

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	Case No. 20-650-EL-AAM
Dayton Power and Light Company for Approval of)	
Certain Accounting Authority)	
)	
In the Matter of the Application of The)	Case No. 20-651-EL-UNC
Dayton Power and Light Company for Approval of its)	
Temporary Plan for Addressing the COVID-19 State)	
of Emergency)	
)	
Dayton Power and Light Company for Waiver of)	Case No. 20-652-EL-WVR
Tariffs and Rules Related to the COVID-19 State of)	
Emergency)	
)	

**COMPREHENSIVE PLAN OF THE DAYTON POWER AND LIGHT COMPANY
TO RESUME PRE-COVID-19 ACTIVITIES**

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*, and 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 non-residential customers or create unnecessary COVID-19 risks associated with social contact.” (*State of Emergency Proceeding*, March 12 Entry at ¶ 1.) On March 13, 2020, the Commission issued an Entry that, due to the declaration of a State of Emergency, “directs all

public utilities under its jurisdiction to review their service reconnection policies, practices, and tariff provisions and to promptly seek any necessary approval to suspend otherwise applicable requirements that may impose a service restoration hardship on residential and non-residential customers or create unnecessary COVID-19 risks associated with social contact.” (*State of Emergency Proceeding*, March 13 Entry at ¶ 1.) Then, on March 20, 2020, the Commission issued an Entry that, due to the declaration of a State of Emergency, “directs all public utilities under its jurisdiction to suspend in-person, actual meter readings in circumstances where a meter is located inside a customer’s home or similar location, as well as all other non-essential functions that may create unnecessary COVID-19 risks associated with social contact.” (*State of Emergency Proceeding*, March 20 Entry at ¶ 1.)

The Dayton Power and Light Company (“DP&L” or the “Company”) proposed in Case No. 20-650-EL-AAM et al. to implement a number of proactive protections for the duration of the State of Emergency (“Plan”) and received Commission approval of the Plan. The May 20, 2020 Commission Order directed DP&L to file a comprehensive plan for resuming activities and operations that were affected by the State of Emergency. This comprehensive plan of DP&L to return to pre-COVID-19 activities (“Return Plan”) outlines the steps and timing of transitioning back to pre-COVID-19 operations.

II. DP&L’S RETURN PLAN FROM THE COVID-19 STATE OF EMERGENCY

DP&L hereby requests the Commission authorize the following:

A. Pay Agreement Plan

DP&L understands the challenges many customers face in paying bills during this challenging time. DP&L believes appropriate terms for pay agreements allow customers to catch up on missed payments, stay current on bills, and avoid disconnection. In addition to the

1/6, 1/9, and Winter Heating plans, DP&L proposes to offer a convenient, easy to enroll standardized 12-month pay agreement for residential customers. DP&L will promote and make this automated option available on its website (customer portal), phone system (IVR), and through call representatives. DP&L will allow customers that are currently on a pay agreement to switch to this option. This 1/12 option divides the account balance by 12 and requires the customer to pay their current bill plus 1/12 of their pay agreement. There is no upfront payment needed to establish this agreement. Additionally, DP&L will offer pay agreements to non-residential customers up to 6 months in length. Non-residential options may also include customized payment terms based on unique situations of larger commercial and industrial customers.

DP&L expects to begin communications regarding these options in July for customers to sign up beginning August 3, 2020. In most cases, these pay agreement options will be available through automated means for customers. DP&L expects these offerings will provide needed relief to many customers and allow for a return to normal operations and pay agreements in the future. This 12-month option will be available through November 2020.

B. PIPP Anniversary and Reverification

Throughout the State of Emergency, DP&L has ensured that PIPP customers have maintained their eligibility status at their anniversary date. DP&L will coordinate with the Ohio Development Services Agency as they reinstitute the PIPP process of verifying eligibility.

C. Process to End Disconnection Moratorium

Immediately following the Commission's March 12 Entry in the *State of Emergency Proceeding*, DP&L initiated changes needed to suspend disconnections for all customers other

than those necessary due to an imminently hazardous situation or a customer request. This included discontinuation of field disconnections for non-payment beginning Friday March 13, 2020. DP&L proposes this disconnection moratorium will end with notifications beginning on August 17, 2020 and actual disconnections on September 1, 2020. DP&L will ensure safe practices that include social distancing and wearing masks when engaging in in-person contact in addition to offering contactless payment options during the personal notice on the day of disconnect. DP&L will continue to monitor and modify safeguards as the situation changes.

D. Resume Deposits and Reconnection Fees, Late Fees, and Credit Card Fees

Upon receiving the March 13 Entry in the *State of Emergency Proceeding*, the Company extended the winter reconnect order (Case No. 19-1472-GE-UNC) through May 1. As an additional Plan component to minimize any service continuity hardship or service restoration hardship on customers while avoiding unnecessary COVID-19 risks associated with social contact, the Company began to temporarily forego reconnection fees for customers that have been recently disconnected. DP&L proposes to begin assessing reconnection fees on September 1, 2020.

