

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for Approval of)	
its Temporary Plan for Addressing the)	Case No. 20-602-EL-UNC
COVID-19 State of Emergency.)	

In the Matter of the Application of)	
Ohio Power Company for Waiver of)	Case No. 20-603-EL-WVR
Tariffs and Rules Related to the)	
COVID-19 State of Emergency.)	

In the Matter of the Application of)	
Ohio Power Company for Approval of)	Case No. 20-604-EL-AAM
Certain Accounting Authority.)	

**MOTION TO PROTECT PIPP CUSTOMERS DURING THE TRANSITION TO
RESUME NORMAL OPERATIONS
BY
COALITION ON HOMELESSNESS AND HOUSING IN OHIO
LEGAL AID SOCIETY OF COLUMBUS
OFFICE OF THE OHIO CONSUMERS' COUNSEL
OHIO POVERTY LAW CENTER
SOUTHEASTERN OHIO LEGAL SERVICES**

The Consumer Parties¹ move the Public Utilities Commission of Ohio (“PUCO”) for an Order to protect electric Percentage of Income Payment Plan (“PIPP”) customers during AEP’s transition to normal operations.² Such customers are among AEP’s most vulnerable. The coronavirus pandemic has heightened the challenges they face. They need protection. As

¹ Coalition on Homelessness and Housing in Ohio; Ohio Poverty Law Center; Southeastern Ohio Legal Services; the Legal Aid Society of Columbus, and the Office of the Ohio Consumers’ Counsel.

² O.A.C. 4901-1-12.

explained in the Consumer Parties' Memorandum in Support, the PUCO should enter an Order preventing AEP from dropping customers from electric PIPP until no earlier than January 2021.

That is when the state agency responsible for administering the electric PIPP program – the Ohio Development Services Agency -- may resume dropping customers from electric PIPP.

Respectfully submitted,

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Ohio Consumers' Counsel

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

The coronavirus pandemic is ongoing. Ohioans continue to struggle with health and financial challenges. Yet AEP wants to end the consumer protections for electric Percentage of Income Payment Plan (“PIPP”) customers and potentially begin removing them from the program. But electric PIPP customers need those protections due to the pandemic. To protect consumers, the PUCO should prevent AEP from dropping customers from electric PIPP until no earlier than January 2021. That is when the state agency responsible for administering the electric PIPP program – the Ohio Development Services Agency -- may resume dropping customers from electric PIPP.

II. RECOMMENDATION

To protect consumers, the PUCO should prevent AEP from removing customers from electric PIPP until no earlier than January 2021.

Despite the ongoing coronavirus pandemic, AEP recently filed a Notice that it plans on prematurely ending the consumer protections for electric PIPP customers.³ AEP's plan is contrary to the more protective and measured approach planned by state government that administers the electric PIPP program, the Ohio Developmental Services Agency. To protect consumers, the PUCO should prevent AEP from dropping customers from electric PIPP until no earlier than January 2021, when the Ohio Developmental Services Agency may resume removing customers from electric PIPP.

The electric PIPP program is a vitally important consumer protection. It helps the most vulnerable Ohioans maintain their essential utility service. Recognizing the importance of this program, the PUCO prevented AEP from dropping customers from electric PIPP as part of approving its emergency plan.⁴

In AEP's Notice, it reported on the Ohio Developmental Services Agency's plans for continuing consumer protections for electric PIPP customers through the end of 2020.⁵ But at the same time, AEP stated that it would cut short any added protections for electric PIPP customers by dropping customers from the program starting in October 2020.⁶ The PUCO should not allow AEP to do so.

³ Notice confirming how PIPP and Graduate PIPP programs Will begin to resume their normal operations submitted by Ohio Power Company (August 21, 2020) ("Notice").

⁴ See, e.g., *In the Matter of the Application of Ohio Power Company For Approval of its Temporary Plan for Addressing the COVID-19 State of Emergency*, Case 20-602-EL-UNC, Finding and Order (May 6, 2020) at 6.

⁵ See Notice.

⁶ See *id.*

The PUCO should continue the consumer protections in place, which prevent AEP (and other electric utilities) from dropping customers from electric PIPP through the end of the year. This added protection is consistent with the consumer protection provided by the Ohio Developmental Services Agency who is administering the program. Additionally, the PUCO should direct its Staff to work with the Ohio Developmental Services Agency to assist in coordinating future plans for reinstating all electric PIPP eligibility and verification requirements.

Given the critical health and safety role that electric PIPP serves in protecting at-risk Ohioans, particularly during a once-in-a-lifetime pandemic, AEP's plan to potentially drop customers from prematurely from the program should be rejected.

III. CONCLUSION

The most vulnerable Ohioans' struggles have been made that much worse by the coronavirus pandemic. The PUCO should not allow AEP to pile on the hardship. The PUCO should require AEP to maintain the electric PIPP program consumer protection at least through the end of the year.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion has been served via electronic transmission upon the following parties of record this 17th day of September 2020.

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

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Case No(s). 20-0602-EL-UNC, 20-0603-EL-WVR, 20-0604-EL-AAM

Summary: Motion Motion to Protect PIPP Customers During the Transition to Resume Normal Operations by Coalition on Homelessness and Housing in Ohio, Legal Aid Society of Columbus, Office of the Ohio Consumers' Counsel, Ohio Poverty Law Center and Southeastern Ohio Legal Services electronically filed by Ms. Deb J. Bingham on behalf of Michael, William J. Mr.