

REDACTED PUBLIC VERSION

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

MICHELLE DIFIORI

Complainant,

v.

THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,

Respondent.

Case No. 18-1608-EL-CSS

DIRECT TESTIMONY OF ROBERT PERKINS ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Robert Perkins. I am employed by The Cleveland Electric Illuminating Company ("CEI" or "Illuminating Company") as Manager of Meter Services. Meter Services is the department responsible for the installation, maintenance, and accuracy of meters and associated equipment to ensure accurate electricity consumption for customer billing.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I have worked at FirstEnergy companies for almost 28 years. I have been the Manager of Meter Services at CEI since 2006. Prior to that, for approximately seven years I supervised some of Ohio Edison's field meter services personnel, including those who installed meters, performed off-cycle meter reads, and investigated customer complaints regarding, among other things, unexplained high bills and allegedly inaccurate meters. Before that, I worked as a metering instructor for FirstEnergy Service Company for one year, instructing technical courses on metering to our metering personnel and other employees. I also taught courses on the basics of electricity to other office personnel. For the first six years of my employment with FirstEnergy, I worked as a technician in Ohio Edison's meter testing laboratory, where I calibrated the testing equipment to ensure its proper function when meters were tested. Previous to my work experience at FirstEnergy, I was self-employed as an electrical contractor and currently hold and maintain an Ohio Electrical Contractor License. My license number is 20358. I also have a four-year degree from The University of Akron in Electronic Technology.

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Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities include management and oversight of all activities that fall within the responsibility of Meter Services at the Cleveland Electric Illuminating Company (“CEI” or the “Company”).

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. Yes, I testified in Case No. 09-947-EL-CSS, *Disiena v. CEI* and in Case No. 17-1563-EL-CSS, *Moore v. CEI*.

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

A. My testimony addresses several aspects of the Complaint pertaining to the electric service provided by CEI to Michelle DiFiori at 3427 Norris Ave., Parma, OH 44134 (the “Property”). Specifically, my testimony addresses the circumstances surrounding the testing of the accuracy of the CEI servicing the Property as well as other issues related to Ms. DiFiori’s high-bill complaint.

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

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

COMPLAINANT'S HIGH BILL COMPLAINT

Q. COMPLAINANT CLAIMS THAT HER CEI BILLS DATED JULY 17, JULY 18, AUGUST 14, AND SEPTEMBER 14, 2018, ALL SHOW HIGHER CONSUMPTION THAN NORMAL. HOW DO YOU RESPOND?

A. As a preliminary matter, I understand that CEI issued Ms. DiFiori a Rebill on July 18, 2018, that replaced the original bill dated July 17, 2018, for billing period June 13 – July 13, 2018. I believe that Ms. DiFiori's claim may be rooted in her confusion about this rebill process. However, from a pure consumption standpoint, these bills do not appear to be out of the ordinary to me.

First, the actual meter reading reflected in the CEI bill dated July 17, 2018 shows that Ms. DiFiori consumed [REDACTED] for billing period June 13-July 13, 2018. This bill was rebilled on July 18, 2018 to reflect [REDACTED] of consumption after Ms. DiFiori gave a meter reading over the phone. As CEI witness Marilyn Cottrill will testify, this meter reading was not entered into CEI's system correctly, and therefore the July 18th rebill underbilled Ms. DiFiori for her consumption during the June 13-July 13, 2018 billing period. As evidenced by CEI's subsequent meter test results for Ms. DiFiori's meter, the [REDACTED] consumption in the July 17, 2018 bill was correct. While this is a high amount of consumption, it is not significantly higher than Ms. DiFiori's historical summer consumption.

