

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 13-1631-EL-UNC
Approval of a Revised Bill Format for)	
Electric Service		

**MOTION TO SUSPEND AUTOMATIC APPROVAL BY
DIRECT ENERGY SERVICES, LLC AND DIRECT ENERGY BUSINESS, LLC**

Pursuant to Rule 4901-1-12 of the Ohio Administrative Code, Direct Energy Services, LLC and Direct Energy Business, LLC (“Direct Energy”) moves for suspension of automatic approval of Dayton Power & Light Company’s (“DP&L”) proposed bill format. The reasons supporting the suspension are contained in the accompanying Memorandum in Support.

WHEREFORE, Direct Energy respectfully requests that the Commission grant this Motion and suspend automatic approval of DP&L’s proposed bill format.

Respectfully Submitted,

/s/ Joseph M. Clark

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**Attorney for Direct Energy Services, LLC and
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**MEMORANDUM IN SUPPORT OF
DIRECT ENERGY SERVICES, LLC AND DIRECT ENERGY BUSINESS, LLC**

Rule 4901:1-10-33(F) provides that “Any new consolidated bill format proposed by an electric utility shall be filed with the commission for approval. If an application for a consolidated bill format is not acted upon by the commission within forty-five calendar days after it is filed, the consolidated bill format shall be deemed approved on the forty-sixth day after filing.” Direct Energy hereby respectfully requests the Commission suspend automatic approval for the good cause reasons described below.

After reviewing the November 1, 2013 filing made by DP&L, Direct Energy supports DP&L’s efforts to simplify their bill. However, Direct Energy has some concerns with the proposed changes in DP&L’s bill format relating to when a customer switches competitive retail electric supply (“CRES”) providers. DP&L’s filing does not include a sample format for a customer who takes service from a CRES provider. DP&L should also provide that bill format. In addition, Direct Energy would like to encourage DP&L to incorporate some of the proposals from the COI billing workshops in its filing. These include changing the price to compare language to reflect the supplier price or a better explanation of the rate a CRES provider must beat to offer savings. Specifically if the customer is with a CRES provider on a lower price than the DP&L standard offer, a new CRES provider must in fact beat that lower price to save the customer more money. The current language references only DP&L’s standard offer price which may be misleading. There were also discussions in the workshops to change the design of bills to make CRES provider charges more visible. This included adding CRES provider logos and increasing the location and font size of CRES provider charges on the bill. The November 1 filing fails to include any of the above changes.

In the past the Commission has suspended approval of bill formats when more time was needed by Staff to review the bill format filings. *In the Matter of the Application of the Dayton Power and Light Company for Approval of New Bill Formats*, PUCO Case No. 05-1360-EL-UNC, Entry (December 19, 2005) and *In the Matter of the Application of Duke Energy Ohio for Approval of a Revised Bill Format*, PUCO Case No. 07-1205-GE-UNC, Entry (January 3, 2008). DP&L's Application should be suspended while the Commission and Staff take additional time beyond the 45-day period to review the concerns raised by Direct Energy. Additionally, granting the Motion would be consistent with the Entry in the Duke bill format case inasmuch as DP&L's time to respond to Direct Energy's Motion to Intervene will not have lapsed by the time the 45-day automatic approval time frame runs. The concerns raised by Direct Energy constitute good cause for suspension of the 45-day automatic approval period.

WHEREFORE, Direct Energy respectfully requests that the Commission grant this Motion and suspend automatic approval of DP&L's proposed bill format. The Commission should require DP&L to file proposed bill formats that show a bill of a customer taking service from a CRES provider, ensure the price to compare on a customer's bill is the correct price to compare for that particular customer, and that DP&L takes the necessary steps to more prominently identify the customer's generation supply information on the customer's bill.

Respectfully Submitted,

/s/ Joseph M. Clark

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Intervene of Direct Energy Services, LLC and Direct Energy Business, LLC was served this 3rd day of December, 2013 by electronic mail delivery upon the persons listed below.

/s/ Joseph M. Clark

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Summary: Motion to Suspend Automatic Approval electronically filed by JOSEPH CLARK on behalf of Direct Energy Services, LLC and Direct Energy Business, LLC