

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

OHIO EDISON COMPANY’S RESPONSES AND OBJECTIONS TO COMPLAINANT’S
FIRST SET OF COMBINED DISCOVERY REQUESTS

Pursuant to Rules 4901-1-16 through 4901-1-22 of the Ohio Administrative Code and in accordance with Ohio Rules of Civil Procedure 26, 33, 34, and 36, Respondent Ohio Edison Company (“Ohio Edison”) submits its responses and objections to Complainant’s first requests for admission, interrogatories, and requests for production of documents, stating as follows:

GENERAL OBJECTIONS

Ohio Edison incorporates the following objections into each response below, as if fully restated therein.

1. Ohio Edison objects to Complainant’s attempt to provide definitions and “instructions for answering” that are broader than or inconsistent with the rules of the Ohio Administrative Code or the Ohio Rules of Civil Procedure. Ohio Edison will respond in accordance with its obligations under those rules.

2. Ohio Edison objects to the definition of “Documents” and “Documentation” to the extent it seeks to impose obligations on Ohio Edison that are broader than, or inconsistent with, those imposed by the rule of the Ohio Administrative Code and the Ohio Rules of Civil

Procedure. Ohio Edison construes the term “document” to be synonymous in meaning and equal in scope to the usage of the term “documents” in Rule 34(A) of the Ohio Rules of Civil Procedure.

3. Ohio Edison objects to the definition of “Communication” as overbroad, unduly burdensome, and vague and ambiguous, and Ohio Edison further objects to the extent that the definition seeks to impose obligations on Ohio Edison that are broader than, or inconsistent with, those imposed by the rule of the Ohio Administrative Code and the Ohio Rules of Civil Procedure. For example, Complainant defines “Communication” to include the transmission of information by “oral” or “otherwise perceptible means” and therefore unreasonably purports to require Ohio Edison to describe in detail communications that are not contained in any document. Further, the definition states that a request “seeking the identity of a communication . . . encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication” and therefore unreasonably purports to place an undue burden on Ohio Edison to identify any documents or communications having any “nexus” or containing any “explicit or implicit” reference to the subject matter of a communication.

4. Ohio Edison objects to the definition of “You,” and “Your,” or “Yourself” as overbroad and unduly burdensome because it unreasonably purports to require Ohio Edison to provide information on behalf of any “present or former director, officer, agent, contractor, consultant, advisor, employee, partner, or joint venturer” and is unlimited as to time. Ohio Edison construes the terms “You,” “Your,” and “Yourself” to refer only to Ohio Edison Company.

5. Ohio Edison objects to Complainant's "instructions" for invoking privilege to the extent they seek to impose requirements on Ohio Edison that are broader than, or inconsistent with, those imposed by the Ohio Administrative Code or by the Ohio Rules of Civil Procedure. Should Ohio Edison withhold any document on the basis of any applicable privilege, immunity, or protection, Ohio Edison will provide the information required by Ohio Rule of Civil Procedure 26(B)(6)(a).

6. A statement that documents will be produced is not intended to suggest that responsive documents exist within Ohio Edison's possession, custody, or control; nor is it intended to suggest that Ohio Edison will search every electronic and paper file within its possession, custody, or control, because that exercise would be unduly burdensome and prohibitively expensive and is not required under the rules. A statement that documents will be produced means that Ohio Edison will search for documents in those places where Ohio Edison reasonably anticipates they may be located and, if located and not subject to any privilege, Ohio Edison will make them available for inspection and copying at a mutually agreeable time and place.

RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSION

RFA-1: Admit that the Property is within Ohio Edison's service territory.

RESPONSE: Admitted.

RFA-2: Admit that Ohio Edison is required to provide service to the owner of the Property if the owner of the Property requests service and meets all other Commission approved prerequisite criteria for service.

RESPONSE: Ohio Edison objects to this request as vague and ambiguous. Specifically, the phrase "meets all other Commission approved prerequisite criteria for service" is undefined and

subject to multiple interpretations, and Ohio Edison can therefore neither admit nor deny the request. Ohio Edison further objects to this request as improper under Rule 4901-1-22, O.A.C., because the request seeks Ohio Edison's legal position on a hypothetical question, rather than an admission regarding "a specific matter," as required by Rule 4901-1-22.

RFA-3: Admit that Enyart contacted Ohio Edison on January 26, 2018 and requested service to the property.

RESPONSE: Admitted.

RFA-4: Admit that Ohio Edison could have provided service to Enyart after Enyart's January 26, 2018 request for service without first installing any new meters or other equipment on the Property.

RESPONSE: Admitted.

RFA-5: Admit that Ohio Edison was providing service to the Property on January 26, 2018 on the prior Property owner's account.

RESPONSE: Admitted.

RFA-6: Admit that on or between January 26, 2018 and January 29, 2018, the service being provided to the Property under the prior owner's account was terminated.

RESPONSE: Ohio Edison admits that, at the prior owner's request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

RFA-7: Admit that once service to the Property on the prior owner's account was terminated, the Property was without service.