Second, even though Ms. DiFiori was billed for [REDACTED] of consumption on the August 14, 2018 CEI bill for billing period July 14-August 10, 2018 (based on an actual meter reading), this [REDACTED] included the [REDACTED] difference between the [REDACTED] of consumption that Ms. DiFiori was originally (and correctly) billed for on July 17, 2018,

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1 and the [REDACTED] she was incorrectly rebilled for on July 18, 2018. In other words, [REDACTED]
2 [REDACTED] of the [REDACTED] was for Ms. DiFiori's consumption from the prior billing period of
3 June 13-July 13, 2018. Subtracting that [REDACTED] from [REDACTED], the August 14th bill
4 indicates only [REDACTED] of consumption for the billing period of July 14-August 10, 2018.
5 This again is in line with Ms. DiFiori's historical summer consumption and is actually
6 lower than her consumption for the same time period in 2016.,

7 Third, the actual meter reading reflected in the September 14, 2018 CEI bill for
8 billing period August 11-September 12, 2018 shows consumption of [REDACTED]. Notably,
9 Ms. DiFiori's CEI meter was replaced on August 15, 2018, in the middle of this billing
10 period. Her consumption was still high for this billing period, but again, it was in line with
11 her historic summer consumption, and lower than her consumption for the same time
12 period in 2016.

13

Complainant's Usage, May-October, 2015-2018, in Kwh				
	2015	2016	2017	2018
May	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
June	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
July	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
August	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
September	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
October	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total kWh	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

18

19 In summary, while Ms. DiFiori's consumption in the Summer months of 2018 is high, it is
20 consistent with her historic summer usage, and in June and August it is actually lower than
21 her usage in June and August 2016. To illustrate, I've included the chart above that

¹This number is based on the actual meter reading reflected in the CEI bill dated July 17, 2018.

² This number was calculated by subtracting the [REDACTED] difference between the [REDACTED] of consumption that Ms. DiFiori was originally (and correctly) billed for on July 17, 2018 and the [REDACTED] she was incorrectly rebilled for on July 18, 2018, from the [REDACTED] of consumption Ms. DiFiori was billed for in the CEI bill dated August 14, 2018.

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1 compares Complainant's monthly usage, in kWh, for the months of May-October, 2015-
2 2018.

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

5 A. No. The actual meter reading reflected in the CEI bill dated July 17, 2018 showing [REDACTED]
6 [REDACTED]h of consumption for billing period June 13-July 13, 2018 was correct. The July 18,
7 2018 rebill for that same billing period of [REDACTED] of consumption was incorrect. The
8 difference between these numbers is [REDACTED], which accounts for consumption that Ms.
9 DiFiori used during that billing period but was not charged for on the July 18, 2018 CEI
10 rebill. Subtracting that [REDACTED] from the [REDACTED] that Ms. DiFiori was billed for on
11 August 14, 2018, it is clear that Ms. DiFiori used [REDACTED] during the billing period
12 reflected on the August 14, 2018 CEI bill.

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

16 A. Again, CEI witness Marilyn Cottrill will testify about this in greater detail. Ms. DiFiori's
17 CEI bill dated July 17, 2018 was based on an actual meter reading on July 13, 2018 and
18 showed consumption of [REDACTED]. She called CEI on July 17, 2018 and stated she felt
19 her bill was too high, and the CEI customer service representative asked Ms. DiFiori to
20 read her the meter numbers over the phone. Ms. DiFiori and the CEI customer service
21 representative mistakenly superimposed two numbers when entering Ms. DiFiori's meter
22 read into CEI's system, making it look as if Ms. DiFiori's usage was much lower than it
23 actually was, at [REDACTED]. CEI issued a Rebill to Ms. DiFiori on July 18, 2018 for [REDACTED]

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1 [REDACTED]. CEI took an actual reading of Ms. DiFiori's meter on August 10, 2018, which
2 detected [REDACTED] of usage since July 13, 2018. CEI charges customers for the electricity
3 they consume, and therefore CEI charged Ms. DiFiori for *all* electricity she had consumed
4 since the last actual meter reading on July 13, 2018.

