

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Proper Procedures and)	
Process for the Commission's Operations and)	Case No. 20-0664-GA-UNC
Procedures During the Declared State of)	
Emergency and Related Matters.)	

**COMMENTS
BY OHIO PARTNERS FOR AFFORDABLE ENERGY**

I. Introduction

On March 12, 2020, the Public Utilities Commission of Ohio ("Commission") initiated Case No. 20- 591-AU-UNC, 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. ("State of Emergency Proceeding") The Commission then issued an Entry that, due to the declaration of a state of emergency, "directs 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."

On March 20, 2020 the Commission issued an Entry in the State of Emergency Proceeding which, consistent with the Governor's Executive Order and the March 12, 2020 Order of the Director of the Ohio Department of Health, suspended certain

activities and programs deemed non-essential.¹ Weatherization programs were included in the Commission's examples of non-essential activities.²

On March 30, 2020, Suburban Natural Gas Company ("Suburban" or "Company") filed an application proposing a comprehensive plan ("Plan") to implement the Commission's directives in the State of Emergency Proceeding, seeking the Commission's approval of the Plan and associated relief.

On May 14, 2020, the Commission issued an Entry establishing a procedural schedule in this matter and directed all interested parties to file motions to intervene and comments by May 21, 2020. The Commission requested parties file comments to assist the Commission in its review of the Company's Applications.

II. Comments

Ohio Partners for Affordable Energy ("OPAE") generally supports the Motion as filed in the above captioned matter and the Staff Recommendation filed on May 12, 2020, however, OPAE urges the Commission to permit in-home energy efficiency audits and weatherization programs to resume.

The Commission originally suspended all weatherization programs as non-essential services in accordance with the guidance provided by the Governor and the Director of Health and their respective Orders. See Case No. 20-591-AU-UNC, Entry, (March 20, 2020). OPAE supported that suspension given the dire and uncertain circumstances Ohioans faced at the time. Consistent with the Commission Entry, Suburban suspended all such functions the Commission deemed non-essential.³

¹ State of Emergency Proceeding, Entry at ¶¶10-11 (March 20, 2020).

² Id. at ¶

³ Application p. 1.

In its recent decision in AEP's COVID-19 docket, the Commission noted its March 20, 2020 suspension of all non-essential functions which created unnecessary risks related to social contact but then stated all non-essential work that does not create such risk may continue.⁴ The Governor and the Director of Health have announced their Responsible Restart Ohio plan and both have ordered that businesses be allowed to open in phases.⁵ The construction industry, to the extent companies had chosen to shutter, was allowed to resume operations on May 4, 2020. The Director of Health issued a list of required best practices for each industry within her Order.⁶

The Ohio Development Services Agency has authorized grantees of the Home Weatherization Assistance Program (HWAP) and the Electric Partnership to return to the field. The agencies that deliver services under Suburban's low-income weatherization programs, are also grantees under these two programs. The HWAP Policy Advisory Committee's Technical Subcommittee has completed development of best practices to be followed to ensure the safety of clients and workers to complement the OSHA and EPA requirements field staff already follow, and these best practices will continue to evolve as additional information comes available. OPAE's member agencies are fully capable of conducting in-home energy efficiency audits and home weatherization installations consistent with all applicable regulations and best practices.

These practices include sending all necessary paperwork in the mail for execution prior to installation, maintaining 6 feet of social distancing, routine disinfecting

⁴ Pub. Util. Comm. Case No. 20-602-EL-UNC, Finding and Order, at ¶66 (May 6, 2020).

⁵ <https://coronavirus.ohio.gov/static/publicorders/Directors-Stay-Safe-Ohio-Order.pdf>; <https://governor.ohio.gov/wps/portal/gov/governor/media/news-and-media/covid19-update-april-27>

⁶ <https://coronavirus.ohio.gov/static/publicorders/Directors-Stay-Safe-Ohio-Order.pdf> at ¶21.

of equipment, and the use of extensive personal protective equipment including N95 masks, gloves, booties, and Tyvek suits. Now that weatherization programs have been authorized to resume by both the Director of Health and ODSA, these programs should be authorized to resume consistent with the Commission's decision in the AEP COVID-19 Docket on May 6, 2020.

Low- and moderate-income Ohioans are disproportionately afflicted by respiratory diseases such as asthma and chronic obstructive pulmonary disease ("COPD"). Individuals with these afflictions are in the high risk category if infected by COVID-19 and have a higher chance of needing more extensive care and treatment. Weatherization provides an additional layer of protection for these vulnerable Ohioans in a time when that protection is most needed. Weatherized homes are proven to improve the health of the families that live in them and now is the time to get back to work protecting Ohio's most vulnerable citizens.

Pursuant to the Director of Health's reopening Order which authorized the resumption of the construction industry and the Commission's May 6, 2020 Order authorizing non-essential functions which do not create unnecessary COVID-19 risks, OPAE respectfully request the Commission authorize Suburban to resume its in-home energy efficiency audit and weatherization programs.

III. Conclusion

OPAE commends the Company for the actions it has taken and is proposing to take to protect its customers during this state of emergency. Additionally, OPAE thanks the Commission for the opportunity to provide input on the Company's proposals. OPAE

respectfully requests the Commission consider OPAC's comments and incorporate OPAC's recommendations in the Commission's decision.

Respectfully submitted,

/s/ Robert Dove
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I certify that The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case.

/s/ Robert Dove
Robert Dove

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5/21/2020 4:28:17 PM

in

Case No(s). 20-0664-GA-UNC

Summary: Comments electronically filed by Mr. Robert Dove on behalf of Ohio Partners for Affordable Energy