

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Operations of The East)	
Ohio Gas Company d/b/a Dominion Energy)	Case No. 20-600-GA-UNC
Ohio During the Declared State of)	
Emergency and Related Matters.)	
)	

**COMMENTS FOR ADDITIONAL CONSUMER PROTECTIONS REGARDING THE
TEMPORARY PLAN OF DOMINION ENERGY OHIO TO ADDRESS
THE CORONAVIRUS EMERGENCY
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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I. INTRODUCTION

Ohio consumers are facing perilous times – a health crisis and an ensuing personal-finance crisis. The harm to Ohioans from these crises will persist for some time, potentially years, after the formal health emergency ends. In Ohio, even before the crisis, residents already were at risk with poverty at 14% of the population and food insecurity at 14.5% of the population, with a number of Ohio cities served by Dominion above 35% poverty. These already dire circumstances are now greatly magnified for people. Unemployment in the country is now considered the worst since the Great Depression.

Against this backdrop of human suffering, the Public Utilities Commission of Ohio (“PUCO”) rightfully ordered public utilities to file plans for the protection of their customers. Dominion Energy Ohio (“Dominion”) then filed its proposals on March 17, 2020, for assisting its 1.2 million natural gas customers during the health emergency.

Dominion’s proposals are appreciated. But additional protections are needed for its consumers during the formal health crisis and for a reasonable time after the formal crisis ends.

In these Comments, the Office of the Ohio Consumers' Counsel ("OCC") will describe additional consumer protections that the PUCO should adopt. The PUCO is addressing and should further address the fact that, for a great many Ohio families and businesses, their money is gone.

On April 15, 2020, the editorial board of The New York Times published an editorial under the headline, "Stop Dawdling. People Need Money."¹ The Times editorial included the following words about the current suffering of Americans:

The economic shutdown caused by the coronavirus has left a growing number of American families desperately short of money. Images of hundreds of cars [waiting in long lines](#) at food banks across the country have become a symbol of the crisis, a contemporary equivalent of the old black-and-white images of Americans standing in bread lines during the Great Depression.

To [ease the pain](#), at least a little, Congress voted in late March to send \$1,200 each to most American adults. In this era of high-speed trading, digital wallets and instant payments, one might have imagined that the federal stimulus payments would be distributed quickly, too.

Instead, the first large wave of payments is only landing in bank accounts on Wednesday.

And tens of millions of Americans won't get their stimulus payments until May — or later.²

OCC, the state advocate for Ohio's residential utility customers, appreciates the opportunity to comment on Dominion's Emergency Plan. The plan needs additional consumer protections.

Those consumer protections should include disallowing charges for Dominion's emergency plan unless, at a minimum, the emergency measures and the related expenses meet

¹ <https://www.nytimes.com/2020/04/15/opinion/coronavirus-stimulus-check-payment.html>.

² *Id.*

Ohio ratemaking standards, including that they are prudent and necessary. Dominion's actions should safeguard or promote goals, such as social distancing, for averting a deeper health crisis. Dominion's actions should protect consumers during the emergency and in some instances for a reasonable time period thereafter. Further, Dominion's added costs due to the emergency should be offset by costs Dominion avoids during the emergency, with any potential charges (or cost savings) to consumers reflecting that netting. The PUCO should also not permit cost or revenue shifting from one class of customers at the expense of another.

Additionally, Dominion's emergency plan should be in effect to protect consumers during the emergency and in some instances for a reasonable time thereafter. In this regard, Dominion has not specified how long its plan is to be in effect. And the PUCO has not established a set time for emergency measures to remain in place, other than to state that measures should be taken for the "duration of the emergency."³ The PUCO did say in AEP's emergency case that the issue of extending the suspension of disconnections needs to be considered, and ordered AEP to file a proposal for how long measures should stay in place.⁴ The emergency for customers may last far beyond any formally declared emergency.

During this state of emergency, the PUCO should consider additional measures beyond those found in Dominion's plan. All "non-essential" services (regardless of whether the services involve personal contact) that Dominion provides should be suspended until a reasonable time after the emergency (or the PUCO decides otherwise). For those in a precarious financial state, this will provide some relief. In addition, to prevent harm to customers from misleading or

³ See Case No. 20-591-AU-UNC, Entry March 12, 2020, at ¶7.