5 **Q. IN YOUR OPINION, IS MS. DIFIORI'S USAGE ABNORMALLY HIGH DURING**
6 **THE BILLING PERIODS JUNE 13-JULY 13, JULY 14-AUGUST 10, OR AUGUST**
7 **11-SEPTEMBER 12, 2018?**

8 A. While Ms. DiFiori's usage is higher in the Summer months of 2018 than the Summer
9 months of 2017, it comparable to her usage in the Summer months of 2016. I do not
10 consider this to be abnormal. In fact, the average temperatures for June, July and August
11 2017 were 74, 75, and 69 degrees Fahrenheit, respectively, while the average temperatures
12 for June, July and August 2018 were 75, 76, and 75, respectively. The higher average
13 temperatures in the Summer of 2018 likely account for at least some, if not all, of the
14 difference in Ms. DiFiori's consumption in the Summer of 2018 compared to the Summer
15 of 2017. This is illustrated on the chart of Ms. DiFiori's consumption compared to the
16 average monthly temperature which is attached to my testimony as Exhibit RP-A.

17 **Q. COMPLAINANT CLAIMS SHE COULD NOT POSSIBLY HAVE USED THE**
18 **AMOUNT OF ELECTRICITY REGISTERED ON THE METER FROM JUNE 13,**
19 **2018 TO AUGUST 10, 2018. HOW DO YOU RESPOND?**

20 A. I believe that it is not only possible that she used the registered amount, but that it is certain.
21 I recognize that Ms. DiFiori may not fully understand the reasons her load increased during
22 this time; however, her high consumption occurred during billing periods beginning on
23 June 13, 2018 and ending September 12, 2018. This was the summer cooling season and

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1 her consumption was very likely the result of cooling the Property. In addition, Ms. DiFiori
2 mentioned that she had some trouble with her air conditioner during the summer of 2018
3 in her Complaint. That could very well have been the cause of her consumption. It is also
4 possible that in the process of checking the function of the air conditioner at the Property
5 that Ms. DiFiori's HVAC technician cured some defect condition without having first been
6 aware of the problem. Unfortunately, these conditions may no longer exist and likely
7 cannot be replicated to gain a complete understanding of the source(s) of Ms. DiFiori's
8 electricity usage that was higher than she had expected.

9 **Q. DOES CEI EVER INVESTIGATE THE CAUSE OF A CUSTOMER'S HIGH**
10 **ELECTRIC CONSUMPTION?**

11 A. Yes, but CEI's investigations are limited to CEI-owned electric facilities. Customers are
12 responsible for identifying, repairing and replacing their own defective equipment, as well
13 as deficiencies in their internal electrical facilities, such as wiring and connections. CEI
14 does not take responsibility for investigation, repairs or maintenance of customer-owned
15 equipment.

16 **COMPLAINANT'S METER**

17 **Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE CIRCUMSTANCES OF THE**
18 **METER TEST?**

19 A. Yes. Ms. DiFiori contacted CEI by phone on August 14, 2018 about her perceived high
20 consumption of electricity over the prior two months. CEI's customer contact notes from
21 that call indicate that Ms. DiFiori believed her meter was running fast. As a result of the
22 call, CEI ordered a test of Ms. DiFiori's meter. To complete this request, CEI personnel
23 removed the meter from service on August 15, 2018 and installed a new meter that same

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1 day. The old meter was sent to the Meter Lab in Akron, Ohio for testing. The Meter Lab
2 conducted the standard tests on the meter, which measured well within the accuracy
3 thresholds established by the Commission. In fact, the meter registered an average accuracy
4 of 99.63 percent. CEI mailed a letter to Ms. DiFiori on August 17, 2018 informing her of
5 the test results on her meter.

6 **Q. DID MS. DIFIORI REQUEST TO HAVE HER METER TESTED?**

7 A. That is not clear from CEI's records.

8 **Q. DOES CEI EVER TEST METERS WITHOUT THE CUSTOMER'S REQUEST?**

9 A. Yes, on occasion. CEI has three ways of initiating a meter accuracy test: (1) a request from
10 a customer; (2) a request from the Public Utilities Commission of Ohio; and (3) a request
11 from CEI itself. While the third type is rare, it is something that CEI will do on occasion.