RESPONSE: Ohio Edison objects to this request as vague and ambiguous because the phrase “the Property was without service” is unlimited as to time and is therefore subject to multiple interpretations. Subject to and without waiving any objections, Ohio Edison admits that, at the prior owner’s request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

RFA-8: Admit that Ohio Edison failed to provide service to the Property within three business days of Enyart’s request for service on January 26, 2018.

RESPONSE: Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 within three business days of Enyart’s request for service on January 26, 2018. Ohio Edison admits that it did not provide service to Meter 680628666 within three business days of Enyart’s request for service on January 26, 2018.

RFA-9: Admit that Ohio Edison failed to provide service to the Property within one business day of Enyart’s request for service on January 26, 2018.

RESPONSE: Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 within one business day of Enyart’s request for service on January 26, 2018. Ohio

Edison admits that it did not provide service to Meter 680628666 within one business day of Enyart's request for service on January 26, 2018.

RFA-10: Admit that the Ohio Edison meter at the Property is capable of starting service remotely.

RESPONSE: Ohio Edison objects to this request as vague and ambiguous because there are two meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, Ohio Edison denies that Meter 680628666 at 50 Newton St., Norwalk, Ohio 44857 is capable of starting service remotely.

RFA-11: Admit that Ohio Edison did not provide service to the Property under Enyart's account until February 1, 2018.

RESPONSE: Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 under Enyart's account until February 1, 2018. Ohio Edison admits that it did not provide service to Meter 680628666 under Enyart's account until February 1, 2018.

RFA-12: Admit that Ohio Edison did not notify Enyart that Ohio Edison would not provide service within three business days of his request.

RESPONSE: Ohio Edison denies this request to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided within three business days of Enyart's request and determined not to notify Enyart. Ohio Edison further denies this request to the extent it implies that Ohio Edison determined that it "would not provide service within three business

days of [Enyart's] request.” Ohio Edison admits that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666.

RFA-13: Admit that Ohio Edison is subject to the Commission's jurisdiction.

RESPONSE: Admitted.

RFA-14: Admit that Ohio Edison is an electric light company.

RESPONSE: Admitted.

RFA-15: Admit that Ohio Edison is subject to the Commission's Rules governing electric light companies.

RESPONSE: Admitted.

RFA-16: Admit that Ohio Edison did not notify Enyart that Ohio Edison would not provide service within one business day of his request.

RESPONSE: Ohio Edison denies this request to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided within one business day of Enyart's request and determined not to notify Enyart. Ohio Edison further denies this request to the extent it implies that Ohio Edison determined that it “would not provide service within one business day of [Enyart's] request.” Ohio Edison admits that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666.

RFA-17: Admit that Ohio Edison violated the minimum service levels O.A.C 4901:1-10-09 required Ohio Edison to provide to Enyart.

RESPONSE: Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service levels O.A.C[.] 4901:1-10-09 required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

RFA-18: Admit that Ohio Edison violated the minimum service levels O.A.C 4901:1-10-09 (A) through O.A.C. 4901:1-10-09 (A)(1)(c) required Ohio Edison to provide to Enyart.

RESPONSE: Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service levels O.A.C[.] 4901:1-10-09 A through O.A.C. 4901:1-10-09 (A)(1)(c) required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by these provisions of Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

RFA-19: Admit that Ohio Edison violated the minimum service level O.A.C 4901:1-10-09 (A)(3) required Ohio Edison to provide to Enyart.

RESPONSE: Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service level O.A.C.[.] 4901:1-10-09 (A)(3) required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

RFA-20: Admit that Ohio Edison’s failure to provide power during subzero temperatures resulted in the frozen pipes and property damage alleged in the Complaint.

RESPONSE: Ohio Edison objects to this request because it seeks information concerning Enyart’s alleged property damages, which are not properly before the Commission since the Commission has no jurisdiction to award damages to Enyart. Subject to and without waiving any objections, denied.

RFA-21: Admit that Ohio Edison violated O.R.C. 4928.11.

RESPONSE: Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further objects to this request as improper under Rule 4901-1-22, O.A.C., because the request seeks Ohio Edison’s legal position on a hypothetical question, rather than an admission regarding “a specific matter,” as required by Rule 4901-1-22.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INT-1: Identify each person who provided any answer or response, or assisted in answering or responding to these Combined Discovery Requests.

RESPONSE: Ohio Edison objects to this interrogatory because it seeks information protected by the attorney-client privilege and work-product doctrines. Subject to and without waiving any objections, Ohio Edison states that its responses to Complainant's discovery requests were prepared by counsel.

INT-2: Is Ohio Edison capable of remotely starting and stopping the meter at the Property?

RESPONSE: Ohio Edison objects to this interrogatory as vague and ambiguous because there are two meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, Ohio Edison states that Meter 680628666 at 50 Newton St., Norwalk, Ohio 44857 is not capable of starting and stopping service remotely.

INT-3: Did Ohio Edison need to install additional equipment of any kind to provide service to the Property as of January 26, 2018?

RESPONSE: No.

INT-4: Why did Ohio Edison fail to provide service to the Property within three business days of Enyart's request?