⁴ See *In the Matter of the Application of Ohio Power Company for Approval of its Temporary Plan for Addressing the COVID-19 State of Emergency*, Case No. 20-602-EL-UNC *et al.*, Finding and Order (May 6, 2020) ("AEP Ohio Emergency Plan Order"), at ¶25.

unwanted marketing, especially while consumers are home so much more, the PUCO should prohibit Dominion from making its customers' personal contact information available to gas marketers for telemarketing and other solicitation purposes.

II. BACKGROUND

On March 9, 2020, Governor DeWine declared a state of emergency to protect the health and safety of Ohioans from the dangerous effect of the coronavirus pandemic.⁵ These are perilous times for Ohio families throughout our great State, with a health crisis and ensuing personal-finance crisis. As a supplement to the strong leadership of Governor DeWine and Ohio Department of Health Director Acton to rally Ohioans to fight back against the virus, the PUCO invoked R.C. 4909.16 and declared an emergency. The PUCO used its emergency powers to shield Ohioans from utility disconnections, door-to-door energy sales, and more – actions that are laudable and vitally important for consumers.

On March 12, 2020, the PUCO opened a docket and ordered utilities to “ensure that utility service to customers is maintained during the state of emergency.”⁶ The PUCO directed all utilities to review their service disconnection policies, practices, and tariffs and promptly seek approval to suspend requirements that may “impose a service continuity hardship on residential and non-residential customers” or “create unnecessary COVID-19 risks associated with social contact.”⁷

On March 13, 2020, the PUCO issued another Entry directing all utilities to review their service reconnection policies, practices, and tariffs and to promptly seek approval to suspend

⁵ See Executive Order 2020-01D.

⁶ Case No. 20-591-AU-UNC March 12, 2020 Entry, at ¶7(c).

⁷ *Id.*, at ¶ 7(a).

requirements that may “impose a service restoration hardship on customers or create unnecessary risk of social contact.”⁸ On March 17, 2020, the PUCO issued an Entry ordering that marketers “immediately suspend, for all customer classes, all door-to-door and in-person marketing to customers in this state for the duration of the emergency, unless otherwise ordered by the [PUCO].”⁹ And then on March 20, 2020, the PUCO issued an additional Entry that directed utilities to suspend all “non-essential functions [which] include, but are not limited to, in-home energy efficiency audits, weatherization programs, in premises inspections not prompted by an identified safety-related concern, and other similar initiatives.”¹⁰

III. RECOMMENDATIONS

As the PUCO reviews Dominion’s Emergency Plan, it should consider that many more Ohioans will struggle to pay their utility bills now and for some time, among their other financial difficulties. Those Ohioans with financial challenges will include customers who have historically paid their bills in full and on time but who may be unable to continue doing so following the economic fallout of the coronavirus pandemic. Ohio businesses and families will face financial burdens that were unforeseeable just a few months ago. As a result of lost wages, unemployment, and other financial hardships from the coronavirus, the need to make sure that all customers pay no more than fair, just, and reasonable rates is especially heightened.

⁸ Case No. 20-591-AU-UNC, March 13, 2020 Entry, at ¶6(a).

⁹ Case No. 20-591-AU-UNC, March 17, 2020 Entry, at ¶9.

¹⁰ Case No. 20-591-AU-UNC, March 20, 2020 Entry, at ¶10.

A. To protect consumers, all disconnections for non-payment should be suspended until a reasonable period after the coronavirus emergency has ended.

Dominion's Emergency Plan appears to comply with the PUCO's Order in the Generic Emergency Case that requires utilities to suspend disconnections of customers due to non-payment. When it comes to disconnections for non-payment, there should be no uncertainty. The PUCO should be clear in its Order in this case (and in all other natural gas emergency cases) that, as of March 9, 2020 (if not earlier), no customer may be shut off until the PUCO otherwise orders. This suspension of disconnections will literally keep the heat on for thousands of Dominion customers during this difficult time. It will permit Dominion's customers an opportunity to recover from the physical and financial damage that the coronavirus emergency has caused even after the formal state of emergency has ended.

