

**KUBITZA, Matt, et al.,** )  
 )  
 **Complainants,** ) **Case No. 17-1435-EL-CSS**  
 )  
 **v.** )  
 )  
 **OHIO EDISON COMPANY,** )  
 )  
 **Respondent.** )  
 )  
 )

**DIRECT TESTIMONY OF RON CARSON**  
**ON BEHALF OF OHIO EDISON COMPANY**

**INTRODUCTION**

**Q. PLEASE INTRODUCE YOURSELF.**

A. My name is Ron Carson. I am employed by FirstEnergy Service Company (“FirstEnergy”) as the Inspection and Maintenance Supervisor for Energy Delivery (“ED”) Distribution Standards. FirstEnergy Service Company provides corporate support, including customer service, to FirstEnergy Corp.’s regulated public utility subsidiaries. In Ohio, these subsidiaries are Ohio Edison Company (“Ohio Edison” or the “Company”), The Cleveland Electric Illuminating Company, and The Toledo Edison Company.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.**

A. I have a Bachelor’s of Science in Mechanical Engineering from University of Akron. I first started working for Ohio Edison in 1989. I was a Special Projects Supervisor for five years, and a Senior Engineer for three years. In 1997, I began working for FirstEnergy Solutions as a Senior Engineer in various departments for twelve years. In 2009, I began working for FirstEnergy Service Co. as an Engineer V in the Business Development Department. In 2018, I started in my current position of Inspection and Maintenance Supervisor for ED Distribution Standards.

**Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?**

A. As Inspection and Maintenance Supervisor, my role is to optimize FirstEnergy’s Inspection and Maintenance program and to develop new solutions to improve distribution system safety and reliability. Over the past year, I have become intimately familiar with FirstEnergy’s Inspection and Maintenance practices, industry-standard practices, and the rules and regulations governing such practices.

1 **Q. WHAT CAN YOU TELL THE COMMISSION ABOUT THE RELIABILITY OF**  
2 **OHIO EDISON’S DISTRIBUTION SYSTEM IN GENERAL?**

3 A. Ohio Edison is a very reliable electric utility overall. The Public Utilities Commission of  
4 Ohio (“Commission”) assists in monitoring the reliability of Ohio Edison’s distribution  
5 system, including requiring Ohio Edison to file yearly reports detailing the reliability of  
6 our system and circuits as well as our maintenance and inspection activities. The  
7 Commission also sets general reliability standards that Ohio Edison must follow. Since  
8 2009, Ohio Edison’s overall system has met all Commission reliability targets, including  
9 for SAIDI (system average interruption duration index), CAIDI (customer average  
10 interruption duration index) and SAIFI (system average interruption frequency index).

11 **Q. WHAT DOES OHIO EDISON DO TO MAINTAIN RELIABILITY FOR ITS**  
12 **CUSTOMERS?**

13 A. Each year Ohio Edison invests substantial sums of money for the purpose of continuing to  
14 improve reliability for our customers. As one example, Ohio Edison is on a repeating cycle  
15 of preventative maintenance. Ohio Edison conducts routine inspections of its pad-mounted  
16 equipment every five years in order to identify and repair unsafe conditions or conditions  
17 that may adversely affect service reliability or system performance. Ohio Edison also  
18 regularly reviews underground equipment and has the ability to address those issues on a  
19 case-by-case basis to ensure reliability to its customers. Ohio Edison places a strong  
20 emphasis on efforts to anticipate and eliminate potential problems.

21 **Q. DOES OHIO EDISON HAVE A MAINTENANCE SCHEDULE SPECIFICALLY**  
22 **FOR UNDERGROUND EQUIPMENT?**

1 A. Yes. FirstEnergy has a Distribution Inspection & Maintenance Practice Manual for  
2 Underground Equipment that details the maintenance schedule for underground  
3 equipment. This manual is adopted and used by Ohio Edison.

4 **Q. HOW IS THIS MANUAL CREATED?**

5 A. FirstEnergy submits an Electrical Safety and Security Filing (“ESS Filing”) to the  
6 Commission that includes plans for inspection and maintenance practices. The last filing  
7 of such plans was in docket number 09-0802-EL-ESS and was approved by the  
8 Commission by operation of law. FirstEnergy’s Distribution Inspection & Maintenance  
9 Practice Manual (which is adopted and used by Ohio Edison) is developed from the  
10 Commission-approved ESS Filing.

11 **Q. WHAT IS OHIO EDISON’S MAINTENANCE SCHEDULE FOR**  
12 **UNDERGROUND EQUIPMENT?**

13 A. Ohio Edison visually inspects its underground equipment on a five-year cycle. This  
14 practice applies to underground distribution equipment, including: pad-mounted and  
15 subsurface transformers, pad-mounted sectionalizing equipment, below-grade  
16 sectionalizing installations, pad-mounted deferral cabinets, pad-mounted switchgear,  
17 handholes and pedestals, and underground rise pole installations that feed the above  
18 equipment.

19 **Q. WHAT IS THE PURPOSE OF OHIO EDISON’S INSPECTION AND**  
20 **MAINTENANCE PRACTICES FOR UNDERGROUND EQUIPMENT?**

21 A. The purpose of inspecting underground equipment is to identify and repair unsafe  
22 conditions or conditions that may adversely affect service reliability or system  
23 performance, and to comply with state regulations and the National Electric Safety Code.

