

In the Matter of the Application of Ohio Edison, The)	
Cleveland Electric Illuminating Company, and The)	Case No. 20-1344-EL-UNC
Toledo Edison Company to Safely Resume Activities to)	
Pre-COVID-19 Levels and Requests for Waivers.)	Case No. 20-1345-EL-WVR

OCC, COHHIO and OPLC (consumer groups) supplement our August 10th Comments.¹

The topic is FirstEnergy’s July 31st request for a *permanent* waiver of a PUCO rule that is important for consumer protection. That rule requires FirstEnergy to give its consumers a last chance to pay their bill if FirstEnergy visits to shut off their electric service for nonpayment.²

On August 13, 2020, the PUCO Staff filed a letter regarding various of FirstEnergy's proposals to resume normal operations. Importantly, the PUCO Staff opposed FirstEnergy's request to deny consumers a last chance to pay their electric bill to avoid disconnection.³ While the consumer groups differ with other PUCO Staff positions, we strongly agree with its recommendation to require FirstEnergy to give consumers a last chance to avoid disconnection. That last chance for a consumer to preserve service has been the humane policy of this state for decades.⁴

¹ There is no schedule in this case for comments.

² See O.A.C. 4901:1-18-06(4).

³ PUCO Staff Review and Recommendation (August 13, 2020) at 2.

⁴ See O.A.C. 4901:1-18-06(4).

Even if, during the pandemic, there needs to be a temporary safer solution to the in-person bill payments, good cause does not exist to make the limit permanent as FirstEnergy seeks. Indeed, FirstEnergy's proposal calls into question why it is even seeking to "transition" to so-called "normal" operations (including disconnection of consumers) when things are not normal.

FirstEnergy should not be disconnecting consumers at this point in the ongoing pandemic (until a later safer date is reached for them). But the PUCO certainly should not allow FirstEnergy to both deny consumers a last chance for payment and to disconnect them.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Supplemental Comments has been served via electronic transmission upon the following parties of record this 20th day of August 2020.

/s/ William J. Michael
William J. Michael
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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This foregoing document was electronically filed with the Public Utilities

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8/20/2020 12:01:30 PM

in

Case No(s). 20-1344-EL-UNC, 20-1345-EL-WVR

Summary: Comments Supplemental Comments for Consumer Protection by Coalition on Homelessness and Housing by Ohio, Office of the Ohio Consumers' Counsel and Ohio Poverty Law Center electronically filed by Ms. Deb J. Bingham on behalf of Michael, William J. Mr.