

From: [Jermeki Anderson](#)
To: [Puco Docketing](#)
Subject: PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00577399 [ref:_00Dt0GzXt._500t0R04xb:ref]
Date: Wednesday, January 22, 2020 4:01:01 PM
Attachments: [image005.png](#)



**PUBLIC UTILITIES COMMISSION OF OHIO
Consumer Service Division
Memorandum**

CASE ID: 00577399
COMPANY:
CUSTOMER:
ADDRESS: , ,
SERVICE ADDRESS: , ,
AIQ:
NIQ:

To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!

DOCKETING CASE #: 19-1429-GA-ORD

SUBJECT: Case No. 19-1429-GA-ORD

January 17, 2020
Via Electronic Mail

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

RE: Case No. 19-1429-GA-ORD

Dear Commission: I am writing on behalf of the Service Contract Industry Council ("SCIC") to provide comments to the rules being proposed by the Public Utilities Commission Ohio ("PUCO") through Case No. 19-1429-GA-ORD, In the Matter of the Commission's Review of the Minimum Gas Service Standards in Chapter 4901:1-13 of the Ohio Administrative Code. The proposed regulation provides that "Natural gas residential bills are to contain only charges that are either a natural gas or competitive

retail natural gas commodity charge or an approved tariffed distribution charge or service.” This proposed regulation, if enacted, will significantly impact SCIC’s members and will potentially negatively impact thousands of Ohio service contract customers.

The SCIC is a national trade association whose member companies include manufacturers, service contract providers, administrators, and retailers offering service contracts on products including, but not limited to, consumer goods, home systems, and appliances. SCIC members may – and several do – partner with Ohio utilities to offer products to their customers. Charges for these service contracts, as a convenience to customers, and at the behest of the utilities, are in many cases included “on-bill” (i.e. on the customer’s utility bill).

As background, many homeowners do not know who is responsible for a repair to certain equipment and systems in the event of a service line leak or failure on their property. A utility customer often finds out they are financially responsible for a service interruption only after they have had a problem requiring emergency repair. It is important for customers to understand where the utility’s responsibility begins and ends, so customers are not surprised when they find out that neither their homeowner’s insurance nor the utility company cover the necessary repairs. SCIC’s members often partner with utilities to both educate and offer customers an affordable option for protecting against the cost and stress of dealing with emergency repairs.

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January 17, 2020

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Utilities often choose to partner with third parties that provide service contract programs because they believe these programs will benefit their customers. Utilities often request that the service contract charges be included on their bill, noting that “on-bill” charging is more convenient for customers. The more customers that receive the service contract protection under these programs, the more utilities are able to ensure that customers’ connection to the utility’s infrastructure is effectively maintained and in good repair. Further, if a customer has a service contract, their utilities can be confident that if a service line failure occurs, then repairs will be conducted quickly and in compliance with local codes. Therefore, utilities are very interested in ensuring that all customers are made aware of the availability of these home service contract programs and are provided the opportunity to enroll for coverage at an affordable price and in a convenient manner.

The availability of these products is important. 4 in 10 adults, if faced with an unexpected expense of \$400, would either not be able to cover this cost or would cover it by selling something or borrowing money, according to a recent Federal Reserve economic well-being report. Home service contracts provide a way for consumers to manage this exposure. As an example, in just the last twelve months, a single SCIC member company alone has performed close to over 32,000 service jobs for utility

customers in Ohio—saving them approximately \$12 million in out-of-pocket repair expenses.

Stripping long-standing customers of their ability to pay for a home service contract via their utility bill, which will be the result of the proposed rule, will cause customer confusion and angst and ultimately result in tens of thousands of customers unwittingly losing their coverage. Any discontinuation of “on bill” billing will require establishing a new payment mechanism for existing home service contracts. In an era of phishing attacks and other attempts to defraud consumers, many customers may be alarmed that their credit card or other payment information is being requested by the service contract company and disregard the request out of confusion or concern that it may be fraudulent, given that the customers have been able to pay for the service contract coverage via their utility bill for several years. Others may believe any notices sent to them regarding the Commission’s decision to remove their current billing vehicle are ‘junk mail’ and may not open or respond or may simply forget to act given more pressing priorities. In short, as a result of the proposed rule, a significant number of customers will unwittingly lose their home service contract coverage which could subsequently result in emergency repairs not being covered. These customers may be surprised that the repairs are no longer covered by an existing service contract and find themselves unnecessarily suffering financial loss if they need an emergency repair that would have been covered by their repair plan, if it had not lapsed.

