



Development Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director

August 8, 2019

FILE

Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, Ohio 43215

PUCO

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To Whom It May Concern:

Due to an oversight, the following comments from The Breathing Association and Advocates for Basic Legal Equality, Inc., et al., were not forwarded to the PUCO to be docketed in case 19-0052-AU-ORD. Development respectfully requests the comments be placed in the docket.

Sincerely,

Michael Fraizer
Assistant Chief, Community Services Division

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Better Breathing for Better Lives.

The Breathing Association

July 19, 2019

Development Services Agency
77 S. High Street
Columbus, Oh 43215

Case No. 19-52-AU-ORD

Initial PIPP Plus Rule Revision Comments of The Breathing Association

4901:1-18-07 (A) (2) and 122:5-3-03 (C)(1)

PIPP Plus customers who have been disconnected for more than 10 days, should not be treated as new customers. Only the PIP Plus default amount at the time of the disconnection should be required to restore service, plus reconnection fees.

4901:1-18-07 (A) 2

PIPP Plus eligible customers who are disconnected and never been on PIPP Plus, should be reconnected for the first PIPP Plus installment (no matter the season of assistance). The requirement that they pay the entire delinquent amount is a huge barrier to securing a residence. The PUCO and ODSA should also work on a policy for former PIPP Plus customers who are now homeless, to pay a lesser amount in order to obtain utility service and housing. Customers are required to obtain utility service before they can secure housing. These delinquencies can perpetuate homelessness.

4901:1-18-12 (D) (3) and 122:5-3-02

These gas and the electric rules don't align. The gas and electric rules must be the same to eliminate confusion and to be consistent. The ODSA revision requires the customer to pay defaulted PIPP Plus amount to re-enroll in the program after they have been voluntarily or involuntarily dropped from the program. The gas rules require they pay the default amount plus the PIPP Plus installment for each month they maintained service or were disconnected. The electric rules would make it easier for the customer to re-enroll in PIPP Plus and should be approved. However, if the gas rule is approved for gas and electric, the default amount the customer must pay to re-enroll in the PIPP Plus program should be limited to two years of PIPP Plus installments. Currently, Duke Energy Ohio has a waiver and only requires customers to pay up to two years of PIPP Plus installments.

4901:1-18-13 (1) and 122:5-3-04 (A)(1)

The percentage of the customer's income they are required to pay under the PIPP Plus program is a hardship to the customers. They pay 6% of their gross income for their electric service and 6% of their gross income for their gas service, a total of 12% of their gross income. An electric heating customers pays 10% of their gross income for their electric service under PIPP Plus. The percentage does not take into account the taxes the customer may have to pay, rent, other utilities, food, etc. The percentage

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amount is prohibitive to customers at the higher income ranges, and does not take into account the household size. (A person earning 48,000 annually and is under 150% of the poverty level at 6% pays 240.00 per month). There should be a cap on PIPP payments if the 6% and/or 10% cannot be changed.

4901:1-18-16 (D) and 122:5-3-04 (5)

The time period for a customer to be on Graduate PIPP Plus should be increased to 18 months to give the customer who has a PIPP Plus default to pay it off and still be able to retire the reset of the arrearages on the account. Many times it takes a customer a few months to pay off the arrearages and then they don't have the full 12 months to get the incentive credits to pay off the balance. These balance can be a barrier to the customer obtaining service with the utility in the future. An alternative to that would be to roll the past due PIPP Plus installments into the arrearages and the customer would begin Graduate PIPP Plus immediately. There are many cases where the customer is just over the income guidelines but still needs help to get rid of their bills. Either of these two options would address that problem. .

4901:1-18-17(B) and 122:5-3-03 (B) (4)

Customers should have at the minimum 30 days from the date of re-verification to be rejected for a failure to catch up their PIPP Plus accounts. Many of the customers who come in are on fixed income. If they come in after they receive their benefits they will not have access to funds again until their next benefit installment. Many of the customers we see are having their meter read within a week on coming into the LDA. This causes an additional amount needed before they can get back on PIPP.

Respectfully Submitted,

Colette R. Harrell, MS. Director of HEAP & Social Services
The Breathing Association
1520 Old Henderson Rd.
Columbus, Ohio 43220
(614) 457-2997, ext. 147
(614) 457-1934 Fax
'Better Breathing, For Better lives'