

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Patricia A. Raymond,)	
)	
Complainant,)	
)	Case No. 21-0787-EL-CSS
v.)	
)	
Ohio Edison Company,)	
)	
Respondent.)	

**DIRECT TESTIMONY OF JOHN C. AHR ON BEHALF OF
OHIO EDISON COMPANY**

INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is John C. Ahr. I am employed by FirstEnergy Service Company which is a direct subsidiary of FirstEnergy Corporation (“FirstEnergy”), the parent company of Ohio Edison Company (“OE” or the “Company”) as an Advisor, Regulatory Compliance, in the Smart Meter program.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I am a graduate of The Pennsylvania State University with a Bachelor of Science Degree in Electrical Engineering. I have also earned a master’s degree in business administration from the University of Pittsburgh. I have worked for over thirty-seven years with subsidiaries of FirstEnergy or its predecessor companies. I began work in 1984 as a field engineer in the distribution planning area and held a number of management positions until I was promoted to Director of System Operations in 1999. Other positions I have held include Director of Energy Procurement; Director of Meter Reading and Collections; Senior Consultant; Manager, Customer Support; and Manager, Regulatory Compliance-Smart Meter. I have been employed in my current position since 2018.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. As Advisor, Regulatory Compliance-Smart Meter, I am responsible for regulatory compliance associated with all FirstEnergy smart meter projects, including all filings and resulting regulatory processes associated with plan implementation and approval. Within my role, I provide leadership, expert guidance, management, and subject matter expertise for the smart meter projects and coordinate smart meter developments among the

1 FirstEnergy operating companies. I also serve as the smart meter subject matter expert and
2 represent the smart meter projects and FirstEnergy's operating companies on regulatory
3 matters. I assist in preparing for regulatory proceedings regarding smart meters and manage
4 external consultants related to the smart meter project.

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

6 A. No, I have not. However, I have testified in over 60 hearings before the Pennsylvania
7 Public Utility Commission, the West Virginia Public Service Commission, and the
8 Maryland Public Service Commission.

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

10 A. My testimony addresses the electric service provided by Ohio Edison to 3790 Woodbury
11 Oval, Stow, Ohio 44224 (the "Property") by Wellington Energy Inc. ("Wellington") on
12 behalf of OE on February 23, 2021. Specifically, my testimony addresses the smart meter
13 installation and the alleged power surge described in Ms. Raymond's Complaint, and Ohio
14 Edison's investigation into the allegations of the Complaint.

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

17 A. I reviewed the Complaint submitted by Ms. Raymond, as well as business records related
18 to this case maintained and preserved within FirstEnergy's SAP System¹. I have personal
19 knowledge of FirstEnergy's and Ohio Edison's practices of acquiring and maintaining this
20 information. These records include customer contact notes, customer service records,
21 billing records, and repair records. All such information is recorded at or near the time the
22 information is acquired by a person with knowledge, or from information transmitted by a

¹ SAP is an enterprise solution that the Company utilizes for billing and customer management.

1 person with knowledge, and all such information is recorded and maintained in the course
2 of Ohio Edison's and FirstEnergy's regularly conducted business activity. It is the regular
3 practice of Ohio Edison and FirstEnergy to make and preserve these business records, and
4 I regularly rely upon such documents when investigating customer complaints in
5 accordance with my duties as an Advisor, Regulatory Compliance, in the Smart Meter
6 program. I also reviewed Ohio Edison's Commission-approved tariff, P.U.C.O. No. 11²
7 ("Tariff"), in particular, Section X "Customer's Wiring, Equipment and Special Services,"
8 and pleadings filed on the docket in this proceeding

9 **Q. WHAT IS YOUR UNDERSTANDING OF MS. RAYMOND'S COMPLAINT IN**
10 **THIS CASE?**

11 A. I understand that Ms. Raymond alleges that the installation of a smart meter at her Property
12 caused a power surge within the Property's electrical system, downstream of the meter,
13 which allegedly resulted in damage to certain appliances, including a refrigerator, an in-
14 home vacuum system, two televisions, the stove, the microwave, the thermostat, and the
15 furnace.

