

FILE

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Commission**Mike DeWine, Governor  
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March 5, 2020

Docketing Division  
Public Utilities Commission of Ohio  
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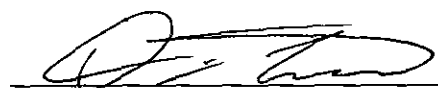
PUCO

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RE: *In the Matter of the Application of Ohio Edison, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of New Tariff Language, Case No. 20-0385-EL-ATA.*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendations in regard to Approval of New Tariff Language, Case No. 20-0385-EL-ATA.

Barbara Bossart  
Chief, Reliability and Service Analysis  
Public Utilities Commission of OhioDavid Liphtratt  
Chief, Accounting and Finance Division  
Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

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**First Energy Companies  
Case No. 20-0385-EL-ATA**

**Background**

Pursuant to Ohio Administrative Code 4901:1-10-05(J)(1), “an electric utility shall provide customers with the option to remove an installed advanced meter and replace it with a traditional meter, and the option to decline installation of an advanced meter and retain a traditional meter, including a cost-based, tariffed opt-out service.” On September 22, 2014 in Case No. 14-1657-EL-ATA, Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (the Companies) filed an application for approval of an Advanced Meter Opt-Out Service Tariff (Rider AMO). As proposed at the time, advanced meter opt-out service would be provided at no cost. On November 20, 2014, the Commission approved the Companies’ application and ordered that the Companies file, in final form, complete copies of the tariffs.

**Application to Revise Tariffs**

On February 18, 2020, in Case No. 20-0385-EL-ATA, the Companies filed an application for approval to revise Rider AMO. The most significant change to the proposed revised tariff is the addition of both an upfront charge of \$41.72 to remove the advanced meter and install a non-communicating meter and a customer charge of \$28.29 to be assessed monthly. Other changes include specifying that Rider AMO is applicable only to customers who take service under residential rate schedules and provisions for customers who elect to have the advanced meter communication disabled as opposed to having the advanced meter replaced with a non-communicating meter.

**Staff Findings**

Staff reviewed the application and requested additional information from the Companies. Regarding customer rights and responsibilities associated with participating in Rider AMO, Staff found the following:

1. If a customer who has an analog meter wishes to opt out of an advanced meter and retain an analog meter and agrees to the approved Rider AMO monthly charge, the customer will be permitted to retain the analog meter provided it is functioning within acceptable limits.
2. If a customer whose service area has not yet been deployed with advanced meters wishes to opt out of receiving an advanced meter in the future, Rider AMO will not be assessed until the customer’s service area is being read remotely.
3. For customers who opt out of an advanced meter and agree to Rider AMO, the Companies will attempt a manual meter read each month.

4. For customers who opt out of an advanced meter, agree to Rider AMO, and are having monthly manual meter readings, those customers will remain on the same meter read and bill cycle that they were on prior to opting out.

Regarding upfront and monthly charges to participate in Rider AMO, Staff reviewed the Companies support for both the upfront cost of removal and monthly meter reading and found that the amount of labor minutes and miles traveled in order to perform both services to be cost based.

### **Staff Recommendation**

Staff recommends that the Companies' application be approved, given the following conditions:

1. The Companies shall work with Staff regarding the format, wording, and timing of communications to customers regarding Rider AMO.
2. The Companies shall endeavor to address each customer's concerns regarding advanced metering and will attempt to ensure that the customer understands the costs associated with Rider AMO prior to allowing the customer to agree to opt out of an advanced meter.