

FILE
REDACTED PUBLIC VERSION

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

MICHELLE DIFIORI)

Complainant,)

v.)

Case No. 18-1608-EL-CSS

THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,)

Respondent.)

DIRECT TESTIMONY OF MARILYN COTTRILL ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Marilyn Cottrill. I am employed by FirstEnergy Service Company as a Customer Services Compliance Specialist. 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, The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I have worked at either FirstEnergy Service Company or Allegheny Power Company ("Allegheny Power") in a customer service capacity for the last 21 years. I have held my current position since 2011, although after the merger the title was changed from Business Analyst to Customer Services Compliance Specialist.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities include reviewing and responding to complaints made by customers of FirstEnergy Corp.'s regulated public utility subsidiaries to the Public Utilities Commission of Ohio ("Commission"), which process includes investigating facts including gathering information from subject matter experts. I also have responsibility for reviewing and responding to customer complaints in Pennsylvania. Among other customer service-related duties, I also provide training to new hires and to my peers within FirstEnergy regarding various state compliance requirements.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. No.

REDACTED PUBLIC VERSION

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THE PRESENT CASE?**

2 A. My testimony addresses aspects of the Complaint pertaining to the electric service provided
3 by CEI to Michelle DiFiori at 3427 Norris Ave., Parma, OH 44134 (the "Property").

4 **Q. WHAT DID YOU DO TO PREPARE FOR YOUR TESTIMONY IN THIS**
5 **PROCEEDING?**

6 A. I have reviewed the Complaint submitted by Ms. DiFiori, as well as business records
7 related to this case maintained and preserved within FirstEnergy's SAP System. These
8 records, all of which were kept in the course of regularly conducted business activity,
9 include customer contact notes and account summary, and CEI's Commission-approved
10 tariff. It is the regular practice of FirstEnergy and CEI to make and preserve these business
11 records, and I rely upon such documents in accordance with my duties at CEI.

12 **COMPLAINANT'S HIGH BILL COMPLAINT**

13 **Q. COULD YOU PLEASE DESCRIBE IN YOUR OWN WORDS THE EVENTS**
14 **THAT LED TO THE COMPLAINT IN THIS MATTER?**

15 A. Yes. Ms. DiFiori's Complaint appears to be rooted in her confusion about CEI's rebill
16 process. Ms. DiFiori's CEI bill dated July 17, 2018 was based on an actual meter reading
17 that was taken on July 13, 2018 and showed consumption of [REDACTED]. She called CEI
18 on July 17, 2018 and stated she felt her bill was too high. CEI's records show that during
19 the call, a customer service representative asked Ms. DiFiori to read her the meter to the
20 customer service representative over the phone. Based on my review of the recording of
21 that call, Ms. DiFiori and the CEI customer service representative mistakenly
22 superimposed two numbers, making it appear that Ms. DiFiori's usage was much lower

REDACTED PUBLIC VERSION

1 than it actually was, at [REDACTED]. CEI issued a Rebill to Ms. DiFiori on July 18, 2018 for
2 [REDACTED].

3 **Q. DID CEI EVENTUALLY REALIZE THAT THIS MISTAKE HAD BEEN MADE?**

4 A. Yes. CEI took another actual reading of Ms. DiFiori's meter on August 10, 2018, which
5 detected [REDACTED] of usage since the Rebill issued on July 18, 2018. CEI charges
6 customers for the electricity they consume, and therefore CEI charged Ms. DiFiori for all
7 electricity she consumed during the relevant billing periods.

8 **Q. DID COMPLAINANT USE [REDACTED] OF ELECTRICITY DURING BILLING**
9 **PERIOD JULY 14, 2018 – AUGUST 10, 2018?**

10 A. No. Ms. DiFiori used approximately [REDACTED] during that billing period.

11 **Q. IF COMPLAINANT DID NOT USE [REDACTED] OF ELECTRICITY DURING**
12 **BILLING PERIOD JULY 14, 2018 – AUGUST 10, 2018, WHY WAS SHE BILLED**
13 **FOR [REDACTED] ON HER AUGUST 14, 2018 CEI BILL?**

14 A. Again, CEI charges customers for the electricity they consume. Ms. DiFiori's CEI bill
15 dated July 17, 2018 was based on an actual meter reading on July 13, 2018 (for billing
16 period June 13, 2018-July 13, 2018) and showed consumption of [REDACTED], but she was
17 only charged for [REDACTED] on her July 18, 2018 rebill, which was a difference of [REDACTED].
18 Her August 14, 2018 bill, which was based on an actual meter reading, charged her for her
19 actual usage between June 13, 2018 and August 10, 2018. If CEI did not charge Ms. DiFiori
20 for the electricity she consumed, and instead wrote off those charges, then CEI would have
21 to collect the written-off charges from other customers under CEI's Distribution
22 Uncollectible Rider (Rider DUN), which would be unfair since Ms. DiFiori did in fact use
23 this electricity.