16 **Q. CAN YOU DESCRIBE THE BASIC PROCESS FOR INSTALLING A SMART**
17 **METER?**

18 A. Yes. As part of the Commission-approved modernization of Ohio's electric distribution
19 system, Ohio Edison began installing smart meters in customers' homes and businesses in
20 March 2020. Exchanging an existing meter with a smart meter takes only a few minutes.
21 Typically, the technician will come to the door and advise any occupants of the new meter

² Available at
<https://firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/Ohio/tariffs/OE-2020-Electric-Service.pdf>

1 installation. The technician will also advise the occupants that their electrical service may
2 be briefly interrupted. The technician will then proceed to the meter socket and complete
3 a visual inspection of the meter socket exterior and adjoining connections. The technician
4 will also check for signs of tampering, broken or missing meter seals, broken meter locks,
5 or other damage, and then remove the meter socket cover. With the meter socket cover
6 removed, the technician will visually inspect the meter socket interior for excessive
7 heating, damaged components, signs of diversion, etc. and inspect all connections for any
8 loose, strained, or heated wiring. The existing meter is then removed and the meter base
9 and meter socket jaws are examined for heating and mechanical damage. The new meter
10 is then installed and the meter socket cover is replaced and a new meter socket seal is
11 installed.

12 **Q. WHAT PROCEDURES ARE OHIO EDISON'S TECHNICIANS REQUIRED TO**
13 **FOLLOW TO INSTALL A SMART METER?**

14 A. Ohio Edison technicians are required to follow Ohio Edison's Meter Standards & Practices
15 Manual.

16 **Q. IF A TECHNICIAN DISCOVERED DAMAGE TO THE METER SOCKET OR**
17 **METER DURING INSTALLATION, WOULD THEY TYPICALLY MAKE NOTE**
18 **OF THAT DAMAGE?**

19 A. Yes.

20 **SMART METER INSTALLATION AT THE PROPERTY**

21 **Q. DID OHIO EDISON INSTALL A SMART METER AT MS. RAYMOND'S**
22 **PROPERTY?**

1 A. Yes. On February 23, 2021, a technician from Wellington arrived at the Property to install
2 a smart meter. Wellington is a contractor for the Company and has installed over 1.75
3 million smart meters for Ohio Edison's sister companies in Pennsylvania and over 401,000
4 smart meters in Ohio.

5 **Q. WHAT DO OHIO EDISON'S RECORDS INDICATE OCCURRED AT THE**
6 **PROPERTY ON FEBRUARY 23, 2021?**

7 A. Ohio Edison's records indicate that the Wellington technician completed the smart meter
8 installation without incident. After the smart meter installation, Ms. Raymond contacted
9 Wellington and indicated that her refrigerator was beeping. In response, a Wellington
10 foreman conducted a field investigation later that same day and confirmed there were no
11 signs of a power surge, overheating, arcing, or damaged components in the meter socket.

12 **Q. DID THE WELLINGTON FOREMAN ASSIST MS. RAYMOND WITH HER**
13 **ALLEGED APPLIANCE DAMAGE?**

14 A. Yes. The Wellington foreman and Ms. Raymond investigated the refrigerator beeping and
15 discovered that the refrigerator door had been left open for an extended period while Ms.
16 Raymond cleaned it. This caused the refrigerator to alarm, indicating that the temperature
17 was rising. After unplugging the refrigerator and plugging it back in, and with the door shut,
18 the alarm stopped. The Wellington foreman also inspected Ms. Raymond's in-home
19 vacuum system. He found that the vacuum was receiving power but that the switch was
20 working only sporadically.

21 **Q. CAN YOU BRIEFLY DESCRIBE WHAT A METER SOCKET IS?**

22 A. A meter socket is the housing through which Ohio Edison's electrical lines connect to the
23 home's electrical system. See **Exhibit JA-001** (exemplar socket without meter). The

1 socket also houses the actual meter, which allows Ohio Edison to monitor the amount of
2 electricity consumed at the home and provides a place for visual meter reads.

3 **NO INDICATION OF A POWER SURGE**

4 **Q. GENERALLY, WHAT IS A POWER SURGE?**

5 A. A power surge is a transient wave of current, voltage, or power in an electrical
6 circuit. Surges, or transients, are brief overvoltage spikes or disturbances on a power
7 waveform that can damage, degrade, or destroy electronic equipment within any home,
8 commercial building, industrial, or manufacturing facility. If not protected against, surges
9 can damage or shorten the life of electrical and electronic equipment.

10 **Q. DID THE WELLINGTON INVESTIGATOR FIND ANY INDICATION OF A**
11 **POWER SURGE AT MS. RAYMOND'S PROPERTY?**

12 A. No. The foreman looked for signs of arcing, burning, overheating, and other signs of a
13 power surge or similar electrical fault at the meter socket but found no such evidence. The
14 fact that Ms. Raymond's electric appliances and devices within the home had power after
15 the smart meter installation supports the conclusion that no power surge occurred from the
16 meter.

