

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

JENNY KENDERES

Complainant,

v.

**THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,**

Respondent.

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Case No. 18-922-EL-CSS

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

1 **INTRODUCTION**

2 **Q. PLEASE INTRODUCE YOURSELF.**

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

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

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

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

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

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

6 A. Yes, I testified in Case No. 09-947-EL-CSS, *Disiena v. CEI* and in Case No. 17-1563-EL-
7 CSS, *Moore v. CEI*. I also filed pre-filed Direct Testimony in *DiFiori v. CEI*, Case No. 18-
8 1608-EL-CSS, which has not yet gone to hearing.

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

10 A. My testimony addresses the Complaint pertaining to the electric service provided by CEI
11 to Jenny Kenderes at 4116 Parkside Drive, Brooklyn, OH 44144 (the "Property").
12 Specifically, my testimony addresses the circumstances surrounding the testing of the
13 meter accuracy requested by Ms. Kenderes as well as other issues related to her high-bill
14 complaint.

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

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

1 **COMPLAINANT'S "ELECTRIC SHOCK" CLAIM**

2 **Q. MS. KENDERES ALLEGES THAT SHE CALLED CEI IN OCTOBER OF 2017**
3 **BECAUSE SHE THOUGHT HER METER WAS "RUNNING LOUD." HAVE YOU**
4 **INVESTIGATED THIS CLAIM?**

5 A. Yes.

6 **Q. PLEASE EXPLAIN THE RESULTS OF YOUR INVESTIGATION.**

7 A. Based on my review of CEI records, Ms. Kenderes called CEI on May 18, 2017 and alleged
8 that her meter was "making loud noises" and that her "neighbor got shocked" when turning
9 off the water at Complainant's house. In her discovery responses, Ms. Kenderes specified
10 that the alleged shock occurred "outside the home" on "the side of the house, facing South."

11 **Q. DID CEI RESPOND TO MS. KENDERES' REPORT ON MAY 18, 2017?**

12 A. Yes. On May 18, 2017, a CEI troubleman went to Ms. Kenderes' Property to investigate.
13 At the Property, the troubleman used a test device called a Beast of Burden tester, which
14 puts an artificial load on the CEI line-side wires to check for loose connections. The
15 troubleman did not find any loose connections and did not detect any unusual sounds
16 coming from the meter. Ms. Kenderes was not at the Property during the troubleman's
17 visit, but she was advised to call CEI back to let CEI know when she could be home.

18 **Q. DID MS. KENDERES CALL CEI BACK REGARDING THIS ISSUE?**

19 A. No. There are no other records of Ms. Kenderes calling the Company regarding sounds
20 from the meter or electric shocks at the Property aside from her telephone call on May 18,
21 2017.

22 **COMPLAINANT'S METER**

23 **Q. DID CEI TEST COMPLAINANT'S METER?**

1 A. Yes.

2 **Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE CIRCUMSTANCES OF THE**
3 **METER TEST?**

4 A. Yes. Ms. Kenderes contacted CEI by phone on March 23, 2018 about her perceived high
5 consumption of electricity since October 2017. During the call, a CEI Customer Services
6 Compliance Specialist confirmed Ms. Kenderes had been using more electricity than
7 normal during that time period and advised Ms. Kenderes to do a breaker test. On April 4,
8 2018, Ms. Kenderes again contacted CEI by phone and requested that her meter be
9 replaced, and a CEI Customer Services Compliance Specialist created a customer request
10 work order for the meter to be exchanged and tested. To complete this request, CEI
11 personnel removed the meter from service on April 5, 2018 and installed a new meter that
12 same day. The old meter was sent to the Meter Lab in Akron, Ohio for testing. The Meter
13 Lab conducted the standard tests on the meter, which measured well within the accuracy
14 thresholds established by the Commission. In fact, the meter registered an average accuracy
15 of 99.76 percent. CEI mailed a letter to Ms. Kenderes on April 11, 2018 informing her of
16 the test results on her meter. A CEI representative spoke with Ms. Kenderes on the
17 telephone on April 16, 2018 about the test results and conveyed the test results as well.

