

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**DAVID RANDALL**

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)

**Complainant,**

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)

**Case No. 18-1851-EL-CSS**

**v.**

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)

**THE CLEVELAND ELECTRIC  
ILLUMINATING COMPANY,**

)

)

**Respondent.**

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)

**DIRECT TESTIMONY OF ROBERT M. SANDVICK ON BEHALF OF  
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**

**INTRODUCTION**

**Q. PLEASE INTRODUCE YOURSELF.**

A. My name is Robert M. Sandvick. I go by Matt Sandvick. I am employed by The Cleveland Electric Illuminating Company ("CEI" or "Illuminating Company") as Supervisor of Transmission services. I am responsible for the installation, and maintenance of the Illuminating Company's 138kV and 345kV systems.

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

A. I have worked at FirstEnergy companies for almost 14 years. I have been the Supervisor of Transmission Services at CEI since November of 2018. Prior to that, for approximately 7 years I supervised some of CEI's distribution utility line personnel, including those who perform trouble shift leaders. Before that, I worked as a distribution utility line personnel for FirstEnergy Service Company for almost 5 years. As a line personnel I maintained and repaired FirstEnergy's distribution system in the field. Prior to that I was a meter reader for almost one year. I also have a Bachelors' degree in Finance and an MBA from the University of Phoenix.

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

A. My job responsibilities include management and oversight of all activities that fall within the responsibility of transmission structures and lines at CEI. At the time of the events alleged in Mr. Randall's Complaint, I supervised some of CEI's distribution utility line personnel, including those who perform trouble shift leaders.

**Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?**

A. No.

1   **Q.    ARE YOU FAMILIAR WITH THE FACTS OF THIS CASE?**

2    A.    Yes, I am.

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

4    A.    My testimony addresses several aspects of the Complaint pertaining to the electric service  
5           provided by CEI to David Randall at 1600 E. 27<sup>th</sup> Street (Rear House), Cleveland, Ohio  
6           44114 (the “Residence”).

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

9    A.    I reviewed the Complaint submitted by Mr. Randall, as well as business records related to  
10          this case maintained and preserved within FirstEnergy’s SAP System. These records, all of  
11          which were kept in the course of regularly conducted business activity, include customer  
12          contact notes and account summary, and CEI’s Commission-approved tariff. It is the  
13          regular practice of FirstEnergy and CEI to make and preserve these business records, and  
14          I rely upon such documents in accordance with my duties at CEI. I also have personal  
15          knowledge regarding the transformer and pole servicing Mr. Randall’s Residence as I  
16          inspected it following his initial call to CEI on September 26, 2018 regarding the subject  
17          matter of his Complaint.

18                               **RESPONSE TO TROUBLE CALL**

19   **Q.    WHEN WAS CEI FIRST INFORMED OF A SERVICE-RELATED ISSUE AT THE**  
20       **RESIDENCE?**

21    A.    CEI received a trouble call from Mr. Randall at approximately 8:25am on September 26,  
22          2018. The trouble call was coded as “dim lights,” indicating a possible voltage problem at  
23          the Residence.

1    **Q.    HAS CEI RESPONDED TO TROUBLE CALLS LIKE THIS BEFORE?**

2    A.    Yes, CEI's crews are trained to handle a variety of service-related issues, including voltage-  
3        related issues.

4    **Q.    DID CEI RESPOND TO COMPLAINANT'S TROUBLE CALL?**

5    A.    Yes.

6    **Q.    HOW DID CEI RESPOND TO COMPLAINANT'S TROUBLE CALL?**

7    A.    In response to Mr. Randall's trouble call, a Work Order was created and a CEI repair crew  
8        was dispatched to the Residence.

9    **Q.    WHEN DID CEI ARRIVE AT THE RESIDENCE?**

10   A.    Approximately 9:55am on September 26, 2018.

11   **Q.    WHAT HAPPENED WHEN THE REPAIR CREW ARRIVED AT THE**  
12       **RESIDENCE?**

13   A.    CEI records show that the repair crew arrived at the residence at 9:55am and inspected  
14       CEI's connection to the Residence. The repair crew discovered that a ground wire at the  
15       transformer pole was missing and had likely been stolen. The repair crew installed a  
16       replacement ground wire at the transformer pole and checked the connections at the  
17       transformer jumpers and at the CEI meter servicing Mr. Randall's Residence. The CEI  
18       repair crew tested the voltage at the Residence and found that 119 volts was available on  
19       both hot legs to the secondary neutral, meaning that the voltage serving the Residence was  
20       satisfactory. In their write-up of this inspection, the repair crew suggested a follow up  
21       inspection of the pole and transformer for possible replacement.

