

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION OF
SUBURBAN NATURAL GAS COMPANY TO
SUSPEND OR MODIFY CERTAIN
PROCEDURES AND PROCESSES DURING
THE COVID-19 STATE OF EMERGENCY
AND RELATED MATTERS.

CASE NO. 20-664-GA-UNC

SUPPLEMENTAL FINDING AND ORDER

Entered in the Journal on July 29, 2020

I. SUMMARY

{¶ 1} The Commission approves, in part, the transition plan filed by Suburban Natural Gas Company to terminate the waiver of certain portions of the Ohio Administrative Code and corresponding provisions of its tariff and to return to pre-COVID-19 activities and operations, consistent with this Supplemental Finding and Order.

II. DISCUSSION

A. *Procedural History*

{¶ 2} Suburban Natural Gas Company (Suburban or the Company) is a natural gas company and a public utility as defined by R.C. 4905.03 and R.C. 4905.02, respectively. As such, Suburban is subject to the jurisdiction of this Commission.

{¶ 3} R.C. 4909.16 provides, in part, that, in the event of an emergency, when the Commission finds it necessary to prevent injury to the business or interests of the public or of any public utility, it may temporarily alter, amend, or suspend any existing rates or schedules.

{¶ 4} On March 9, 2020, the governor signed Executive Order 2020-01D (Executive Order), declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19. As described in the Executive Order, state agencies are required to implement procedures consistent with recommendations from the Department of Health to prevent or alleviate the public health threat associated with COVID-19. Additionally, all citizens are urged to heed the advice of the Department of Health regarding

this public health emergency in order to protect their health and safety. The Executive Order was effective immediately and will remain in effect until the COVID-19 emergency no longer exists. The Department of Health is making COVID-19 information, including information on preventative measures, available via the internet at coronavirus.ohio.gov/.

{¶ 5} Pursuant to R.C. 3701.13, the Ohio Department of Health has supervision of “all matters relating to the preservation of the life and health of the people” and the “ultimate authority in matters of quarantine and isolation.” On March 12, 2020, the Director of the Ohio Department of Health issued an Order indicating that “all persons are urged to maintain social distancing (approximately six feet away from other people) whenever possible.”

{¶ 6} On March 12, 2020, the Commission opened Case No. 20-591-AU-UNC and directed all utility companies in this state to review their disconnection procedures in light of the state of emergency. *In re 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 (*Emergency Case*), Entry (Mar. 12, 2020) at ¶ 7. On March 13, 2020, the Commission extended its winter reconnection order through May 1, 2020, and directed all utility companies in this state to review their reconnection procedures. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 6. In the March 12, 2020, and March 13, 2020 Entries, the Commission also directed all utility companies to promptly seek any necessary approval, for the duration of the emergency, to suspend otherwise applicable disconnection or reconnection requirements that may impose a service continuity or service restoration hardship on residential and non-residential customers or create unnecessary COVID-19 risks associated with social contact. The Commission determined that such filings shall be deemed approved on an emergency basis for a period of at least 30 days effective as of the filing date or until such date as the Commission may otherwise specify, which shall not be less than 30 days.

{¶ 7} On March 20, 2020, in the *Emergency Case*, the Commission directed all utility companies 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 including, but 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. The Commission also clarified that requests for accounting authority or incremental cost recovery related to the emergency will be addressed in each utility's individual case by subsequent entry. *Emergency Case*, Entry (Mar. 20, 2020) at ¶¶ 10-11, 13.

{¶ 8} On March 30, 2020, in the above-captioned case, Suburban filed an application for authority to suspend and modify various policies and practices and for waivers of related Commission rules due to the COVID-19 pandemic.

{¶ 9} On April 8, 2020, in the *Emergency Case*, the Commission, among other things, extended the 30-day automatic approval period for filings to suspend otherwise applicable disconnection requirements for an additional 30 days, unless otherwise ordered by the Commission. *Emergency Case*, Finding and Order (Apr. 8, 2020) at ¶ 9.

