

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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.	)	

**NOTICE REGARDING IMPLEMENTATION OF COVID-19 TRANSITION PLAN  
OF VECTREN ENERGY DELIVERY OF OHIO, INC.**

Vectren Energy Delivery of Ohio, Inc. (VEDO or the Company) hereby files this notice regarding its implementation of its COVID-19 Transition Plan concerning Percentage of Income Payment Plan (PIPP) program customers, with respect to Paragraphs 51-54 of the Commission's July 29, 2020 Supplemental Finding and Order (the July 29 Order) in this proceeding.

In the July 29 Order, the Commission expressed concern that PIPP customers may have been removed from the PIPP program after March 12, 2020. *Id.* at ¶ 51-54. The Commission specifically held:

Initially focusing on any customers who may have been removed for failure to reverify or to be current on the anniversary date, since the initial phase of the pandemic beginning on March 12, 2020, we direct Vectren to contact any such customers immediately, in the event that such customers were not promptly reenrolled. Vectren should work with these customers to evaluate whether these customers wish to remain on PIPP. If these customers wish to remain on PIPP, Vectren 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. Vectren 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.

*Id.* at ¶ 52. In addition, in Paragraph 35 of June 3, 2020 Finding and Order in this proceeding (the June 3 Order), the Commission directed VEDO not to remove or drop PIPP and Graduate PIPP participants from 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.

On or around June 3, VEDO identified a technical design issue with its legacy billing and customer information system (CIS) processes that resulted in certain customer accounts being inadvertently and automatically dropped from PIPP between March 16 and June 3. VEDO identified and reviewed each affected account, manually placed active accounts back on PIPP, verified the calculation and application of incentive credits were correct for those accounts, and implemented a process for its Credit and Collections group to monitor PIPP accounts to ensure that active PIPP customers remain enrolled in PIPP through September 7, 2020. As a result of VEDO's response to the technical issue, no active PIPP account was adversely affected. In addition, now that VEDO has resumed disconnects for non-payment (DNP) as of August 15, 2020, the Company has reviewed its DNP processes and practices to ensure that active PIPP accounts are not inadvertently disconnected, as the Company returns to normal operations. VEDO intends to continue to advise and update Staff on the status of active PIPP accounts, during implementation of its COVID-19 Transition Plan, as modified by the July 29 Order.

In the July 29 Order, the Commission also held:

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).

*Id.* at ¶ 53. The PIPP plus verification date is “the calendar date by which the PIPP plus customer must document his or her household income and household size to continue participation in the PIPP plus program or participate in the graduate PIPP plus program.” Ohio Adm.Code 4901:1-18(S). The reverification date “shall be every twelve months from when the customer last reverified.” *Id.* Pursuant to Ohio Adm.Code 4901:1-18-12(D)(1). “[a]ll PIPP plus customers must provide proof of eligibility to the Ohio development service agency of the household income at least once every twelve months at or about the customer's PIPP plus reverification

date. The customer shall be accorded a grace period of sixty days after the customer's PIPP plus reverification date to reverify eligibility.” If a customer fails to comply with the reverification requirement in Rule 4901:1-18-12(D)(1), the gas utility “shall remove” the customer from PIPP and “the entire account arrearage will become due.” Ohio Adm.Code 4901:1-18-17(A) & (B).

In response to the Commission’s directives in the June 3 Order and Case No. 20-591-AU-UNC (the Emergency Case), VEDO manually changed reverification dates for active PIPP customers and extended the reverification date out one year, due to limitations in the Company’s legacy billing system. For example, if a PIPP customer had a May 1, 2020 reverification date, that customer would now have a new verification date of May 1, 2021. This manual change was necessary to prevent the VEDO legacy billing system from dropping an active PIPP customer for failure to verify during the period that the PIPP eligibility rules were suspended. As a result of this manual change, the bills for PIPP customers, who had reverification dates between March 12 and August 19, now reflect new reverification dates one year later in 2021. To avoid additional manual changes to the VEDO legacy billing system, on an account by account basis, and prevent customer confusion on reverification dates, VEDO proposes to maintain the 2021 reverification dates for this subset of PIPP customers, until such time as the customers reverify and receive a new reverification date. For PIPP customers with reverification dates between August 20 and September 7, VEDO intends to manually change the reverification date to September 7, 2020 to comply with the July 20 Order. These customers would then also be afforded the grace period of sixty days after September 7, 2020 to reverify eligibility pursuant to Ohio Adm.Code 4901:1-18-12(D)(1).

In the July 29 Order, the Commission further held:

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.

*Id.* at ¶ 53. After evaluating the feasibility of implementation and considering the limitations in the legacy billing system, VEDO reports that it will be able to treat any missed PIPP installment 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, as part of the customer's arrearage balance.

For these reasons, VEDO files this Notice to inform the Commission on implementation of the COVID-19 Transition Plan, as modified by the July 29 Order, with respect to the guidance and requirements in Paragraphs 51-54. VEDO has discussed this Notice with Staff and Staff does not have any concerns with the Company's treatment of reverification dates, as described herein.

To the extent that the Commission believes that VEDO needs an additional waiver of Ohio Adm.Code 4901:1-18-12(D)(1) and 4901:1-18-17(A) and (B) or any additional authority to implement its COVID-19 Transition Plan, as modified by the July 29 Order and as described herein, VEDO respectfully requests such authorization along with any other necessary or proper relief.

Dated: August 28, 2020

Respectfully submitted,

/s/ Christopher T. Kennedy

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**CERTIFICATE OF SERVICE**

I hereby certify that a courtesy copy of the foregoing pleading was served by electronic mail on 28th day of August, 2020, to the following:

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/s/ Christopher T. Kennedy  
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Summary: Notice Notice Regarding Implementation of COVID-19 Transition Plan  
electronically filed by Christopher T Kennedy on behalf of Vectren Energy Delivery of Ohio,  
Inc.