22   **Q.    WHAT IS A TRANSFORMER GROUND WIRE?**

1 A. A transformer ground wire is a piece of equipment that connects CEI's wiring system to a  
2 ground source, to keep voltage stable.

3 **Q. WHAT HAPPENS TO A CUSTOMER WHEN A TRANSFORMER GROUND**  
4 **WIRE IS REMOVED FROM A TRANSFORMER SERVICING THAT**  
5 **CUSTOMER'S RESIDENCE?**

6 A. In some instances, a missing ground wire can cause voltage to become unstable. It can also  
7 cause outages to occur.

8 **Q. DID THE MISSING GROUND WIRE CAUSE THE SERVICE INTERRUPTION**  
9 **THAT COMPLAINANT EXPERIENCED ON SEPTEMBER 26, 2018?**

10 A. I cannot say that for certain. While a missing ground wire *can* cause voltage fluctuation  
11 and outages, there can be other ground sources that will help keep voltage balanced on  
12 CEI's system, even if a ground wire is missing. These can include customer grounding  
13 systems (water pipe grounds) and other grounds on poles connected to the same  
14 transformer neutral.

15 **Q. DID CEI DETERMINE THE CAUSE OF THE COMPLAINANT'S SERVICE**  
16 **INTERRUPTION ON SEPTEMBER 26, 2018?**

17 No. When CEI's repair crews respond to trouble calls they make repairs that are necessary  
18 to restore outages and give proper voltage. They do not necessarily determine the root cause  
19 of every service-related issue that they respond to.

20 **Q. DID CEI'S REPAIRS TO THE TRANSFORMER GROUND WIRE ON THE**  
21 **TRANSFORMER SERVICING THE RESIDENCE RESTORE ELECTRIC**  
22 **SERVICE TO THE RESIDENCE ON SEPTEMBER 26, 2018?**

1 A. Mr. Randall was not home at the time of the repairs, so the function of his internal  
2 appliances could not be verified. However, the voltage tests performed by the CEI repair  
3 crew after making these repairs showed that Mr. Randall's electric service had been fully  
4 restored on the service side of the meter.

5 **Q. WHY DID THE CEI CREW SUGGEST AN INSPECTION AND REPAIR OF THE**  
6 **TRANSFORMER AND POLE FOLLOWING THEIR REPAIRS ON SEPTEMBER**  
7 **26, 2018?**

8 A. The CEI crew made this suggestion after observing visible rust on the transformer can.

9 **Q. DOES VISUAL RUST ON A TRANSFORMER CAN INDICATE THAT THE**  
10 **TRANSFORMER OR POLE SHOULD BE REPLACED?**

11 A. No. The visual characteristics of a pole or transformer are subjective and not necessarily  
12 indicative of a pole or transformer's operational condition.

13 **Q. DID CEI ULTIMATELY REPLACE THE POLE AND TRANSFORMER**  
14 **SERVICING THE RESIDENCE?**

15 A. No. The CEI repair crew that reported to the Residence on September 26, 2018 had checked  
16 connections and tested for proper voltage. The transformer displayed proper voltage. I  
17 personally went to the Residence and inspected the transformer and pole on or around  
18 October 3, 2018. Following my inspection, I made the decision to not replace the  
19 transformer or pole because they were still in satisfactory condition. I closed out the work  
20 order for the Residence following my inspection.

21 **Q. DOES CEI KNOW FOR CERTAIN WHETHER A POWER SURGE OCCURRED**  
22 **AT THE RESIDENCE ON SEPTEMBER 26, 2018?**

1 A. No. Again, all CEI knows is that the trouble crew that reported to the Residence on  
2 September 26, 2018 discovered that a ground wire at the transformer pole was missing and  
3 had likely been stolen. The repair crew installed a replacement ground wire at the  
4 transformer pole, checked the connections at the transformer jumpers and at the CEI meter  
5 servicing Mr. Randall's Residence, and found satisfactory voltage.

