

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ALAN JONES

Complainant,

v.

**THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,**

Respondent.

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Case No. 22-0016-EL-CSS

**DIRECT TESTIMONY OF ROBERT PERKINS ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**

INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Robert Perkins. I am employed by The Cleveland Electric Illuminating Company (“CEI” or the “Company”) as Manager of Meter Reading. Meter Reading is the department responsible for obtaining monthly meter reads to ensure accurate electricity consumption for customer billing.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND WORK EXPERIENCE.

A. I have worked at FirstEnergy companies for 32 years. I have been the Manager of Meter Reading at CEI since February 2022, and I was previously the Manager of Meter Services at CEI from 2006 to February 2022. Prior to that, for approximately seven years I supervised some of Ohio Edison’s field meter services personnel, including those who installed meters, performed off-cycle meter reads, and investigated customer complaints regarding, among other things, unexplained high bills, and allegedly inaccurate meters. Before that, I worked as a metering instructor for FirstEnergy Service Company for one year, instructing technical courses on metering to our metering personnel and other employees. I also taught courses on the basics of electricity to other office personnel. For the first six years of my employment with FirstEnergy, I worked as a technician in Ohio Edison’s meter testing laboratory, where I calibrated the testing equipment to ensure its proper function when meters were tested. Previous to my work experience at FirstEnergy, I was self-employed as an electrical contractor and currently hold and maintain an Ohio Electrical Contractor License. I also have a four-year degree from The University of Akron in Electronic Technology.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

1 A. My job responsibilities include management and oversight of all activities that fall within
2 the responsibility of meter reading at CEI.

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

4 A. Yes, I testified in *Disiena v. CEI*, Case No. 09-947-EL-CSS; *Moore v. CEI*, Case No. 17-
5 1563-EL-CSS; *Kenderes v. CEI*, Case No. 18-922-EL-CSS; and *Patek v. CEI*, Case No.
6 21-0549-EL-CSS. I also filed pre-filed Direct Testimony in *DiFiori v. CEI*, Case No. 18-
7 1608-EL-CSS.

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

9 A. My testimony addresses the Complaint pertaining to the electric service provided by CEI
10 to Alan Jones at 2636 Hampshire Road, Cleveland, Ohio (the “Property”). Specifically,
11 my testimony addresses the circumstances surrounding the investigation into a mix
12 metering occurrence that took place at the duplex owned by Alan Jones and other issues
13 related to Complainant’s high-bill complaint.

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

16 A. I have reviewed the Complaint submitted by Mr. Jones, as well as business records related
17 to this case maintained and preserved within FirstEnergy’s SAP System. These records,
18 all of which were kept in the course of regularly conducted business activity, include
19 customer contact notes, account summary, and claim documents, and CEI’s Commission-
20 approved tariff. It is the regular practice of FirstEnergy and CEI to make and preserve
21 these business records, and I rely upon such documents in accordance with my duties at
22 CEI.

ALAN JONES' COMPLAINT

Q. YOU MENTIONED THAT YOU REVIEWED THE COMPLAINT IN THIS MATTER. WHAT IS YOUR UNDERSTANDING OF MR. JONES' COMPLAINT?

A. From my review of CEI's records and the filings in this matter, I understand Mr. Jones' Complaint is chiefly that he believes that for an unspecific period of time, the two meters located at the duplex rental property he owns (2634 and 2636 Hampshire Road) were mixed and registering usage to the wrong portion of the duplex. He believes this alleged error led to errors in how much he was charged during periods he had the unoccupied portion of the duplex in his name.

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. 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. ACCORDING TO CEI'S RECORDS, HOW MANY METERS ARE USED AT THE DUPLEX PROPERTY MR. JONES OWNS?

A. Two. There is one meter associated with 2634 Hampshire Road and there is another meter associated with 2636 Hampshire Road.

Q. DOES CEI KEEP A RECORD OF WHAT METER IS REGISTERED TO WHAT PROPERTY ADDRESS?

A. Yes. CEI maintains within its system a record of meters that are listed as being active at a specific property address. Specifically, CEI has records dating back from present to 1965

that shows when each meter was used at each side of the duplex rental property Mr. Jones owns (2634 and 2636 Hampshire Road) was in service.