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

19 A. When a meter arrives for testing at the Company's Meter Lab, it is marked and logged for
20 identification purposes. The basic meter function measures a well-known relationship of
21 current and voltage commonly referred to as "load" which is reflected as kilowatts over
22 time ("kilowatt hours" or "kWh"). As installed in the field, the meter measures the kWh
23 being drawn from the Company's service line through the meter and into the premise by

1 the electricity-using devices such as electronics, lights, fans, and motors. The testing
2 consists of putting a known voltage and amperage through the customer's untested meter
3 and comparing the measured result with a meter standard with known test results. The
4 result can be expressed as a percentage of measured load to known load. In this case, the
5 meter in question tested at 99.76%. The tolerance allowed by Commission Rules is plus or
6 minus 2.0% of 100%.

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

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

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

13 A. No, it is not. First, testing at the Meter Lab showed the meter to be operating within the
14 Commission's tolerance levels. The Meter Lab's tests use exactly the same delivery-side
15 electrical connections and measurement relationships as in the field, and, of course, the
16 internal workings of the meter itself are the same. In other words, there is no difference in
17 result between testing in the field and testing in the lab. That is why our Meter Lab is able
18 to verify meter accuracy as required by law. I would again note that the Commission Staff
19 inspects our Meter Lab annually for compliance.

20 Second, given the satisfactory test results, it is clear the meter registered accurately
21 until its removal in April 2018, including during the months of October 2017 through April
22 2018.¹ Meters do not temporarily "go haywire" for a few months and then revert to normal.

¹ Ms. Kenderes' electricity consumption was measured with actual meter readings for October 2017 – April 2018.

1 When they break—which is relatively rare—they stay broken. If Ms. Kenderes’ meter was
2 malfunctioning as she claims it was, it would not have tested 99.76% accurate at the Meter
3 Lab.

4 Third, the Company cannot “push” electricity through a meter—it can only be
5 drawn through or “pulled” by electric-consuming devices on the customer’s side of the
6 meter. For example, a new meter installed at a planned construction site will continue to
7 register zero kWh until the first wire is connected on the customer’s side. After that, the
8 amount of kWh flowing through the meter is exclusively determined by the customer’s
9 load. Electricity, somewhat like pushing on a rope, doesn’t go anywhere until it is pulled.

10 **Q. MS. KENDERES ALLEGES SHE COULD NOT POSSIBLY HAVE USED THE**
11 **AMOUNT OF ELECTRICITY REGISTERED ON THE METER FROM**
12 **OCTOBER 2017 TO APRIL 2018. HOW DO YOU RESPOND?**

13 A. I believe that it is not only possible that she used the registered amount, but that it is certain.
14 I recognize that Ms. Kenderes may not fully understand the reasons her load increased
15 during this time; however, her high consumption occurred during billing periods beginning
16 on October 19, 2017 and ending April 18, 2018. This was the winter heating season and
17 her consumption was very likely the result of heating the Property, whether with a space
18 heater or other electric appliance. It even could have been an issue with her furnace itself,
19 as many furnaces have an electric blower motor even if the furnace itself is powered by
20 natural gas. Unfortunately, these conditions may no longer exist and likely cannot be
21 replicated to gain a complete understanding of the source(s) of Ms. Kenderes’ electricity
22 usage that was higher than she had expected. Based on my 28 years of professional
23 experience, when I see temperature decrease and coupled with a residential consumption

1 increase, the increased consumption is related to heating the house during the winter
2 season.

