

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

John Shreve,

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Complainant,

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Case No. 20-0402-EL-CSS

v.

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)

Ohio Edison Company,

)

)

Respondent.

)

**DIRECT TESTIMONY OF CHRIS HARRIS ON BEHALF OF
OHIO EDISON COMPANY**

INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Chris Harris and I am employed with FirstEnergy, the parent company of Ohio Edison Company ("OE" or the "Company") as Staff Business Analyst in Customer Service Systems.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I received a BA in Microbiology in 1999. I have worked for the Company in its Customer Service department since 2001. For 3 years as a Customer Service associate, I was responsible for review and correction of accounts in our billing system. Then 14 years in the capacity of Customer Service business analyst where I was responsible for day-to-day management and reporting of work process in the back office. Additionally, I have worked on various projects that impacted the Customer Service organization such as system functionality testing, system upgrades, and process enhancements. Notably, I worked on the 2009 Ohio ESP project in which we converted our Ohio billing rate categories to the currently filed Rates. For the past 3 years I have worked as a business analyst in Billing & Customer Service Controls which is responsible for oversight of the processes and computer systems in the Customer organization. My current focus is on the Smart meter implementation projects across the FirstEnergy footprint, including Ohio Grid Modernization.

Q. HOW LONG HAVE YOU WORKED FOR FIRSTENERGY?

A. I have been employed by FirstEnergy continuously since 2001.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

1 A. No, I have not. However, I have offered testimony before the Pennsylvania Public Utility
2 Commission for various FirstEnergy operating companies.

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

4 A. My testimony addresses several aspects of the Complaint pertaining to the electric service
5 provided by OE to a customer registered as “Concord Station 4461” (“Complainant”) at
6 4461 Oberlin Avenue, Suite 102, Lorain, Ohio 44053 (the “Property”). Specifically, my
7 testimony addresses the accuracy of Complainant’s electric utility bills, and other issues
8 related to Mr. John Shreve’s “high bill” complaint.

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

11 A. I reviewed the Complaint submitted by Mr. Shreve. I also reviewed business records
12 related to this case maintained and preserved within FirstEnergy’s SAP System. These
13 records, all of which were kept in the course of regularly conducted business activity,
14 include customer contact notes, account summary, and Ohio Edison’s Commission-
15 approved Tariff. It is the regular practice of FirstEnergy and OE to make and preserve
16 these business records, and I rely upon such documents in accordance with my duties at
17 OE.

18 **COMPLAINANT’S ALLEGATIONS AND OE’S RESPONSE**

19 **Q. WHAT IS YOUR UNDERSTANDING OF MR. SHREVE’S COMPLAINT IN THIS**
20 **CASE?**

21 A. From my review of OE’s records and the filings in this matter, I understand that Mr.
22 Shreve’s Complaint is chiefly premised on a belief that OE incorrectly billed his company
23 for the electric service at the property. The basis of his complaint stems from his perceived

1 high bill amounts for both specific months and overall annual usage. He is specifically
2 focused on his overall low kWh usage and low hours' usage of the service. I believe that
3 Mr. Shreve misunderstands how his account is billed per OE's Commission-approved
4 Tariff. I believe this confusion lies at the heart of Mr. Shreve's Complaint.

5 **Q. CAN YOU PLEASE DESCRIBE WHAT OE'S RECORDS INDICATE ABOUT**
6 **COMPLAINANT'S ACCOUNT FOR ELECTRIC SERVICE AT THE**
7 **PROPERTY?**

8 A. Yes. According to OE's records, Mr. Shreve's company's account was billed on OE's
9 Commission-approved Tariff rate General Service - Secondary ("GS Rate"). Under the
10 GS Rate, the billing demand for each billed month is the greatest of the three following
11 categories: (1) the Measured Demand, being the highest thirty (30) minute integrated
12 kilowatt (kW); (2) 5.0 kW; or (3) the Contract Demand. I have attached a copy of OE's
13 Tariff, PUCO No. 11, Original Sheet 20, General Service - Secondary (Rate "GS"), as
14 Attachment OE-1.

