

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Boyce Parker,)	
)	
Complainant,)	
)	CASE NO. 21-0025-EL-CSS
vs.)	
)	
The Cleveland Electric Illuminating)	
Company,)	
)	
Respondent.)	

**DIRECT TESTIMONY OF PRINCESS DAVIS ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**

PUBLIC VERSION

1 **INTRODUCTION**

2 **Q. PLEASE INTRODUCE YOURSELF.**

3 A. My name is Princess Davis. I am employed by FirstEnergy Service Company as an
4 Advanced Business Analyst Regulator and Compliance. FirstEnergy Service Company
5 provides corporate support, including customer service, to FirstEnergy Corp.'s regulated
6 public utility subsidiaries. In Ohio, those subsidiaries are Ohio Edison Company, The
7 Cleveland Electric Illuminating Company ("CEI" or "Company"), and The Toledo Edison
8 Company.

9 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK**
10 **EXPERIENCE.**

11 A. I received a Bachelor of Science, Criminal Justice degree from Fairmont State University
12 in December 1999, majoring in criminal justice with a minor in psychology. I have worked
13 at either FirstEnergy Service Company or Allegheny Power Company in a customer
14 service capacity for the last 22 years. Beginning in 2010, I was a Business Analyst for
15 Allegheny Power Company. After the merger, I continued in my role for FirstEnergy
16 Service Company, but the job title was changed to Customer Services Compliance
17 Specialist. In May 2021, I was promoted to Advanced Customer Services Compliance
18 Specialist. In September 2022, I started in my current position as an Advanced Business
19 Analyst Regulatory and Compliance.

20 **Q. WHAT ARE YOUR JOB RESPONSIBILITIES?**

21 A. My job responsibilities include reviewing and responding to complaints made by
22 customers of FirstEnergy Corp.'s regulated public utility subsidiaries to the Public Utilities
23 Commission of Ohio ("Commission") which includes investigating facts and gathering

1 information from subject matter experts. I also have responsibility for reviewing and
2 responding to customer complaints in Maryland and West Virginia. Among other customer
3 service-related duties, I also provide training to new hires and to my peers within
4 FirstEnergy Service Company regarding various state compliance requirements.

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

6 A. Yes, I have testified multiple times before the Commission, including Case No. 18-0082-
7 EL-CSS on behalf of The Toledo Edison Company; Case Nos. 17-2121-EL-CSS, 18-0785-
8 EL-CSS, 19-1594-EL-CSS, 20-1355-EL-CSS, 21-1017-EL-CSS, 21-0824-EL-CSS, 21-
9 0864-EL-CSS, 22-0193-EL-CSS, and 22-0247-EL-CSS, on behalf of CEI; and Case Nos.
10 18-1734-EL-CSS, 21-0236-EL-CSS, 21-225-EL-CSS, and 22-0247-EL-CSS on behalf of
11 Ohio Edison Company.

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

13 A. My testimony addresses the allegations raised in the Complaint pertaining to billing for
14 electric service at 9505 St. Catherine Avenue, Cleveland, OH 44104. Specifically, I will
15 address Mr. Parker's allegations that CEI improperly calculated his energy usage.

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

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

HISTORY OF BOYCE PARKER'S ACCOUNT

Q. WHAT IS YOUR UNDERSTANDING OF MR. PARKER'S COMPLAINT IN THIS CASE?

A. From my review of CEI's records and the filings in this matter, I understand Mr. Parker's Complaint is that CEI was allegedly incorrectly calculating his electrical usage, resulting in errors in how much he was being charged.

Q. HOW DOES CEI DETERMINE THE AMOUNT OF ELECTRICITY USED?

A. Each service account has a meter, which could be analog (with dials instead of digital numbers), digital, or a smart meter. Regardless of the type, these meters record the net usage over the life of the meter. To determine each month's bill, CEI reads the meter and subtracts the current reading from the previous month's reading. This results in the usage amount for that month.

Q. DOES CEI ESTIMATE BILL READINGS?

A. If a customer does not have a smart meter, CEI will, on occasion, estimate the read to determine that month's usage.

Q. HOW DOES THE ESTIMATED BILL READINGS WORK?

A. When CEI is unable to obtain an actual read of the meter, CEI will generally use an algorithm to estimate that month's usage based, in part, on historical usage data. The meter will still record the actual usage, so when an actual read is obtained, this will reconcile the estimated reads. On each bill, CEI provides a customer the ability to provide their own read of the meter.

Q. DID CEI PROVIDE ESTIMATES ON MR. PARKER'S BILLS?

1 A. On occasion, yes. Based on my review of CEI records, Mr. Parker's bills were estimated
2 for May, June, and August 2020 bills.