3 **Q. DOES CEI EVER INVESTIGATE THE CAUSE OF A CUSTOMER'S**
4 **PERCEIVED HIGH ELECTRIC CONSUMPTION?**

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

10 **Q. MS. KENDERES HAS ALLEGED THAT THE CEI METER TECHNICIAN WHO**
11 **REPLACED HER METER IN APRIL OF 2018 HELPED HER TRY TO**
12 **INVESTIGATE THE CAUSE OF HER HIGHER THAN NORMAL USAGE BY**
13 **HAVING HER "SHUT OFF SOME BREAKER SWITCHES . . . AND START**
14 **[HER] WASHER AND DRYER . . . TO SEE IF ANYTHING CHANGED." HOW**
15 **DO YOU RESPOND?**

16 A. As part of my preparation in this case, I spoke with this CEI meter technician about his
17 recollection of the day he replaced the meter on Ms. Kenderes' home. He did have Ms.
18 Kenderes do a breaker test to see if she could identify the cause of her perceived high bills
19 while he was at her residence replacing her meter. He did not enter her house as part of this
20 test.

21 **Q. IS THIS A STANDARD PRACTICE FOR CEI?**

1 A. CEI will offer to help facilitate a breaker test if a customer requests it during a meter
2 replacement. Sometimes a breaker test can help a customer identify the cause of the
3 customer's perceived high usage.

4 **Q. IN THIS CASE, WAS THE CEI TECHNICIAN ABLE TO HELP THE**
5 **COMPLAINANT IDENTIFY THE CAUSE OF COMPLAINANT'S HIGHER**
6 **THAN NORMAL USAGE?**

7 A. To the meter technician's recollection, no.

8 **Q. WHY WAS THE METER TECHNICIAN UNABLE TO HELP COMPLAINANT**
9 **DETERMINE THE CAUSE OF HER PERCEIVED HIGHER THAN NORMAL**
10 **USAGE?**

11 A. I cannot say for certain. Breaker tests can sometimes show an obvious cause of high usage,
12 but they do not always give the full story of a customer's electricity usage. When a breaker
13 test is inconclusive, as it was in this case, CEI relies on meter tests in the CEI Meter Lab
14 to identify whether there is an issue with CEI's equipment that is causing the perceived
15 higher than normal usage. In this case, the meter on Ms. Kenderes' home was found to be
16 functioning within the Commission's tolerance levels, showing that any issue with Ms.
17 Kenderes' electric usage was an issue with her electrical facilities.

18 **Q. COMPLAINANT CLAIMS THAT THE METER TECHNICIAN ALSO**
19 **"COULDN'T FATHOM WHY THE METER WAS SPINNING SO FAST." HOW**
20 **DO YOU RESPOND?**

21 A. The meter technician who removed the meter from Ms. Kenderes' home and had Ms.
22 Kenderes do the breaker test has no recollection of the meter "spinning fast" and does not
23 recall saying that to Ms. Kenderes. Again, breaker tests can sometimes identify the source

1 of perceived higher than normal usage, but they do not always tell the full story. In order
2 to fully investigate the source of higher than normal usage, a customer would need to do a
3 more comprehensive inspection of his or her own facilities in addition to a breaker test,
4 which is beyond the scope of what CEI offers to customers, since customers are responsible
5 for identifying, repairing and replacing their own defective equipment, as well as
6 deficiencies in their internal electrical facilities, such as wiring and connections.

7 **Q. COMPLAINANT ALSO STATED THAT THE CEI METER TECHNICIAN TOLD**
8 **HER HE HAS “NEVER SEEN [A SITUATION LIKE COMPLAINANT’S]**
9 **HAPPEN.” HOW DO YOU RESPOND?**

10 A. The CEI meter technician has no recollection of saying this to Ms. Kenderes. In fact, this
11 statement is not true. It is common for a breaker test to not conclusively show the cause of
12 a customer’s perceived higher than normal electricity usage. Again, to fully investigate the
13 source of higher than normal usage, a customer would need to do a more comprehensive
14 inspection of his or her own facilities in addition to a breaker test, which is beyond the
15 scope of what CEI offers to customers, since customers are responsible for maintaining
16 and repairing their own electrical facilities after the meter.

17 **Q. MS. KENDERES ALLEGES IN THE COMPLAINT THAT SHE “DID BREAKER**
18 **TESTS” AND “HAD TWO ELECTRICIANS COME OUT [TO INSPECT THE**
19 **PROPERTY] AND THEY SAID EVERYTHING WAS FINE WITH THE HOUSE.”**
20 **HOW DO YOU RESPOND?**

21 A. CEI has requested copies of reports showing the results of Ms. Kenderes’ electrical
22 inspections in discovery in this proceeding, but Ms. Kenderes never produced those reports
23 or results. I therefore cannot comment on specific findings from her electrician(s).