6 **Q. IS IT POSSIBLE THAT COMPLAINANT EXPERIENCED A POWER SURGE AT**  
7 **THE RESIDENCE?**

8 A. Yes, it is possible. However, it is also possible that the wiring in the Residence caused the  
9 problems that Complainant has complained of. Publicly available property information for  
10 the Residence indicates that the Residence was constructed in 1890. Please see Exhibit  
11 RMS-A, attached hereto. Based on my knowledge of the location of the Residence, I  
12 believe that the Residence is "Building 2" in this property record.

13 CEI's investigations are limited to CEI-owned electric facilities. Customers are  
14 responsible for identifying, repairing and replacing their own defective equipment, as well  
15 as deficiencies in their internal electrical facilities, such as wiring and connections. CEI  
16 does not take responsibility for investigation, repairs or maintenance of wiring, appliances  
17 or other equipment in a customer's property after the CEI meter.

18 **Q. IN THE COMPLAINT, COMPLAINANT SUGGESTS THAT CEI DID NOT SEND**  
19 **A REPAIR TECHNICIAN TO HIS RESIDENCE BETWEEN HIS FIRST CALL ON**  
20 **SEPTEMBER 26, 2018 AND OCTOBER 18, 2018. HOW DO YOU RESPOND?**

21 A. This is not true. CEI was at the Residence investigating Mr. Randall's call within 90  
22 minutes of his trouble call on September 26, 2018. CEI also sent a repair crew to the  
23 Residence in response to a trouble call from Complainant on October 15, 2018.

1   **Q.     DID COMPLAINANT FILE A CLAIM WITH CEI?**

2   A.     Yes. Mr. Randall filed a Claim with CEI's Claims Department on September 26, 2018.

3   **Q.     DID CEI RESPOND TO COMPLAINANT'S CLAIM?**

4   A.     Yes. CEI records indicate that on September 27, 2018, a CEI Claims Department  
5         representative contacted Mr. Randall by telephone and explained that CEI was denying Mr.  
6         Randall's Claim because the cause of Mr. Randall's service interruption was a sudden and  
7         unforeseen equipment failure, and CEI had made permanent repairs to restore normal  
8         voltage to the Residence. The CEI Claims Department also sent Mr. Randall a letter  
9         explaining the denial of his Claim.

10  **Q.     DID COMPLAINANT CONTACT CEI AGAIN?**

11  A.     Yes. Mr. Randall called CEI on October 15, 2018 to report that his lights were out.

12  **Q.     DID CEI RESPOND TO THIS CALL?**

13  A.     Yes. CEI records indicate that a CEI repair crew reported to the Residence on October 15,  
14         2018 to investigate Mr. Randall's trouble call.

15  **Q.     DID CEI FIND AN OUTAGE AT THE RESIDENCE ON OCTOBER 15, 2018?**

16  A.     No. Upon arriving at the Residence, CEI records show that the CEI repair crew pulled the  
17         meter servicing the Residence and tested the CEI wires feeding into the meter box and  
18         found satisfactory voltage. The CEI technician then reset and sealed the meter. Mr. Randall  
19         was not available to speak with the CEI technician, but the CEI technician was able to  
20         speak with the CEI customer residing at 1602 E. 27<sup>th</sup> Street, Cleveland, OH 44114, which  
21         is the unit in front of the Residence and upon information and belief is the only way to  
22         access the Residence. The customer at 1602 E. 27<sup>th</sup> Street, Cleveland, OH 44114 reported  
23         full service and did not report an outage. The CEI technician determined that any issue at



1 the Residence must be on Mr. Randall's side of the meter and closed out the trouble call  
2 with no repairs required.

3 **Q. DID COMPLAINANT CONTACT CEI AGAIN AFTER OCTOBER 15, 2018?**

4 A. Yes. Mr. Randall filed an informal complaint with the PUCO on October 16, 2018  
5 reporting that he was still having voltage issues.

6 **Q. DID CEI INVESTIGATE THIS INFORMAL COMPLAINT?**

7 A. Yes, CEI investigated this Complaint by reviewing the same records that I have reviewed  
8 in preparing for my testimony in this proceeding. CEI responded to the Informal Complaint  
9 on October 23, 2018, explaining the CEI had denied Mr. Randall's Claim on September  
10 27, 2018, because a CEI repair crew responded to Mr. Randall's September 26, 2018  
11 trouble call, determined that the cause of Mr. Randall's service interruption was a sudden  
12 and unforeseen equipment failure, and CEI had made permanent repairs to restore normal  
13 voltage to the Residence.

