

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE COMPLAINT)
OF RAYMOND A. COLLINS,)
)
Complainant,)
)
v.)
)
THE TOLEDO EDISON COMPANY,)
)
Respondent.)
)**

Case No. 21-0473-EL-CSS

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

PUBLIC VERSION

1 **INTRODUCTION**

2 **Q. PLEASE INTRODUCE YOURSELF.**

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

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

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

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

19 A. As Advisor, Regulatory Compliance-Smart Meter, I am responsible for regulatory
20 compliance associated with all FirstEnergy smart meter programs, including filings, and
21 resulting regulatory processes associated with plan implementation and approval. Within
22 my role, I provide leadership, expert guidance, management, and subject matter expertise
23 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 regulator
3 matters. I also assist in preparing for regulatory proceedings regarding smart meters and
4 manage external consultants related to the smart meter project.

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

6 A. Yes, I have testified one time before the Public Utilities Commission of Ohio. I also have
7 testified in over 60 hearings before the Pennsylvania Public Utility Commission, the West
8 Virginia Public Service Commission, and the Maryland Public Service Commission.

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

10 A. My testimony addresses the Complaint pertaining to the electric service provided by
11 Toledo Edison to Raymond Collins ("Mr. Collins" or the "Customer") at 207 S. Reynolds
12 Road, Apt 40, Toledo, Ohio 43615 (the "Property"). Specifically, my testimony addresses
13 the circumstances surrounding the smart meter installation at the Property and Mr. Collins'
14 allegations related to the new smart meter.

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

17 A. I reviewed the Complaint submitted by Mr. Collins, as well as business records related to
18 this case maintained and preserved within FirstEnergy's SAP System.¹ I have personal
19 knowledge of FirstEnergy's and Toledo Edison's practices of acquiring and maintaining
20 this information. These records, all of which were kept in the course of regularly conducted
21 business activity, include customer contact notes, customer service records, and account
22 summary. It is the regular practice of FirstEnergy and Toledo Edison to make and preserve

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

these business records, and I regularly rely upon such records when investigating customer complaints in accordance with my duties as Advisor, Regulatory Compliance.

RAYMOND COLLINS COMPLAINT

Q. WHAT IS YOUR UNDERSTANDING OF MR. COLLINS COMPLAINT IN THIS CASE?

A. I understand that Mr. Collins alleges that after the installation of a smart meter at his Property, his electric utility bill was higher than his normal usage prior to the installation of the new smart meter. It is also my understanding that Mr. Collins alleges that a smart meter does not provide a digital Load Emulator, like that of the spinning dial of an analog meter, for a customer to see how fast the customer is consuming electricity within the home.

Q. DID TOLEDO EDISON INSTALL A SMART METER AT MR. COLLINS' PROPERTY?

A. Yes. As part of the Commission-approved modernization of Ohio's electric distribution system, Toledo Edison began installing smart meters in customers' homes and business in March 2020. Toledo Edison installed a smart meter at Mr. Collins' Property on February 5, 2021.

Q. WAS THE NEW SMART METER TESTED PRIOR TO BEING INSTALLED ON MR. COLLINS' PROPERTY?

A. Yes. The smart meter was tested by the manufacturer on December 30, 2020, prior to installation, and it tested at 100% percent accuracy.

Q. DID MR. COLLINS CONTACT TOLEDO EDISON AFTER THE SMART METER INSTALLATION?

1 A. Yes. Mr. Collins contacted Toledo Edison on March 2, 2021, regarding his most recent
2 electric utility bill and informed Toledo Edison that he believed the bill was too high.

3 **Q. MR. COLLINS CLAIMS THAT HIS TOLEDO EDISON BILL FROM FEBRUARY**
4 **25, 2021, SHOWS A HIGHER CONSUMPTION THAN NORMAL AND IS**
5 **BECAUSE OF THE INSTALLATION OF THE SMART METER, HOW DO YOU**
6 **RESPOND?**

7 A. The meter that was removed/exchanged from the Property was replaced with a smart meter
8 on February 5, 2021. The smart meter reading reflected in the Toledo Edison bill dated
9 February 25, 2021, shows that Mr. Collins consumed [REDACTED] kilowatt hours (“kWh), for the
10 usage registered on both the old meter and the smart meter from January 24, 2021 to
11 February 23, 2021. While Mr. Collins may allege this is a high amount of consumption for
12 the same period in 2020, it is lower than Mr. Collins’ consumption from December 23,
13 2019 to January 23, 2020, which was [REDACTED] kWh.