RESPONSE: Ohio Edison objects to this interrogatory because it incorrectly assumes that Ohio Edison "fail[ed] to provide service" to the property at 50 Newton St., Norwalk, Ohio 44857 within three business days of Enyart's request. Subject to and without waiving any objections, Ohio Edison states that it began providing service to Meter 674019737 under Enyart's account on

January 29, 2018, which was the first business day following Enyart's request for service. Ohio Edison further states that the delay in establishing service to Meter 680628666 under Enyart's account from January 29, 2018 to February 1, 2018 was due to a system error.

INT-5: What date did Ohio Edison terminate service to the Property on the account for the Owner of the Property immediately preceding Enyart?

RESPONSE: At the prior owner's request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

INT-6: What date did Ohio Edison provide service for the first time to the Property with Enyart as the owner of the Property on the account?

RESPONSE: Ohio Edison began providing service to Meter 674019737 under Enyart's account on January 29, 2018. Ohio Edison began providing service to Meter 680628666 under Enyart's account on February 1, 2018.

INT-7: How many service installations, that did not require construction of new or additional electric facilities, did Ohio Edison perform in January 2018?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-8: Of the number provided in response to INT-7 above, how many of those service installations were performed within three business days once Ohio Edison was notified the service location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-9: Of the number provided in response to INT-7 above, how many of those service installations were performed via meters that could start and stop service remotely?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-10: Of the number provided in response to INT-9 above, how many of those service installations were performed within one business day after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio

Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-11: Of the number provided in response to INT-7 above, how many of those service installations were performed via meters that could not start and stop service remotely?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-12: Of the number provided in response to INT-11 above, how many of those service installations were performed within three business days after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-13: Of the number provided in response to INT-7 above, how many of those service installations were from applicants who requested an installation date more than three business days after the original installation request?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-14: Of the number provided in response to INT-13 above, how many of those service installations were performed by the requested installation date after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-15: Did Ohio Edison achieve 99% of new installations, requiring no construction of electric facilities, within the required time frames from O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c) for January 2018?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, and overbroad. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, and overbroad.

INT-16: How many service installations, that did not require construction of new or additional electric facilities, did Ohio Edison perform in February 2018?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-17: Of the number provided in response to INT-16 above, how many of those service installations were performed within three business days once Ohio Edison was notified the service location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-18: Of the number provided in response to INT-16 above, how many of those service installations were performed via meters that could start and stop service remotely?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-19: Of the number provided in response to INT-18 above, how many of those service installations were performed within one business day after Ohio Edison was

notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-20: Of the number provided in response to INT-16 above, how many of those service installations were performed via meters that could not start and stop service remotely?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-21: Of the number provided in response to INT-20 above, how many of those service installations were performed within three business days after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-22: Of the number provided in response to INT-16 above, how many of those service installations were from applicants who requested an installation date more than three business days after the original installation request?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-23: Of the number provided in response to INT-22 above, how many of those service installations were performed by the requested installation date after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-24: Did Ohio Edison achieve 99% of new installations, requiring no construction of electric facilities, within the required time frames from O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c) for February 2018?

RESPONSE: Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

INT-25: What type of service does Ohio Edison provide Enyart at the Property?

RESPONSE: Ohio Edison provides electric service to the property at 50 Newtown St., Norwalk, Ohio 44857.

INT-26: Identify the tariff governing the service Ohio Edison provides Enyart at the Property.

RESPONSE: Ohio Edison, Tariff P.U.C.O. No. 11, on file with the Public Utilities Commission of Ohio.

INT-27: If Your Response to RFA-17 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

RESPONSE: Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-17, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

INT-28: If Your Response to RFA-18 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

RESPONSE: Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-18, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

INT-29: If Your Response to RFA-19 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

RESPONSE: Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-19, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

INT-30: If Your Response to RFA-20 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

RESPONSE: Ohio Edison objects to this interrogatory because it seeks information concerning Enyart's alleged property damages, which are not properly before the Commission since the Commission has no jurisdiction to award damages. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

INT-31: If Your Response to RFA-21 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

RESPONSE: Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-21, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

INT-32: Identify every expert witness you expect or intend to call at the hearing in this matter and the subject matter upon which you expect them to testify.

RESPONSE: Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which experts, if any, it expects or intends to call at the hearing in this matter. Ohio Edison will disclose its witnesses in accordance with the procedural schedule.

INT-33: Identify every non-expert witness you expect or intend to call at the hearing and the subject matter upon which you expect them to testify.

RESPONSE: Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which witnesses, if any, it expects or intends to call at the hearing in this matter. Ohio Edison will disclose its witnesses in accordance with the procedural schedule.

INT-34: Identify every document, exhibit, or demonstrative you intend or expect to introduce as a document at the hearing.

RESPONSE: Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase "introduce as a document at the hearing" is undefined and subject to multiple interpretations. Ohio Edison construes this phrase to refer to documents Ohio Edison intends to

formally introduce as exhibits to the record at hearing. Ohio Edison further objects to this interrogatory as premature. Ohio Edison has not yet determined which exhibits it will introduce into the record at hearing. Ohio Edison further objects to this interrogatory to the extent it seeks disclosure of exhibits beyond the requirements of the Commission's rules or the Ohio Rules of Civil Procedure. Ohio Edison will identify the exhibits it intends to introduce at hearing at the appropriate time in accordance with those rules and any applicable Commission orders.