17 **Q. CAN THE INSTALLATION OF A SMART METER IMPACT THE HOME'S**
18 **ELECTRICAL SYSTEM OR APPLIANCES DOWNSTREAM OF THE METER?**

19 A. It is possible, but extremely rare, and any damage caused by a meter installation would
20 typically be observed at the time the meter is installed. No such observation was made at
21 the time of Ms. Raymond's installation. The smart meter installation process is routine
22 and should not result in any damage to customer-owned equipment downstream of the
23 meter.

1 **Q. CAN YOU EXPLAIN THE “LOUD CRACK AND LOUD NOISE” THAT**
2 **MS. RAYMOND ALLEGES SHE HEARD DURING THE SMART METER**
3 **INSTALLATION?**

4 A. I was not there and cannot know for certain. But when the technician installs a new meter,
5 the force of the meter contacting and sitting into the socket jaws could possibly cause a
6 loud sound that may be described as a popping sound. If the sound was coming from an
7 appliance, I would first check the appliance for signs of electrical damage. There is no
8 indication of any electrical damage to any of Ms. Raymond’s appliances in OE’s records.

9 **Q. WHAT DOES A POWER SURGE SOUND LIKE?**

10 A. A power surge is not necessarily heard but can be associated with a buzzing or crackling
11 sound.

12 **Q. IS IT LIKELY THAT MS. RAYMOND’S PROPERTY EXPERIENCED A POWER**
13 **SURGE?**

14 A. No. It is possible but not likely. It is far more likely that the wiring downstream of the
15 meter and within the Property caused any alleged problem. According to a study by the
16 Electric Power Research Institute, as many as 80% of all power disturbances originate
17 inside the home or business. While lightning, ice storms, high winds, trees falling on power
18 lines, car-pole crashes, normal electric circuit operations—even birds and squirrels—cause
19 their share of power disruptions, most disturbances are caused by the day-to-day operation
20 of ordinary household equipment and appliances. Among the biggest culprits are electrical
21 devices with motors or compressors that cycle on and off throughout the day. These include
22 heating and air conditioning systems, refrigerators, washing machines, pumps, fans and the
23 like. Household appliances like vacuum cleaners and blenders, and power tools like saws,

sanders, and drills are another common cause of electrical disturbances.³ Moreover, the condition of the wiring of Ms. Raymond's home could be another contributing factor.

Q. DID OHIO EDISON INVESTIGATE THE ELECTRICAL SYSTEM WITHIN THE PROPERTY FOR EVIDENCE OF A POWER SURGE?

A. Other than briefly assisting Ms. Raymond with her refrigerator alarm and vacuum, no. Ohio Edison's investigations are limited to Ohio Edison-owned electric facilities. Customers are responsible for identifying, repairing, and replacing their own defective equipment, as well as deficiencies in their internal electrical facilities, such as wiring and connections. Ohio Edison does not take responsibility for investigation, repairs, or maintenance of wiring, appliances, or other equipment in a customer's property downstream of the Ohio Edison meter.

OHIO EDISON'S CLAIM PROCESS

Q. DID MS. RAYMOND INITIATE A CLAIM WITH OHIO EDISON?

A. Yes. After Wellington denied Ms. Raymond's claim on March 5, 2021, Ms. Raymond informed Ohio Edison of her claim on or about March 8, 2021. Ms. Raymond called Ohio Edison and informed the claim representative that her appliances were damaged following the smart meter installation.

Q. DID OHIO EDISON RESPOND TO MS. RAYMOND'S CLAIM?

A. Yes. Records indicate that after Ohio Edison concluded its investigation into Ms. Raymond's claim, a claim representative contacted Ms. Raymond on March 16, 2021 and denied the claim.

³ See FirstEnergy, "Troubleshooting Electrical Problems," available at <https://firstenergycorp.com/help/safety/using-electricity/electrical-problems.html>

1 **Q. DID MS. RAYMOND CONTACT OHIO EDISON AGAIN AFTER MARCH 8,**
2 **2021?**

3 A. Yes. Ms. Raymond filed an informal complaint with the PUCO on March 9, 2021,
4 reporting that, following the installation of the smart meter, she heard a loud crack, her
5 kitchen appliances were “going crazy,” and a “surge” caused damage to her thermostat,
6 two televisions, and her vacuum. OE replied that Wellington denied Ms. Raymond’s claim
7 as the voltage was normal and there were no signs of arcing or overheating that would
8 indicate a surge. *See Exhibit JA-002* (informal complaint).