1 That being said, and assuming that the electricians did indeed find nothing wrong
2 with the Property during their inspections, there are possible explanations for such a
3 finding. For instance, there could have been a ground condition in the wiring at the
4 Property. Or, someone living at or visiting the Property could have identified an appliance
5 causing the high consumption and unplugged it – possibly without Ms. Kenderes’
6 knowledge. It is also possible that in the process of checking the wiring or electrical
7 equipment at the Property that Ms. Kenderes’ electrician cured some defect condition
8 without having first been aware of the problem.

9 **Q. IF THERE IS A GROUND CONDITION AND THE CUSTOMER IS NOT EVEN**
10 **USING THE ELECTRICITY TO POWER DEVICES, WHY IS IT PROPER TO**
11 **BILL THE KWH USAGE AS CONSUMPTION?**

12 A. Pursuant to CEI’s Commission-approved tariff, customers are responsible for all
13 equipment “behind the meter,” including the wiring leading from the meter to any terminus
14 on the premises. Thus, if a wire becomes grounded and draws current, it is the customer’s
15 responsibility and is treated no differently than, say, running an air conditioner or space
16 heater. This is necessary because even a grounding condition requires generation to
17 produce—and transmission and distribution circuits to deliver—the electricity. If the
18 customer whose meter the electricity flows through doesn’t pay for it, then other customers
19 would be required to make up the difference.

20 **Q. IN YOUR PROFESSIONAL OPINION, COULD THE “LOUD NOISES” COMING**
21 **FROM THE METER OR THE “ELECTRIC SHOCK” INCIDENT THAT**
22 **COMPLAINANT REPORTED IN MAY 2017 BE RELATED TO**

1 **COMPLAINANT’S HIGH CONSUMPTION FROM OCTOBER 2017 TO APRIL**
2 **2018?**

3 A. No. As I stated before, on May 18, 2017, a CEI troubleman went to the Property to
4 investigate Complainant’s complaints about the loud noises coming from the meter and the
5 electric shock. The troubleman did not detect any unusual sounds coming from the meter.
6 The troubleman also tested the CEI line-side wires at the Property to check for loose
7 connections and found none. CEI’s only record of these complaints is Complainant’s call
8 to CEI on May 18, 2017, five months before the billing periods beginning on October 19,
9 2017 and ending April 18, 2018, during which the Complainant had higher than normal
10 electric consumption.

11 Regarding the “loud noises”, it is true that sometimes meters run loudly. However,
12 just because a meter is running loudly does not mean that the meter would register higher
13 consumption than what the customer was actually using. Moreover, “loud noises” from a
14 meter is not a condition that would “come and go” – it would remain constant. As I stated
15 before, on May 18, 2017, a CEI troubleman went to Ms. Kenderes’ Property to investigate
16 her complaints about the loud meter and electric shock and did not detect any unusual
17 sounds coming from the meter.

18 Regarding the alleged “electric shock” incident, a ground fault condition could
19 cause electric shocks, and could also appear as higher consumption on a customer’s electric
20 bill. However, a ground fault condition severe enough to cause higher than normal
21 consumption on a customer’s electric bill would not manifest as a single shock incident;
22 rather, there would be multiple instances of electric shock from anything connected to the
23 home’s plumbing system. There is no evidence of that in this case, and it is highly unlikely

that a one-time electric shock would cause higher than normal consumption five months later. Moreover, the CEI troubleman who visited the Property on May 18, 2017 did not find any loose connections in the CEI line-side wires at the Property. Thus, even if there was a ground fault condition at the Property, it would have been an issue with Complainant's equipment, not CEI's. The Complainant would have been responsible for identifying, repairing and replacing her own defective equipment, and also would have been responsible for paying for any excess consumption as a result of such a defect.

CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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

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