INT-35: Did Ohio Edison provide Enyart notice that OE would not provide service to Enyart within the prescribed time frame once OE was aware that the Property was ready for service and all other regulatory and tariff requirements were met.

RESPONSE: Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase "the prescribed time frame" is undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it "would not provide service to Enyart." Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

INT-36: If the Response to INT-35 above is negative explain why.

RESPONSE: Ohio Edison objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this

interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

INT-37: Did Ohio Edison provide Enyart notice that OE would not provide service to Enyart within the prescribed time frame once OE should have been aware that the Property was ready for service and all other regulatory and tariff requirements were met.

RESPONSE: Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase “the prescribed time frame” is undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware, or should have been aware, that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

INT-38: If the Response to INT-37 above is negative explain why.

RESPONSE: Ohio Edison objects to this interrogatory to the extent it implies that Ohio Edison was aware, or should have been aware, that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it

“would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

**RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION OF
DOCUMENTS**

RFP-1: Provide all documents identified in Ohio Edison's interrogatory responses.

RESPONSE: Ohio Edison will produce the non-privileged, non-protected, and non-public documents, if any, identified in its responses to Enyart's interrogatories.

RFP-2: Provide all documents consulted or relied upon to prepare Ohio Edison's interrogatory responses.

RESPONSE: Ohio Edison will produce any non-privileged, non-protected, and non-public responsive documents in its possession, custody, or control.

RFP-3: Provide all documents Ohio Edison may introduce at any depositions or hearings in this matter.

RESPONSE: Ohio Edison objects to this request as vague and ambiguous because the term "introduce" is undefined and subject to multiple interpretations. Ohio Edison construes this phrase to refer to documents Ohio Edison intends to formally introduce as exhibits to the record at hearing or at deposition. Ohio Edison further objects to this request as premature. Ohio Edison has not yet determined which exhibits it will introduce into the record at hearing or at deposition. Ohio Edison further objects to this request to the extent it seeks disclosure of exhibits beyond the requirements of the Commission's rules or the Ohio Rules of Civil Procedure. Ohio Edison will identify the exhibits it intends to introduce at hearing or at deposition at the appropriate time in accordance with those rules and any applicable Commission orders.

RFP-4: Provide all documents executed between Enyart and Ohio Edison.

RESPONSE: Ohio Edison objects to this request because it seeks documents that are already within Enyart's possession, custody, or control. Subject to and without waiving any objections, Ohio Edison is not currently aware of any documents responsive to this request.

RFP-5: Provide all documents provided to customers who accept the same type of service as Enyart.

RESPONSE: Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and ambiguous. This request facially seeks documents that are not relevant to the current proceeding between Enyart and Ohio Edison, given that the request seeks documents relating only to other customers of Ohio Edison. The request is also unlimited as to time and would literally require Ohio Edison to search for and produce "all documents" ever "provided to" Ohio Edison's current and former customers "who accept the same type of service as Enyart." The request therefore ignores all reasonable bounds placed on discovery by the Commission's rules and the Ohio Rules of Civil Procedure, and purports to impose an immense and unreasonable burden on Ohio Edison. Ohio Edison further objects to the request because the phrase "all documents provided to customers" is undefined and subject to multiple interpretations. Ohio Edison will not produce documents in response to this objectionable request.

RFP-6: Provide all documents, including written correspondence (including electronic mail) exchanged between Ohio Edison or any of its agents, representatives, or employees and Enyart from January 2018 to the present.

RESPONSE: Ohio Edison objects to this request because it seeks documents that are already within Enyart's possession, custody, or control. Ohio Edison further objects to this request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence because it seeks the production of "all documents" "exchanged" between Ohio Edison and Enyart since January 2018 without regard to whether such documents relate to Enyart's complaint against Ohio Edison. Ohio Edison construes this request to seek documents that are related to Enyart's complaint. Subject to this clarification and its objections, Ohio Edison is not currently aware of any documents responsive to this request that are not already within Enyart's possession, custody, or control.

RFP-7: Provide all documents, written correspondence (including electronic mail) exchanged between any Ohio Edison employee or representative and any other Ohio Edison employee or representative that relates to the actions and inactions alleged in the Complaint in this matter starting January 2018 through the present.

RESPONSE: Ohio Edison objects to this request because it seeks documents protected by the attorney-client privilege and work-product doctrines. Subject to and without waiving any objections, Ohio Edison will produce any non-privileged, non-protected responsive documents in its possession, custody, or control.

RFP-8: Provide the notification Ohio Edison sent to Enyart notifying him they would not complete his service installation within the timeframe prescribed by O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c).

RESPONSE: Ohio Edison objects to this request as not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Information concerning the system-wide

performance standards identified by Rule 4901:1-10-09, O.A.C., is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666 and that Ohio Edison discussed the matter with Enyart that day. Subject to and without waiving any objections, Ohio Edison is not currently aware of any responsive documents.

RFP-9: Provide the call logs, recorded calls, and or transcripts of every telephone conversation between Enyart Ohio Edison from January 2018 to March 2018.

RESPONSE: Ohio Edison will produce files containing recorded calls between Enyart and Ohio Edison from January 2018 to March 2018.