12 **Q. PLEASE DESCRIBE THE PROCESS OF METER TESTING?**

13 A. When a meter arrives for testing at the Company's Meter Lab, it is marked and logged for
14 identification purposes. The basic meter function measures a well-known relationship of
15 current and voltage commonly referred to as "load" which is reflected as kilowatts over
16 time ("kilowatt hours" or "kWh"). As installed in the field, the meter measures the kWh
17 being drawn from the Company's service line through the meter and into the premise by
18 the electricity-using devices such as electronics, lights, fans, and motors. The testing
19 consists of putting a known voltage and amperage through the customer's untested meter
20 and comparing the measured result with a meter standard with known test results. The
21 result can be expressed as a percentage of measured load to known load. In this case, the
22 meter in question tested at 99.63%. The tolerance allowed by Commission rules is plus or
23 minus 2.0% of 100%.

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Q. IS THE METER LAB EVER INSPECTED BY THIRD PARTIES?

A. Yes. The Public Utilities Commission of Ohio inspects the Meter Lab on an annual basis to ensure that CEI's Meter Lab is compliant with the Commission's Rules.

Q. IN YOUR OPINION, IS IT POSSIBLE THAT THE COMPLAINANT'S METER REGISTERED MORE ELECTRICITY THAN THE COMPLAINANT ACTUALLY USED DURING THE MONTHS IN QUESTION?

A. No, it is not. First, the meter test uses exactly the same delivery-side electrical connections and measurement relationships as those used in the field, and, of course, the internal workings of the meter itself are the same. In other words, testing the meter in the Meter Lab does not give different results than a test in the field. That is why our lab is able to verify meter accuracy as required by law. I would again note that the Commission Staff inspects our Meter Lab annually for compliance.

Second, given the satisfactory test results, it is clear the meter registered accurately until its removal in August 2018, including during the months of June 2018 through August 2018. Meters do not temporarily "go haywire" for a few months and then revert to normal. When they break—which is relatively rare—they stay broken. If Ms. DiFiori's meter was malfunctioning as she claims it was, it would not have tested 99.63% accurate at the Meter Lab.

Third, the Company cannot "push" electricity through a meter—it can only be drawn through or "pulled" by electric-consuming devices on the customer's side of the meter. For example, a new meter installed at a planned construction site will continue to register zero kWh until the first wire is connected on the customer's side. After that, the

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1 amount of kWh flowing through the meter is exclusively determined by the customer's
2 load. Electricity, somewhat like pushing on a rope, doesn't go anywhere until it is pulled.

3 **Q. MS. DIFIORI ALLEGES IN THE COMPLAINT THAT SHE HAD AN HVAC**
4 **COMPANY OUT TO INSPECT HER AIR CONDITIONING AND THAT THEY**
5 **FOUND NOTHING WRONG WITH THE AIR CONDITIONER AND THAT THE**
6 **AIR CONDITIONER WAS "NOT USING THE AMOUNT OF ELECTRICITY**
7 **THAT THE ILLUMINATING CO. SAID WAS BEING USED." HOW DO YOU**
8 **RESPOND?**

9 A. I have not seen any written reports from Ms. DiFiori's HVAC technician so I cannot
10 comment on their specific findings. That being said, and assuming that the HVAC
11 technician did indeed find nothing wrong with the air conditioner, there are possible
12 explanations for such a finding. For instance, there could have been a ground condition in
13 the wiring at the Property.

14 **Q. IN YOUR OPINION, HAS CEI OVERBILLED MS. DIFIORI FOR HER**
15 **ELECTRIC CONSUMPTION?**

16 A. No. Based on my 28 years of professional experience, when I see a temperature increase
17 coupled with a residential consumption increase, the increased consumption is related to
18 cooling the house during the summer season. Ms. DiFiori's bills for the summer of 2018
19 are high, but they are not inconsistent with her historic usage during the summer months.

20 **CONCLUSION**

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

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

Exhibit RP-A

Scanned as Received

12 Months | 24 Months