{¶ 10} On June 3, 2020, the Commission granted, in part, Suburban's motion for waiver of certain provisions of the Ohio Administrative Code and corresponding provisions of the Company's tariff, consistent with Staff's recommendations and modifications, and consistent with its Finding and Order. Further, in recognition of the state's relaxation of social distancing restrictions, the Commission directed Suburban to work with Staff to develop a single, comprehensive plan to resume activities and operations, including timelines, and file the plan at least 45 days prior to resuming such activities and operations. Interested persons were directed to file comments within ten days after the filing of the plan.

{¶ 11} On June 19, 2020, Suburban filed its plan to resume pre-emergency operations and activities (transition plan) in compliance with specific provisions of the Ohio Administrative Code and related provisions of the Company's tariff.

{¶ 12} On June 29, 2020, the Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE) filed comments regarding Suburban's transition plan.

B. *Review of Suburban's Transition Plan and the Comments*

{¶ 13} Suburban indicates it is submitting its transition plan in accordance with the Commission's directives in the June 3, 2020 Finding and Order in this matter. In response to the plan, OPAE offers refinements with regard to the payment plans and the treatment of percentage of income payment plan (PIPP) customers. Similarly, OCC asks the Commission to review certain aspects of the plan, including disconnections, the PIPP program, and late fees and related payments.

1. RESUMPTION OF FIELD ACTIVITIES SUSPENDED DUE TO SOCIAL CONTACT

{¶ 14} Suburban indicates it has purchased personal protective equipment (PPE) for all personnel. Suburban will continue to keep social distancing while interacting with the public and observing all state of Ohio safety protocols. Effective July 13, 2020, Suburban will commence the following field activities: start reading meters that are located inside a structure; comply with standards for service requests, scheduled appointments, and leak repairs pursuant to Ohio Adm.Code 4901:1-13-05; comply with all service reconnection procedures pursuant to Ohio Adm.Code 4901:1-18-07, including tie-ins, which involves disconnecting an existing service line in order to tie-in to a new service line, within a 90-minute timeframe, pursuant to the customer's availability.

{¶ 15} OPAE and OCC support reopening field activities on July 13, 2020.

{¶ 16} Upon review, the Commission finds Suburban's transition plan to contain appropriate PPE and precautions for the Company to resume field activities, in light of the state's relaxation of social distancing restrictions. Specifically, the Commission finds Suburban's plan to resume meter reading; comply with standards for service requests, scheduled appointments, and leak repairs; and comply with service reconnection procedures to be reasonable. Therefore, the Company's request to resume compliance with the requirements of Ohio Adm.Code 4901:1-13-04(D) and (G) and Ohio Adm.Code 4901:1-13-05(A), (B), and (C), and related tariff provisions, should be granted.

2. DISCONNECTIONS AND RECONNECTION ACTIVITIES

{¶ 17} Suburban intends to resume the issuance of disconnection notices on or around August 18, 2020, with scheduled disconnections to occur the first week in September. OPAE indicates that, while it would prefer a longer moratorium on disconnections than August 18, 2020, this position was recently rejected by the Commission. *In re Columbia Gas of Ohio, Inc. to Suspend Certain Procedures and Process During the COVID-19 State of Emergency and Related Matters*, Case No. 20-637-GA-UNC (*Columbia Emergency Plan Case*), Supplemental Finding and Order (June 17, 2020) at ¶ 26. Accordingly, OPAE is not restating its position in this proceeding.

{¶ 18} OCC appreciates that Suburban will not terminate customers' service for non-payment until the first week of September because this is more lenient than other utilities' proposals. However, OCC still finds this timeline premature because the pandemic is not yet over and forces customers with limited financial resources to prioritize their needs. OCC requests the Commission to suspend service disconnections for the duration of the emergency and for a reasonable time after the state of emergency officially ends. OCC also faults Suburban for not including discrete data in its transition plan such as the number of customers who are currently delinquent on their payments, the amount of the delinquency, the number of customers who are eligible to receive disconnection notices, the number of customers who are currently on payment plans, the number of PIPP customers, the number of PIPP customers who are behind in payments, the number of customers who are not eligible for medical certifications, arrearages that are more than 60 days, the value of those arrearages, and the impact of the suspension on uncollectible debt and PIPP riders. OCC believes this information is tracked and available and Suburban should have included it in its transition plan to allow the Commission to assess the projected financial and social impact on consumers or Suburban.