RFP-10: Provide the call logs, recorded calls, and or transcripts of every telephone conversation between Ohio Edison and Enyart from April 2018 to June 2018.

RESPONSE: Ohio Edison will produce files containing recorded calls between Enyart and Ohio Edison from April 2018 to June 2018.

RFP-11: Provide all documents reflecting, referring, or relating to meter readings for the Property from January 2018 until June 2018.

RESPONSE: Ohio Edison objects to this request as vague, ambiguous, overbroad, and unduly burdensome because the phrase “reflecting, referring, or relating to meter readings for the Property” is undefined and subject to multiple interpretations. Subject to and without waiving any objections, Ohio Edison will produce meter reading results for the meters at 50 Newton St., Norwalk, Ohio 44857 from January 2018 to present.

RFP-12: Provide all documents reflecting, referring, or relating to installations of any equipment of any kind by Ohio Edison at or on the Property from December 2017 to June 2018.

RESPONSE: Ohio Edison is not currently aware of any responsive documents.

RFP-13: Provide all documents reflecting, referring, or relating to Enyart.

RESPONSE: Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and ambiguous. Ohio Edison further objects to this request because it seeks documents protected by the attorney-client privilege and work-product doctrines. This request is unlimited as to time and seeks “all documents reflecting, referring, or relating to Enyart” without regard to whether such documents relate to the subject matter of this proceeding—Enyart’s complaint against Ohio Edison. The request therefore ignores all reasonable bounds placed on discovery by the Commission’s rules and the Ohio Rules of Civil Procedure, and would literally require Ohio Edison to search the entirety of its records for any documents “reflecting, referring, or relating to Enyart.” Further, the phrase “reflecting, referring, or relating to Enyart” is undefined and subject to multiple interpretations, rendering the request vague and ambiguous. Ohio Edison will not produce documents in response to this objectionable request.

RFP-14: Provide all documents reflecting, referring, or relating to Ohio Edison’s equipment and/or meters for reading electricity used at the Property from December 2017 to March 2018.

RESPONSE: Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and

ambiguous. This request is so lacking in specificity that Ohio Edison cannot know to which documents the request is referring. Further, the phrase “all documents reflecting, referring, or relating to Ohio Edison’s equipment and/or meters for reading electricity used at the Property” is undefined and subject to multiple interpretations, rendering the request vague and ambiguous. Ohio Edison will not produce documents in response to this objectionable request.

Dated: August 2, 2019

Respectfully submitted,

/s/ Ryan A. Doringo

Scott J. Casto (0085756)

Counsel of Record

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Fax: (216) 579-0212

radoringo@jonesday.com

On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by email this 2nd day of August,
2019 upon the following:

Robert Dove
Kegler Brown Hill + Ritter Co., L.P.A.
65 E State St., Ste. 1800
Columbus, OH 43215-4295
rdove@keglerbrown.com

Counsel for Complainant

/s/ Ryan A. Doringo

Attorney for Ohio Edison Company

Customer: RUSSELL ENYART / 805941643
 Contract Acct: 110129069909
 Service Address: 50 NEWTON ST UB,NORWALK OH 44857