REDACTED PUBLIC VERSION

Q. DID COMPLAINANT CONTACT CEI AGAIN AFTER HER CALL ON JULY 17, 2018?

Yes. Ms. DiFiori called CEI again on August 14, 2018. CEI's customer contact notes from that call indicate that Ms. DiFiori complained that her meter was running fast. As a result, CEI ordered a test of Ms. DiFiori's meter, and CEI personnel removed the meter from service on August 15, 2018 and installed a new meter that same day. The old meter was sent to the Meter Lab in Akron, Ohio for testing and registered an average accuracy of 99.63 percent. CEI mailed a letter to Ms. DiFiori on August 17, 2018 informing her of the test results on her meter.

Q. DID CEI OVERBILL COMPLAINANT FOR HER ELECTRIC CONSUMPTION DURING THE SUMMER OF 2018?

A. No. First, her meter tested 99.63% accurate. Second, with the exception of the July 18, 2018 rebill, all of Ms. DiFiori's CEI bills for the summer of 2018 were based on actual meter readings. Third, my review of her historic usage shows that she regularly consumes more electricity than normal during the summer months. Ms. DiFiori used quite a bit of electricity in June and July of 2018, but not significantly more than usual. Fourth, I suspect that Ms. DiFiori may be unfamiliar with her typical summer usage because of her prior enrollment in the Percentage of Income Payment Plan Plus program ("PIPP Plus").

Q. WHAT IS PIPP PLUS?

A. PIPP Plus is an extended payment plan arrangement that requires regulated gas and electric companies to accept payments based on a percentage of the household income for those customers who are at or below 150% of the federal income guidelines. PIPP Plus helps customers maintain their electric service by providing customers with a consistent payment

REDACTED PUBLIC VERSION

1 amount year-round and customers who pay on-time and in-full receive credit for the
2 balance of their current bill as well as credit to reduce their outstanding balance. Over 24
3 months, a customer can eliminate their outstanding balance by paying on-time and in-full.

4 **Q. COULD ENROLLMENT IN PIPP PLUS CAUSE A CUSTOMER TO NOT**
5 **NOTICE THAT THEY HAVE HIGH SEASONAL USAGE?**

6 A. Yes, because when a customer is enrolled in PIPP Plus, their monthly payment is the same,
7 year-round, regardless of the amount of electricity they consume.

8 **Q. IS COMPLAINANT CURRENTLY ENROLLED IN PIPP PLUS?**

9 A. No. However, she was enrolled in PIPP Plus from February 6, 2016-May 8, 2018. Thus,
10 Ms. DiFiori may not have noticed her high usage during the Summers of 2016 and 2017
11 and may have been surprised by her CEI bills in the Summer of 2018 since they were not
12 leveled-out PIPP Plus bills and rather charged her for the full amount of electricity she
13 consumed.

14 **Q. WHY DID COMPLAINANT'S ENROLLMENT IN PIPP PLUS END ON MAY 8,**
15 **2018?**

16 A. Ms. DiFiori's enrollment in the PIPP Plus program ended on May 8, 2018 because she
17 failed to submit the income verification that was required to keep her enrolled in the
18 program.

19 **COMPLAINANT'S AIR CONDITIONING**

20 **Q. COMPLAINANT CLAIMS THAT A CEI SUPERVISOR TOLD HER TO HAVE**
21 **HER AIR CONDITIONING INSPECTED IF SHE "WANTED TO ARGUE"**
22 **ABOUT HER ELECTRICITY CONSUMPTION. HOW DO YOU RESPOND TO**
23 **THAT?**

REDACTED PUBLIC VERSION

1 A. CEI does not record supervisor telephone calls so I cannot opine on that part of her claim.
2 However, customer contact notes from Ms. DiFiori's August 14, 2018 call to CEI state that
3 Ms. DiFiori mentioned to the Customer Service Representative that she was experiencing
4 issues with her air conditioning. It is common practice for Customer Service
5 Representatives and Supervisors to recommend that customers have electricians or
6 technicians inspect their wiring or appliances when customers feel that they are
7 experiencing higher than normal consumption.

8 **COMPLAINANT'S CEI BILLS AFTER HER METER WAS REPLACED**

9 **Q. DID CEI DO AN ACTUAL READING OF COMPLAINANT'S NEW METER IN**
10 **SEPTEMBER 2018?**

11 A. Yes, CEI took an actual reading of Ms. DiFiori's new meter on September 12, 2018 for
12 Ms. DiFiori's CEI bill dated September 14, 2018. It was again in line with her historic
13 usage and her usage over the summer of 2018.

14 **COMPENSATION OF COMPLAINANT**

15 **Q. HAS CEI DONE ANYTHING TO COMPENSATE COMPLAINANT FOR HER**
16 **INCONVENIENCE?**

17 A. Yes. CEI issued Ms. DiFiori a one-time goodwill credit of \$43.61 on September 19, 2018
18 to compensate her for the confusion with the rebill process. Ms. DiFiori also received a
19 \$50 rebate on September 17, 2018 to compensate her for the money she spent on having
20 an HVAC technician inspect her air conditioning.

21 **CONCLUSION**

22 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

23 A. Yes; however, I reserve my right to supplement my testimony.