9 **Q. DID OHIO EDISON INVESTIGATE THIS INFORMAL COMPLAINT?**

10 A. Yes, Ohio Edison investigated this Complaint by reviewing the same records that I have
11 reviewed in preparing for my testimony in this proceeding.

12 **Q. DID MS. RAYMOND CONTACT OHIO EDISON AGAIN?**

13 A. Not directly. Ms. Raymond filed her formal Complaint with the Commission on July 8,
14 2021.

15 **CONCLUSIONS**

16 **Q. IN YOUR OPINION, DID THE SMART METER INSTALLATION CAUSE A**
17 **POWER SURGE AT THE PROPERTY?**

18 A. No. Ohio Edison, through its contractors, did not discover any physical evidence
19 suggesting that the Property’s meter caused or experienced any power surge or other
20 electrical fault.

21 **Q. IN YOUR OPINION, DID WELLINGTON ACT REASONABLY IN RESPONDING**
22 **TO MS. RAYMOND’S CLAIM?**

1 A. Yes. Wellington responded to Complainant's claim the same day it was made and inspected
2 the meter and meter socket. The Wellington foreman found no evidence of a power surge,
3 or any overheating or arcing.

4 **Q. IN YOUR OPINION, DID OHIO EDISON ACT REASONABLY IN RESPONDING**
5 **TO MS. RAYMOND'S CLAIM?**

6 A. Yes. Ohio Edison, through its contractors, responded to Complainant's claim promptly and
7 investigated the matter.

8 **Q. IN YOUR OPINION, IF A POWER SURGE DID OCCUR ON FEBRUARY 23, 2021,**
9 **DID OHIO EDISON HAVE ANY CONTROL OVER THE CAUSE OF THE**
10 **SURGE?**

11 A. No. If Complainant's Property experienced a power surge during the meter installation it
12 was most likely caused by stray arcing or other electrical faults within the customer-owned
13 electrical system downstream of the meter.

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

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



From: PUCO Consumer Call Center <contactthepuco@puc.state.oh.us>

Sent: Tuesday, March 9, 2021 3:49 PM

To: Ohio Commission <ohcommission@firstenergycorp.com>

Subject: [EXTERNAL] PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00671132 PATRICIA A RAYMOND / 110008895143 [ref:_00Dt0GzXt._500t0iSFMf:ref]



**Initial Submission of a Consumer Complaint
Please Respond Within 10 Business Days**

CASE ID: 00671132

CUSTOMER: Patricia Raymond

ADDRESS: 3790 Woodbury Oval, Stow, Ohio 44224

SERVICE ADDRESS: 3790 Woodbury Oval, Stow, Ohio 44224

AIQ: Ohio Edison Company

SERVICE ACCOUNT NUMBER:

ALTERNATIVE PHONE NUMBER:

NIQ: (330) 688-0947

To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!

DESCRIPTION OF ISSUE:

The customer reached out to the PUCO regarding a damage claim and states that she reached out to Ohio Edison. The customer is stating her meter was changed on 2/23/2021 by Wellington, she was told by a tech named Joe that the electric would be out for 15 seconds.

She's stating she heard a loud "crack" and her kitchen appliances were going crazy. She states when she called OE that another tech came and checked the meter and the meter was fine but this 2nd tech noticed her refrigerator was going "crazy" and was told to unplug it. This surge blew her thermostat, 2 televisions and a vacuum.

Wellington denied her claim and said there was no power surge.

She also stated that she filed a claim with OE and was told they're working on the claim on OE's end.

Please provide:

1. What you have on file as far as the damage claim?
2. When was the claim filed?
3. When do you anticipate having an answer to the claim?
4. When was the claim filed?
5. What do your records show happened on 2/23/21?

Please provide any other information that would be helpful.

Sincerely,

Jermeki Knox

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Customer Service Investigator
(800) 686-PUCO (7826)
www.PUCO.ohio.gov

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

ref:_00Dt0GzXt._500t0iSFMf:ref

From: Cottrill, Marilyn F **On Behalf Of** Ohio Commission
Sent: Thursday, March 11, 2021 12:11 PM
To: PUCO Consumer Call Center <contactthepuco@puc.state.oh.us>
Subject: RE: [EXTERNAL] PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00671132 PATRICIA A RAYMOND / 110008895143 [ref:_00Dt0GzXt._500t0iSFMf:ref]

Good Afternoon,

What you have on file as far as the damage claim?