{¶ 19} The Commission recognizes that many customers may continue to experience financial stress as a result of COVID-19 despite the reopening of businesses throughout the state. We note, however, that the options provided residential customers in the winter

reconnect order in Case No. 19-1472-GE-UNC, to reconnect service or avoid the disconnection of service, were extended until May 1, 2020. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 8. Further, as we previously recognized in our Finding and Order issued on June 3, 2020, even in light of the emergency, service disconnections for non-payment cannot be suspended indefinitely. Additionally, Suburban, pursuant to the Finding and Order, has worked to restore service to customers who were disconnected for non-payment within 30 days from the March 12, 2020 Entry in the *Emergency Case* and suspended applicable required deposits and reconnection fees. Suburban has also suspended disconnections for non-payment and will do so until the first week of September 2020. Further, pursuant to Ohio Adm.Code 4901:1-18-05(A), Suburban is required to offer a customized payment plan when contacted by a customer with a delinquent account, taking into account certain considerations. In fact, as further discussed below, Suburban has created an additional payment plan to work with customers facing disconnection of service. For these reasons, we decline to adopt OCC's recommendation of halting service disconnections for the duration of the emergency and for a reasonable time after it ends. Additionally, we also find OCC's contention about the lack of granular data in Suburban's transition plan regarding customer payment delinquencies and financial impact to be outside the scope of the plan we directed Suburban to file to address the resumption of pre-emergency operations and activities.

{¶ 20} Though we reject OCC's arguments with regard to disconnections, the Commission strongly encourages Suburban's customer service representatives and collectors to continue to provide customers with delinquent accounts or who wish to avoid a delinquent account with the extended payment plan options, including PIPP, as set forth in Ohio Adm.Code 4901:1-18-05, and information regarding other available payment assistance through the Company. Therefore, the Commission finds Suburban's plan to resume disconnection activities and operations to be reasonable. Reconnection requirements for PIPP program participants are addressed below.

3. PERCENTAGE OF INCOME PAYMENT PLAN PLUS AND GRADUATE PERCENTAGE OF INCOME PAYMENT PLAN

{¶ 21} Turning to the PIPP and Graduate PIPP programs, Suburban indicates that it has continued to remove PIPP customers from the PIPP program for failure to re-verify or to be current on the anniversary dates pursuant to Ohio Adm.Code 4901:1-18-17. Suburban puts the anniversary date on every bill pursuant to Ohio Adm.Code 4901:1-18-15(D). Further, Suburban also identifies the customer's re-verification date on the bill and, 30 days prior to the customer's anniversary date, Suburban sends the customer a reminder to be current. Suburban sends a second reminder if the customer is not current as of their anniversary date. As a result of following these internal procedures, Suburban removed one PIPP customer in May. Moreover, Suburban explains that, 30 days prior to the customer's re-verification date, the Company sends the customer a reminder to re-verify the income and, if this does not occur, Suburban sends a second reminder 30 days after their re-verification date. As a result of following this process, Suburban removed three customers in April and one in May. Suburban indicates that it will offer the customers who have been removed from the PIPP program for failure to reverify or to be current on their anniversary date payment plans to avoid disconnection. If they are able to re-verify, then the customers will only need to make up their PIPP installment amounts, instead of current charges, for the months they were not enrolled in the PIPP program. Suburban requests a waiver of Ohio Adm.Code 4901:1-18-12(D)(3) until November 1, 2020, if it is needed to allow customers to waive the payment requirement to re-enroll in PIPP. Finally, Suburban notes that, while community action agencies did not allow in-person contact during the pandemic, customers were able to re-verify their income through e-mail or regular mail. The agencies also offered phone interviews to provide customers assistance to keep their PIPP installments current.