15 **Q. DID MR. SHREVE EVER CONTACT OE REGARDING HIS PERCEIVED ISSUE**
16 **OF BEING BILLED INCORRECTLY?**

17 A. Yes. Based on my review of OE's records, Mr. Shreve submitted a bill inquiry after he
18 received what he perceived to be a "high bill" in August 2018. Mr. Shreve complained
19 that he should not have been charged as much as he was because his energy usage was only
20 53 kWh. OE responded to his bill inquiry and explained that his bill included his usage
21 based off of an actual meter reading of 53 kWh and additionally, on the GS Rate, a
22 minimum demand charge of 5 kW. Mr. Shreve indicated that he uses his electric service
23 which includes heat and a water tank for less than 6 hours per week and keeps the electric

1 off at the breaker. Per his calculations, Mr. Shreve complained that his per kWh cost was
2 \$1.50.

3 **Q. CAN YOU PLEASE EXPLAIN WHY A MINIMUM DEMAND CHARGE WOULD**
4 **BE ADDED?**

5 A. As previously discussed, under the GS Rate, a billing demand charge is billed each month
6 and is calculated based off of the greatest of the three following categories: (1) the
7 Measured Demand, being the highest thirty (30) minute integrated kilowatt (kW); (2) 5.0
8 kW; or (3) the Contract Demand. For example, if a customer's meter registered 0 kWh
9 used during a billing period, and the customer's account was serviced under the GS Rate,
10 the customer's bill for that billing period would still include a demand charge of at least
11 5.0 kW.

12 **Q. SO IS IT ACCURATE TO SAY THAT A CUSTOMER'S BILL, ON AN ACCOUNT**
13 **SERVICED UNDER THE GS RATE, IS COMPRISED OF BOTH A KWH USAGE**
14 **CHARGE AND A DEMAND CHARGE?**

15 A. Yes. If a customer on a GS Rate account only looked at their kWh usage, they would not
16 have a complete and accurate understanding of their bill.

17 **Q. DO YOU BELIEVE THESE TWO COMPONENTS, KWH USAGE CHARGE AND**
18 **A DEMAND CHARGE, HAVE AN IMPACT ON THE BILLING COMPLAINT OF**
19 **MR. SHREVE?**

20 A. Yes. Based on my review of OE's records and the Complaint, it appears that Mr. Shreve's
21 calculation of \$1.50 per kWh had not accommodated for the demand charge. According
22 to the current tariff sheet for the GS Rate, for Distribution charges the first 5 kW is charged
23 at a rate of \$12.80 and each additional kW is charged \$5.4635. Rider GEN (Generation

1 service) is charged at a rate of 1.5229 cents per kWh for Capacity charges and 3.3443 to
2 4.1087 cents per kWh for Energy charges. Comparatively speaking the demand charges
3 would have the greater impact. With this in mind, I believe Mr. Shreve's Complaint stems
4 from the winter billing periods specifically. His kWh (energy) usage was relatively low,
5 consistent with his claim of only using service for 6 hours per week. His kW (demand)
6 component, however, between November and March averaged approximately 12 to 13 kW
7 which could be caused by resistive electric heating such as baseboard heat. Simply turning
8 on the breakers for a short period of time can cause a sudden high demand to be recorded
9 on the meter. Based on my understanding of Mr. Shreve's electric usage, I believe this is
10 what caused the higher wintertime bills, thereby increasing his annualized total cost.

11 **Q. WHAT IS THE STATUS OF MR. SHREVE'S ACCOUNT TODAY?**

12 A. As of August 31, 2020, the account was closed per Mr. Shreve's request, with a final
13 balance of \$42.05. Part of this balance was transfer posted to his company's active electric
14 account at the same service address.

15 **CONCLUSION**

16 **Q. IN YOUR OPINION, DID OE PROPERLY DETERMINE THE CHARGES DUE**
17 **TO OE FROM MR. SHREVE?**

18 A. Yes. In my opinion, to a reasonable degree of professional certainty, OE correctly
19 determined and applied all charges due from Mr. Shreve under the GS Rate and in
20 accordance with OE's Commission-approved Tariff.

21 **Q. IN YOUR OPINION, DID OE'S CONDUCT VIOLATE ITS TARIFF OR**
22 **COMMISSION RULES?**

1 A. No. In my opinion, to a reasonable degree of professional certainty, OE at all times fully
2 complied with its Tariff and Commission Rules.

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

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

ATTACHMENT OE-1

GENERAL SERVICE - SECONDARY (RATE "GS")

AVAILABILITY:

Available to general service installations requiring Secondary Service. Secondary Service is defined in the Company's Electric Service Regulations. Choice of voltage shall be at the option of the Company.