1   **Q.    WHAT IS THE NATIONAL ELECTRIC SAFETY CODE?**

2   A.    The National Electric Safety Code sets the ground rules and guidelines for practical  
3       safeguarding of utility workers and the public during the installation, operation, and  
4       maintenance of electric supply, communication lines, and associated equipment.

5   **Q.    HOW ARE OHIO EDISON’S INSPECTION & MAINTENANCE PRACTICES**  
6       **CONSISTENT WITH THE NATIONAL ELECTRIC SAFETY CODE?**

7   A.    Ohio Edison’s practice of performing underground equipment inspections is based on  
8       accepted electric utility practices and the experience of the FirstEnergy Operating  
9       Companies. National Electrical Safety Code Rule 313A2 states, “Accessible lines and  
10      equipment shall be inspected by the responsible party at such intervals as experience has  
11      shown to be necessary.” Underground equipment inspections have proven to be successful  
12      in addressing emergent problems in a timely manner, allowing for proper planning and  
13      remediation prior to the emergent problem having a negative impact on safety, equipment  
14      integrity, or service reliability.

15  **Q.    IN ADDITION TO THE FIVE-YEAR CYCLE MENTIONED ABOVE, DOES**  
16       **OHIO EDISON CONDUCT ANY OTHER MAINTENANCE ON UNDERGROUND**  
17       **EQUIPMENT?**

18  A.    Yes. Ohio Edison also practices corrective maintenance. Pursuant to its Distribution  
19      Inspection and Maintenance Manual, underground equipment with recorded defects that  
20      Ohio Edison could reasonably expect to endanger life or property are promptly repaired,  
21      disconnected, or isolated. Deficiencies likely to cause an outage are corrected within one  
22      year of the completion of the inspection that originally revealed such deficiencies up to no  
23      later than the end of the following year. Corrective maintenance of a deficiency identified

1 by Ohio Edison may include repair or replacement. Items not likely to cause an outage will  
2 be evaluated and prioritized on a case-by-case basis.

3 **Q. THE COMPLAINT ALLEGES THAT “THE LIFE EXPECTANCY OF []**  
4 **UNDERGROUNDS ARE 25-40 YEARS.” HOW DO YOU RESPOND TO THIS**  
5 **ALLEGATION?**

6 A. I disagree with Complainant’s allegation. There is no industry standard for the life  
7 expectancy of underground secondary lines.

8 **CONCLUSIONS**

9 **Q. IN YOUR OPINION, TO A REASONABLE DEGREE OF PROFESSIONAL**  
10 **CERTAINTY, HAS OHIO EDISON PROVIDED REASONABLE SERVICE TO**  
11 **COMPLAINANT?**

12 A. Yes. In my opinion, to a reasonable degree of certainty, Ohio Edison has provided  
13 reasonable service to Complainant. Ohio Edison has followed its industry-standard  
14 inspection and maintenance practices for the Jackson Circuit, including conducting its  
15 routine inspections every five years and responding to outage and trouble calls with  
16 appropriate and reliable measures.

17 **Q. ARE OHIO EDISON’S DISTRIBUTION INSPECTION AND MAINTENANCE**  
18 **PRACTICES INDUSTRY STANDARD AND CONSISTENT WITH THE**  
19 **NATIONAL ELECTRIC SAFETY CODE?**

20 A. Yes. Ohio Edison’s Distribution Inspection Maintenance Practices are industry-standard  
21 and consistent with the National Electric Safety Code. They are also developed from an  
22 ESS filing that is approved by the Commission.

1 **Q. IN YOUR OPINION, TO A REASONABLE DEGREE OF CERTAINTY, ARE**  
2 **OHIO EDISON'S DISTRIBUTION INSPECTION AND MAINTENANCE**  
3 **PRACTICES REASONABLE?**

4 A. Yes. Contrary to Complainant's assertion, there is no reason to believe that Ohio Edison's  
5 inspection and maintenance practices are insufficient to ensure safe and reliable service to  
6 its customers.

7 **Q. IN YOUR OPINION, TO A REASONABLE DEGREE OF CERTAINTY, HAS**  
8 **OHIO EDISON PROPERLY FOLLOWED ITS DISTRIBUTION INSPECTION**  
9 **AND MAINTENANCE PRACTICES AS IT RELATES TO THE UNDERGROUND**  
10 **EQUIPMENT AND LINES SERVICING COMPLAINANT'S PROPERTY?**

11 A. Yes. Ohio Edison last conducted an inspection of the Jackson Circuit in September 2016,  
12 including overhead, underground, and pole inspections. In the area servicing  
13 Complainant's residence, all facilities were found to be in good condition. Prior to that,  
14 Ohio Edison conducted an inspection of the Jackson Circuit in late-August 2011. In the  
15 area servicing Complainant's residence, Ohio Edison employees identified and replaced a  
16 damaged hand-hole cover. Otherwise, all facilities were found to be in good condition.

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

18 A. Yes, it does; however, I reserve the right to supplement my testimony.

Date: June 28, 2019

/s/ Casteel E. Borsay

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Direct Testimony of Ron Carson was served by U.S. Mail, courtesy copy via electronic mail, upon the following on this 28th day of June, 2019.

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**Commission of Ohio Docketing Information System on**

**6/28/2019 4:06:03 PM**

**in**

**Case No(s). 17-1435-EL-CSS**

Summary: Testimony Testimony of Ron Carson on behalf of Ohio Edison electronically filed by  
Casteel E. Borsay on behalf of Ohio Edison Company