

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

Russel Enyart,)	
)	
Complainant,)	Case No. 18-1734-EL-CSS
)	
v.)	
)	
Ohio Edison Company,)	
)	
Respondent.)	
)	

**DIRECT TESTIMONY OF PRINCESS DAVIS
ON BEHALF OF OHIO EDISON COMPANY**

1 **Q. PLEASE INTRODUCE YOURSELF.**

2 A. My name is Princess Davis. I am employed by FirstEnergy Service Company as a
3 Customer Services Compliance Specialist. FirstEnergy Service Company provides
4 corporate support, including customer service, to FirstEnergy Corp.'s regulated public
5 utility subsidiaries. In Ohio, these subsidiaries are Ohio Edison Company ("Ohio Edison"),
6 The Cleveland Electric Illuminating Company, and The Toledo Edison Company.

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

9 A. I received a Bachelor of Science, Criminal Justice degree from Fairmont State University
10 in December 1999, majoring in criminal justice with a minor in psychology. I have worked
11 at either FirstEnergy Service Company or Allegheny Power Company in a customer
12 service capacity for the last 19 years. I have held my current position since 2010, although
13 after the merger the title was changed from Business Analyst to Customer Services
14 Compliance Specialist.

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

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

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

1 A. The purpose of my testimony is to discuss Complainant Russell Enyart's ("Complainant")
2 January 2018 request for electric service at the property located at 50 Newton St., Norwalk,
3 Ohio 44857 (the "Property"). Specifically, my testimony will address Complainant's
4 request for service, the request of the previous owner to disconnect service at the Property,
5 and when service to the Property was established under Complainant's accounts.

6 **Q. DID YOU REVIEW ANY RECORDS RELATED TO THIS CASE?**

7 A. Yes, I have reviewed business records related to this case maintained and preserved within
8 FirstEnergy's SAP System. These records, all of which were kept in the course of regularly
9 conducted business activity, included work order requests, customer contact notes, meter
10 reads, and other customer service records. It is the regular practice of FirstEnergy and Ohio
11 Edison to make and preserve these business records, and I regularly rely upon such
12 documents when investigating customer complaints in accordance with my duties as a
13 Customer Service Compliance Specialist.

14 **Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE BACKGROUND OF THE**
15 **COMPLAINT?**

16 A. Yes. Complainant claims that he contacted Ohio Edison to have electric service established
17 at the Property on Friday, January 26, 2018. Complainant alleges that Ohio Edison failed
18 to timely start service to the Property under his account and that service did not begin until
19 February 1, 2018. Complainant claims that this alleged failure to establish service left the
20 Property without power for a period of time following the request of the previous to
21 disconnect service to the Property.

22 **Q. DID COMPLAINANT CONTACT OHIO EDISON TO ESTABLISH SERVICE AT**
23 **THE PROPERTY IN JANUARY 2018?**

1 A. Yes. Complainant called Ohio Edison shortly before 2:00 p.m. on Friday, January 26, 2018,
2 and requested that Ohio Edison start electric service to the Property under two separate
3 accounts that same day. Ohio Edison informed Complainant that the soonest electric
4 service could begin under his accounts was the next business day, Monday, January 29.
5 Complainant then scheduled to have service to the Property under his accounts begin on
6 January 29.

7 **Q. WHY ARE THERE TWO ACCOUNTS RELATED TO THE PROPERTY?**

8 A. There is one account for each active meter at the Property. Two active meters are located
9 at the Property, each feeding a different unit. Meter 674019737 is for 50 Newton St. U1,
10 Norwalk, Ohio 44857 (“Meter U1”). Meter 680628666 is for 50 Newton St. UB, Norwalk,
11 Ohio 44857 (“Meter UB”).

12 **Q. WAS ELECTRIC SERVICE BEING PROVIDED TO THE PROPERTY AS OF**
13 **JANUARY 26, 2018?**

14 A. Yes, electric service was being provided to the Property under the prior owner’s accounts
15 as of January 26, 2018.