This Order should remain effective for a reasonable time after the coronavirus emergency has ended. In its decision regarding AEP's emergency plan, the PUCO said it will give further consideration to extending the disconnection suspension beyond the end of the formal emergency. The PUCO said that "how to responsibly return to otherwise applicable protocols related to maintenance and restoration of service – requires further consideration and should be addressed."¹¹ An extended suspension is an important consumer protection, as customers' personal emergencies may exist long after the end of the declared formal state emergency.

The PUCO also required AEP to further address the duration of the disconnection suspension and is inviting parties to then comment.¹² Similarly, the PUCO should direct Dominion to develop a plan with respect to residential service disconnections and file that plan

¹¹ AEP Ohio Emergency Plan Order, at ¶24.

¹² *Id.*, at ¶25.

in this docket 45 days prior to resuming service disconnections. Interested parties should be invited to comment on Dominion's plan.¹³

The suffering of consumers who have been touched by a coronavirus tragedy or who face financial ruin will likely continue for months or years after the formal emergency is ended by the state. The PUCO has the authority to suspend disconnections and to order other consumer protections under, among other things, its emergency powers, R.C. 4909.16. The emergency statute enables the PUCO to act when it "deems it necessary to prevent injury to the business or interests of the public...."

B. To protect consumers, Dominion should reconnect customers who were disconnected for non-payment, 30 days or more before March 9, 2020.

Dominion's Emergency Plan states that it will reconnect customers previously disconnected for non-payment.¹⁴ The PUCO should adopt that proposal. The PUCO should also establish a look-back period in this case (and make it applicable to other gas utilities' emergency plans). To protect consumers, the look-back period should begin at least 30 days before the Governor's Order on March 9, 2020. At a minimum, the PUCO should direct Dominion to work with its customers on terms to reconnect customers regardless of when disconnection occurred.¹⁵ Additionally, consistent with Dominion's proposal regarding reconnection and late payment fees,¹⁶ the PUCO should order that all reconnection fees, deposits, and accumulated late fees during the emergency, including any look-back period, be deferred, for later collection from customers and returned to those customers, if already collected.

¹³ *Id.*

¹⁴ Dominion Emergency Plan, at 3.

¹⁵ AEP Ohio Emergency Plan Order, at ¶31.

¹⁶ Dominion Emergency Plan, at 3.

C. The PUCO should require Dominion to extend additional consumer protections for low-income consumers enrolled in the Percentage of Income Payment Plan (“PIPP”).

Dominion’s Emergency Plan appears to properly suspend termination of PIPP plus customers during the emergency.¹⁷ That is appropriate and the PUCO should adopt Dominion’s proposal. PIPP participants in the Dominion service area should not be dropped from the PIPP program if their re-verification is disrupted during the declared state of emergency. And PIPP participants should be provided the opportunity to avoid building up debt to Dominion through waiving requirements that payments should be made in full and on time before arrearage credits are given.

As stated, the financial impact of the health emergency will likely continue for some time after the declared state of emergency ends. PIPP customers are the neediest of the needy in our society. They are especially vulnerable at this time. These additional protections for PIPP customers should continue for a reasonable period after the declared emergency ends when the extent of the emergency and the financial hardships consumers are facing are better understood. The PUCO said in its decision regarding AEP’s emergency plan that, “how to responsibly return to otherwise applicable protocols related to maintenance and restoration of service – requires further consideration and should be addressed.”¹⁸ The PUCO should at least require that further consideration here, with a proposal from Dominion and then comments from other parties.

The PUCO has the authority to order these protections for PIPP customers under, among other things, its emergency powers per R.C. 4909.16. The emergency statute enables the PUCO to act when it “deems it necessary to prevent injury to the business or interests of the public....”

¹⁷ See Dominion Emergency Plan, at 3, Appendix A (seeking suspension of PIPP rules).

¹⁸ AEP Ohio Emergency Plan Order, at ¶24.

D. The PUCO should require Dominion to offer extended payment plans through 2021 or until the emergency is over (whichever is later).

