



**Public Utilities  
Commission**

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FILE

November 27, 2018

Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

RE: *In the Matter of the Application of the Dayton Power and Light Company for a Limited Waiver of Rule 4901:1-18-06 (A)(2), Case No. 18-1257-EL-WVR*

Dear Docketing Division:

Enclosed please find the Staff Review and Recommendation in regard to the application filed by the Dayton Power and Light Company in Case No. 18-1257-EL-WVR.

Respectfully submitted by,

Barbara Bossart  
Chief, Reliability and Service Analysis Division  
Service Monitoring and Enforcement Dept.  
Public Utilities Commission

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**Dayton Power and Light Company  
Case No. 18-1257-EL-WVR**

On August 2, 2018 in Case No. 18-1257-EL-WVR, Dayton Power and Light Company ("DP&L" or "the Company") filed an application requesting a limited waiver of Ohio Adm.Code 4901:1-18-06(A)(2), which states the following with respect to disconnection procedures for electric utilities:

*"On the day of disconnection of service, the utility company shall provide the customer with personal notice. If the customer is not at home, the utility company shall provide personal notice to an adult consumer. If neither the customer nor an adult consumer is at home, the utility company shall attach written notice to the premises in a conspicuous location prior to disconnecting service."*

DP&L requests a limited waiver of this requirement in instances when a residential customer who has been designated as "Code Red" is to have their electric service disconnected for non-payment. The term "Code Red" is used by the Company to refer to a customer who has acted violently or aggressively towards DP&L representatives in the past, and thus generally requires a police escort for their representative whenever required to visit the premises. As of the time of filing the application for waiver, the Company had approximately 50 active customer accounts designated as "Code Red".

The Company plans to install meters equipped with cellular technology which can be remotely disconnected and reconnected at any premises where a customer has been designated as "Code Red". Meter readings for billing purposes will be obtained through the Company's current AMR system. The ability to remotely disconnect and reconnect and obtain meter readings through AMR, coupled with a waiver of 4901:1-18-06(A)(2), would eliminate the need for a company employee to physically visit the premises of a "Code Red" customer.

This waiver would impact no other current rule or requirement. "Code Red" customers will continue to be eligible for all of DP&L's available assistance programs to help them avoid disconnection.

In the application for waiver, the Company proposes the following:

- DP&L will work with Staff on communications sent to Code Red customers prior to implementing the waiver.
- DP&L will maintain and retain on file any and all documentation which supports a customer being designated as "Code Red" for as long as the customer account is active.
- DP&L will provide to Staff an annual report of customers designated "Code Red".
- DP&L will investigate a customer's claim that the occupants of the household or premises has changed or that the "Code Red" designation is in error.
- DP&L will work with police to install the new meters at the customers' premises.

Given these conditions, Staff does not oppose DP&L's application for a limited waiver of 4901:1-18-06(A)(2).