The SCIC asks the PUCO to reconsider and remove the proposed language in the rule. We appreciate the PUCO’s willingness to take into consideration public comment on the proposed rule. We are very interested in continuing the dialogue with the PUCO to ensure that the final

Public Utilities Commission of Ohio
January 17, 2020
Page 3

version of the rules continue to allow utilities to provide their customers with the best products available, in a convenient manner.

Sincerely, Stephen K. McDaniel
Assistant Executive Director &
General Counsel
Service Contract Industry Council

Also this was sent in on 1/17/2020, due to the call center call volume it is just being processed.

Please docket the attached in the case number above.

Sincerely,

Jermeki Anderson

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Customer Service Assistant
(800) 686-PUCO (7826)
www.PUCO.ohio.gov

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

----- Original Message -----

From: Jermeki Anderson [jermeki.anderson@puco.ohio.gov]

Sent: 1/22/2020 2:49 PM

To: docketing@puco.ohio.gov

Subject: PUBLIC UTILITIES COMMISSION OF OHIO - Case No. 19-1429-GA-ORD [ref:_00Dt0GzXt._500t0R04xb:ref]



**PUBLIC UTILITIES COMMISSION OF OHIO
Consumer Service Division
Memorandum**

CASE ID: 00577399 Case No. 19-1429-GA-ORD

COMPANY: Service Contract Industry Council

CUSTOMER:

ADDRESS: PO Box 11247, Tallahassee, FL 32302-1247

SERVICE ADDRESS: , ,

AIQ:

NIQ:

To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!

DOCKETING CASE #: 19-1429-GA-ORD

SUBJECT: Case No. 19-1429-GA-ORD

Due to call center volume, this email is just being processed and was received on Friday, January 17, 2020.

Please see the attached PDF.

Please docket the attached in the case number above.

Sincerely,

Jermeki Anderson

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Customer Service Assistant
(800) 686-PUCO (7826)
www.PUCO.ohio.gov

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

----- Original Message -----

From: Mark Chandler [mark@meenanlawfirm.com]

Sent: 1/17/2020 3:29 PM

To: contactthepuco@puco.ohio.gov

Cc: stephen@meenanlawfirm.com; kdenny@meenanlawfirm.com

Subject: FW: PUBLIC UTILITIES COMMISSION OF OHIO - Your Case #00577399

To Whom it May Concern:

Attached to this email is a comment letter for case number 19-1429-GA-ORD. There was nowhere to attach a document on the "File a Public Comment" link <https://www.puc.state.oh.us/secure/PicForm/index.cfm?CaseNo=19-1429> I spoke with Aubrey in your office who suggested I submit it via email to you at ContactThePUCO@puco.ohio.gov If you have any questions or if I should submit the public comment letter in a different format please let me know.

Thanks,

Mark Chandler, Paralegal

Meenan P.A.

300 S. Duval Street, Ste. 410

P. O. Box 11247 (32302)

Tallahassee, FL 32301

850.425.4000



MEENAN
REGULATORY AND LEGISLATIVE ATTORNEYS



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From: PUCO Consumer Call Center [<mailto:noreply@puc.state.oh.us>]

Sent: Friday, January 17, 2020 10:59 AM

To: Mark Chandler <Mark@meenanlawfirm.com>

Subject: PUBLIC UTILITIES COMMISSION OF OHIO - Your Case #00577399



Dear Stephen K. McDaniel:

Thank you for contacting the Public Utilities Commission of Ohio (PUCO). Your case number is 00577399.

A PUCO Call Center Representative will contact you as soon as possible to discuss your case.

Sincerely,

PUCO Call Center
(800) 686-PUCO (7826)
www.PUCO.ohio.gov

 <https://www.facebook.com/PUCOhio>

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

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Commission of Ohio Docketing Information System on

1/22/2020 4:30:47 PM

in

Case No(s). 19-1429-GA-ORD

Summary: Public Comment of Stephen K. McDaniel, Assistant Executive Director & General Counsel, Service Contract Industry Council, via website, electronically filed by Docketing Staff on behalf of Docketing