The Dominion Emergency Plan is not specific regarding payment plans for customers struggling to pay their bills as a result of the pandemic. The PUCO should impose a reasonable time period during which Dominion's customers may enter payment plans for paying back any past-due amounts caused during this state of emergency. While the existing PUCO-ordered payment plans¹⁹ may be helpful for some consumers, more customized payment plans that meet the needs of consumers should be broadly offered.²⁰ This will provide some relief to Dominion customers who have lost income due to the coronavirus emergency while still allowing Dominion to collect revenues for gas service.

The PUCO should also require Dominion to offer payment plans that allow consumers more time (than the traditional three-, six- and nine-month payment plans) to pay back the past due balances to Dominion. This will also provide some much-needed relief to Dominion customers who have lost income due to the coronavirus emergency while still allowing Dominion to collect revenues (albeit over a longer period of time) for utility service while consumers are fighting to get back on their feet.

E. To protect consumers, Dominion should not be permitted to lessen safety standards when person-to-person contact is unlikely.

Dominion's Emergency Plan takes steps to limit person-to-person interactions. When reasonable, such steps should be incorporated into any PUCO Order addressing the state of emergency including, but not limited to, avoiding in-person payments whenever possible and limiting meter reading at a home whenever possible. The PUCO recently approved AEP Ohio's

¹⁹ O.A.C. 4901:1-18-05(B).

²⁰ O.A.C. 4901:1-18-05(A).

plan to encourage electronic bill payments or payments by mail to reduce in-person conduct,²¹ and the PUCO should adopt similar measures for Dominion in this case.

In addition, repairs necessary to maintain the safety and reliability of Dominion's system should continue unless they involve unnecessary person-to-person interaction with customers. For example, Dominion requests a waiver from the requirements under Ohio Adm. Code 4901:1-16-04(I) regarding the remediation of grade-two gas pipeline leaks. The PUCO Staff does not oppose Dominion's request to extend the time to remediate grade-two leaks until December 31, 2020.²² However, PUCO Staff recommended that such leaks be re-evaluated every six months.²³ The PUCO Staff's approach is reasonable and should be adopted. In ruling on the AEP emergency plan, the PUCO made clear that it is not allowing a reduction in safety.²⁴ That is consistent with the PUCO Staff's recommendations in this case. And OCC recommends that the PUCO's ruling in this case should, like in the AEP case, not allow a reduction in safety.

F. The PUCO should require Dominion to make publicly available for consumers, on its website and elsewhere, the details of its Emergency Plan information for transparency and the protection of their interests as customers.

Dominion's Emergency Plan proposes to modify and suspend certain customer communications.²⁵ However, Dominion's customers have a right to know about the emergency plan, including what their rights and options are during emergency. The PUCO should develop a plan to educate and inform customers of their rights during this emergency. In the PUCO's ruling

²¹ AEP Ohio Emergency Plan Order, at ¶¶49-51.

²² Staff Review and Recommendation (May 5, 2020) ("Staff Report"), at p. 5.

²³ *Id.*

²⁴ See AEP Ohio Emergency Plan Order, at ¶64.

²⁵ Dominion Emergency Plan, at 4-5.

in the AEP emergency plan, the PUCO stated that consumers should be informed.²⁶ All reasonable methods of communication should be used. For example, use of bill inserts, public service announcements, social media, and working with social service agencies should be explored. And Dominion should be coordinating in the communities that it serves by providing central locations where consumers can receive bill payment assistance and communicating the procedures customers should follow in order to obtain bill payment assistance to avoid falling behind in their natural gas bills.

IV. FOR CONSUMER PROTECTION, THE PUCO SHOULD NOT APPROVE POTENTIAL DOMINION CHARGES TO CONSUMERS UNLESS, AT A MINIMUM, ANY CHARGES PROPOSED BY DOMINION ARE FOR COSTS THAT ARE PRUDENT, NECESSARY, AND MEET OTHER RATEMAKING STANDARDS.