14 **Q. DID COMPLAINANT CONTACT CEI AGAIN?**

15 A. Yes. Mr. Randall called CEI again on October 18, 2018 and reported that his lights were  
16 out.

17 **Q. DID CEI RESPOND TO THIS CALL?**

18 A. Yes, a CEI repair crew reported to Mr. Randall's Residence that same day to investigate  
19 his trouble call.

20 **Q. DID COMPLAINANT HAVE A SERVICE OUTAGE ON OCTOBER 18, 2018?**

21 A. Yes.

22 **Q. WHAT WAS THE CAUSE OF THE OUTAGE?**

23 A. Major storms in the area caused the service outage on October 18, 2018.

1 **Q. WHEN WAS MR. RANDALL’S SERVICE RESTORED?**

2 A. Mr. Randall’s service was restored on October 18, 2018. CEI records show that a CEI  
3 repair technician cleared vegetation around the transformer pole servicing the Residence  
4 and repaired a neutral that was damaged during the storm. No follow-up repairs were  
5 required following that repair.

6 **Q. THE COMPLAINANT ALLEGES THAT A CEI TECHNICIAN INFORMED HIM**  
7 **ON OCTOBER 18, 2018 THAT THE ISSUES WITH HIS VOLTAGE WERE**  
8 **CAUSED BY “ANTIQUATED WIRING FROM THE UNSERVICEABLE**  
9 **UTILITY POLE” SERVICING HIS METER, AND THAT THE POLE AND**  
10 **WIRING WERE OVER 70 YEARS OLD AND SHOULD HAVE BEEN REPLACED**  
11 **YEARS AGO. HOW DO YOU RESPOND?**

12 A. CEI has no record of that interaction. As I previously testified, I personally inspected the  
13 transformer and pole servicing Mr. Randall’s Residence on or around October 3, 2018 and  
14 found them to be in working condition. There is no evidence that the pole or the transformer  
15 caused the service interruptions at the Residence on September 26, 2018 or October 18,  
16 2018. The pole servicing Mr. Randall’s Residence was inspected in 2011 according to  
17 CEI’s pole replacement program schedule. The pole passed inspection at that time. It is  
18 scheduled to be inspected again in 2021 to ensure it is still in satisfactory condition. If a  
19 CEI technician did in fact make a statement like this to Mr. Randall, that CEI technician  
20 was mistaken.

**CONCLUSION**

**Q. IN YOUR OPINION, WAS THE LOSS OR THEFT OF THE TRANSFORMER  
GROUND WIRE ON OR AROUND SEPTEMBER 26, 2018 WITHIN CEI'S  
CONTROL?**

A. No. While CEI takes measures to prevent and minimize the theft of CEI equipment, equipment theft cannot be completely prevented. The loss or theft of the transformer ground wire was not within CEI's control and is best categorized as an unforeseen equipment failure.

**Q. IN YOUR OPINION, DID CEI ACT REASONABLY IN RESPONDING TO MR.  
RANDALL'S TROUBLE CALLS?**

A. Yes. CEI responded to Complainant's trouble call on September 26, 2018 within 90 minutes of his trouble call and restored service that same day. I personally visited the Residence on or around October 3, 2018 to ensure the satisfactory condition of the transformer and pole servicing the Residence. CEI also responded promptly to the trouble calls placed on October 15, 2018 and October 18, 2018, in both instances reporting to the Residence, testing voltage, and making any necessary repairs that same day. CEI acted reasonably under the circumstances to prioritize safety and reliability and to restore service to Mr. Randall's Residence as quickly and efficiently as possible.

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

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

# **EXHIBIT RMS-A**







3

 Address

## Key Results

## PROPERTY DATA

Information

5

[g information](#)

### g Sketch

## improvements

10

by Summary Report

## E5

[Pay Tax Bill](#)

## AL RECORDINGS

Document List

## VITY

## al Reviews

### of Revisions Cases



**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 17th day of July, 2019. A copy has been served on the following by Certified U.S. Mail:

David Randall  
1600 E. 27th Street RR  
Cleveland, Ohio 44114

/s/ Emily V. Danford  
Attorney for The Cleveland Electric  
Illuminating Company

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**Case No(s). 18-1851-EL-CSS**

Summary: Testimony of Robert M. Sandvick on Behalf of The Cleveland Electric Illuminating Company electronically filed by Ms. Emily V Danford on behalf of The Cleveland Electric Illuminating Company