Created On: 07/17/2019
 Date Range: 07/17/2016 to 07/17/2019

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
06/15/2019 12:40:56	06/15/2019	110129069909	EAILOGINVM7	Ready Pay Create
No 69948995 - \$ 139.21 - 06/15/2019 Russell Enyart russell.enyart@gmail.com				
05/20/2019 10:02:11	05/20/2019	110129069909	EAILOGINVM7	Ready Pay Create
No 69305026 - \$ 162.47 - 05/20/2019 Russell Enyart russell.enyart@gmail.com				
05/20/2019 10:01:25	05/20/2019	110129069909	B2BEALOGIN	Contact Added to Alert Preferences
Alert Contact Added: russell.enyart@gmail.com				
05/20/2019 10:01:24	05/20/2019	110129069909	EAILOGINVM7	Account Added to Website Profile
Added Account 110129069909				
04/24/2019 10:33:18	04/24/2019		Cathy A Carmichael	Personal Data Changed
Old BP Phone:(916)770-5121 New BP Phone:(916)524-9733 Created By: Cathy A Carmichael				
03/30/2019 19:59:49	03/30/2019	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
02/02/2019 19:53:16	02/02/2019	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
12/31/2018 13:24:04	12/31/2018	110129069909	Kristi C Martin	Update Comments to Power On
Reported By: GEORGE POMPSON, contractor Work Type: VPLV Storm Mode: Non-Storm Mode ERT Type: SYS ERT Time Quoted: 12/31/18 04:00 PM Script Read: Yes Notification Instructions: Please contact enroute or contact on site. George Pompton (contractor) would like to show you where the problem is. Created By: Kristi C Martin				
12/31/2018 13:22:15	12/31/2018	110129069909	Kristi C Martin	Voltage Problem - Low Voltage
Reported By: RUSSELL ENYART Reported By Phone: (800)829-2400 Storm Mode: Non-Storm Mode ERT Type: SYS ERT Time Quoted: 12/31/18 04:00 PM Script Read: Yes Notification Instructions: contractor, George Pompton (800)829-2400 believes that it is a voltage problem. Not getting enough power to power the pumphouse. Xst Baker ST. Created By: Kristi C Martin				
12/31/2018 13:18:29	12/31/2018	110129069909	Kristi C Martin	General Inquiry
Response to last ctt 749273934 - No Outage; issue unknown Good voltage at 3 meter locations at this address. There are two meters and they need power for the pump house. The contractor wld like to speak to someone about Russell Enyart for contact to contractor, George Pompton (800)829-2400. Asked if he needed a separate meter install for the pump house - says no, contractor believes that it is a voltage problem. Adv will enter new ctt.				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
11/29/2018 19:53:50	11/29/2018	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
10/26/2018 09:50:46	10/26/2018	110129069909	Mile J Hamilton	Lights-None
<p>Reported By: RUSSELL ENYART</p> <p>Reported By Phone: (916)524-9733</p> <p>Storm Mode: Non-Storm Mode</p> <p>ERT Type: SYS</p> <p>Neighbors Out: No/Unknown</p> <p>Breakers Checked: Yes</p> <p>Restoration callback requested: (916)524-9733</p> <p>ERT Time Quoted: 10/26/18 12:30 PM</p> <p>Script Read: Yes</p> <p>Notification Instructions:</p> <p>Breakers checked: Yes:</p> <p>Created By: Mile J Hamilton</p>				
08/01/2018 19:50:48	08/01/2018	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
06/30/2018 19:43:08	06/30/2018	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
05/01/2018 19:39:59	05/01/2018	110129069909	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
03/12/2018 10:08:08	03/12/2018	110129069909	Miranda A Mack	General Inquiry
<p>sw RUSSELL ENYART</p> <p>requested dupe bill to be sent to russell.enyart@gmail.com</p>				
03/12/2018 10:06:49	03/12/2018	110129069909	EAILOGINWM7	Temporary Online Profile Cancelled
<p>Miranda Mack</p> <p>Temporary Online Profile CancelledoszDFj3x7qtcWPd</p>				
03/12/2018 10:06:49	03/12/2018	110129069909	EAILOGINWM7	Paperless Bill Cancelled
Miranda Mack - Paperless Removed on Account 110129069909				
02/01/2018 13:52:36	02/01/2018	110129069909	Dennyelle Kenee	ALERT! Sensitive Account
<p>meter wkr May verified this meter has been turned on</p> <p>previously. this meter is not blocked current read</p> <p>87491-there is a meter of # L10856089 at property that is</p> <p>not turned on, if customer is requesting service at the</p> <p>meter will need to apply.</p>				
02/01/2018 13:16:56	02/01/2018	110129069909	C50626	General Inquiry
<p>S/W: RUSSELL ENYART / called because saying we disco the</p> <p>meter instead of reconnecting. same-day due to company error</p> <p>and put in claim</p>				
02/01/2018 13:13:29	02/01/2018	110129069909	Jeffrey M Bertleff	Company Error: Move in error
<p>Disc Doc Reason: Vacant status disconnection</p> <p>Activity: Reconnection order</p> <p>Activity Date: 02/01/2018</p> <p>Work Type: MRUB</p> <p>Remote: No</p> <p>Disconnection Type: Meter (Manual)</p> <p>Company Error Reason: Move in error</p> <p>Supv Jeff B -- assisting with DTRT process generating same day order customers confirmed meter nbr still yellow tagged despite unblock order saying worked 01/29</p> <p>Created By: Bertleff,Jeffrey M</p>				
02/01/2018 13:10:46	02/01/2018	110129069909	Jeffrey M Bertleff	Change Customer Requested Disconnect/Reconnect
<p>Disc Doc Reason: Vacant status disconnection</p> <p>Activity: Reverse reconnection order</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
Remote: No				
Created By: Bertleff,Jeffrey M				
02/01/2018 13:03:40	02/01/2018	110129069909	C50626	Claim-Customer
S/W: RUSSELL ENYART Russell.enyart@gmail.com 01/31/2018, morning time we shut off the meter and that caused the pipes to freeze and bust, he now has to get them reestablished 916-770-5121 and 916-524-9733				
02/01/2018 12:40:25	02/01/2018	110129069909	C50941	General Inquiry/Other
s/w RUSSELL ENYART - 110129069909 vai Power was on and then turned off causing pipes to burst transferred to mipmop				
01/26/2018 13:54:35	01/26/2018	110129069909	Workflow General Purpose Batch	Optional Payment Programs
E-Bill Selection: Yes, CSR Signed Up				
01/26/2018 13:54:30	01/26/2018	110129069909	C52562	Move-In / Advised of Service Charge
Move In Date: 01/29/2018 Property Owner: Yes Dog moving In: No Alternate contact phone: (916)770-5121 Customer Contact: john randall (partner) Reconnect Fee: 0.00 Ebill:Yes Email Address: russell.enyart@gmail.com Closed Active Account: No Summary Script Read - Yes sw: Russell enyart wont be in the building to turn off breakers New Move In Premise Phone Number: (916)524-9733 Advised Breakers Off: Yes Bills will be mailed to: special mailing address Advised Security Deposit:Yes Created By: Eva Delvalle				
01/26/2018 13:49:31	01/26/2018	110129069909	EAILOGINVM7	Temporary Online Profile Created
Eva Delvalle - Temporary Site Registration 110129069909 Acct enrolled in eBill--Ts<(>&<)>Cs accepted.				

