

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Duke Energy Ohio, Inc., for Approval)	Case No. 19-1593-GE-UNC
of Bill Format Changes.)	

MEMORANDUM CONTRA MOTION TO INTERVENE AND SUSPEND

Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) responds herein to the motion to intervene and suspend automatic approval of bill format changes (Motion) filed by the Office of the Ohio Consumers' Counsel (OCC). OCC's Motion should be rejected.

On August 27, 2019, Duke Energy Ohio filed an application for approval of new bill formats that will be used when the Company completes its transition to a new customer information and billing system that is referred to as Customer Connect. Pursuant to O.A.C. Rule 4901:1-10-22(C), if an application for sample bill approval is not acted upon within forty-five calendar days, said sample shall be deemed approved on the forty-sixth day after filing.

The application that accompanies the bill format prototypes demonstrates numerous positive benefits for customers, including that those prototypes are significantly easier to read than existing bills. The improvements are explained in some detail in the application. In support of the application, the Company submitted 34 pages of bill prototypes that demonstrate variations on relevant bills. Despite the manifest benefits provided for customers, OCC seeks to intervene and delay approval. However, the process promulgated by the Commission to enable an administratively efficient approval should not be slowed or impeded by frivolous issues. The bill approval process is a portion of an overall Customer Connect endeavor that is built upon a step-

by-step process. In order to enable Customer Connect, there will be a freeze on changes to information technology (IT) changes to the legacy (current) customer information systems over the next two years, and any changes must be tightly orchestrated with Customer Connect.. Thus, the seemingly short delay of this bill format approval could effectively delay the Company's ability to implement the new format and/or add additional cost to the Customer Connect Program. Accordingly, absent a compelling reason to do so, the Commission should allow the existing application to proceed without any delay.

OCC complains that Duke Energy Ohio "claims" the new bill format will be easier to read and easier for customers to understand. This is not a "claim" by the Company but rather something that is made clear by the prototypes that were filed with the application. The Commission can judge for itself, from the prototypes provided, whether the new bill format is acceptable. OCC's claim that the bills require a "thorough review" assumes that the Commission, and the Staff of the Commission are not sufficiently capable and knowledgeable to perform such a review based upon what has been provided in the docket.

OCC is correct that a prototype for every possible bill variety has not been filed. This is due to the sheer number of such variables that exist. The attachment includes 34 pages of bill prototypes, which are more than adequate to demonstrate variables among rate codes, customer options, etc. Likewise, although Duke Energy Ohio is indeed a combination electric and gas distribution service provider, samples were provided that demonstrate how combination customers will be billed.

Finally, OCC argues in favor of including information such as price to compare and shadow billing. These are arguments that OCC has raised in other proceedings and likely will raise in future proceedings. Such arguments are not appropriate or necessary in this bill format case as

they raise issues of billing system capability and costs of coding to provide such data, rather than bill formatting.

OCC also seeks intervention in this proceeding. However, in order to grant intervention, the Commission must consider “[w]hether the intervention by the prospective intervenor will unduly prolong or delay the proceedings.”¹ Indeed, OCC stated, in its memorandum supporting the motion to intervene, that its intervention would not unduly prolong or delay the proceeding. This directly contravenes the request, in that same document, that the case be suspended. It is beyond dispute that OCC’s proposed intervention would delay the proceeding. And, as explained above, that any delay could substantially impact the implementation of the new bill format and/or the cost to deliver the Customer Connect Program. Intervention and suspension could delay the bill format change for due to the very difficult IT scheduling calendar and related processes. Thus, OCC cannot meet burden of proof as to why it should be granted intervention.

Duke Energy Ohio respectfully requests that the Commission deny OCC’s motion to intervene and its motion to suspend.

Respectfully submitted,
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¹ R.C. 4903.221(B)(3); O.A.C. 4901-1-11(B)(3).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic delivery this 2nd day of October, 2019 to the following:

/s/ Elizabeth H. Watts
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/2/2019 10:47:33 AM

in

Case No(s). 19-1593-GE-UNC

Summary: Memorandum Contra Motion to Intervene and Suspend electronically filed by
Carys Cochern on behalf of Duke Energy