

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

STEVEN D. PAINTER,)	
)	
Complainant,)	
)	CASE NO. 21-0236-EL-CSS
vs.)	
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	
)	

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

INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Princess Davis. I am employed by FirstEnergy Service Company as an Advanced Customer Services Compliance Specialist. FirstEnergy Service Company provides corporate support, including customer service, to FirstEnergy Corp.'s regulated public utility subsidiaries. In Ohio, those subsidiaries are Ohio Edison Company ("Ohio Edison" or the "Company"), The Cleveland Electric Illuminating Company, and The Toledo Edison Company.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I received a Bachelor of Science, Criminal Justice degree from Fairmont State University in December 1999, majoring in criminal justice with a minor in psychology. I have worked at either FirstEnergy Service Company or Allegheny Power Company in a customer service capacity for the last 22 years. Beginning in 2010, I was a Business Analyst for Allegheny Power Company. After the merger, I continued in my role for FirstEnergy Service Company, but the job title was changed to Customer Services Compliance Specialist. In May 2021, I was promoted to my current position.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities include reviewing and responding to complaints made by customers of FirstEnergy Corp.'s regulated public utility subsidiaries to the Public Utilities Commission of Ohio ("Commission"), which includes investigating facts and gathering information from subject matter experts. I also have responsibility for reviewing and responding to customer complaints in Maryland and West Virginia.

1 Among other customer service-related duties, I also provide training to new hires and to
2 my peers within FirstEnergy Service Company regarding various state compliance
3 requirements.

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

5 A. Yes, I have testified multiple times before the Commission, including: Case No. 18-0082-
6 EL-CSS on behalf of The Toledo Edison Company; Case No. 18-0785-EL-CSS on behalf
7 of CEI; Case No. 17-2121-EL-CSS on behalf of The Cleveland Electric Illuminating
8 Company; Case No. 18-1734-EL-CSS on behalf of Ohio Edison; and Case No. 20-1355-
9 EL-CSS on behalf of The Cleveland Electric Illuminating Company.

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

11 A. My testimony addresses several of the allegations raised in the Complaint pertaining to
12 Mr. Painter's application to request electrical service.

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

14 A. Yes, I have reviewed numerous business records related to this case maintained and
15 preserved within FirstEnergy's SAP System. These records, all of which were kept in the
16 course of regularly conducted business activity, include customer contact notes, recorded
17 customer calls, claims letter responses, and Ohio Edison's Commission-approved tariff.
18 It is the regular practice of FirstEnergy and Ohio Edison to make and preserve these
19 business records, and I regularly rely upon such documents when investigating customer
20 complaints in accordance with my duties as an Advanced Customer Services Compliance
21 Specialist. I also reviewed the Complaint in this proceeding.

1 **HISTORY OF STEVEN PAINTER'S ACCOUNT**

2 **Q. CAN YOU PLEASE BRIEFLY DESCRIBE THE INITIAL CIRCUMSTANCES**
3 **OF MR. PAINTER'S FIRST APPLICATION FOR SERVICE?**

4 A. Mr. Painter called Ohio Edison on January 21, 2021 and informed the customer service
5 representative that he recently closed on a house and would like to have the electrical
6 service transferred into his name. Because the county auditor did not show that he owned
7 the property, he was directed to submit a copy of the deed to Ohio Edison via fax. Until
8 it received a copy of the deed, Ohio Edison was unable to accept his application for
9 electrical services at the service address because the account associated with that address
10 had a large outstanding balance and therefore proof of ownership was required. Ohio
11 Edison advised him that it could not move forward with his application until it received
12 proof of ownership.

13 **Q. WHAT HAPPENED NEXT?**

14 A. Following his phone conversation, Mr. Painter submitted an online move in request. Due
15 to the large account balance associated with that service address and that his ownership of
16 the property was not of public record, an automated email message from
17 feccoutbound@firstenergycorp.com directed him to contact a customer service
18 representative. As stated in the message, feccoutbound@firstenergycorp.com is a
19 nonrecipient, unmonitored email address and he was warned as follows: "Please do NOT
20 reply to this automated confirmation message."

21 **Q. WHAT WAS THE OFFICIAL STATUS OF HIS APPLICATION AT THIS**
22 **POINT?**

1 A. His application was denied because we did not have proof of ownership on record. His
2 web request for service was cancelled since he was directed to contact customer service
3 at 1-800-633-4766 during regular business hours.

4 **Q. DID MR. PAINTER SUBMIT A COPY OF HIS DEED VIA FAX AS**
5 **INSTRUCTED?**

6 A. He did not.

7 **Q. WHAT DID HE DO INSTEAD?**

8 A. According to the document attached to his Complaint, he sent a copy of the deed to the
9 email address: feccoutbound@firstenergycorp.com. Ohio Edison has no record of
10 receiving this email.

11 **Q. WHAT IS THAT EMAIL ADDRESS?**

12 A. It is a nonrecipient, unmonitored email address that is used by Ohio Edison's automated
13 system to send out automated emails. Any emails sent to that address are not received by
14 anyone at First Energy or Ohio Edison. Ohio Edison has no means to check that email
15 address. Ohio Edison would have been unaware of any document submitted to that email
16 address, which is why correspondence from that email address direct recipients not to
17 reply to that email address.

