

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Ned Bushong,)	
)	
Complainant,)	
)	
v.)	Case No: 18-1828-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

**DIRECT TESTIMONY OF
PAULA S. IGO
ON BEHALF OF
OHIO POWER COMPANY**

1 **I. INTRODUCTION**

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

3 A. My name is Paula S. Igo. My business address is 700 Morrison Road, 4th floor, Gahanna,
4 Ohio 43232.

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

6 A. I am employed by Ohio Power Company (“AEP Ohio” or the “Company”) in the
7 Regulatory Consultant, Principle position.

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

9 A. I am an attorney, but I am not employed as or practicing as an attorney for American
10 Electric Power Company (“AEP”) or AEP Ohio. I received my Juris Doctorate from the
11 University of Dayton School of Law in May 1996. I was admitted to the Ohio Bar in
12 November 1996. Prior to that, I received a Bachelor of Arts in Psychology from Wright
13 State University in March 1993. I have also completed my Project Management
14 Professional certification.

15 I have over 10 years of electric utility experience with AEP Ohio. I started my career as a
16 Contract Analyst supporting distribution and AEP’s gridSMART projects. I then became
17 an AEP Ohio Project Manager, responsible for the contracts that supported the AEP Ohio
18 gridSMART Demonstration Project as well as the project reporting. Following that
19 project’s successful completion, I joined the AEP Ohio Regulatory Operations group.

20 Prior to joining AEP, I spent 10 years as a trial attorney for the Franklin County Public
21 Defender’s Office.

22 **Q. WHAT WERE YOUR RESPONSIBILITIES AS A PROJECT MANAGER ON**
23 **THE GRIDSMART TEAM?**

1 A. I was responsible for the management of the contracts for the gridSMART project. This
2 included managing Requests for Proposals and the selection of vendors, negotiating
3 contracts, drafting contracts with the AEP Legal Department, and project reporting. With
4 this effort, I became familiar with the technologies being deployed within the Company's
5 service territory, including Advanced Meter Infrastructure ("AMI") meters or "smart"
6 meters.

7 **Q. WHAT ARE YOUR RELEVANT RESPONSIBILITIES AS A REGULATORY**
8 **CONSULTANT, PRINCIPLE?**

9 A. In my current role, I have continued to be involved with the AEP Ohio smart grid
10 deployment. Specifically, I have provided support with the implementation of the "opt out"
11 process for AMI meters and Automatic Meter Reading or Radio Frequency meters.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A. The Purpose of my testimony is to address some of the allegations and policy issues raised
14 in the Complaint filed by Complainant Ned Bushong on December 12, 2018. Through my
15 testimony, I will demonstrate that AEP Ohio met its obligations to provide safe, reasonable,
16 and adequate electric service to Mr. Bushong and otherwise acted in accordance with Ohio
17 law and regulations and AEP Ohio's tariffs at all times. Although I am an attorney, I am
18 not attempting to address any of the legal issues presented in this proceeding.

19 **II. SUMMARY OF COMPLAINT**

20 **Q. PLEASE BRIEFLY DESCRIBE THE NATURE OF MR. BUSHONG'S**
21 **COMPLAINT.**

22 A. Mr. Bushong's Complaint relates to AEP Ohio's deployment of AMI meters in the
23 Company's service territory, which includes Mr. Bushong's residence. The Complaint

1 indicates that Mr. Bushong does not want an AMI meter and does not believe he should be
2 subject to the Company's Commission-approved Advanced Meter Opt Out tariff
3 provisions and opt-out fee. In lieu of paying the opt-out fee, Mr. Bushong wishes to read
4 his meter himself and send the Company his monthly meter readings, or to have the
5 Company estimate his bill every month.

6 **III. METERING OPTIONS FOR RESIDENTIAL CUSTOMERS**

7 **Q. IS A RESIDENTIAL CUSTOMER REQUIRED TO HAVE AN AMI METER?**

8 A. No. Under Paragraph 16 of the Terms and Conditions of Service in the Company's
9 Commission-approved tariff, a residential customer may request to "opt-out" of having an
10 AMI meter installed at his or her service address.¹ In such cases, the Company's typical
11 practice is to install a non-emitting, non-communicating digital meter at the customer's
12 premises. A customer who elects not to have an AMI meter is required to pay a \$24.00
13 monthly opt out fee.

14 **Q. DOES A CUSTOMER WHO DECLINES THE INSTALLATION OF AN AMI**
15 **METER HAVE THE RIGHT TO KEEP HIS OR HER EXISTING METER?**

16 A. No. It is first important to keep in mind that electric meters are owned by AEP Ohio, not
17 by individual customers.² Additionally, AEP Ohio's tariff expressly provides that opt-out
18 service does not guarantee that a customer will retain the existing meter at their premises
19 and that the Company "maintains the right to replace meters for customers on opt-out
20 service with meters that do not have one-way or two-way communications."³ When a

¹ P.U.C.O. No. 20 at 3rd Revised Sheet No. 103-12 (¶ 16).