3 **Q. WHY DID CEI ESTIMATE SOME OF MR. PARKER'S BILLS?**

4 A. The meter located at Mr. Parker's premises at the time was a digital display meter with
5 Encoder Receiver Transmitters (ERT) technology. This allowed for Mr. Parker's meter to
6 communicate with a hand-held receiver carried by CEI meter readers and register the
7 reading remotely from a short distance away. During May, June, and August 2020 Mr.
8 Parker's meter failed to register the reading remotely on the hand-held device.

9 **Q. WHAT DID CEI DO AFTER MR. PARKER'S METER FAILED TO REGISTER**
10 **READINGS?**

11 A. CEI removed and replaced Mr. Parker's meter with a new meter on or about October 15,
12 2020.

13 **Q. HOW DID CEI'S REMOVAL AND REPLACEMENT OF MR. PARKER'S METER**
14 **IMPACT HIS NEXT UTILITY BILL?**

15 A. As a result of Mr. Parker's meter being removed and replaced in the middle of the billing
16 cycle, Mr. Parker's CEI bill dated November 11, 2020, includes his usage from both the
17 old meter and the new meter, both of which were based on actual meter readings. For
18 example, On October 10, 2020 (the first day of the billing period) Mr. Parker's meter
19 registered an actual reading of [REDACTED] kWh. Prior to the meter's removal and replacement,
20 the meter was read a few days later on October 14, 2020, and registered a reading of [REDACTED]
21 kWh. The new meter that was installed on October 15, 2020, started at a reading of [REDACTED]
22 and when an actual reading was obtained on November 10, 2020, the meter registered a

1 reading of [REDACTED] kWh. This resulted in Mr. Parker being billed for [REDACTED] kWh used during the
2 billing period.

3 **Q. MR. PARKER ARGUES IN HIS COMPLAINT THAT HE IS BEING BILLED FOR**
4 **MORE ELECTRIC THAN HE IS USING BECAUSE HE SAYS HIS BILLS**
5 **INCLUDE HIGHER READINGS THAN HIS METER REGISTERED. IS THIS**
6 **ACCURATE?**

7 A. No. In reviewing Mr. Parker's Complaint, it appears that he is confusing the kWh billed
8 amount and the kWh readings that are included on the bill. For example, on his November
9 11, 2020 bill, it shows that he was billed for [REDACTED] kWh used. As previously discussed, this
10 was a combination of the old meter and new meter's actual readings. Mr. Parker then
11 appears to confuse the usage history and kWh reading on his December 14, 2020 bill. The
12 December bill accurately reflects that his usage history for November was [REDACTED] kWh. The
13 December 14, 2020 bill then reflects a start of billing period actual reading of [REDACTED] kWh on
14 November 11, 2020 and an end of billing period actual reading of [REDACTED] kWh on December
15 10, 2020. This resulted in Mr. Parker being accurately billed for [REDACTED] kWh used.

16 **Q. DID CEI TEST COMPLAINANT'S METER AT ANY TIME?**

17 A. Yes.

18 **Q. CAN YOU BRIEFLY DESCRIBE THE CIRCUMSTANCES OF THE METER**
19 **TEST?**

20 A. As I noted previously, because Mr. Parker's meter failed to register readings remotely on
21 the hand-held device carried by CEI meter readers, CEI removed and replaced Mr. Parker's
22 meter on or about October 15, 2020.

1 The old meter was sent to the Meter Lab for testing in March 2021. The Meter Lab
2 conducted the standard tests on the meter, which measured well within the accuracy
3 thresholds established by the Commission. In fact, the meter registered an average
4 accuracy of 99.98 percent.

5 **Q. PLEASE DESCRIBE THE PROCESS OF METER TESTING?**

6 A. When a meter arrives for testing at the Company's Meter Lab, it is marked and logged for
7 identification purposes. The basic meter function measures a well-known relationship of
8 current and voltage commonly referred to as "load" which is reflected as kilowatts over
9 time ("kilowatt hours" or "kWh"). As installed in the field, the meter measures the kWh
10 being drawn from the Company's service line through the meter and into the premise by
11 the electricity-using devices such as electronics, lights, fans, and motors. The testing
12 consists of putting a known voltage and amperage through the customer's meter and
13 comparing the measured result with a meter standard with known test results. The result
14 can be expressed as a percentage of measured load to known load. In this case, the meter
15 in question tested at 99.98% accurate. The tolerance allowed by Commission Rules is plus
16 or minus 2.0% of 100%. So Mr. Parker's meter was operating within the Commission's
17 parameters.