If Dominion seeks to collect any costs associated with the emergency from consumers, then the PUCO should only approve such costs that are directly related to actions Dominion takes during the coronavirus emergency and the costs meet Ohio ratemaking standards. Such ratemaking standards include that the costs are prudently incurred and necessary in the provision of utility service. These important standards are not found in Dominion's Emergency Plan. But the PUCO did affirm in AEP's emergency case that any cost recovery would be subject to ratemaking standards, "including, but not limited to, issues such as prudence, proper computation, proper recording, reasonableness, and any potential double-recovery, . . ."²⁷

²⁶ AEP Ohio Emergency Plan Order, at ¶51.

²⁷ AEP Ohio Emergency Plan Order, at ¶61.

V. FOR CONSUMER PROTECTION, THE PUCO SHOULD ADDRESS IN DOMINION’S EMERGENCY PLAN SPECIFIC CHARGES THAT SHOULD BE WAIVED, CONFORMING DEFERRALS TO STRICT REGULATORY STANDARDS, TRACKING OF DOMINION’S COST SAVINGS FOR LATER OFFSET AGAINST CHARGES TO CONSUMERS, AND AVOIDANCE OF DUPLICATIVE (DOUBLE) CHARGES.

The PUCO Staff Report states that Dominion “is deferring or eliminating certain fees to encourage reconnection or continuity of service.”²⁸ But Dominion’s Emergency Plan is unclear as to how it will collect these unknown expenses and charges from customers. If Dominion seeks to defer for later collection from customers fees and charges associated with customer disconnections and reconnections (or any other pandemic-related fees or charges), such deferrals should comply with the PUCO’s standards for reviewing and approving accounting deferrals.²⁹

To benefit customers in these difficult times, all late fees and credit card fees should be waived as of March 9, 2020 and deferred for later collection from customers. Dominion should also be required to waive any fees on returned checks. Such policies would help Dominion’s customers begin to recover from the damage caused by the coronavirus pandemic.

The PUCO should also order Dominion to track expenses that were *not* incurred during this state of emergency as a result of emergency measures. Such avoided expenses should be used to offset expenses associated with its Emergency Plan that Dominion is later seeking to collect from customers. Certain postponed actions and deferred activities will no doubt occur and can significantly reduce Dominion’s overall expenses. Some of these activities include, but are not limited to, furloughs or reduction in salaries, temporary or permanent reductions in employee

²⁸ Staff Report, at 4.

²⁹ See e.g., *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 17-2118-GA-AAM, Finding and Order (April 18, 2018).

numbers, postponed or avoided inside meter readings, reduced travel expenses, and any postponed or deferred operations and maintenance activities.

It is only reasonable that the expenses that Dominion *does not* incur due to the coronavirus pandemic should be tracked so that they can offset any extra expenses that Dominion *does* incur due to the pandemic. The PUCO recently directed AEP Ohio to track any costs avoided under its emergency plan,³⁰ and the PUCO should direct Dominion to do the same in this case. Also, the PUCO should not permit cost or revenue shifting from one class of customers at the expense of another.

Additionally, certain costs that Dominion will incur during the emergency may already be included in Dominion's base rates. An example is labor and fleet expenses required to do disconnections that are suspended during the emergency. This expense is duplicative because this same labor and fleet will be used to perform the reconnections mentioned earlier. Obviously, consumer protection requires that duplicative collections (double recovery) from customers should be prohibited. The PUCO should direct Dominion to track and report these expenses.³¹

VI. THE PUCO SHOULD ORDER THAT DOMINION ADOPT ADDITIONAL CONSUMER PROTECTIONS IN ITS EMERGENCY PLAN.

In addition to causing severe health concerns, the coronavirus emergency has had a devastating impact on consumers' finances. Jobs have been lost, unemployment has increased, and wages have been reduced. In light of that devastating impact, the PUCO should add consumer protections to Dominion's Emergency Plan.

³⁰ AEP Ohio Emergency Plan Order, at ¶62.

³¹ AEP Ohio Emergency Plan Order, at ¶¶61-62.