As part of its approved Plan, the Company is temporarily waiving the requirements to pay a security deposit prior to re-activation of previously disconnected service and the imposition of late fees. DP&L plans to resume assessing late fees at the same time it issues disconnect notices in advance of the September 1 resumption. DP&L will not assess late fees on accounts that are current on established pay agreements. DP&L has also modified its practices that previously required notarization and now accepts digital forms of ID requirements. DP&L intends to utilize this process until it is safe to resume normal processes that include in-person notarization.

Finally, as part of its approved Plan, DP&L also waived credit cards fees for customers that make payment electronically. DP&L intends to continue waiving this fee through the terms of the 12-month payment plan, which means through November 2021. DP&L will continue to defer and seek recovery of these costs incurred.

E. Meter Reading, Energy Efficiency Programs and other functions resuming under safe processes

Consistent with DP&L's Applications in this case, the Company has already restarted certain activities that were initially paused during the State of Emergency. As noted in its Applications, DP&L has developed safe, no contact processes to resume most meter reading and energy efficiency programs. DP&L has safe meter reading practices in place to read meters; however, some meters still requiring personal contact to read meters inside locations. Safe protocols have been developed to read these meters with few exceptions. Those exceptions include demand meters located inside the premises and would not permit the required social distancing; therefore, these meters will continue to be estimated until it's safe to read the meter.

Regarding energy efficiency programs, DP&L developed safe processes to resume "contactless" appliance recycling as well as resuming rebate program activities under social distancing guidelines. Other utility funded programs such as administering the Home Weatherization Assistance Program and Electric Partnership Program, that did not add incremental risk have resumed; see ODSA guidance <http://oacaa.org/wp-content/uploads/2020/05/2020-025-IU-HWAP-and-EPP-Production-1.pdf>. DP&L will continue to monitor and make changes as necessary but believes no further approval or action on these plans is necessary.

F. Communication Plan

DP&L will begin communicating its plans by the end of July. DP&L will make its new convenient, easy to enroll payment plans available on August 3, 2020 and will inform customers of the availability through various means including emails, automated calls, TV and radio, social media, and website updates. DP&L will work with other organizations, including the PUCO, to publish information. Additionally, DP&L will inform customers of changes related to various fees and PIPP changes.

G. Recovery of costs and revenues associated with the State of Emergency

The Company proposes to continue deferral for fees and other COVID-19 related costs and seek recovery through a future filing with the PUCO.

H. Reservation to Make Changes to the Plan, Including During the Remaining Period of the State of Emergency

The Company reserves the right to modify or supplement its Plan, based on developing conditions. DP&L looks forward to cooperatively working with the Commission and the State of Ohio to do its part in returning to pre-emergency processes and operations.

III. REQUEST FOR CLARIFICATION AND WAIVER OF RULES

DP&L hereby requests the Commission to clarify or waive the following:

A. Clarification of OAC 4901:1-18-05(C) Pay Agreements

DP&L requests a clarification of the rule in order to consistently offer its proposed 12-month pay agreement. The 12-month agreement should be treated similarly to the agreements outlined in OAC 4901:1-18-05(B), as a Commission approved payment plan. DP&L believes such clarification will allow customers to be treated fairly and not disadvantage customers in selecting a pay agreement that works best. DP&L expects that a customer in default of a pay

agreement must remedy the default before being offered a different pay agreement plan. This clarification request is limited to the specific 12-month agreement described in this plan and for the duration of the 12-month agreement. If approved as proposed, DP&L will offer the 12-month plan through November 2020 and be in place for 12 months.

B. Waiver of OAC 4901:1-10-09(B) Call Center Times

DP&L is taking action to respond to our customers in a time of need. DP&L is providing additional training and securing additional resources to respond to an expected increased call volume. The standardized 12-month pay agreement that is available through the phone system and web portal allows customers to conveniently sign-up without speaking to a representative. However, communications on pay agreement and disconnect notices will undoubtedly increase call volumes. While DP&L believes its preparations will support additional call volume, events outside DP&L's control, such as further increased COVID-19 concerns or unexpected storms, may strain the capacity of DP&L's call center and cause call wait times to exceed the thresholds set forth in O.A.C. 4901:1-10-09(B). DP&L acknowledges the challenges ahead and requests such waiver request through the end of 2020.

IV. REQUESTED RELIEF

WHEREFORE, DP&L requests that the Commission find and order, to the extent not already automatically approved, as follows:

1. That the Company's Return Plan and requested relief shall be granted;
2. That any provision of the Company's tariffs that is inconsistent with, or conflicts with, the Return Plan shall be waived;
3. That any provision of the Ohio Administrative Code that is inconsistent with, or conflicts with, the Return Plan shall be waived; and
4. That the Company be granted accounting authority to track all costs associated with the Return Plan and to establish a regulatory asset for future recovery of those costs.

Respectfully submitted,

/s/ Michael J. Schuler

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served via electronic mail upon the
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Summary: Application for Comprehensive Plan of The Dayton Power and Light Company to Resume Pre-COVID-19 Activities electronically filed by Mr. Michael J Schuler on behalf of The Dayton Power and Light Company