{¶ 22} OPAE finds Suburban's approach to PIPP customers troublesome, particularly with regard to the anniversary date requirement. OPAE acknowledges that Suburban serves few PIPP customers and may not have any customers with PIPP arrears that need to be paid to comply with the anniversary date requirements. However, OPAE

argues that the fact that the Company has not suspended the anniversary date requirements does not mean that Suburban should not suspend those requirements if need be. OPAE indicates its members are still working to coordinate payment plans with available assistance, and there should be a backstop to ensure customers retain essential utility service. OPAE notes that, with so few PIPP customers, Suburban has the administrative capacity to roll a missed payment into arrears when necessary to ensure continued access to utility service, as ordered by the Commission in the *Columbia Emergency Plan Case*. OPAE advocates a similar approach in this proceeding.

{¶ 23} OCC advocates for similar measures as OPAE. OCC encourages the Commission to follow its previous Finding and Order in this proceeding and suspend Suburban's strict compliance with PIPP eligibility requirements until a reasonable time after the formal state of emergency ends. OCC argues that requiring customers to comply with the strict PIPP eligibility requirements and dropping them from the program for failure to meet the requirements is unreasonable. Accordingly, OCC recommends Suburban immediately stop its current practice of dropping customers from the PIPP program for not being current on their payments or for failure to verify eligibility.

{¶ 24} Upon review of OPAE's and OCC's arguments, we find that Suburban's approach with regard to PIPP customers is inconsistent with our previous Finding and Order in this proceeding. In that Finding and Order, we specifically directed Suburban, during the pandemic, to not remove or drop PIPP customers from the programs or prohibit them from enrolling in the programs for not being current, for failure to comply with program requirements as of the customer's anniversary date, or for failure to timely reverify eligibility. Finding and Order at ¶ 32. This approach is consistent with our directives in the *Emergency Case* and directives issued to other utility companies during the pandemic. Consequently, Suburban should follow the below guidance to ensure PIPP customers who wish to remain on the programs are adequately accommodated.

{¶ 25} Initially focusing on the five customers Suburban indicated it has removed for failure to reverify or to be current on the anniversary date, we direct Suburban to contact

these customers immediately. Suburban should work with these customers to evaluate whether these customers wish to remain on PIPP. If these customers wish to remain on PIPP, Suburban is directed to assist them in re-enrolling in the program and to provide them specific information regarding how to reverify information and maintain eligibility. Suburban should provide Staff with an update with regard to the status of these customers and whether they wish to remain on the PIPP programs within 30 days of this Supplemental Finding and Order.

{¶ 26} Further, we note that, during this state of emergency, the local community action agencies have implemented procedures to facilitate the processing of PIPP applications, including reverification. However, so as not to cause an immediate hardship to PIPP participants, the Commission finds it prudent to follow the approach outlined in the *Columbia Emergency Plan Case*. *Columbia Emergency Plan Case*, Supplemental Finding and Order (June 17, 2020) at ¶ 33. The Commission directs that any PIPP participant, who otherwise would have been required to reverify their eligibility shall be afforded until September 7, 2020, to come into compliance with Ohio Adm.Code 4901:1-18-12(D)(1) and 4901:1-18-17(A) and (B). Further, as to Ohio Adm.Code 4901:1-18-12(D)(2) and (3) and 4901:1-18-16(D), which require that the PIPP participant be current on his/her income-based payment due by the participant's anniversary date, or within one billing cycle after the anniversary date, the Commission directs that PIPP income-based payments due or billed to the PIPP participant as of March 12, 2020, through September 7, 2020, which have not been paid by September 8, 2020, shall be added to the PIPP or Graduate PIPP participant's arrearage. If the customer is no longer eligible for PIPP or does not wish to be enrolled in Graduate PIPP, Suburban should offer the customer the extended payment plans as discussed and approved in this Supplemental Finding and Order. We strongly encourage Suburban to recognize the former PIPP participant's financial circumstances and to be flexible with the extended payment plan offered. PIPP and Graduate PIPP participants for whom installment payments are added to the participant's arrearage shall not be eligible for the incentive pursuant to Ohio Adm.Code 4901:1-18-14, in association with the number of payments added to the arrearage.