The customer filed a claim for “surge” type damages from a Wellington smart meter exchange.

When was the claim filed?

03/09/21 - The claim was filed

When do you anticipate having an answer to the claim?

03/09/21 - The customer was advised that Wellington had denied their claim. As a courtesy, we reached out to Wellington to gather details to understand their investigation and help the customer understand Wellington’s position of a denial.

What do your records show happened on 2/23/21?

02/23/21 - A Wellington Foreman performed a meter socket investigation. Voltage was normal, there were no signs of arcing or overheating that would indicate a surge. The meter install was deemed routine and did not involve negligence.



Marilyn Cottrill

Cust Svcs Compl Spec

office: 681-753-5528 (333-5528)

mcottri@firstenergycorp.com

5001 Nasa Boulevard, Fairmont, WV 26554 | mailstop: WV-MP / Fairmont-MonPower-Transmission

From: Jermeki Knox <jermeki.knox@puco.ohio.gov>

Sent: Monday, March 15, 2021 3:50 PM

To: Ohio Commission <ohcommission@firstenergycorp.com>

Subject: RE: [EXTERNAL] PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00671132 PATRICIA A RAYMOND / 110008895143 [ref: _00Dt0GzXt._500t0iSFMf:ref]

Good Afternoon,

1. Could you please advise if the customer filed a damage claim with Ohio Edison and if so when was it filed?
2. If a claim was filed with Ohio Edison, when was it filed and when do you anticipate having an answer?
3. Has Ohio Edison verified the accuracy of the outcome of Wellington’s claim?
4. When the technician went back out to check the meter, was it a tech from Wellington or Ohio Edison?

Thank you,
Jermeki

From: Cottrill, Marilyn F **On Behalf Of** Ohio Commission
Sent: Wednesday, March 17, 2021 1:38 PM
To: Jermeki Knox <jermeki.knox@puco.ohio.gov>
Subject: RE: [EXTERNAL] PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00671132 PATRICIA A RAYMOND / 110008895143 [ref: _00Dt0GzXt._500t0iSFMf:ref]

Good Afternoon,

Could you please advise if the customer filed a damage claim with Ohio Edison and if so when was it filed? If a claim was filed with Ohio Edison, when was it filed and when do you anticipate having an answer? **Yes, they filed a claim on 03/9/21. We anticipate a conclusion by the end of the week.**

Has Ohio Edison verified the accuracy of the outcome of Wellington's claim? **Yes, Wellington provided their investigation details for our review. We internally reviewed and verified their outcome.**

When the technician went back out to check the meter, was it a tech from Wellington or Ohio Edison? **Wellington.**



Marilyn Cottrill

Cust Svcs Compl Spec

office: 681-753-5528 (333-5528)

mcottri@firstenergycorp.com

5001 Nasa Boulevard, Fairmont, WV 26554 | mailstop: WV-MP / Fairmont-MonPower-Transmission

From: Cottrill, Marilyn F **On Behalf Of** Ohio Commission
Sent: Friday, March 19, 2021 2:11 PM
To: PUCO Consumer Call Center <contactthepuco@puc.state.oh.us>
Subject: RE: [EXTERNAL] RE: PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00671132 [ref: _00Dt0GzXt._500t0iSFMf:ref]

Good Afternoon,

03/16/21 – A company Claims Representative spoke to the customer and verbally denied the claim.



Marilyn Cottrill

Cust Svcs Compl Spec

office: 681-753-5528 (333-5528)

mcottri@firstenergycorp.com

5001 Nasa Boulevard, Fairmont, WV 26554 | mailstop: WV-MP / Fairmont-MonPower-Transmission

CERTIFICATE OF SERVICE

On April 7, 2022, 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 to the Complainant at the following address:

Patricia A. Raymond
3790 Woodbury Oval
Stow, OH 44224

A copy has also been sent by email to the following:

jetack@aol.com

/s/ Christopher A. Rogers
Attorney for Ohio Edison Company

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

4/7/2022 10:02:24 AM

in

Case No(s). 21-0787-EL-CSS

Summary: Testimony DIRECT TESTIMONY OF JOHN C. AHR ON BEHALF OF
OHIO EDISON COMPANY electronically filed by Mr. Christopher Rogers on behalf
of Ohio Edison Company