14 **Q. MR. COLLINS CLAIMS HE COULD NOT POSSIBLY HAVE USED THE**
15 **AMOUNT OF ELECTRICITY REGISTERED ON THE SMART METER FROM**
16 **FEBRUARY 5, 2021 TO FEBRUARY 23, 2021, HOW DO YOU RESPOND?**

17 A. I believe that it is not only possible that he used the registered amount, but that it is certain.
18 First, I recognize that Mr. Collins may not fully understand the reasons his load increased
19 during that time; however, his high consumption occurred during a period in the winter
20 that according to the information provided to Mr. Collins on his February 25, 2021 bill,
21 was over 10 degrees colder than the daily average for the same time period last year. As
22 stated on the February 25, 2021 bill, the average daily temperature at that time in 2020 was

1 32 degrees, whereas the average daily temperature during the same time period in 2021
2 was 21 degrees.

3 Second, given the lack of high consumption months after the complained period, it
4 is clear the new meter registered accurately during the time period of which Mr. Collins
5 complains. Meters do not temporally fail for a month and then revert to normal. When they
6 fail—which is relatively rare—they stay in that condition. If Mr. Collins’ meter was
7 malfunctioning as he claims it was in February 2021, it would not have reverted to normal
8 function after. Looking at Mr. Collins’ usage after time period of which he complains, the
9 usage was consistent with his end of winter and beginning of spring usage. For example,
10 for the two months of billing after the time period he complaint of, Mr. Collins’ usage was
11 ■ kWh of usage and ■ kWh of usage.

12 Finally, an electric meter only measures and records usage on the “load” or
13 customer side of the meter. A meter that is not connected to any load will not register any
14 kWh usage. The “line” or Company side of the meter provides the power for the meter to
15 operate.

16 SMART METER DISPLAY

17 **Q. MR. COLLINS ALSO CLAIMS THAT THAT A SMART METER DOES NOT**
18 **PROVIDE A LOAD EMULATOR, LIKE THAT OF THE SPINNING DIAL OF AN**
19 **ANALOG METER, FOR A CUSTOMER TO SEE HOW FAST THE CUSTOMER**
20 **IS CONSUMING ELECTRICITY WITHIN THE HOME, HOW DO YOU**
21 **RESPOND?**

22 **A.** Mr. Collins’ belief is incorrect. A customer can continue to read the digital display on their
23 smart meter today the same as if they had a legacy meter with a digital display or an analog

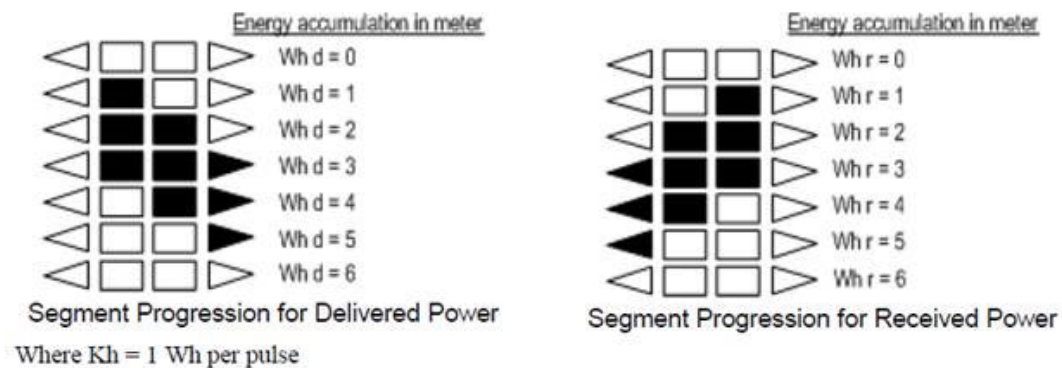
meter with dials. The digital display on the smart meter includes a Load Emulator, which displays a series of progressing indicators to emulate the spinning dial of an analog meter. A customer can see the Load Emulator in the bottom left corner of the digital display. For each watt-hour of usage delivered to (or received from) the meter, the display advances one segment. After 1,000 Wh of usage, one kWh is added to the 6-digit total shown on the display. The faster the Load Emulator is advancing through the sequence, the faster the customer is consuming electricity within the home.

Below is an image showing the Load Emulator and the sequence for delivered or received power.



OpenWay CENTRON Meter Load Indicators

The watt disk emulator can represent the delivered or received power as follows:



CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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

**This foregoing document was electronically filed with the Public Utilities
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5/19/2022 1:57:24 PM

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Summary: Testimony Direct Testimony of John C. Ahr (PUBLIC VERSION)
electronically filed by Mr. John W. Breig on behalf of The Toledo Edison Company