{¶ 27} To the extent Ohio Adm.Code 4901:1-18-12(C)(2) requires the PIPP participant to accept weatherization for which the customer is eligible, we recognize that PIPP participants, even with the PPE and other precautions taken, may not be comfortable permitting weatherization personnel in their residence and refuse access. Until the state of Ohio has determined that COVID-19 is no longer a health emergency, PIPP participants may elect not to accept weatherization, without recourse to their eligibility to participate in or to continue participation in the PIPP programs.

{¶ 28} Finally, we find it concerning that Suburban removed PIPP customers from the program during the initial phase of the pandemic, when many sectors of the economy were closed, particularly in light of our directive in the *Emergency Case* that natural gas companies and other public utilities should suspend otherwise applicable requirements that may impose a service continuity hardship on customers. *Emergency Case*, Entry (Mar. 12, 2020) at ¶ 7. We expect Suburban to be mindful of its low-income customers during difficult financial circumstances. We also remind Suburban of our authority under R.C. 4905.54, which empowers the Commission to assess a forfeiture of not more than \$10,000 per day for each violation or failure of a public utility or railroad, or an officer of a public utility or railroad, to comply with an order, direction, or requirement of the Commission made under authority of R.C. Chapter 4909. If Suburban should fail to comply with the terms of this Supplemental Finding and Order, the Commission will exercise its authority under R.C. 4905.54.

4. COLLECTION OF LATE FEES, RECONNECT FEES, AND ARREARAGES, AND STRUCTURE OF PAYMENT PLANS

{¶ 29} Suburban indicates that it will not charge a deposit for reconnections until January 1, 2021. Suburban will charge a reconnect fee but will not require the customer to pay prior to reconnection. Instead, the fee will be added to the customer's bill. Suburban plans to offer, in addition to the one-sixth and one-ninth payment plans, a new payment plan through the end of the 2020-21 winter heating season. Under this new plan, the customer will pay \$175 of the delinquent amount to avoid disconnection, and the balance

will go on a 12-month payment plan. All three plans will be offered to both residential and commercial accounts. If the 12-month plan is approved, Suburban will announce the plan on its website.

{¶ 30} Suburban indicates that it has continued to add deposits to accounts which were established for new service, pursuant to Ohio Adm.Code 4901:1-17-03. Suburban did, however, suspend adding deposits to customer accounts to reestablish creditworthiness. Effective January 1, 2021, Suburban will resume the review of reestablishing credit pursuant to Ohio Adm.Code 4901:1-17-04. Finally, Suburban indicates it did not suspend adding late fees to delinquent accounts.

{¶ 31} OPAE supports Suburban's proposal to forego deposits until January 1, 2021, and to add the reconnect fee to the customer bill. OPAE believes this strategy will help families still feeling the impact of the COVID-19 pandemic to retain essential utility service. OPAE likewise supports the 12-month payment plan and the proposal to add a payment plan utilizing a \$175 down payment coupled with a 12-month payment plan for the balance. However, OPAE argues this new plan, along with Suburban's existing one-sixth and one-ninth plans, fail to comply with Ohio Adm.Code 4901:1-18-05(A). OPAE notes the Commission has previously found, in the *Columbia Emergency Plan Case*, that utility companies are "required to offer a customized payment plan when contacted by a customer with a delinquent account." *Columbia Emergency Plan Case*, Supplemental Finding and Order (June 17, 2020) at ¶ 26. OPAE states that a customized payment plan which incorporates the factors listed in Ohio Adm.Code 4901:1-18-05(A) should be the first option offered to customers. OPAE further explains that a customer's ability to pay is the critical factor and, if that is not considered, it could lead to a cascading set of problems ultimately resulting in disconnection.

{¶ 32} OCC finds the \$175 payment requirement in the new 12-month payment plan offered by Suburban as overly burdensome for many residential customers who are experiencing significant loss of income during the pandemic. Further, OCC notes there are limited, if any, bill payment assistance resources available to help customers pay the \$175.

OCC suggests the Commission require Suburban to work with its customers to offer more customized payment plans, including 12-month or longer payment plans without \$175 upfront payments.