Q. DID CEI EVER EXCHANGE THE METERS ASSOCIATED WITH 2634 AND 2636 HAMPSHIRE ROAD?

A. Yes. CEI's records indicate that meters were exchanged at 2634 Hampshire Road on August 19, 2014, August 4, 2020, September 17, 2021, and December 16, 2022. CEI's records indicate that meters were exchanged at 2636 Hampshire Road on August 19, 2014, August 4, 2020, July 3, 2021, and September 17, 2021.

Q. DID YOU REVIEW THE CEI RECORDS OF WHICH METERS WERE ACTIVE AT 2634 AND 2636 HAMPSHIRE ROAD DURING A SPECIFIC TIME PERIOD?

A. Yes. The image below represents the meter records maintained in the CEI system related to 2634 Hampshire Road:

Data Environment from 01/01/1900 to 12/31/9999

Menu

Back

Exit

Cancel

System

Refresh

Expand subtree

Collapse subtree

Display Object

Change object

Data environment for ot

Connection Object

101260028890

CE5100

2634 HAMPSHIRE RD, CLEVELAND HEIGHTS

DUP HOUSE

Premise

1260028890

HOUSE

CLEVELAND HEIGHTS, 2634 HAMPSHIRE RD

DUP

Installation

702989252

Electricity CONS DIST

Installation Fully Operational

Installation

702989260

Electricity CONS SUPP

Installation Fully Operational

Device Location

101014751

CLEVELAND HEIGHTS, 2634 HAMPSHIRE RD

Outside Right

SAME HOUSE

Device

06/01/65-08/18/14

19972

4300

1PH 3W FM2S

240V CL200;NO KYZ KWH1 2S2420W

KWH5X1

Device

08/19/14-08/03/20

S311298911

4300

1PH 3W FM2S

240V CL200;NO KYZ KWH1 2S2420W

KWH5X1G

Device

08/04/20-09/16/21

5002235047

100069022

1PH 3W FM2S

240V CL200;SMART AMI1 2S2420A

SWDB1WD1

Device

09/17/21-12/15/21

S336846769

4300

1PH 3W FM2S

240V CL200;NO KYZ KWH1 2S2420W

KWH5X1G

Device

12/16/21-**-**-**

5003000649

100069022

1PH 3W FM2S

240V CL200;SMART AMI1 2S2420A

SWDB1WD1

The next image represents the meter records maintained in the CEI system related to 2636 Hampshire Road:

Data Environment from 01/01/1900 to 12/31/9999									
<div>Menu</div> <div></div> <div>Back</div> <div>Exit</div> <div>Cancel</div> <div>System</div> <div>Refresh</div> <div>Expand subtree</div> <div>Collapse subtree</div> <div>Display Object</div> <div>Change object</div> <div>Data environment for o</div>									
Connection Object 101260028903 CE5100 2636 HAMPSHIRE RD, CLEVELAND HEIGHTS DUP HOUSE									
Premise 1260028903 HOUSE CLEVELAND HEIGHTS, 2636 HAMPSHIRE RD DUP									
Installation 702989263 Electricity CONS DIST Installation Fully Operational									
Installation 702989272 Electricity CONS SUPP Installation Fully Operational									
Device Location 101014753 CLEVELAND HEIGHTS, 2636 HAMPSHIRE RD Outside Right									
Device 06/01/65-08/18/14 19973 4300 1PH 3W FM2S 240V CL200;NO KYZ KWH1 2S2420W KWH5X1G									
Device 08/19/14-08/03/20 S311298913 4300 1PH 3W FM2S 240V CL200;NO KYZ KWH1 2S2420W KWH5X1G									
Device 08/04/20-07/06/21 5002235046 100069022 1PH 3W FM2S 240V CL200;SMART AMI1 2S2420A SWDB1WD1									
Device 09/17/21-**-**-** 5002235047 100069022 1PH 3W FM2S 240V CL200;SMART AMI1 2S2420A SWDB1WD1									
Device 07/07/21-09/16/21 S336846769 4300 1PH 3W FM2S 240V CL200;NO KYZ KWH1 2S2420W KWH5X1G									

Q. WHAT METERS ARE AT ISSUE BASED ON THE ALLEGATIONS IN THE COMPLAINT?

A. Meter 5002235046 and Meter 5002235047 are at issue based on the allegations in the Complaint.

Q. WHEN WAS A CONCERN RAISED REGARDING THE METERS RAISED?

A. CEI's records indicate that a power outage was reported for the duplex owned by Mr. Jones in the evening of July 2, 2021. A work order was created on July 3, 2021, and a CEI technician arrived at the duplex property and investigated the issue with an electrician that was hired by Mr. Jones. After investigating the cause of the power outage, it was determined that Smart Meter 5002235046 was off and needed to be replaced. The meter was removed and replaced with Meter S336846769.