Customer: RUSSELL ENYART / 805941643
 Contract Acct: 110129069941
 Service Address: 50 NEWTON ST U1,NORWALK OH 44857

Created On: 07/17/2019
 Date Range: 07/17/2016 to 07/17/2019

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
07/02/2019 19:54:34	07/02/2019	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
06/15/2019 12:40:17	06/15/2019	110129069941	EAILOGINWM7	Ready Pay Create
No 69948985 - \$ 800.00 - 06/15/2019 Russell Enyart russell.enyart@gmail.com				
06/03/2019 19:44:44	06/03/2019	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
05/20/2019 10:00:11	05/20/2019	110129069941	EAILOGINWM7	Ready Pay Create
No 69304943 - \$ 1348.17 - 05/20/2019 Russell Enyart russell.enyart@gmail.com				
05/20/2019 09:59:50	05/20/2019	110129069941	EAILOGINWM7	Bank Details Added
0001 Bank Details Added Russell Enyart russell.enyart@gmail.com				
05/20/2019 09:54:14	05/20/2019	110129069941	B2BEALOGIN	Contact Added to Alert Preferences
Alert Contact Added: russell.enyart@gmail.com				
05/20/2019 09:54:12	05/20/2019	110129069941	EAILOGINWM7	Register for Website
Russell Enyart russell.enyart@gmail.com Site Registration renyart609				
04/30/2019 19:47:47	04/30/2019	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
04/24/2019 10:43:36	04/24/2019	110129069941	Cathy A Carmichael	Bill Inquiry
Caller: RUSSELL ENYART (Business Partner) Nature of Inquiry: Bill for \$1,150.05 from 03/05/2019 to 03/29/2019 Act Bill for \$1,348.96 from 02/02/2019 to 03/04/2019 Act Bill for \$791.06 from 01/01/2019 to 02/01/2019 Act Actual Read Concern Read Validation: Misread/poor estimate suspected: No Alternatives/Solutions: Something else - something has created higher usage/demand Notifications: Company Position: No Follow Up Summary: Script read/details provided to customer Additional Comments: customer aware of balancer due , suggested electrician to see where his panels are inside and what they are serving adv meter no on invoices for each unit Bills will be mailed to: current mailing address				
04/24/2019 10:33:18	04/24/2019		Cathy A Carmichael	Personal Data Changed
Old BP Phone:(916)770-5121 New BP Phone:(916)524-9733 Created By: Cathy A Carmichael				
04/24/2019 09:55:53	04/24/2019	110129069941	Gabriella M Constable	General Inquiry
s/w- RUSSELL ENYART via the account 110129069941 called in about the high bill charges xfer to commerical to go over the high bill				

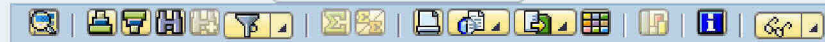
Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
03/30/2019 19:59:51	03/30/2019	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
03/06/2019 12:05:50	03/06/2019	110129069941	Pamela A Young	Single Bill/Invoice Generated
implaused-load and kwh up last 2 months-billed				
02/02/2019 19:52:47	02/02/2019	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
11/29/2018 19:53:46	11/29/2018	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
10/26/2018 09:51:23	10/26/2018	110129069941	Mile J Hamilton	Lights-None
<p>Reported By: RUSSELL ENYART</p> <p>Reported By Phone: (916)524-9733</p> <p>Storm Mode: Non-Storm Mode</p> <p>ERT Type: SYS</p> <p>Neighbors Out: No/Unknown</p> <p>Breakers Checked: Yes</p> <p>Restoration callback requested: (916)524-9733</p> <p>ERT Time Quoted: 10/26/18 12:30 PM</p> <p>Script Read: Yes</p> <p>Notification Instructions:</p> <p>Breakers checked: Yes:</p> <p>Created By: Mile J Hamilton</p>				
09/01/2018 19:45:51	09/01/2018	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
08/01/2018 19:50:52	08/01/2018	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
06/30/2018 19:43:08	06/30/2018	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
05/01/2018 19:39:52	05/01/2018	110129069941	CS General Purpose Batch	Disconnection Notice - OH Non-Residential
03/12/2018 10:08:29	03/12/2018	110129069941	Miranda A Mack	General Inquiry
<p>sw RUSSELL ENYART</p> <p>requested dupe bill to be sent to russell.enyart@gmail.com</p>				
01/31/2018 15:54:00	01/31/2018	110129069941	Ladenna J Collins	Installation Changed
01/26/2018 13:59:59	01/26/2018	110129069941	Workflow General Purpose Batch	Optional Payment Programs
E-Bill Selection: Yes, CSR Signed Up				
01/26/2018 13:59:56	01/26/2018	110129069941	C52562	Move-In / Advised of Service Charge
<p>Move In Date: 01/29/2018</p> <p>Property Owner: Yes</p> <p>Dog moving In: Yes</p> <p>Alternate contact phone: (916)770-5121</p> <p>Customer Contact: john rando (partner)</p> <p>Reconnect Fee: 0.00</p> <p>Ebill:Yes</p> <p>Email Address: russell.enyart@gmail.com</p> <p>Closed Active Account: No</p> <p>Summary Script Read - Yes</p> <p>sw: Russell enyart</p> <p>New Move In Premise Phone Number: (916)524-9733</p> <p>Advised Breakers Off: Yes</p> <p>Bills will be mailed to: special mailing address</p> <p>Advised Security Deposit:Yes</p> <p>Created By: Eva Delvalle</p>				

