

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Investigation of Ohio's Retail Electric)	Case No. 12-3151-EL-COI
Service Market.)	
 In the Matter of the Market Development)	 Case No. 14-2074-EL-EDI
Working Group.)	

**JOINT COMMENTS OF IGS ENERGY,
DIRECT ENERGY SERVICES, LLC AND DIRECT ENERGY BUSINESS, LLC**

In accordance with the Commission's February 7, 2018 Finding and Order, IGS Energy (IGS), Direct Energy Services, LLC and Direct Energy Business, LLC (collectively, Direct) jointly submit the following comments.

I. COMMENTS

The process to switch and move customers resides solely with the electric utility. A CRES supplier and its customer have no option to independently conduct a seamless move. If a customer contacts his or her supplier today and informs the supplier of a move, the supplier and customer must still wait for the first bill cycle to obtain a new account number and initiate the switch through the electric utility. The result is still at least one month of non-supplier service and customers forced to pay SSO pricing.

As we contemplate the implementation of seamless move capabilities, it is important when reviewing costs to acknowledge that there is a preference for default service inherent in the current systems. All customers already pay for these systems, which are the sole avenue for a customer to receive the supply, service and price of his or her choosing. A shopping customer who wishes to keep his or her contract with a supplier and not be disrupted may only do so when the utility system is designed to allow for it.

Direct and IGS do not believe that shopping customers should be required to pay more to fix this uneven approach to utility administration of switching and implement seamless move capabilities. However, as noted in the MDWG at the time, suppliers were willing to contribute toward the cost to facilitate a timely solution. Despite several years of delay, suppliers still would like this fix to the uneven approach for moving customers, but what the costs would be today, nearly six years later, and what that fix would look like are unknown. If suppliers are ultimately asked to share in the cost allocation, that share should be based on a few specific criteria, as the discussions with EDUs on the implementation of proper seamless move systems continue.

First, the total amount paid by suppliers should be capped. Cost overruns remain a concern for suppliers who are building these costs into our products. Suppliers need the ability to plan for the recovery. A cost cap also ensures that the fee, as discussed below, ends once costs are fully recovered by the utilities. In addition, Direct and IGS believe that on-going compliance and operational costs will be recoverable from all customers, given that the program implementation ensures all customers retain their option of default or choice service.

Second, the fee should be per-use and not a flat total amount across all suppliers. This will ensure that free ridership, where late entrants freely benefit from the early adopters that paid for the full system, does not occur.

Finally, there needs to be a consideration of the per-customer costs when determining the fee. For instance, a fee of \$100 per switch is cost prohibitive and will discourage use of the system, while a de minimis amount such as \$1 per switch is likely not enough to ensure timely recovery of system costs.

II. CONCLUSION

All customers benefit from the availability of seamless move capabilities. Direct and IGS appreciate the Commission recognizing this fact and adopting it as the standard in the state. As these systems are implemented, costs should be reasonably capped and allocated fairly; shopping customers should not be asked to pay twice.

Dated: March 9, 2018

Respectfully submitted,

/s/ Rebekah J. Glover

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Comments was served by electronic mail this 9th day of March, 2018 to the following:

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Summary: Text Joint Comments electronically filed by Ms. Rebekah J. Glover on behalf of Direct Energy Services, LLC and Direct Energy Business, LLC and Interstate Gas Supply, Inc.