² P.U.C.O. No. 20 at 3rd Revised Sheet No. 103-10 (¶ 14).

³ P.U.C.O. No. 20 at 3rd Revised Sheet No. 103-13.

customer declines an AMI meter, the Company's normal practice is to install a digital non-emitting, non-communicating meter. However, if a dispute arises regarding the type of meter installed or to be installed at a customer's residence, the Company works with the customer to try to reach a mutually-agreeable metering solution.

Q. WHY IS IT THE COMPANY'S NORMAL PRACTICE TO INSTALL A DIGITAL NON-EMITTING, NON-COMMUNICATING METER AT AN AMI OPT-OUT CUSTOMER'S RESIDENCE?

A. Analog meters are no longer standard metering equipment. Those meters are no longer manufactured, and replacement parts and components are not available. AEP Ohio does not purchase or use such meters and, in fact, has not purchased an analog meter in over ten years. Based on these factors, the Company has moved to installing non-emitting digital meters at opt-out customers' residences. Non-emitting digital meters measure the electrons a consumer uses (like a traditional dial meter) and displays the reading on a digital display that is easier for a meter reading technician to read.

Q. DOES AEP OHIO'S TARIFF PROVIDE CUSTOMERS WITH ANY OTHER OPTIONS REGARDING SMART METER INSTALLATION?

A. Yes. Another metering solution that a customer may choose is to relocate their meter location (at the customer's expense) and have an AMI meter installed at the new location.⁴ No monthly opt-out fee is required for a customer who chooses this option.

Q. WHAT TYPE OF METER IS INSTALLED AT MR. BUSHONG'S RESIDENCE?

A. The analog meter that was installed at Mr. Bushong's residence on July 1, 1989 continues to be in place today.

⁴ P.U.C.O. No. 20 at 3rd Revised Sheet No. 103-12 (¶ 16(1)).

1 **Q. WILL THE COMPANY ALLOW THE ANALOG METER AT MR. BUSHONG'S**
2 **PREMISES TO REMAIN IN PLACE?**

3 A. Yes. The Company is willing to allow the meter currently installed at Mr. Bushong's
4 residence to continue to serve the residence as long as that meter is functioning within the
5 standards set forth in Ohio Adm. Code 4901:1-05 and Paragraph 14 of the Terms and
6 Conditions of Service in AEP Ohio's tariff.⁵ Consistent with the Advanced Meter Opt Out
7 provisions set forth in Paragraph 16 of the Company's tariff, Mr. Bushong will also be
8 required to pay the Company's Commission-approved monthly opt-out fee.

9 **Q. IS MR. BUSHONG'S REQUEST TO READ HIS OWN METER AND SEND THE**
10 **COMPANY HIS USAGE INSTEAD OF MR. BUSHONG ACCEPTING AMI OR**
11 **OPTING OUT AND PAYING THE COMPANY'S OPT-OUT FEE**
12 **APPROPRIATE?**

13 A. No, it is not appropriate or reasonable. Although a customer may be able to read his meter,
14 AEP Ohio is unable to use that reading for billing purposes. Such an approach would not
15 be appropriate because there would be both an opportunity for inadvertent error and for a
16 customer to manipulate a reading. The Company also has no systems in place to enter a
17 customer-provided reading or store information or photographs a customer might provide
18 to document the reading. Such systems would be costly to develop and of little utility in
19 any event, given the Company's concerns about the accuracy or a customer-provided
20 reading and the fact that the vast majority of customers' metering information is obtained
21 and recorded through other means.

⁵ P.U.C.O. No. 20 at 3rd Revised Sheet No. 103-10 and 103-11.

1 **Q. IS MR. BUSHONG’S SUGGESTION THAT THE COMPANY ESTIMATE HIS**
2 **ELECTRIC USAGE EVERY MONTH INSTEAD OF MR. BUSHONG**
3 **ACCEPTING AMI OR OPTING OUT AND PAYING THE COMPANY’S OPT-**
4 **OUT FEE REASONABLE?**

5 A. No, it is not. Ohio Adm. Code 4901:1-10-05(I)(1) requires the Company to obtain actual
6 readings of all its in-service customer meters at least once per calendar year. Mr.
7 Bushong’s suggestion is inconsistent with that requirement.

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

9 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 2nd day of July, 2019.

Ned Bushong
1191 Gloria Ave
Lima, Ohio 45805

Complainant

/s/ Tanner S. Wolffram
Tanner S. Wolffram

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/2/2019 9:48:32 AM

in

Case No(s). 18-1828-EL-CSS

Summary: Testimony -Direct Testimony of Paula S. Igo on Behalf of Ohio Power Company
electronically filed by Tanner Wolfram on behalf of Ohio Power Company