 10, 2018. Through my testimony, I will
21 demonstrate that the cause of the over-voltage event at issue was outside the control of
22 the Company, that the Company acted reasonably in addressing the outage and restoring

1 service to Complainant's residence, and that AEP Ohio provided reasonable service to
2 Complainant at all times.

3 **Q. DID AEP OHIO RESPOND TO AN OVER-VOLTAGE INCIDENT AT**
4 **COMPLAINANT'S RESIDENCE ON AUGUST 26, 2018?**

5 A. Yes. AEP Ohio employees whom I manage and supervise responded to and resolved an
6 over-voltage incident at Complainant's residence.

7 **Q. PLEASE DESCRIBE THAT INCIDENT.**

8 A. We received a call at the call center about an over-voltage event at Complainant's
9 residence. William T. Gross, a line servicer, was dispatched to the residence. Upon
10 arrival, Mr. Gross spoke with Complainant about the situation. Complainant indicated
11 that he had not turned off his main breaker and that the power was fluctuating inside his
12 home. Mr. Gross de-energized Complainant's meter in order to safely identify the over-
13 voltage issue and prevent any further damage. Mr. Gross determined, after testing the
14 service, that the underground service neutral had failed, which led to the over-voltage
15 event. Not having a service neutral creates an imbalance of voltage to the customer. Mr.
16 Gross then laid a temporary neutral to give Complainant's service the proper voltage and
17 restore the service. After reenergizing the meter, Complainant indicated the issue had
18 been resolved and Mr. Gross determined that the service was safe for Complainant's use
19 until the Company could address the fault in the underground line. Mr. Gross then
20 contacted Kevin Bates, a project coordinator, who went out to the Complainant's
21 residence the next day to attempt to locate the fault in the line.

1 **Q. WAS ANYONE ABLE TO DETERMINE THE LOCATION OF THE FAULT IN**
2 **THE LINE?**

3 A. Not in this case. On August 27, 2018, Mr. Bates and Ty Caldwell, a line crew supervisor,
4 went out to the Complainant's residence to test the line in an attempt to locate where in
5 the line the neutral had failed. They tested the line at the transformer and at the
6 customer's meter but were unable to determine the precise location of the fault. After the
7 testing failed, Mr. Bates and Mr. Caldwell hand dug around the utility pole in a final
8 attempt to locate the fault but they were still unable to pinpoint where the direct-buried
9 cable that served the house had failed.

10 **Q. WHAT IS A DIRECT-BURIED CABLE?**

11 A. A direct-buried cable is an electrical wire designed for placement in an underground
12 trench. The electrical wires are encased in sheathing that seals out moisture and protects
13 the wiring within, but the cable is otherwise designed to withstand exposure to soil and
14 moisture conditions found underground without any further protection.

15 **Q. BASED ON YOUR KNOWLEDGE AND EXPERIENCE, WHY MIGHT THE**
16 **NEUTRAL HAVE FAILED AS IT DID IN THIS INSTANCE?**

17 A. This underground neutral failure could have occurred for any number of reasons. I have
18 encountered failed service neutrals caused by animals chewing through a line, tree roots
19 growing through a line, rocks cutting a line, and the natural aging of a line.

20 **Q. DO YOU KNOW HOW OLD THIS PARTICULAR LINE WAS?**

21 A. I do not know the precise age of the line. The Company installed the original meter at the
22 residence in 1957 and the Complainant first took service at the address in 1979. The
23 Company would have installed a direct-buried cable and the original meter as part of the

1 installation of a new service in 1957. Although there is no record of any upgrade to
2 Complainant's underground service when Complainant first took service at the address,
3 when a new customer takes service at a service address the Company may upgrade the
4 service as part of creating a new service under the customer's name. We have no
5 information that indicates the Company upgraded Complainant's underground service at
6 any time, or for any reason, after Complainant began to take service at this service
7 address. Thus, I would estimate the line was approximately 39-61 years old on the date
8 of the event.