{¶ 33} Finally, OCC argues that Suburban should suspend the collection of late fees, reconnection fees, and deposits from customers until a reasonable time after the state of emergency has ended, instead of resuming to charge reconnection fees and deposits beginning January 1, 2021. OCC posits that January 1, 2021 falls in the middle of the next winter heating season, at which time customers will already be receiving higher natural gas bills. Consequently, OCC requests the Commission require Suburban to continue waiving late fees and reconnection deposits throughout the duration of the emergency and for a reasonable time afterwards. In addition, OCC believes Suburban should not report customers who defer late fees and delinquent charges to credit reporting agencies to avoid further financial harm to these customers.

{¶ 34} The Commission finds Suburban's request to resume charging deposits for reconnections and reviewing credit on January 1, 2021, to be reasonable. We also approve Suburban's proposed 12-month payment plan. However, we acknowledge that an initial \$175 payment to qualify for the 12-month payment plan could be financially difficult for some customers during the pandemic. Accordingly, we encourage Suburban, when appropriate, to offer customized payment plans which incorporate the factors listed in Ohio Adm.Code 4901:1-18-05(A) to those customers who qualify for the 12-month plan but are unable to make the initial \$175 payment. We also strongly encourage Suburban's customer service representatives and collectors to continue to provide customers with delinquent accounts with the extended payment plan options, including PIPP, because we do not wish for customer bills to continue to accrue unpaid delinquent charges to the point that the utility bill becomes an insurmountable debt.

{¶ 35} We note it appears Suburban has continued to assess late payment fees despite our contrary directive in our June 3, 2020 Finding and Order to defer delinquent charges, deposits, and fees to ensure continuity of service during the emergency period. Finding and

Order at ¶ 31. Consequently, we clarify that Suburban should ensure no customers are disconnected from natural gas service as a result of accrued late payment fees. Further, we direct Suburban to not report customers who deferred reconnection fees or deposits during the Company's emergency plan period to credit reporting agencies. In all other respects, Suburban's resumption of reconnection requirements, including fees and charges, represents a reasonable plan to transition to pre-emergency activities, operations, and customer obligations. Accordingly, the Commission finds this aspect of Suburban's plan to be reasonable and, therefore, it should be adopted, as modified by the Commission.

5. ADDITIONAL OCC COMMENTS

{¶ 36} OCC urges the implementation of consumer protection guidelines developed by the National Consumer Law Center (NCLC), titled "Coronavirus Crisis: How States Can Help Consumers Maintain Essential Utility Services," as part of Suburban's transition plan. OCC initially attached the NCLC guidelines with its May 21, 2020 comments. OCC has once again attached the guidelines to its current comments. OCC argues Suburban's premature and unreasonable proposals in its transition plan, including treatment of PIPP customers, highlight the need for a uniform set of consumer protection guidelines applicable to all Ohio gas utilities. Because we find that Suburban's transition plan is reasonable in addressing the issues of service continuity, social distancing, consumer protections, and payment arrangements, including fees and charges, subject to modifications identified above, we once again decline to adopt the NCLC guidelines.

C. *Commission Conclusion*

{¶ 37} Upon thorough review of Suburban's plan to resume pre-emergency activities and operations and intervenors' comments, the Commission finds that the plan should be approved, in part, consistent with this Supplemental Finding and Order.

III. ORDER

{¶ 38} It is, therefore,

{¶ 39} ORDERED, That Suburban's plan to resume activities and operations pursuant to certain provisions of the Ohio Administrative Code and related tariff requirements be approved, consistent with this Supplemental Finding and Order. It is, further,

{¶ 40} ORDERED, That Suburban take all necessary steps to carry out the terms of this Supplemental Finding and Order. It is, further,

{¶ 41} ORDERED, That a copy of this Supplemental Finding and Order be served upon all interested persons and parties of record.

COMMISSIONERS:

Approving:

Sam Randazzo, Chairman
M. Beth Trombold
Lawrence K. Friedeman
Daniel R. Conway
Dennis P. Deters

AS/kck

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Summary: Finding & Order approving, in part, the transition plan filed by Suburban Natural Gas Company to terminate the waiver of certain portions of the Ohio Administrative Code and corresponding provisions of its tariff and to return to pre-COVID-19 activities and operations, consistent with this Supplemental Finding and Order electronically filed by Heather A Chilcote on behalf of Public Utilities Commission of Ohio