

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Operations of Vectren |) | |
| Energy Delivery of Ohio, Inc. During the |) | Case No. 20-0649-GA-UNC |
| Declared State of Emergency and Related |) | |
| Matters. |) | |

**COMMENTS ON THE TRANSITION PLAN
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, it “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 In-home audit and weatherization programs were among the programs suspended.²

On June 30, 2020, Vectren Energy Delivery of Ohio, Inc. (“Vectren” or “Company”) filed its comprehensive plan (“Plan”) to transition out of the waivers and temporary policies followed during the initial phase of the pandemic response. Ohio Partners for Affordable Energy (“OPAЕ”) offers the following comments regarding the Plan, which was developed in conjunction with Staff per the Commission Finding and Order issued on May 20, 2020.

II. Comments

A. Enhanced Safety Protocols

Vectren indicates it has implemented a series of safety protocols consistent with guidelines issued by the Centers for Disease Control (“CDC”) and the Ohio Director of Public Health’s Stay Safe Ohio Order issued April 30, 2020, as a part of its Pandemic Preparedness Plan. The measures comply with the various guidelines and are consistent with those proposed by other utilities.

B. Field Activities

Vectren has already restarted field activities associated with repairs where there is a potential for service interruption. Likewise, meter testing, meter relocations, service upgrades have been restarted as of July 1, 2020. In addition, Vectren’s transition to full compliance with customer service response standards has also begun. OPAЕ has no objection, and applauds the measured restart of activities.

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

² Id. at ¶

C. Meter Reading

The Company will restart in-person meter readings for non-AMR/ERT 45 days after filing, and provide initial or final readings for willing customers. OPAE supports this decision.

D. Weatherization and Demand Side Management Programs

The March 20, 2020 Order required utilities to suspend DSM activities that required social contact with customers. This applied to low-income and in-home audit programs. The State Department of Health authorized these programs to return to the field on May 5, 2020. Local Community Action Programs (“CAPs”) returned to the field soon after, serving customers with federal and State funds. Vectren indicates it permitted agencies to restart its program on July 1, 2020. The agencies are following CDC and Department of Health guidelines, and implemented additional best practices developed based on experience and federal guidance. OPAE supports the restart of these critical programs. In particular, the positive health impacts of weatherization on those with chronic conditions that render individuals susceptible to COVID-19, justify the reopening.

E. Disconnections

The Commission’s May 20, 2020 Order authorized utilities to begin disconnection 45 days after the filing of a transition plan. Vectren proposes a four-phase approach with each phase lasting 20 to 30 days, and commits to not disconnecting customers for nonpayment before August 15, 2020, and returning to pre-COVID-19 policies by October 1, 2020. The various phases focus on outreach to non-paying customers, with an increasing focus on those with the largest arrearages. OPAE notes that while this is

the time of year when customers use very little gas, the high customer charge can result in a significant arrearages being built up even during a period of low usage.

OPAE urges the Company to delay disconnections until October 1, 2020, though it supports sending disconnection notices on August 15, 2020. It is clear to OPAE that the moratorium on disconnections is resulting in customers facing financial hardship ignoring their utility bills. As we move into the winter heating season, it is important to encourage compliance with payment requirements. The Ohio Development Services Agency (“ODSA”) has opened the Summer Crisis Program, funded by the federal government. Additional funding for the program was provided under the CARES Act, and a further increase in funding is likely. The program opened on July 1 and will continue through September 30, 2020. The Winter Crisis Program will open on November 1, 2020. In addition, unemployed customers may be eligible for the Percentage Income Payment Plan.

It is critical that customers reach out for assistance before arrearages build to the point where benefits cannot cure the default. OPAE members do not have fuel fund resources to supplement HEAP funds in this territory, so getting people connected with benefits sooner rather than later should be a priority. We encourage Vectren, as a part of its outreach to customers, to provide information on contacting their local CAP. OPAE anticipates a surge in applications as the moratoria are lifted, and the sooner clients contact agencies the sooner they can be helped.

F. Late Payment Fees

OPAE supports Vectren's proposal to delay collection of late fees until October 1, 2020. This is reasonable; the moratorium was put in place to allow customers reeling from the loss of employment or their business from being disconnected from essential energy services. OPAE recommends that Vectren forego the collection of late fees accrued between the start of the moratorium in March through October 1, 2020. While Vectren is undoubtedly accustomed to receiving revenues from the fees, this revenue is unrelated to system costs. Recovering late fees incurred during the pandemic is punitive. Adding late fees into arrearages covered by a payment plan would occur as a matter of course under the Winter Reconnect Order. OPAE suggests Vectren defer late fees, as a number of utilities have proposed, which will allow the foregone revenue to be offset by whatever savings can be identified in a future docket.

G. Payment Plans

OPAE supports Vectren's approach to payment plans. We support the implementation of a twelve-month payment plan, and encourage the Company to consider longer-term plans as necessary. Vectren commits to working with customers on a case-by-case basis, the best approach. Payment plans not based on a customer's ability to pay will result in better payment compliance and speed the elimination of arrears. OPAE also supports the suspension of down payments, including deposits and fees.

H. Percentage Income Payment Plan (“PIPP”) Requirements

Vectren’s proposals regarding PIPP customers do not follow the decision of the Commission in the Finding and Order issued regarding Columbia’s transition plan filed in Case No. 20-637-GA-UNC on June 17, 2020.

As the Commission explained in its Order, during the emergency, or until otherwise specified by the Commission, PIPP participants and Graduate PIPP participants shall not be removed or dropped from the programs or prohibited from enrolling in the programs for not be current, for failure to comply with programs requirements as of the customer’s anniversary date, or for failure to timely reverify eligibility. Finding and Order at pp. 12-13.

Thus, Vectren’s proposal to reinstate the requirements of O.A.C. 4901:1-18-12(D)(1) and O.A.C. 4901:1-18-17(A) and (B) thirty days after approval of this Plan is inappropriate. The Commission will make this decision when appropriate.

Missed PIPP payments incurred through October 1, 2020, should be rolled into the client’s arrearages. If the customer is no longer eligible for PIPP – an unlikely situation – developing a payment plan, as proposed by Vectren, is appropriate. However, Vectren’s proposal to negotiate a payment plan for missed PIPP payments is not appropriate as rolling the missed payments into the arrears is a better option and will help ensure service remains affordable for the most vulnerable customers. Moreover, any missed payments rolled into arrearages should be eligible for crediting under the Program. This was the approach used by the Program prior to the last rule review, and should be the approach taken until the emergency is over.

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 OPAE's comments and incorporate OPAE's recommendations in the Commission's decision.

Respectfully submitted,

/s/ Robert Dove
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CERTIFICATE OF SERVICE

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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Case No(s). 20-0649-GA-UNC

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