SERVICE:

All service under this rate schedule will be served through one meter for each installation.

RATE:

All charges under this rate schedule shall be calculated as described below and charged on a monthly basis.

Distribution Charges:

Service Charge:	\$7.00
Capacity Charge:	
Up to 5 kW of billing demand	\$12.8000
For each kW over 5 kW of billing demand	\$5.4635
Reactive Demand Charge applicable to three phase customers only	
For each rkVA of reactive billing demand	\$0.360

BILLING DEMAND:

The billing demand for the month shall be the greatest of:

1. Measured Demand, being the highest thirty (30) minute integrated kW
2. 5.0 kW
3. The Contract Demand

Measured Demand shall be estimated for all customers not having a demand meter and using over 1,000 kWh per month by applying a factor of 200 by the following formula: Measured Demand = kWh / 200.

REACTIVE BILLING DEMAND:

For installations metered with reactive energy metering, the reactive billing demand in rkVA for the month shall be determined by multiplying the Measured Demand by the ratio of the measured lagging reactive kilovoltampere hours to the measured kilowatthours by the following formula: rkVA = Measured Demand X (measured lagging reactive kilovoltampere hours ÷ measured kilowatthours). For all other installations, the reactive billing demand shall be the integrated reactive demand occurring coincident with the Measured Demand.

APPLICABLE RIDERS:

The charges included with the applicable riders as designated on the Summary Rider, Tariff Sheet 80 shall be added to the Rates and charges set forth above.

GENERAL SERVICE - SECONDARY (RATE "GS")

ADJUSTMENT FOR PRIMARY METERING:

Where a transformer installation (regardless of ownership) is utilized solely to furnish service to a single customer, the Company may meter the service on the primary side of the transformers, and in such case all the demand and energy registrations shall each be reduced 2%.

SPECIAL METERS:

Time-Of-Day and Interval Metering is available from the Company. Charges for such service are specified in the Miscellaneous Charges, Tariff Sheet 75.

UNMETERED SERVICE:

Unmetered service is available to customers with loads of constant wattage such that the monthly use may be calculated accurately and where the Company and the customer agree to unmetered service. The Billing Load shall be the connected load in kilowatts. The monthly billing kilowatt-hours shall be the product of Hours of Use times connected load. Hours of Use shall be 730 hours for continuous operation mode and 350 hours for all other operation modes.

The customer shall notify the Company of the initial connected load and operation mode and shall provide advance notice of each subsequent change in such load or operation mode. The Company may make an inspection of the customer's equipment at any time to verify connected loads and operation mode. In the event of the customer's failure to notify the Company of an increase in load, the Company reserves the right to refuse to provide unmetered service at the delivery point thereafter and adjust prior billing amounts accordingly to reflect the increases in load.

DUPLICATE CIRCUIT SERVICE:

When service is furnished to provide redundancy to the Company's main service as requested by the customer, a contract demand shall be established by mutual agreement and shall be specified in the service contract. Such installations shall be considered a Premium Installation and shall be a separate account from the customer's main service.

ELECTRIC SERVICE REGULATIONS:

The Company's Electric Service Regulations shall apply to the installation and use of electric service.

CONTRACT:

Electric service hereunder shall be furnished in accordance with a written contract, at the Company's discretion, which by its term shall be in full force and effect for a minimum period of one year and shall continue in force thereafter from year to year unless either party shall give to the other not less than 60 days notice in writing prior to the expiration date of any said yearly periods that the contract shall be terminated at the expiration date of said yearly period. When a contract is terminated in the manner provided herein, the service will be discontinued.

GENERAL SERVICE - SECONDARY (RATE "GS")

The Contract Demand shall be specified in the contract for electric service of customers establishing service after January 22, 2009 and of customers requiring or requesting a significant change in service. The Contract Demand shall be 60% of the customer's expected, typical monthly peak load. Customers with a Contract Demand on January 22, 2009 will remain at that existing Contract Demand level, until such time as they reestablish service or request or require a significant change in service. The Contract Demand shall be reevaluated based on actual usage upon customer request, no more than once per 12 month period.

If the customer's capacity or service requirements increase, the Company, at its sole and exclusive judgement, may at any time require the customer to enter into a new contract for electric service.

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Summary: Testimony Direct Testimony of Chris Harris electronically filed by Mr.
John W. Breig on behalf of Ohio Edison Company