16 **Q. DID THE PRIOR OWNER OF THE PROPERTY REQUEST THAT SERVICE TO**
17 **THE PROPERTY BE TAKEN OUT OF HIS OR HER NAME?**

18 A. Yes. The prior owner contacted Ohio Edison on January 25, 2018 and requested to no
19 longer be the account holder of record for service to the Property. Ohio Edison completed
20 the prior owner’s move-out request at approximately 9:52 a.m. on January 29, 2018, with
21 an effective date of January 26, 2018.

1 **Q. AFTER SERVICE UNDER THE PRIOR OWNER'S ACCOUNTS WAS**
2 **TERMINATED, DID ELECTRIC SERVICE TO THE PROPERTY BEGIN ON**
3 **JANUARY 29, 2018 UNDER COMPLAINANT'S ACCOUNTS?**

4 A. Yes.

5 **Q. DID COMPLAINANT CONTACT OHIO EDISON REGARDING SERVICE TO**
6 **THE PROPERTY FOLLOWING THE TRANSFER OF SERVICE TO HIS**
7 **ACCOUNTS ON JANUARY 29, 2018?**

8 A. Yes. Complainant called Ohio Edison at approximately 1:00 p.m. on February 1, 2018 and
9 stated that he believed that one of the meters at the Property—Meter UB—had been turned
10 off by Ohio Edison.

11 **Q. DO OHIO EDISON'S RECORDS INDICATE ANY POTENTIAL ISSUES WITH**
12 **RESPECT TO COMPLAINANT'S ACCOUNT FOR METER UB?**

13 A. Our records indicate an “error in processing” the unblock order with respect to Meter UB
14 on January 29, 2018.

15 **Q. CAN YOU PLEASE DESCRIBE THE “ERROR IN PROCESSING” THAT**
16 **OCCURRED ON JANUARY 29, 2018?**

17 A. Yes. When a customer contacts Ohio Edison for a move-out, our system generates a work
18 order for the meter to be blocked, which is essentially a “move-out.” When a customer
19 contacts Ohio Edison for new service, our system generates a work order for the meter to
20 be unblocked, which is essentially a “move-in.” When both a block and an unblock order
21 are scheduled for the same property, the meter worker typically processes the block first,
22 then the unblock. In this particular instance, the meter worker processed the unblock first,
23 then the block. This caused the system to report an error.

1 **Q. DID THIS SYSTEM ERROR EFFECT ELECTRIC SERVICE TO THE**
2 **PROPERTY UNDER COMPLAINANT'S ACCOUNTS?**

3 A. No. At no time did Ohio Edison disconnect power from either Meter UB or Meter U1.

4 **Q. HOW DO YOU KNOW THAT THE PROPERTY WAS NOT DISCONNECTED**
5 **FROM EITHER METER UB OR METER U1?**

6 A. Meter U1 was read when the move-in order was processed for Complainant on January 29,
7 2018. There are no records indicating that service ever ceased or disconnected, as all other
8 meter reads show usage from January 29, 2018 to the present. Meter UB was also read on
9 January 29, 2018. Shortly after Complainant contacted Ohio Edison on February 1, 2018
10 and claimed that Meter UB had been turned off, a meter worker went to the Property and
11 confirmed that Meter UB was on and had in fact registered usage from January 29, 2018
12 to February 1, 2018.

13 **Q. ARE THERE ANY ADDITIONAL METERS AT THE PROPERTY IN**
14 **QUESTION?**

15 A. Yes, there is a third meter at the property. The third meter is not currently active and has
16 had no service since December 1, 2016. Service has not been reestablished and no one has
17 requested service at the third meter.

18 **Q. DID THE SYSTEM ERROR REFERENCED ABOVE CAUSE ANY DISRUPTION**
19 **OF SERVICE FOR COMPLAINANT?**

20 A. No.

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

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

Dated: October 29, 2019

Respectfully submitted,

/s/ Ryan A. Doringo

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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Direct Testimony of Princess Davis has been served upon the following on this 29th day of October, 2019.

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Summary: Testimony of Princess Davis electronically filed by Mr. Scott J Casto on behalf of Ohio Edison Company