A. Consumers' personal information should be protected.

The PUCO should use its emergency powers under R.C. 4909.16 to suspend Dominion's disclosure of its customers' personal contact information to gas marketers for telemarketing and other sales purposes. No customer's personal contact information should be shared with a marketer, in the absence of the customer's affirmative consent. As stated, the PUCO can declare an emergency that, under the circumstances of the current health and financial crises, includes barring the disclosure of customer's personal contact information to gas marketers unless customers have affirmatively consented. The emergency statute would allow the PUCO to override R.C. 4929.22(F) and O.A.C. 4901:1-13-14(C), if that statute is deemed to require disclosure unless a consumer opts out.

Marketers can use personal contact information to exploit customers by marketing service at unreasonable rates. This recommendation is supported by the shadow-billing information that Columbia Gas of Ohio has collected since the inception of so-called "Choice." Through March 2020, according to the latest information, Columbia consumers have paid **\$1.8 billion** more than they would have paid had they been served by Columbia's GCR/standard offer.³²

The PUCO is now inquiring into protections for consumers during this emergency. The emergency is a time to recognize that there are not many, if any, greater opportunities for natural gas consumers to save money than the savings that they could achieve by not entering into a contract with a gas marketer at a rate in excess of Dominion's standard choice offer.

For quite some time, there has been a dwindling number of marketer offers that allow consumers to beat Dominion' standard offer. This emergency is a time for the government

³² See Columbia Shadow Billing Report attached here as Attachment A.

(PUCO) to incorporate this bitter reality for Dominion consumers into how the PUCO informs (educates) consumers about their dim prospects with natural gas marketing offers. During this emergency (and for a reasonable time after the formal emergency) the PUCO should help protect already stressed consumers from cold-calling by energy marketers and from over-paying them for natural gas service as a result of Dominion's disclosure of their personal contact information.

Further, the PUCO should revise its Apples-to-Apples website to help consumers understand more explicitly their significant exposure for paying more money (and possibly a lot more money) than Dominion's low-priced standard offer. As stated, many consumers now have less money (or no money) as result of the health crisis.

B. Work on, and charges for, “non-essential” utility services should be suspended (and associated costs should be saved and used to offset costs Dominion incurs because of the emergency) until the emergency ends (or the PUCO determines otherwise).

Work on, and charges for, “non-essential” utility services, even those that do not involve social contact, should be suspended until the emergency ends (or the PUCO determines otherwise). Maintaining essential utility service to consumers in this emergency is crucial. Equally as important is helping consumers deal with the financial hardships they are facing as a result of the emergency. While making sure that essential utility service must be done, “non-essential” utility services (and charges for them) should be suspended. Essential utility services are those necessary to ensure that Dominion has necessary and adequate facilities to provide basic reliable and safe service to customers. Non-essential services are those not needed to provide basic utility services to customers.³³ The PUCO has further clarified that “non-essential functions include, but are not limited to, in-home energy efficiency audits, weatherization

³³ See R.C. 4905.22.

programs, in premises inspections not prompted by an identified safety-related concern, and other similar initiatives.”³⁴

C. Other consumer protection considerations.

The National Consumer Law Center has published a one-page list of recommendations for consumer protection, “Coronavirus Crises: How States Can Help Consumers Maintain Essential Utility Services.” The publication is attached hereto as Attachment B. As the PUCO reviews Dominion’s Emergency Plan, the consumer protections in the National Consumer Law Center’s publication should be implemented.

VII. CONCLUSION

For the health and economic security of Dominion’s customers, the PUCO should issue an order that helps Ohio consumers with their difficult path through the coronavirus crisis and their ensuing financial crisis. The additional steps proposed by OCC to protect customers, but not included in Dominion’s Emergency Plan, should be adopted by the PUCO.

³⁴ Case No. 20-591-AU-UNC, March 20, 2020 Entry, at ¶10.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Comments have been served via electronic transmission upon the following parties of record this 13th day of May 2020.

