



**Public Utilities  
Commission**

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May 5, 2020

Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus OH 43215

RE: *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion Energy Ohio During the Declared State of Emergency and Related Matters: Motion for Suspension, Case Nos. 20-0600-GA-UNC,*

Dear Docketing Division:

Enclosed please find the Staff Recommendation in the Matter of the Application of Dominion Energy Ohio for Approval of their Motion for Suspension or Modification in Case Nos. 20-0600-GA-UNC

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Barbara Bossart  
Chief, Reliability and Service Analysis Division  
Service Monitoring and Enforcement Department  
Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

**The East Ohio Gas Company d/b/a Dominion Energy Ohio**  
**Case No. 20-0600-GA-UNC**

**SUMMARY**

On March 12, 2020, the Public Utilities Commission of Ohio (Commission) issued an order, in accordance with the Executive Order 2020-01D<sup>1</sup> (Executive Order) directing “all public utilities under its jurisdiction to review their service disconnection policies, practices, and tariff provisions and to promptly seek any necessary approval to suspend otherwise applicable requirements that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact.”<sup>2</sup>

On March 17, 2020, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or Company) filed an application proposing to comply with the above order in four ways: 1) Limitations on field activities; 2) Suspension and adjustment of disconnection and reconnection activities; 3) Gas pipeline safety; and 4) Impact on customer communications.

**STAFF REVIEW OF LIMITATIONS ON FIELD ACTIVITIES**

The Company is requesting Commission approval to minimize social contacts for field activities including but not limited to meter readings, meter testing, meter relocations, customer meetings, and service upgrades. During the state of emergency, the Company will continue performing the following activities:

- Emergency response
- New service requests and reconnections
- Service disconnections requested by the customer or when necessary for safety reasons
- Leak repair
- Work performed by contractors (e.g., mainline and service installation)

The Company also requests a waiver of certain performance requirements such as average answer times for the call center, the number of days until reconnection of services, the number of days for service installations, and the requirement to repair service line leaks that require shutoff by the end of the next day. DEO is also limiting some activities under its demand-side-management programs, such as home energy audits. Finally, the Company requests temporary waiver of the following administrative rules set forth in the table below.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>DEO Action</u>
4901:1-13-04(D)	Meter Test	Social Contact	DEO will not be performing meter tests at customer’s request

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<sup>1</sup> On March 9, 2020 the governor of Ohio signed Executive Order 2020-01D declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19.

<sup>2</sup> See *In the Matter of the Proper Procedures and Process for the Commission’s Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry and Order dated March 12, 2020 at 1.

4901:1-13-04(G)	Meter Reading	Social Contact	Dominion will not be required to attempt to get an actual read every other month or be required to obtain an actual read once a year
4901:1-13-05(A)	New Service Requests	Social Contact	DEO will not be required to complete new service requests in 3 days for locations that do not require installation of service lines, or within 20 days for locations that require service lines
4901:1-13-05(B)	Telephone Response	Service Continuity	DEO customer service line answer times may exceed an average of 90 seconds due to increased volume or decreased staffing levels
4901:1-13-05(C)	Scheduled Appointments with Customers	Social Contact	DEO will not have to provide windows for appointments or reschedule for the next day if an appointment is missed
4901:1-13-05(C)	Repair of Service Line Leaks	Social Contact	DEO will not be required to repair service line leaks that require shutoff by the end of the next day
4901:1-13-07	Employee Identification	Social Contact	Company personnel may choose not to get close enough for a customer to read their identification
4901:1-13-10(B)	Complaints and Complaint-Handling Procedures	Social Contact	DEO will not be conducting in-person meetings with customers at this time

## **STAFF RECOMMENDATION REGARDING LIMITATIONS ON FIELD ACTIVITIES**

Staff has no objections to the Company's limitations on field activities. Staff does not oppose the temporary waiver of administrative rules referenced above or related tariff requirements regarding in person meter reading or the suspension of the call center answer time requirements. Staff recommends that for customers who request an initial or final meter reading, DEO should request and instruct willing customers how to provide a meter reading during the COVID-19 pandemic. In addition, Staff recommends in situations where the customer resides at the premises and gas service is needed DEO should reconnect or connect services as soon as practical. Staff does not oppose the temporary waiver of timeframes for new service requests or scheduled appointments, however, Staff would like the company to continue to track and report any missed guidelines under

Ohio Admin.Code 4901:1-13-05. Also, Company employees should continue to have identification, but should not be required to be within 6 feet of any customer.