9 **Q. DID THE COMPANY REPLACE THE DIRECT-BURIED CABLE THAT**
10 **FAILED WITH ANOTHER DIRECT-BURIED CABLE?**

11 A. No. The Company installed a cable-in-conduit.

12 **Q. WHY DID THE COMPANY REPLACE THE DIRECT-BURIED CABLE WITH A**
13 **CABLE-IN-CONDUIT?**

14 A. It is the Company's normal practice to install cables-in-conduit for new underground
15 service installations. The in-conduit wiring provides additional protection to the
16 underground services and allows the Company to find and address problems in the line,
17 such as failed underground service neutrals, more easily.

18 **Q. WHY WAS THE COMPLAINANT'S RESIDENCE SERVED BY A DIRECT-**
19 **BURIED CABLE AT THE TIME OF THE INCIDENT ON AUGUST 26, 2018?**

20 A. At the time the Company initially installed Complainant's underground service, the
21 standard industry and Company practice was to use direct-buried cables when installing a
22 new underground service. Given there is no record of any upgrade to Complainant's

1 service before the over-voltage event, it makes sense that Complainant's residence was
2 served by a direct-buried cable at the time of the event.

3 **Q. DOES THE COMPANY STILL USE DIRECT-BURIED CABLES?**

4 A. Yes. The Company still buys and installs direct-buried cables, although the normal
5 practice is to install cables-in-conduit for any new service, as I discussed previously.

6 **Q. DID COMPLAINANT ADVISE THE COMPANY THAT HE EXPERIENCED**
7 **ANY SIGNS THAT AN OVER-VOLTAGE EVENT WAS ABOUT TO TAKE**
8 **PLACE PRIOR TO THE ACTUAL EVENT?**

9 A. No, he did not. It is very common that customers do not experience any perceivable
10 warning signs prior to such an over-voltage event. Although it is possible that things like
11 flickering lights could have alerted Complainant to a potential over-voltage event, he did
12 not advise AEP Ohio of any such conditions prior to the August 26, 2018 over-voltage
13 event.

14 **Q. IS THERE ANY WAY THE COMPANY WOULD HAVE KNOWN ABOUT THE**
15 **POTENTIAL FAILURE OF THE UNDERGROUND NEUTRAL PRIOR TO**
16 **EVENT?**

17 A. No. I have no records or knowledge of any prior issues with Complainant's service.
18 Additionally, Complainant's service was the only service affected by the over-voltage
19 event and the only notice the Company received regarding the event was Complainant's
20 telephone call after it occurred. The Company also has no way to predict when such line
21 failures will, or could, occur. Thus, there was no information that would have alerted the
22 Company to any potential issue with the underground service prior to the event on
23 August 26, 2018.

1 **Q. AFTER MR. BATES AND MR. CALDWELL WERE UNABLE TO LOCATE**
2 **THE FAULT IN THE LINE, WHAT STEPS DID THE COMPANY TAKE TO**
3 **RESTORE COMPLAINANT’S SERVICE?**

4 A. After the project coordinator was unable to locate the fault in the line, AEP Ohio created
5 a work order and scheduled a line crew to complete the work called for in the order.

6 **Q. WHAT WORK DID THE WORK ORDER CALL FOR?**

7 A. The work order directed the line crew to install a new underground service and replace
8 the existing utility pole that served the residence.

9 **Q. WHY DID THE COMPANY REPLACE THE EXISTING POLE THAT SERVED**
10 **THE RESIDENCE?**

11 A. While Mr. Bates and Mr. Caldwell were hand digging around the pole, they noticed the
12 pole was rotten and ordered a replacement pole to be installed as a measure to proactively
13 mitigate the potential hazards associated with a rotting pole.

14 **Q. PLEASE DESCRIBE THE WORK DONE TO COMPLETE THE**
15 **INSTALLATION OF THE NEW UNDERGROUND SERVICE.**

16 A. After the crew installed the new pole, they dug a trench from the pole to Complainant’s
17 meter to lay the new underground line. However, due to the location of Complainant’s
18 meter, the line also had to go under a concrete slab and through Complainant’s
19 flowerbed.