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Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741
Feb-18	-\$11,398,416	-\$2,573,054	-\$37,638	\$32,141	\$35,553	-\$13,941,414	\$0	-\$13,941,414	\$23,412,227	-\$1,551,780,927	-\$1,575,193,155
Mar-18	-\$13,701,257	-\$4,102,488	-\$71,874	\$97,706	\$23,532	-\$17,754,381	\$0	-\$17,754,381	\$23,412,227	-\$1,569,535,308	-\$1,592,947,536
Apr-18	-\$14,252,376	-\$4,362,801	-\$80,331	\$48,637	\$20,711	-\$18,626,161	\$0	-\$18,626,161	\$23,412,227	-\$1,588,161,468	-\$1,611,573,696
May-18	-\$6,279,749	-\$1,859,047	-\$35,776	\$20,324	\$15,933	-\$8,138,314	\$0	-\$8,138,314	\$23,412,227	-\$1,596,299,783	-\$1,619,712,011
Jun-18	-\$2,785,837	-\$866,876	-\$13,609	\$15,332	\$43,914	-\$3,607,076	\$0	-\$3,607,076	\$23,412,227	-\$1,599,906,859	-\$1,623,319,087
Jul-18	-\$2,391,788	-\$728,416	-\$12,355	\$17,243	\$71,279	-\$3,044,037	\$0	-\$3,044,037	\$23,412,227	-\$1,602,950,896	-\$1,626,363,124
Aug-18	-\$2,370,543	-\$763,545	-\$11,058	-\$8,968	\$73,229	-\$3,080,885	\$0	-\$3,080,885	\$23,412,227	-\$1,606,031,780	-\$1,629,444,009
Sep-18	-\$2,377,345	-\$747,286	-\$11,546	\$8,187	\$48,877	-\$3,079,113	\$0	-\$3,079,113	\$23,412,227	-\$1,609,110,894	-\$1,632,523,122
Oct-18	-\$3,048,855	-\$877,058	-\$21,557	-\$8,173	\$41,244	-\$3,914,399	\$0	-\$3,914,399	\$23,412,227	-\$1,613,025,293	-\$1,636,437,521
Nov-18	-\$8,245,795	-\$2,195,153	-\$46,857	\$49,759	\$57,367	-\$10,380,680	\$0	-\$10,380,680	\$23,412,227	-\$1,623,405,972	-\$1,646,818,201
Dec-18	-\$7,107,855	-\$486,892	-\$11,127	-\$131,642	\$36,444	-\$7,701,071	\$0	-\$7,701,071	\$23,412,227	-\$1,631,107,044	-\$1,654,519,272
Jan-19	-\$14,432,062	-\$4,330,882	-\$90,482	-\$9,463	-\$117,386	-\$18,980,275	\$0	-\$18,980,275	\$23,412,227	-\$1,650,087,319	-\$1,673,499,547
Feb-19	-\$20,526,817	-\$6,533,568	-\$128,396	\$24,773	\$23,583	-\$27,140,424	\$0	-\$27,140,424	\$23,412,227	-\$1,636,251,318	-\$1,659,663,546
Mar-19	-\$17,106,315	-\$5,386,552	-\$109,858	-\$51,686	-\$1,770	-\$22,656,180	\$0	-\$22,656,180	\$23,412,227	-\$1,658,907,497	-\$1,682,319,726
Apr-19	-\$11,367,867	-\$3,623,774	-\$74,339	\$49,716	\$10,455	-\$15,005,809	\$0	-\$15,005,809	\$23,412,227	-\$1,673,913,306	-\$1,697,325,534
May-19	-\$6,410,621	-\$1,840,759	-\$28,594	\$17,288	\$30,188	-\$8,232,499	\$0	-\$8,232,499	\$23,412,227	-\$1,682,145,805	-\$1,705,558,033
Jun-19	-\$3,592,368	-\$1,200,432	-\$15,590	-\$6,574	\$26,184	-\$4,788,780	\$0	-\$4,788,780	\$23,412,227	-\$1,686,934,584	-\$1,710,346,813
Jul-19	-\$2,998,675	-\$1,087,420	-\$14,994	\$18,709	\$39,386	-\$4,042,994	\$0	-\$4,042,994	\$23,412,227	-\$1,690,977,578	-\$1,714,389,806
Aug-19	-\$2,813,061	-\$1,067,297	-\$15,342	\$18,693	\$40,760	-\$3,836,246	\$0	-\$3,836,246	\$23,412,227	-\$1,694,813,825	-\$1,718,226,053
Sep-19	-\$2,859,421	-\$1,071,283	-\$14,214	\$25,450	\$46,097	-\$3,873,371	\$0	-\$3,873,371	\$23,412,227	-\$1,698,687,196	-\$1,722,099,424
Oct-19	-\$3,348,874	-\$1,102,361	-\$19,762	\$2,084	\$44,122	-\$4,424,791	\$0	-\$4,424,791	\$23,412,227	-\$1,703,111,987	-\$1,726,524,215
Nov-19	-\$8,645,982	-\$2,655,864	-\$57,042	\$107,477	\$56,498	-\$11,194,913	\$0	-\$11,194,913	\$23,412,227	-\$1,714,306,900	-\$1,737,719,128
Dec-19	-\$16,457,094	-\$5,480,208	-\$131,140	\$96,260	\$42,802	-\$21,929,380	\$0	-\$21,929,380	\$23,412,227	-\$1,736,236,280	-\$1,759,648,508
Jan-20	-\$18,659,395	-\$6,818,494	-\$157,018	\$112,697	\$23,420	-\$25,498,789	\$0	-\$25,498,789	\$23,412,227	-\$1,761,735,069	-\$1,785,147,297
Feb-20	-\$20,153,919	-\$7,318,893	-\$164,857	\$119,648	\$8,427	-\$27,509,594	\$0	-\$27,509,594	\$23,412,227	-\$1,789,244,663	-\$1,812,656,891
Mar-20	-\$18,103,090	-\$6,385,425	-\$141,270	\$82,100	\$4,253	-\$24,543,434	\$0	-\$24,543,434	\$23,412,227	-\$1,813,788,097	-\$1,837,200,325

