

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	Case No. 20-385-EL-ATA
Edison Company, The Cleveland)	
Electric Illuminating Company, and The)	
Toledo Edison Company for Approval)	
of New Tariff Language)	

**COMMENTS BY THE OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY**

I. COMMENTS

Consistent with the implementation of Grid Mod I¹ and in anticipation of the deployment of advanced metering infrastructure in their service territories, the Companies filed an application to update their Automated Meter Opt-out Rider (“Rider AMO”) on February 18, 2020 (“Application”).² The proposed updates to Rider AMO will provide any customer taking service under the Residential Service rate schedule (“Rate RS”) 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, through a cost-based, tariffed opt-out service.³

On March 5, 2020, Staff filed their Review and Recommendations and recommended that the Companies’ Application be approved.⁴ Staff’s findings included, in pertinent part, that:

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.

¹ Case No. 16-481-EL-UNC, *et al.*

² Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of New Tariff Language (2/18/2020).

³ *Id.*

⁴ Staff Review and Recommendations (3/5/2020) (recommending approval subject to two conditions).

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.**⁵

The Companies' Commission-approved tariffs and the Ohio Administrative Code currently afford them flexibility regarding meter read and bill cycles that is necessary to achieve operational efficiencies, and Rider AMO's cost-based tariffed opt-out service is premised upon such flexibility. The Companies need to maintain this flexibility for customers who opt out pursuant to Rider AMO. Customers who have opted out will continue to receive bills "rendered monthly or at the Compan[ies'] option at other regular intervals" and "[b]ills rendered monthly shall typically cover a period of approximately 30 days" in accordance with the Companies' Commission-approved tariffs.⁶ Also, pursuant to their tariffs, the Companies attempt to read meters on a regular basis⁷ and will continue to do so, and the Companies' meter reading procedures will continue to conform to the requirements of Ohio Administrative Code 4901:1-10-05.⁸

The Companies must be permitted to retain the flexibility that they currently have regarding meter reading routes and scheduling. This flexibility is essential to the Companies' business processes and allows the Companies to shift, adjust, and re-assign meter reads as necessary. Further, the proposed Rider AMO rates were calculated assuming this flexibility to achieve operational efficiencies would continue, so without it, the Rider AMO rates would need to be revisited. The Companies must be able to perform meter reads for opt-out customers in a way that

⁵ *Id.* at 2-3 (emphasis added).

⁶ See Companies' Tariffs: P.U.C.O. No. 11 at Original Sheet 4, Page 4 of 21, Section VI.A; P.U.C.O. No. 13, Original Sheet 4, Page 4 of 21, Section VI.A; P.U.C.O. No. 8 at Original Sheet 4, Page 4 of 21, Section VI.A.

⁷ See Companies' Tariffs: P.U.C.O. No. 11 at Sheet 4, 1st Revised Page 5 of 21, Section VI.G; P.U.C.O. No. 13, Sheet 4, 1st Revised Page 5 of 21, Section VI.G; P.U.C.O. No. 8 at Sheet 4, 1st Revised Page 5 of 21, Section VI.G.

⁸ O.A.C. 4901:1-10-05 regarding the frequency of meter reads is currently being litigated in Case No. 17-1842-EL-ORD.

is not only compliant with their tariffs and Commission rules, but also compatible with operational efficiencies, which may at times mean that opt-out customers will not remain on the same meter reading cycle that they were on prior to opting out. The Companies will continue to provide information to customers regarding meter reading cycle changes in accordance with current procedures. For these reasons, the Commission should reject Finding 4.

II. CONCLUSION

For the foregoing reasons, the Companies respectfully request that the Commission approve their Application, reject Finding 4, and find that the Companies retain the flexibility that they currently have regarding meter reading routes and scheduling.

Respectfully submitted,

/s/Christine E. Watchorn

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Comments by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company were filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 29th day of April 2020. The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/Christine E. Watchorn

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Edison Company*

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Case No(s). 20-0385-EL-ATA

Summary: Comments electronically filed by Ms. Christine E. Watchorn on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company