Q. WAS METER 5002235046 IN THE CORRECT LOCATION ON JULY 3, 2021?

A. No. The CEI technician determined that Meter 5002235046 was in the socket for 2634 Hampshire Road, instead of being in the socket for 2636 Hampshire Road as the CEI records indicated. A switched meters investigation was conducted, and it was determined that Meter 5002235046 should be tied to 2634 Hampshire Road and Meter 5002235047 should be tied to 2636 Hampshire Road.

1 **Q. CAN YOU PLEASE EXPLAIN WHY THE IMAGE ABOVE SAYS METER**
2 **5002235046 WAS REPLACED ON JULY 7, 2023, BUT YOU JUST STATED THAT**
3 **METER 5002235046 WAS ACTUALLY REPLACED ON JULY 3, 2021?**

4 A. Yes. According to CEI internal records, even though Meter 5002235046 was removed and
5 replaced on July 3, 2021, when the CEI employee went into the system on July 9, 2021, to
6 note the meter exchange, the employee was unable to input the work exchange for July 3,
7 2021, because the system would not allow the input due to an estimated reading that was
8 added to the account on July 6, 2021.

9 **Q. WHAT DID CEI DO IN RESPONSE TO THE FINDINGS FROM THE SWITCHED**
10 **METER INVESTIGATION?**

11 A. CEI corrected the switched meters on September 17, 2021, and a rebill of Mr. Jones'
12 account was completed on September 24, 2021. Additionally, after CEI received a claim
13 from Mr. Jones for reimbursement of money paid to the electrician that needed to respond
14 on July 3, 2021, CEI approved the claim and issued a check to Mr. Jones for \$300.

15 **Q. IN YOUR OPINION, IS IT POSSIBLE THAT THE METERS WERE SWITCHED**
16 **BEFORE AUGUST 4, 2020?**

17 A. Yes, it is possible. However, prior to the meters being installed on August 4, 2020, the
18 previous meters were in place since August 19, 2014, and there are no recorded metering
19 issues from any of the accounts at the property during that time period to lead me to believe
20 that there was a switched meter situation prior to August 4, 2020.

21 **Q. BASED ON YOUR REVIEW OF CEI RECORDS, DID MR. JONES HAVE AN**
22 **ACTIVE ACCOUNT CONNECTED TO 2634 HAMPSHIRE ROAD FROM**
23 **AUGUST 4, 2020 TO PRESENT?**

1 A. No he did not. His last active account at 2634 Hampshire Road was in June 2018.

2 **Q. BASED ON YOUR REVIEW OF CEI RECORDS, DID MR. JONES HAVE AN**
3 **ACTIVE ACCOUNT CONNECTED TO 2636 HAMPSHIRE ROAD FROM**
4 **AUGUST 4, 2020 TO PRESENT?**

5 A. Yes, he did. However, it was only from July 6, 2021 to August 11, 2021. This is the
6 account that was rebilled, and a credit applied due to the results of the switched meter
7 investigation. Prior to this time period, his last active account at 2636 Hampshire Road
8 was in July 2019.

9 **CONCLUSION**

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

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

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing Direct Testimony of Robert Perkins on Behalf Cleveland Electric Illuminating Company was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 22nd day of August 2023. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties. A courtesy copy was also sent via Email this 22nd day of August 2023 to:

Alan D. Jones
410 Wakefield Run Blvd.
Hinckley, Ohio 44233
alanmichele@roadrunner.com
Complainant

/s/ John W. Breig, Jr.

John W. Breig, Jr. (0096767)
*One of the Attorneys for Cleveland Electric
Illuminating Company*

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

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in

Case No(s). 22-0016-EL-CSS

Summary: Testimony Direct Testimony of Robert Perkins electronically filed by Mr.
John W. Breig on behalf of The Cleveland Electric Illuminating Company.