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
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Coronavirus Crisis: How States Can Help Consumers Maintain Essential Utility Services

March 2020

KEEP RESIDENTIAL UTILITY SERVICE ON DURING THE CRISIS

Access to affordable electric, gas, water, sewer, and telecommunications (including internet) services is essential at all times, but especially during a worldwide pandemic and shelter-at-home orders. Throughout the COVID-19 emergency, states should take the following steps to ensure that consumers stay connected to essential utility networks and reduce the need for public interaction:

- Issue an emergency declaration through gubernatorial action banning all regulated and unregulated utility service shut offs, including electric, gas, water/sewer, and telecommunications services, due to inability to pay, during the crisis;
- Order all regulated and unregulated utilities to reconnect customers who were previously disconnected due to inability to pay;
- Ban all in-person marketing and sales of alternative energy supply and distributed energy products during the length of the emergency declaration;
- Encourage low-income households to apply for the federal Lifeline phone and broadband program for free or discounted voice and data service;
- Adjust state Low Income Home Energy Assistance Program (LIHEAP) application deadlines, enrollment access and eligibility certification processes; and

ENSURING THAT UTILITY SERVICE IS AFFORDABLE FOR ALL

After emergency orders have been lifted, states should ensure that utility arrearages incurred during the crisis do not trigger disconnections. States should require all utility service providers, both regulated and unregulated, to adopt more flexible credit and collections practices than currently required by state regulations and unregulated utility policies. Such protections should:

- Eliminate any customer deposit requirements;
- Eliminate down payment requirements on deferred payment arrangements (DPAs);
- Allow flexible, reasonable DPAs that are based on the customer's ability to pay;
- Eliminate any requirement that disconnected customers pay the full arrearage in order to reconnect, thereby permitting reconnection upon issuance of an affordable DPA;
- Eliminate minimum balance requirements for prepaid utility service customers;
- Require utilities to write off debt for consumers who certify that they are eligible for LIHEAP, but are unable to receive LIHEAP due to insufficient LIHEAP funds; and
- Prohibit utilities from imposing late fees and engaging in negative credit reporting

Questions? Contact National Consumer Law Center advocates Jen Bosco (jbosco@nclc.org), Charlie Harak (charak@nclc.org), John Howat (jhowat@nclc.org), Karen Lusson (klusson@nclc.org) or Olivia Wein (owein@nclc.org).

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Summary: Comments Comments for Additional Consumer Protections Regarding the Temporary Plan of Dominion Energy Ohio to Address the Coronavirus Emergency by The Office of The Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of O'Brien, Angela D