20 **Q. DID THE CREW DIG UP THE CONCRETE SLAB OR THE FLOWERBED TO**
21 **LAY THE NEW SERVICE?**

22 A. The line crew hand dug in the flowerbed to minimize any impact to the flowers and the
23 flowerbed in order to help ensure that the affected flowers could be replanted and the

1 flowerbed restored after the work was completed. The crew did not dig up the concrete
2 slab. Instead, the crew had to hand trench under the concrete so they were able to run the
3 underground line under the slab and connect it to Complainant's meter.

4 **Q. WHEN DID THE COMPANY COMPLETE THE WORK?**

5 A. According to the work order, the Company completed the work on September 11, 2018.

6 **Q. APPROXIMATELY HOW LONG WAS THE CUSTOMER WITHOUT POWER**
7 **BECAUSE OF THE OVER-VOLTAGE EVENT?**

8 A. It is my understanding that Complainant was without power for approximately an hour on
9 August 26, 2018, which is the time it took Mr. Gross to identify the issue, lay the
10 temporary neutral, and reenergize Complainant's meter. Additionally, the day the
11 Company installed the new underground service, Complainant was without power for
12 approximately six hours. In total, I would estimate the Complainant was without power
13 for seven hours.

14 **Q. DID THE CREW MAKE ANY OTHER ACCOMMODATIONS FOR**
15 **COMPLAINANT WHEN INSTALLING THE NEW UNDERGROUND**
16 **SERVICE?**

17 A. Yes. The crew laid a new telephone wire and coordinated with Complainant's telephone
18 provider to have that new service activated as well.

19 **Q. DID THE COMPANY RESTORE COMPLAINANT'S PROPERTY AFTER THE**
20 **COMPANY INSTALLED THE NEW UNDERGROUND SERVICE?**

21 A. Yes. AEP Ohio hired a contractor to perform the restoration work.

1 **Q. IN YOUR OPINION, DID AEP OHIO RESPOND REASONABLY AND**
2 **APPROPRIATELY TO THE OVER-VOLTAGE EVENT?**

3 A. Yes, based upon my nearly 34 years of experience in distribution operations, the
4 Company's response to the over-voltage event was reasonable and appropriate.

5 **Q. ARE YOU AWARE OF ANY COMPLAINTS RELATED TO THE**
6 **RESTORATION WORK COMPLETED BY THE CONTRACTOR OR BY THE**
7 **COMPANY?**

8 A. No.

9 **Q. HAVE YOU RECEIVED ANY COMPLAINTS RELATED TO ANY OF THE**
10 **WORK DONE BY THE COMPANY IN RESTORING COMPLAINANT'S**
11 **SERVICE?**

12 A. I have not.

13 **Q. ARE YOU AWARE OF ANY PRIOR OVER-VOLTAGE EVENTS OR OTHER**
14 **SIGNIFICANT OUTAGES AT THIS SERVICE ADDRESS PRIOR TO THE**
15 **INCIDENT ON AUGUST 26, 2018?**

16 A. I am not aware of any previous incidents at this service address.

17 **Q. ARE YOU AWARE OF ANY COMPLAINTS RELATED TO THE NEW**
18 **SERVICE INSTALLED AT COMPLAINANT'S RESIDENCE AFTER THE**
19 **INCIDENT ON AUGUST 26, 2018?**

20 A. I am not.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was served upon Complainants at the address listed below by regular U.S. mail, postage prepaid, on this 16th day of April, 2019.

Dean A. Robinson
64520 Hidden Acres Rd.
Cambridge, Ohio 43725

Complainant

/s/ Tanner S. Wolffram

Tanner S. Wolffram

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Summary: Testimony - Direct Testimony of Jeffrey A. Abele on Behalf of Ohio Power Company
electronically filed by Tanner Wolfram on behalf of Ohio Power Company