18 **Q. WOULD A CUSTOMER SERVICE REPRESENTATIVE GIVE HIM THAT**
19 **EMAIL ADDRESS?**

20 A. No, they would not.

21 **Q. HOW DO YOU KNOW?**

22 A. In cases like this, there is a specific procedure that our representatives are trained to
23 follow, which is to provide the caller with a fax number. Neither their training, the

1 operating procedures, nor the script that our representatives follow include a reference to
2 this email address. These procedures require that the representative provide the fax
3 number to submit proof of ownership, so the representative would not have given the
4 feccoutbound email address to Mr. Painter to email a copy of his deed. I also listened to
5 the recording of the January 21, 2021 call from Mr. Painter, although the quality is poor
6 and it cuts out before we can hear the fax number given, you can clearly hear that Ohio
7 Edison's representatives says "I'm going to give you a fax number..." Mr. Painter
8 appears to say, "Thank you" and she replies, "No problem" before the audio recording
9 ceases.

10 **Q. WAS MR. PAINTER AN OHIO EDISON CUSTOMER ON JANUARY 21, 2021?**

11 A. He was not. His application had not yet been accepted.

12 **Q. WHAT HAPPENED NEXT?**

13 A. The previous owner of the service address contacted Ohio Edison January 21, 2021 and
14 requested to discontinue their service January 22, 2021. Because there was no active
15 account for the service address, Ohio Edison shut off the power on Tuesday, February 9,
16 2021.

17 **Q. WHAT HAPPENED AFTER THE POWER WAS SHUT OFF?**

18 A. Mr. Painter called several times on Saturday, February 13, 2021, demanding that the
19 power be restored immediately. He asserted that Ohio Edison never informed him of
20 "any additional paperwork that you would have needed." Because a service account
21 could not be set up on the weekend or a holiday, he was directed to call back during
22 normal business hours to set up a new account. He demanded to speak to a supervisor,

1 but never answered when the supervisor called back at approximately 2:29 pm and 4:48
2 pm on February 13, 2021.

3 **Q. WHAT HAPPENED NEXT?**

4 A. Mr. Painter called Ohio Edison on February 16, 2021, and requested his power be turned
5 on. He admitted that he “never even started the account” with Ohio Edison. Ohio Edison
6 was able to verify that the service address was transferred into his name on January 26,
7 2021. Ohio Edison then requested a same day reconnect. His power was restored on
8 February 16, 2021.

9 During a conversation with a supervisor on February 16, 2021, Mr. Painter
10 expressed his belief that Ohio Edison would continue to contact the auditor’s office to
11 verify his ownership of the service address. He expressed his belief that “it’s your job...I
12 think it’s your job, to continue to follow up with Marion County Auditor.” Ohio Edison
13 does not have the resources to do this. Mr. Painter correctly recognized that he never
14 started an account with Ohio Edison.

15 **Q. WHEN DID MR. PAINTER FIRST BECOME AN OHIO EDISON CUSTOMER?**

16 A. On February 16, 2021, when he reapplied for services and his application was accepted.

17 **Q. DID MR. PAINTER FOLLOW OHIO EDISON’S PROCEDURES FOR**
18 **STARTING SERVICE ON JANUARY 21, 2021?**

19 A. He did not. Ohio Edison needed proof of ownership and could not start service in his
20 name until it received it. He did not follow the instructions to send the deed via fax.

21 **Q. DID MR. PAINTER FOLLOW OHIO EDISON’S PROCEDURES FOR**
22 **STARTING SERVICE ON FEBRUARY 13, 2021?**

1 A. He did not. New service can only begin during normal business hours, Monday through
2 Friday. He requested service to commence on a Saturday.

3 **Q. WAS OHIO EDISON REQUIRED TO SEND A DISCONNECTION NOTICE?**

4 A. It was not. Disconnection notices are only required for delinquent accounts for
5 customers. They are not required when all accounts are cancelled for a particular service
6 address and no new account established. On February 9, 2021, there was no account for
7 services at the service address (i.e. no one responsible for paying for the electricity used),
8 and therefore no disconnection notice was required.

9 **Q. DID OHIO EDISON VIOLATE COMMISSION RULES?**

10 A. No.

11 **Q. DID OHIO EDISON COMPLY WITH ITS TARIFF?**

12 A. Yes.

13 **CONCLUSION**

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

15 A. Yes, however, I reserve my right to supplement my testimony.
16

CERTIFICATE OF SERVICE

On October 25, 2021, the foregoing document was filed on the Public Utilities Commission of Ohio's Docketing Information System. The PUCO's e-filing system will electronically serve notice of the filing of this document on all parties of record in this proceeding. A service copy has been sent by U.S. Mail on this 25th day of October 2021 to the Complainant at the following address:

Mr. Steven D. Painter
261 Cottswold Drive
Delaware, Ohio 43015

/s/ Christopher A. Rogers
Attorney for FirstEnergy Corp.

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

10/25/2021 3:24:55 PM

in

Case No(s). 21-0236-EL-CSS

Summary: Notice DIRECT TESTIMONY OF PRINCESS DAVIS ON BEHALF OF
OHIO EDISON COMPANY electronically filed by Mr. Christopher Rogers on behalf
of Ohio Edison Company