## **STAFF REVIEW OF SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES**

The Company is requesting to alter the Company's disconnection policies and practices to suspend disconnection during the COVID-19 emergency. In addition, the Company is deferring or eliminating some fees to encourage reconnection or continuity of service. Finally, the Company is requesting waivers of several administrative rules as set forth in the table below.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>DEO Action</u>
4901:1-18-07(A)	Reconnection of Service	Service Continuity	DEO may reconnect customers without receiving the default amounts needed under normal circumstances
4901:1-18-07(B)	Reconnection of Service	Service Continuity	DEO may waive proof of payment options to reconnect service
4901:1-18-07(C)	Reconnection of Service	Service Continuity	DEO will waive the collection charge for reconnection of service
4901:1-18-12(C)	PIPP Eligibility	Service Continuity	DEO may waive requirements for enrolling in PIPP
4901:1-18-12(D)	PIPP Reverification of Eligibility	Service Continuity	DEO is postponing reverification requirements
4901:1-18-16(D)	Graduate PIPP Plus Enrollment	Service Continuity	DEO will not remove customers from PIPP+ for missed payments during this time
4901:1-18-17(A)&(B)	PIPP and Graduate PIPP Termination	Service Continuity	DEO will not remove customers from PIPP+ at this time

## **STAFF RECOMMENDATION REGARDING SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES**

Staff has no objections to Company's suspension and adjustment of disconnection and reconnection activities by removing financial barriers to reconnection or continuity of service such as deposits, late fees for commercial customers, and reconnection fees.

In addition, Staff is not opposed to the suspension of the removal of Percentage of Income Payment Plan (PIPP) and Graduate PIPP Plus customers at the anniversary date because some customers

may not be able to keep current on their PIPP Plus payments, or be able to satisfy reverification requirements in order to maintain eligibility.

### **STAFF REVIEW OF GAS PIPELINE SAFETY CODE**

The Company is requesting to suspend or modify certain gas pipeline safety activities. The repairs at issue would require disconnection of service and consequent entry into homes to inspect and relight appliances. DEO is requesting authorization to extend the date of compliance to December 31, 2020.

4901:1-16-04(I)	Remediation of Leaks	Service Continuity	DEO can extend the timeline to clear grade 2 leaks till December 31, 2020
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### **STAFF RECOMMENDATION REGARDING GAS PIPELINE SAFETY**

Staff does not oppose the extension of time to clear the level 2 grade leaks till December 31, 2020. Staff, however, does believe that the requirement to reevaluate the leaks every six months should remain in effect.

### **STAFF REVIEW OF IMPACT ON CUSTOMER COMMUNICATIONS**

The Company is requesting to modify communications with its customer by suspending the following:

- Automated calls associated with credit action or failure to provide access.
- Unnecessary batch and manual letters, post cards and notices that drive calls for work DEO is suspending.
- Communications associated with the 40-day no-access process.
- Online scheduling of DOT inspections.
- 10-day letter/post card for disconnection.

### **STAFF RECOMMENDATION REGARDING IMPACT ON CUSTOMER COMMUNICATIONS**

Staff has no objections to the Company's suspension of these customer communications during suspension of its disconnection activity.

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

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**Case No(s). 20-0600-GA-UNC**

Summary: Comments Comments of the PUCO Staff electronically filed by Mr. Craig E Smith  
on behalf of Public Utilities Commission of Ohio and Craig E Smith