Customer number 08059416435000324471
 Business Partner 0805941643
 Contract Account 110129069909
 Meter reading unit E032772
 Installation 0704981284

METER READING RESULTS

RUSSELL ENYART / 6284 HORSESHOE BAR RD / LOOMIS CA 95650
 ACTV 50 NEWTON ST, NORWALK UB WAREHOUS
 Ohio rte MRU 032772



Device	MR date	MR Reas...	Multiple	MR T...	MR Status	KWH TO...	KW TO...	KVR TO...
680628666	07/02/2019	01	X	01	7	8,116	6.09	5.68
680628666	06/03/2019	01	X	01	7	7,192	5.57	5.07
680628666	04/30/2019	01	X	01	7	6,163	6.82	5.21
680628666	03/29/2019	01	X	01	7	5,011	7.68	5.28
680628666	03/04/2019	01	X	01	7	3,420	8.27	5.01
680628666	02/01/2019	01	X	01	7	1,479	7.57	5.22
680628666	12/31/2018	01	X	01	7	99,627	8.03	5.98
680628666	11/29/2018	01	X	01	7	98,384	7.80	5.89
680628666	10/30/2018	01	X	01	7	97,218	4.62	6.13
680628666	10/02/2018	01	X	01	7	96,369	4.83	6.32
680628666	08/31/2018	01	X	01	7	95,586	4.68	5.47
680628666	08/01/2018	01	X	01	7	94,685	4.68	5.97
680628666	06/29/2018	01	X	01	7	93,829	4.68	5.97
680628666	05/31/2018	01	X	01	7	92,934	5.11	5.78
680628666	05/01/2018	01	X	01	7	91,948	7.92	5.83
680628666	04/03/2018	01	X	01	7	90,628	8.08	5.89
680628666	03/02/2018	01	X	01	7	89,000	9.34	5.65
680628666	01/29/2018	06	X	01	7	87,242	9.34	5.65
680628666	01/26/2018	03	X	13	7	87,083	6.91	5.41
680628666	01/04/2018	01	X	01	7	85,895	8.65	5.61
680628666	12/01/2017	01	X	01	7	84,317	6.69	5.50

Customer number 08059416430001364537
 Business Partner 0805941643
 Contract Account 110129069941
 Meter reading unit E032772
 Installation 0701356341

METER READING RESULTS

RUSSELL ENYART / 6284 HORSESHOE BAR RD / LOOMIS CA 95650
 ACTV 50 NEWTON ST, NORWALK U1
 Ohio rte MRU 032772



Device	MR date	MR Reas...	Multiple	MR T...	MR Status	KWH TO...	KW TO...	KVR TO...
674019737	07/02/2019	01	X	01	7	99,649	10.51	3.04
674019737	06/03/2019	01	X	01	7	97,017	14.72	5.38
674019737	04/30/2019	01	X	01	7	92,969	26.75	3.15
674019737	03/29/2019	01	X	01	7	83,790	29.19	3.68
674019737	03/04/2019	01	X	01	7	71,717	28.00	4.41
674019737	02/01/2019	01	X	01	7	57,008	25.94	5.57
674019737	12/31/2018	01	X	01	7	50,085	19.33	6.15
674019737	11/29/2018	01	X	01	7	44,400	19.33	6.15
674019737	10/30/2018	01	X	01	7	40,412	10.07	5.95
674019737	10/02/2018	01	X	01	7	38,345	13.04	6.85
674019737	08/31/2018	01	X	01	7	35,136	13.04	6.85
674019737	08/01/2018	01	X	01	7	33,118	13.04	6.05
674019737	06/29/2018	01	X	01	7	29,430	9.77	4.88
674019737	05/31/2018	01	X	01	7	26,180	10.63	4.43
674019737	05/01/2018	01	X	01	7	23,090	10.94	3.21
674019737	04/03/2018	01	X	01	7	20,104	11.99	5.33
674019737	03/02/2018	01	X	01	7	17,133	13.97	7.74
674019737	01/29/2018	06	X	01	7	14,027	9.39	4.01
674019737	01/26/2018	03	X	13	7	14,027	9.39	4.01
674019737	01/04/2018	01	X	01	7	11,686	11.61	2.71
674019737	12/01/2017	01	X	14	7	8,471	5.45	1.66

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Case No(s). 18-1734-EL-CSS

Summary: Exhibit Complainant's Exhibit 2

Ohio Edison Company's Responses and Objections to Complainant's First Set of Combined Discovery Requests electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Cunningham, Cindy