18 **Q. IS THE METER LAB EVER INSPECTED BY THIRD PARTIES?**

19 A. Yes. The Public Utilities Commission of Ohio inspects the Meter Lab on an annual basis
20 to ensure that CEI's Meter Lab is compliant with the Commission's Rules.

21 **Q. IN YOUR OPINION, IS IT POSSIBLE THAT THE COMPLAINANT'S METER**
22 **REGISTERED MORE ELECTRICITY THAN THE CUSTOMER ACTUALLY**
23 **USED DURING THE MONTHS IN QUESTION?**

1 A. No, it is not. First, testing at the Meter Lab showed the meter to be operating within the
2 Commission's tolerance levels. The Meter Lab's tests use the same delivery-side electrical
3 connections and measurement relationships as in the field, and, of course, the internal
4 workings of the meter itself are the same. In other words, there is no difference in result
5 between testing in the field and testing in the lab. That is why our Meter Lab can verify
6 meter accuracy as required by law. I would again note that the Commission Staff inspects
7 our Meter Lab annually for compliance.

8 Second, given the satisfactory test results, it is clear the meter registered accurately
9 until its removal in October 2020. Meters do not temporarily "go haywire" for a few
10 months and then revert to normal. When meters break—which is relatively rare—they stay
11 broken. If Mr. Parker's meter was malfunctioning as he claims it was, it would not have
12 tested 99.98% accurate at the Meter Lab.

13 Third, the Company cannot "push" electricity through a meter—it can only be
14 drawn through or "pulled" by electric-consuming devices on the customer's side of the
15 meter. For example, a new meter installed at a planned construction site will continue to
16 register zero kWh until the first wire is connected on the customer's side. After that, the
17 amount of kWh flowing through the meter is exclusively determined by the customer's
18 load. Electricity, is somewhat like pushing on a rope, doesn't go anywhere until it is pulled.

19 Fourth, it appears that Mr. Parker is misreading his bill and not understanding that
20 the kWh used, and the actual meter readings are not the same number. To determine each
21 month's bill, CEI reads the meter and subtracts the current reading from the previous
22 month's reading. This results in the usage amount for that month.

1 **Q. BASED ON THE INFORMATION REVIEWED, WAS MR. PARKER'S METER**
2 **PROPERLY CALCULATING HIS USAGE?**

3 A. Yes. I have seen no evidence that would suggest that Mr. Parker's meter was not
4 functioning within the parameters required by the Commission.

5 **Q. IS MR. PARKER ENTITLED TO ANY REFUND?**

6 A. No. Mr. Parker's meter was performing properly and recorded the actual amount of
7 electricity that his property used. CEI calculated his bills based on the amount of electricity
8 he used.

9 **Q. CAN THE ENERGY USAGE FROM A SINGLE DAY DEMONSTRATE THAT A**
10 **METER INCORRECTLY CALCULATED USAGE FOR ANY GIVEN MONTH?**

11 A. No. Many factors go into the determining how much energy a house uses in a given month.
12 For example, a few exceptionally cold days in a month could cause a heat pump to work
13 more than usual, which would increase usage. Similarly, leaving the house or turning off
14 various appliances could decrease usage for a single day. Therefore, simply comparing
15 kWh usage for a single day does not accurately reflect what a household's monthly kWh
16 usage would be.

17 **Q. MR. PARKER ALLEGES HE COULD NOT POSSIBLY HAVE USED THE**
18 **AMOUNT OF ELECTRICITY REGISTERED ON THE METER. HOW DO YOU**
19 **RESPOND?**

20 A. I believe that it is not only possible that he used the registered amount, but that it is certain.
21 I recognize that Mr. Parker may not fully understand the amount of electricity normal
22 household appliances use on a daily basis, but the consistency between his previous meter
23 and his new meter makes it a practical certainty that both meters are registering normally.

1 **Q. DID CEI VIOLATE COMMISSION RULES?**

2 A. No.

3 **Q. DID CEI COMPLY WITH ITS TARIFF?**

4 A. Yes.

5 Q. WERE MR. PARKER'S METERS WORKING PROPERLY?

6 A. To a reasonable degree of professional certainty, yes.

7 CONCLUSION

8 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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

CERTIFICATE OF SERVICE

On November 10, 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. Certified Mail on this 10th day of November 2022 to the Complainant at the following address:

Mr. Boyce Parker
9505 St. Catherine Avenue
Cleveland, OH 44104

/s/ John W. Breig, Jr.
Attorney for Respondent

**This foregoing document was electronically filed with the Public Utilities
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Case No(s). 21-0025-EL-CSS

Summary: Testimony Direct Testimony of Princess Davis (Public Version)
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