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October 22, 2021

Ms. Tanowa Troupe, Secretary  
Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street, 11th Floor  
Columbus, OH43215

Re: Review of the Competitive Electric and Natural Gas Service Rules  
Case Nos. 17-1843-EL-ORD, 17-1844-EL-ORD, 17-1862-EL-ORD,  
17-1845-GA-ORD, 17-1846-GA-ORD, 17-1847-GA-ORD, 17-1848-GA-  
ORD, 17-1849-GA-ORD, 17-1850-GA-ORD, 17-1851-GA-ORD, and 17-  
1852-GA-ORD

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Dear Ms. Troupe:

Constellation NewEnergy, Inc. and Constellation NewEnergy – Gas Division, LLC (collectively “Constellation”) were granted a waiver of Ohio Administrative Code 4901:1-21-06(C) and 4901:1-29-06(B)<sup>1</sup>, and those rules are under review in the above proceedings. Constellation appreciates the opportunity to comment on reply.

Customers in Ohio have been able for approximately two years to choose to enroll in retail electric and natural gas services via a customer-friendly, real-time, online, written conversation (a “chat”) with a Constellation representative because of the waiver. Constellation urges the Commission to continue to allow this additional enrollment process. It continues to be a process desired by customers – both residential and commercial. Constellation’s experience has been that the customers like using the chat process.

Constellation is able to provide a better customer enrollment experience for those customers who desire to enroll using the chat process. It is an additional option available for customers in Ohio and it is fully within the customer’s control to use it. The chat process is a real-time, interactive, written communication between the Constellation representative and the

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<sup>1</sup> *In the Matter of the Joint Application of Constellation NewEnergy, Inc. and Constellation NewEnergy – Gas Division, LLC for Waivers of Ohio Adm. Code 4901:1-21-06(C) and 4901:1-29-06(B)*, Case No. 18-604-GE-WVR, Entry (September 26, 2019).

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customer that obtains the required enrollment information from the customer. A transcript of the conversation is immediately available to both the customer (if the customers select that option) and the company for its records. Constellation employs best practices, and monitors and validates the chat enrollments.

This additional enrollment process is an advancement of the existing minimum enrollment standards in Ohio Administrative Code 4901:1-21-06(C) and 4901:1-29-06(B). It uses newer technology than what existed when the Commission last revised the rules in 2014. The chat enrollment process continues to further the state of Ohio's energy policies and further develop the competitive market in Ohio. For all of these reasons, enrollments through a chat process should continue to be permitted and the Commission should not foreclose this advancement. The Commission should affirmatively continue the chat enrollment process in its decision for these proceedings.

In the alternative, if the Commission decides to add the chat enrollment process to Ohio Administrative Code 4901:1-21-06(C) and 4901:1-29-06(B), Constellation desires to be part of the conversation to accomplish that implementation since Constellation has invaluable experience with the process in Ohio and is knowledgeable of the Ohio enrollment rules.

Lastly, Constellation confirms for the Commission that, when customers in Ohio complete an enrollment for Constellation's electric supply services through the Internet process, Constellation provides the customers with a link to access its Ohio environmental disclosure.<sup>2</sup> It is also available on Constellation's website for any customer who wishes to review that information before, during or after completing an enrollment.

Very truly yours,

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci  
Vorys, Sater, Seymour and Pease LLP  
Counsel for Constellation NewEnergy, Inc. and  
Constellation NewEnergy – Gas Division, LLC

cc: Parties of record

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<sup>2</sup> Initial Comments from Citizens' Utility Board of Ohio (at 3-4) wrongly imply that Constellation does not provide the environmental disclosure information to enrolling customers. The environmental disclosure information is located on the Constellation website as part of the Ohio-specific disclosures. *See* <https://www.constellation.com/solutions/for-your-commercial-business/StateDisclosures.html> (accessed October 21, 2021).

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Summary: Correspondence on Reply electronically filed by Mrs. Gretchen L. Petrucci on behalf of Constellation NewEnergy, Inc. and Constellation NewEnergy - Gas Division, LLC