

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|---|-------------------------|
| In the Matter of the Application of      | : |                         |
| Duke Energy Ohio, Inc. for Approval      | : | Case No. 19-2151-EL-EDI |
| of an Operational Plan for Seamless Move | : |                         |

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**COMMENTS  
OF THE STAFF OF THE PUBLIC UTILITIES  
COMMISSION OF OHIO**

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**I. BACKGROUND**

In Case No. 14-2074 -EL-EDI, et al., Market Development Working Group Case (MDWG) the Commission ordered that a seamless move mechanism be adopted as the statewide standard for supplier migration when a Competitive Retail Electric Service (CRES) customer moves within a given Electric Distribution Utility (EDU) footprint and the customer wishes to continue their current contract and transfer it with them to their new location. The Commission ordered each EDU in the state to work with the Retail Energy Supply Association (RESA) to develop an operational plan for the implementation of a seamless move mechanism and to file this operational plan with the Commission for Commission Staff review and approval. On March 13, 2019, in the Second Entry on Rehearing in Case No. 14-2074-EL-EDI, et al., the Commission granted an extension of the operational plan filing deadline to December 13, 2019, and advised that an operational plan should be filed in a proceeding separate from the MDWG Case docket. Duke filed its application for approval of an operational plan for implementing a seamless move mechanism on December 13, 2019, in the instant case.

## **II. COMMENTS**

The seamless move operational plans for each EDU have similar core eligibility requirements and similar processes to provide a similar experience statewide. To be eligible for a seamless move, the following core requirements and restrictions apply:

1. Only residential customers are eligible for a seamless move;
2. Net metering customers are not eligible for a seamless move;
3. Governmental aggregation customers are not eligible for a seamless move;
4. Customers must provide at least a one-day notice to the EDU for a seamless move;
5. Customers can only have a 3-day gap or overlap of service between premises;
6. Customers must have similar meters and customer types between premises;
7. Customer must not have a pending change order to another supplier; and
8. Customers must have an existing CRES supplier.

The EDUs operational plans also include similar processes, developed with RESA to create uniformity in operation for the CRES suppliers. These similar processes include the following:

1. Initiation of the seamless move at least through the EDUs call center but online moves are options;
2. Customers will receive a 7-day rescission letter; and
3. Transactions will utilize four Electronic Data Interchange (EDI) transactions including: a 814 M (move transaction), 814 D (customer rescinds or drops), 814 C (customer changes move in date), and 814 E (when the CRES rejects transfer).

Some of these processes have not been approved in Ohio yet.

The Duke plan includes comparable core eligibility requirements and similar core processes; however, Duke's plan offers four variations. First, while Duke requires a customer to notify the Company at least one business day prior to seamless move, the company will accept a move in and move out date up to ninety days in advance rather than the typical 30 days in advance. Second, Duke's plan specifies a 3 calendar day gap or overlap of service whereas other EDU plans specify a 3 business day gap or overlap. Third, Duke's plan allows customers to initiate a seamless move over the web as well as through the call center. Finally, Duke's plan proposes to transfer all customers who are a part of Governmental Aggregation to the supplier that was serving the Governmental Aggregation; however, according to Duke's plan, the customer will no longer be included in the Governmental Aggregation at the new premise.

Duke proposes to incorporate and implement the seamless move function as part of its proposed new Customer Information System (CIS) in 2022. However, if Duke is required to implement seamless move as a stand-alone function, it estimates a cost of \$850,000 to \$1 million with an estimated timeframe of 12 to 18 months to complete. Duke provided no recommendation on method of recovery, as Duke would prefer seamless move to be included as part of the new CIS.

### **III. Recommendations**

Staff has four recommendations to the Duke seamless move operational plan. First, Staff recommends Duke use "business" when referring to the number of days a customer may have a gap or overlap in service. Second, Staff believes customers who participate in aggregation, governmental or otherwise, should not be eligible for seamless move as

proposed by Duke. If Governmental Aggregation customers are allowed to participate in seamless move, the customer must remain within the Governmental Aggregation program that the customer is currently a part of, and continue to have the Governmental Aggregation indicator in Duke's CIS system. Third, Staff believes that customer education regarding choice should occur at the time a transfer is requested. To that end, Staff recommends that Duke educate customers regarding the choices in energy suppliers, including governmental aggregation, shopping, and default service. Staff also recommends that customers who initiate a seamless move through Duke's website are provided with similar advice regarding their energy choice options. Staff recommends that Duke's scripts advise customers of all their energy choice options, and that Duke provide Staff with a draft of its proposed script for review and input prior to implementation.

Finally, while Duke's operational plan did not specifically address recovery of any seamless move costs, Staff believes that CRES suppliers should be responsible for one hundred percent of the expense of the seamless move function. In addition, if the Commission approves Duke's seamless move process, Staff is not opposed to implementation through Duke's new CIS deployment.

Respectfully submitted,

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## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Comments** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 1<sup>st</sup> day of May, 2020.

*/s/ Steven T. Darnell*

**Steven T. Darnell**

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### **Parties of Record:**

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/1/2020 2:52:00 PM**

**in**

**Case No(s). 19-2151-EL-EDI**

Summary: Comments of The Staff of The Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO