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April 17, 2002

Via UPS Next Day Air

PUCO

Docketing Division  
The Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

RE: **Review of Electric Service  
and Safety Standards  
Case No. 02-564-EL-ORD**

Dear Docketing:

Enclosed for filing is the **Comments of Monongahela Power Company** in the  
above-referenced case.

Sincerely yours,

Gary A. Jack  
Senior Attorney

GAJ:tmw

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Commission's Review of its )  
Electric Service and Safety Standards, the )  
Electric Interconnection Standards, and the )  
Electric Reliability, Safety and Customer ) Case No. 02-564-EL-ORD  
Service Standards Enforcement at Chapters )  
4901:1-10, 4901:1-22 and 4901:1-23 of the )  
Ohio Administrative Code. )

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**COMMENTS OF MONONGAHELA POWER COMPANY**

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By Entry of the Public Utilities Commission of Ohio ("Commission") of March 21, 2002, interested parties were invited to file comments with regard to the Staff's proposal to revise the Electric Service and Safety Standards ("ESSS"). Monongahela Power Company ("Mon Power"), as a provider of electric energy to approximately 29,000 customers in southeastern Ohio, hereby provides the following comments.

**4901:1-10-02 Purpose and scope.**

Mon Power suggests Section (E) be revised to insert the following sentence after the second sentence of the paragraph: "An EDU may adopt or maintain tariffs which upon approval from the commission offer alternative methods of providing services consistent with the rules of this chapter." This sentence provides for differences in the utilities' tariffs, which result from negotiated agreements, settlements and rulings from the commission. Whereas,



these differences do not affect the service, reliability or safety, or greater protection for customers or consumers, they have been granted by the commission and adopted as practices by the utilities for operation.

**4901:1-10-05 Metering.**

Section (D), line one, states that "Meters which are not direct reading shall have the multiplier plainly marked on the meter." Oftentimes the multiplier is located on a tag or nameplate adjacent to the meter. Accordingly, we suggest the following change. "Meters which are not direct reading shall have the multiplier plainly marked on or adjacent to the meter."

In Section (I), paragraph 2, Mon Power suggests the reference to the customer requesting an actual meter read "at the termination of service, when the customer changes electric service providers or any other time the customer is transferred to a new rate schedule" should be removed. When service is terminated, the customer should be prorated back to the day the customer actually is no longer responsible for service to that location. By experience, it has been found that customers often change the termination day after the utility has been initially notified, or will notify the utility after they have moved. Scheduling of an actual meter read, therefore, becomes very difficult if not impossible in some instances. Additionally, a customer transferred to a new rate schedule has the new rate schedule retroactively applied to the last meter reading or applied to the next meter read to correspond to the billing cycles. So



there is no need to request a reading. And, the customer gets the advantage of starting a new rate schedule with the entire current billing cycle.

**4901:1-10-08 *Emergency plans, et al.***

Section (B) requires that each utility submit its emergency plan and amendments to the Commission Outage Coordinator. Members of the Commission have indicated that, due to the confidentiality of the emergency plans, the Commission would prefer that these manuals not be submitted to them due to possible liability. Subsequent to September 11, 2001, these emergency plans describing the way utilities would respond to emergency events have been considered to be information that should not be open to access or availability to others. These manuals do exist and are free for audit. Alternatively, a summary report of the emergency plan could be provided so that details would not be readily available to others. Accordingly, we believe the Commission should reconsider its request for submitting copies of the emergency manuals due to security issues.

**4901:1-10-09 *Minimum customer service levels.***

The Staff proposal is to increase the percentage of new service installations to be completed within ten (10) business days from 90% to 95%. Mon Power objects to this proposed change for several reasons. First, it is unable to comply with this higher number at this time. Pursuant to Staff request, Mon Power reported to the Commission that the percentage of new service



installations requiring construction of electric facilities that are completed within 10 business days is 90% for Mon Power customers. Secondly, this was an issue that was heavily debated when these rules were originally promulgated. Ninety percent seemed to be an acceptable level given all the various parameters and interests, including the customer's interest in being provided timely service and the utility's problems with priorities, resources, and construction circumstances. Mon Power knows of no compelling reason to increase the rate from 90% to 95% and believes the Commission should retain the current 90%.

Mon Power objects to the requirement in Section (A)(3) that notice to the customer must be in writing. In our opinion, verbal interaction has been more personal—in being able to respond immediately to questions raised by customers—and more efficient from a time and resource perspective. Mon Power does not feel that a written letter increases customer satisfaction. The written letter also involves time delay whereas verbal communication provides immediate or almost immediate response. The utility should be able to decide the preferred method of communication, taking into consideration the customer's desired method.

Mon Power objects to the requirement in 4901:1-10-09 (B)(2) that answer time should be measured from the first ring. Calls may be answered by the Interactive Voice Response system (IVR). The IVR may meet the needs to service the customer. The customer's choice of options and selections will determine how long the customer will remain within the IVR. The time within the IVR cannot be measured, and the customer has the choice of exiting the IVR at



any time. The 60 seconds answer time should be measured as queue time to represent delays experienced by the customer in attempting to reach a representative when desired.

**4901:1-10-10 Distribution system reliability.**

Article 4901:1-10-10 "Distribution System Reliability", Section (C), Paragraph (2), Item (b) provides that remedial action plans for the utility's poorest performing distribution circuits (existing provision) must be supplemented by a monthly status report on each circuit's remedial activities undertaken during the previous calendar month (new provision).

Mon Power notes that this Article also mandates remedial plans on 10% (new provision) versus 4% (existing provision) of Mon Power's distribution circuits. While this increase does not significantly alter the number of distribution circuits for which Mon Power must submit remedial documentation, Mon Power believes the increased reporting requirement to be excessively burdensome for electric utilities with a larger presence in Ohio. Mon Power notes that the proposed 10% reporting requirement has no reference to historical service area or circuit performance benchmarks or allowable operating bandwidth similar to One Standard Deviation. These circuits are merely at the bottom of a list of all of the utility's Ohio circuits ranked by a composite index that incorporates CAIDI, SAIDI and SAIFI circuit indices. The fact that they are in the bottom 10% of that ranking does not necessarily imply that their performance is somehow substandard.



Additionally, Mon Power objects to the proposed monthly reporting of remedial activities as excessively burdensome, unnecessary and unproductive. Mon Power does not embrace the concept that an arbitrary ordering of distribution circuits means that the bottom 10% are substandard performers for which some mandatory action must be undertaken. Additionally, many circuits are adversely impacted by a single non-recurring event in a given year for which no additional activity is required. Yet Mon Power anticipates, nonetheless, that we would be required to tender 12 monthly, repetitive explanations as to why this circuit requires no remedial activity to meet the letter of the law. Accordingly, Mon Power urges the Commission to reject the proposed monthly provision in favor of a reasonable and consistent annual reporting requirement.

**4901:1-10-11 Distribution circuit performance.**

Article 4901:1-10-11 "Distribution Circuit Performance", Section (B), Paragraph (1) provides for major storm or major event data (existing provision) and outages caused by transmission facilities (new provision) to be excluded from the calculation of circuit performance.

In every other jurisdiction wherein Mon Power serves distribution customers (including Ohio) the state regulatory authority has required Mon Power to include transmission outages that impacted service continuity to distribution customers in our distribution circuit reliability indices. Accordingly, Mon Power has taken great effort in specifying such requirement with our Outage Management System (OMS) vendor and such functionality is a core provision of



Mon Power's OMS software code and OMS regulatory and management reporting modules. In addition to this technical constraint within OMS, Mon Power believes that forced outages of facilities that directly and adversely impact distribution customer service reliability should be acknowledged and incorporated into reliability indices, regardless of whether those facilities are classified as transmission, subtransmission or distribution assets.

Article 4901:1-10-11 "Distribution Circuit Performance", Section (C), Paragraph 5, Item (d) includes a brand new MAIFI reporting requirement that is not documented in Article 4901:1-10-10 wherein the definitions for such indices reside.

Mon Power has no capability to report MAIFI (the average number of momentary interruptions per customer) in Ohio or any other jurisdiction that Mon Power serves. First of all, Mon Power's OMS system is not integrated with its SCADA or data acquisition systems. Second, Mon Power's SCADA systems are not employed universally in all distribution substations. Finally, for those substations that actually employ SCADA, Mon Power does not monitor, record, time-stamp, alarm, or flag substation recloser momentary operations. In fact, SCADA equipped stations report only that a substation recloser locked out and not the identity of the circuit affected. The impacted circuit is actually identified by Mon Power's Outage Management System based upon customer calls and OMS connectivity algorithms programmed into the latter system.

Paragraph 9 of this same Article requires the utilities to report the total number of momentary interruptions experienced during the reporting period by



cause. AP notes that the very fact that protective devices do not go to lockout indicates the temporary or transient nature of the fault. If the protective device successfully restores service, there generally is no need to patrol the circuit, and causation clues, if indeed any can be found, are not identified. However, if the circuit experiences recurring momentary interruptions, AP identifies them by recloser counter readings and via customer complaints at which time targeted inspection and maintenance activities are initiated. These activities are described in detail in AP's Reliability Improvement Program (RIP), a summary of which was previously provided to the Commission Staff.

Mon Power objects to the MAIFI reporting requirement because it cannot be provided, because existing OMS and SCADA systems are not currently designed to recognize, timestamp or log such events. Further, MAIFI indices cannot be reported with any degree of accuracy without incorporating the effect of multiple, series, automated downstream protective devices that also sense faults and operate multiple times in an effort to clear transient faults. Mon Power has no distribution line SCADA facilities to support the gathering of downstream MAIFI data.

Mon Power's best cost estimate for SCADA/OMS integration software is \$200,000 to directly report lockout of substation devices to OMS. However, Mon Power's OMS product does not include or support a MAIFI reporting capability. Even if such report module were available, Mon Power estimates that it would cost an estimated \$2.6 million and take 30 to 36 months to modify existing SCADA equipped substations and to install SCADA at non-SCADA substations



to recognize, time-stamp and log momentary interruptions. Furthermore, Mon Power has never considered and has no realistic cost estimates for distribution SCADA capable of monitoring downstream momentary recloser operations.

Unless the Commission adds some variance provisions to the MAIFI reporting requirements, Mon Power will be in violation of such requirements for the foreseeable future. Alternative, Mon Power is willing and able to report substation recloser counter readings on an annual basis for the "lowest performing" Ohio distribution circuits.

**4901:1-10-12 Provision of customer rights and obligations.**

As commented above in 4901:1-10-05, Section (I), paragraph 2, Mon Power suggests the reference in Section (K) to the customer requesting an actual meter read "at the termination of service, transfer to a new electric service provider, or transfer to a new rate schedule" should be removed.

**4901:1-10-14 Deposits.**

Section (E)(1) states that an EDU may require an applicant who fails to establish creditworthiness to make a deposit. The amount of the deposit shall not exceed one hundred thirty per cent of the estimated average monthly bill for the customer's tarified service for the ensuing twelve months.

The current security limit of 1.3 times the average monthly usage should be changed to 2 times the average monthly usage for all classes of accounts. Under current regulations, a delinquent residential account cannot be



disconnected for nonpayment until at least 60 days of service has been rendered. The mandated billing cycle under AP provides service to the consumer as follows:

1. 28-32 days – customer receives service and then meter is read and a monthly bill is issued.
2. 20 days from due date – although bill is due upon receipt, customer is given approximately 20 days from the bill date to pay before a late charge is assessed (30 + 20);
3. After the foregoing 20 day period expires, a notice of termination is issued, which gives the customer 10 days to cure the debt. (30 + 20 + 10)
4. 11-14 days after the due date – The next month's bill is issued and the customer is notified of default to the prior month's bill.

The mandated billing and termination process places the company in a position of exposure for a minimum of 60 days. For companies like Mon Power that bill residents on a bi-monthly basis, this would add an additional 30 days of exposure and thus justifying an even higher deposit than 200% of the monthly bill. Moving the security amount to a limit that would cover approximately 60 days of this exposure, would reduce the uncollectible (charged-off) amounts occurring as a result of payment default.

Accordingly, Mon Power recommends the following change:

- (E) *Deposit to establish tariffed service; review of deposit upon customer request.*



- (1) *An EDU may require an applicant who fails to establish creditworthiness to make a deposit. The amount of the deposit shall not exceed ~~one~~ TWO hundred ~~thirty~~ per cent of the estimated average monthly bill for the customer's tariffed service for the ensuing twelve months.*

Section (l) allows for the refunding of deposits on nonresidential accounts after two years of service if the service was not disconnected for nonpayment, a fraudulent practice, tampering, or unauthorized reconnection, and the customer had not more than three past due bills. Account security for nonresidential accounts should not be refunded according to existing guidelines, but should be held and applied only in final billing situations. Increasingly, nonresidential customers' payment habits are not indicative of the likelihood of default. Customers facing bankruptcy will often pay all electric bills in a timely fashion when no other creditors are receiving such treatment. Consequently, the companies are frequently required to refund a deposit, leaving a totally unsecured account at the time of default. Even when major credit rating services and business publications indicate that a customer's overall financial position is deteriorating and that default appears imminent, the current rule precludes the companies from securing the account unless payments to the companies meet specified late payment requirements.

Accordingly, Mon Power recommends the following change:

~~(l) — Each EDU shall:~~



- ~~(1) — Review each nonresidential account after the first two years of service for which a deposit is being held, and shall promptly refund the deposit or credit the nonresidential customer's account, plus interest accrued, if during the preceding twenty-four months:~~
- ~~(a) — The customer's service was not disconnected for nonpayment, a fraudulent practice, tampering, or unauthorized reconnection; and~~
- ~~(b) — The customer had not more than three past due bills.~~
- ~~(2) — Upon customer request, but not more than annually, review each nonresidential account after the first two years of service for which a deposit is being held, and shall promptly refund the deposit or credit the nonresidential customer's account, plus interest accrued, if during the preceding twelve months:~~
- ~~(a) — The customer's service was not disconnected for nonpayment, a fraudulent practice, tampering, or unauthorized reconnection; and~~
- ~~(b) — The customer had not more than three past due bills.~~

**4901:1-10-19 Delinquent residential bills.**

Mon Power objects to the requirement of (D)(2) to include language on the disconnect notices referring to failure to pay CRES charges. Including this language is confusing to the customer, often misleading the customer to believe it has to pay its CRES charges to avoid disconnection. The disconnect notice



should be as precise as possible so that the customer knows exactly what is necessary to avoid disconnection.

**4901:1-10-21 Customer complaints, slamming complaints and complaint-handling procedures.**

In Section (H)(4) and (5), the requirements for returning the customer to its previous supplier indicate that "the EDU shall not issue the customer the notice required by rule 4901:1-10-29 (F) (1) of the Ohio Administrative Code." Mon Power objects to this requirement. This notice is automatically generated when the enrollment is received electronically from the supplier. To stop this letter would take an extensive amount of manual intervention and timing by the EDU. In the operations meetings held to develop workable slamming rules, it was agreed that the commission staff could advise the customer when the customer is informed that the slamming complaint is legitimate, that the customer would receive a notice from the EDU showing the correction to the customer's supplier, but they are to ignore the rescission portion of the letter. Since the commission staff and the customer should be communicating regularly about the status of the slamming complaint, permitting the process to flow unobtrusively would provide the customer with the most expeditious manner of correcting the unauthorized switch. Mon Power has learned from experience that advising the customer with a letter confirming the actions to restore the supplier and the date when the action will take place is a reassurance to the customer. Otherwise, the customer will not know that the action has been completed until the customer receives a bill or calls the EDU to inquire about the change.



**4901:1-10-22 EDU customer billing and payments.**

Mon Power objects to the suggested language required by Section (B)(5) and suggests it be revised to direct the utilities to include reference to the Commission's and the Ohio Consumers Counsel's phone numbers and websites. It is understandable that the Commission and Ohio Consumers Counsel both desire to give the customer as much information as possible on how to contact them, however the wording in this section is excessive and creates spacing problems for the utilities that are rendering the bill. Bill messages need to be as short as possible on the bill. The addition of this wording will either push the length of the bill to another page or cause information currently printed for the customers benefit to be removed. The phone number and website should be enough to direct the customer to these parties. The Commission and the Ohio Consumers Counsel should respond at their respective locations with the additional information they desire the customer to know.

Mon Power objects to Section (C) and suggests it be removed. Once bills have been approved, future bill revisions should not need to be approved by the Commission, as long as the content is not being changed. When bill format is revised, a sample bill could be submitted as an FYI to the Commission when the utilities are ready to present it to their customers.

Mon Power suggests that the last sentence of Section (D) should be changed as follows: "Customer charges for payments at local payment centers or authorized agents shall be consistent with nominal agency fees commonly charged across the state of Ohio." Additionally, the sentence, "Other means of



payment may be offered for the convenience of the customer at the fee charged by the administrating agent." should be added. This change will provide for payment agencies whose nominal fee is not based on the utilities requirements and of which the utility has no control, and credit card, Western Union, or other type of payment methods that self-determine the customer's charges for using their services.

Mon Power objects to the provisions of Section (E) that indicate that the EDU shall not disconnect service to a customer who pays, on the account by the close of business on the disconnection date listed on the disconnection notice. The method suggested is operationally impractical and creates communication loopholes which give legitimacy to ill-thwarted customer complaints. The issued disconnect notices state that service will be terminated on or after a particular date. The utility follows through with disconnection after 8 am on that date. The customer should make payment before the scheduled termination date so there is no mistake that the account has been paid or arrangements made to prevent disconnection on the date given.

Mon Power objects to the last paragraph of Section (G) and suggests it should be removed. This paragraph creates a condition that would require special handling for payments on accounts for which there is a billing dispute. The customer is required to pay the budget amount or payment in full. Currently, a partial payment is posted to the oldest balance, which provides the customer with the greatest advantage against disconnection or removal from the program. Should the billing dispute be resolved in the customer's favor the customer will



be credited accordingly. Should the customer dispute be determined as unwarranted, by having paid in full or by having the partial payments applied to the oldest balance, the customer may avoid past due penalties and possibly disconnection due to arrears accumulated during the billing dispute.

**4901:1-10-24 Consumer safeguards and information.**

Mon Power suggests Section (B) should be revised to indicate the EDU shall maintain a listing in each local telephone service provider's directory operating in the EDU's certified territory.

Mon Power objects to the requirement in Section (E)(6) which dictates the message the EDUs shall use to relay information to the customer regarding the mass eligibility lists. The required language limits the EDU's ability to adjust their bill messages to fit the formats available and may force additional pages to be required for the bill. There is no need to provide such language so long as the EDU conveys the message that is required.

**4901:1-10-26 Annual system improvement plan report.**

There are two new provisions proposed under this Section 26, specifically Sections (B)(3)(f)(iv) and (v). Both of these requirements, we believe, are already handled in the Company's Long Term Forecast Report. It should not be made part of the annual system improvement plan report as well. Therefore, Mon Power does not recommend their proposed adoption.



**4901:1-10-29 Coordination with CRES providers.**

Mon Power objects to the last statement of Section (C) and suggests that the statement be removed. Unless the EDU is buying the supplier's receivables, the customer's liability to the supplier of which the customer has contracted, continues until payment has been made to the supplier. Should the payment made by the customer be revoked due to extenuating circumstances, non-sufficient funds, etc., the utilities will not forward payment to the supplier, the customer will remain liable to the supplier for those payments and the supplier will be responsible for collecting that payment should that payment not be corrected. The utilities do not agree to provide receivable services to the supplier unless negotiated and agreed for such with the supplier as part of a purchase of receivables agreement. The OSPO working group has developed guidelines for an Accounts Receivable Purchase Agreement, which contains the processes for customer payments and liabilities. There is no reason to require this language in the EDU supplier tariff or supplier agreement.

Mon Power objects to Section (I)(iii) and suggests removal of the part of the paragraph that reads, "but no later than the next business day after the EDU is notified of the customer's participation in the PIPP or arrearage crediting program." Customers who have switched to a CRES provider and subsequently become approved for PIPP or the arrearage-crediting program can be switched at their next available meter read date. The purpose for having time restraints in the standard switching rules is to allow all parties, CRES, EDU and customers, to react to the change without creating unduly manipulative and costly situations.



The next business day requirement will cause all parties involved to engage in expensive manual interventions, including energy scheduling by the CRES provider who usually schedules on at least a one day ahead basis, and prorating of bills for the energy services provided prior to the customer being switched. Additionally, should PIPP customers become aggregated, a one day switch will not allow that service provider to schedule load or prepare for the customer being served by that supplier under the aggregation.

**4901:1-10-33 Consolidated billing requirements.**

Although the requirements of 4901:1-10-33 is a valiant attempt to provide guidelines for consolidated billing, it fails to recognize that there are three (3) distinct methods, rate ready, bill ready, and CRES consolidated bill ready, for providing consolidated billing currently being used in the competitive services arena. Each offers its own nuances and processes which fulfill different needs for the parties using that form of billing. In a "rate-ready" process the CRES provider provides the EDU with the customer's rates in advance of the customer enrolling with the CRES provider. The EDU calculates the bill for the CRES and prints that information on the bill. Current and past due charges are maintained by the EDU. Customer programs such as budget billing and summary billing are usually performed with the same provisions for the CRES as for the EDU. Late payment penalties and taxes are usually at the same rate for the CRES as for the EDU. There is no CRES bill messaging. And, the CRES charges must be structured within the constraints of the EDU's billing system. The advantage of



this type of billing is that it relieves the CRES of the responsibility and cost of performing all of these billing functions themselves. Many of the back-office functions and costs associated with billing are not required of the CRES to begin operation. The CRES understands the limitations of this type of billing but is willing to operate within those constraints in order to take advantage of those benefits.

The other method for consolidated billing by the EDU is the "bill-ready" billing method. This method for billing permits the CRES to calculate its own charges and use whatever billing schemes it may be able to use for their advantage. The CRES is responsible for all of the information it wants to put on the bill within the constraints of the electronic data transfer process and the space provided by the EDU on the bill. Any additional charges, including late payment charges for CRES services are the responsibility of the CRES. Budget billing is calculated by the CRES and balances of such are maintained by the CRES. Bill messages are available for the CRES to use but are limited to space requirements of the EDU bill. Messages can be used to explain charges or conditions involving the CRES charges. The advantages of the bill ready process is that it gives the CRES the flexibility to do innovative billing structuring or provide services for the customer outside the limitations of the EDU.

The third method of billing is the consolidated billing by the CRES. This method of billing is usually performed in a bill ready format. In this format, the EDU would prepare its billing information and send it to the CRES to be printed on the bill. This method of billing creates a completely different set of constraints



and limitations for both the CRES and EDU, many of which do not exist under the other methods for billing. However, in Ohio, this is a new concept and the conditions of this type of billing have not been explored, including the requirements or changes to requirements that the EDU will need to have contained on the bill under the CRES consolidate bill scenario. Until those requirements are identified and the corresponding data communications are developed to meet these requirements, CRES consolidated billing cannot be successfully detailed.

Mon Power objects to the requirements of 4901:1-10-33 and recommends that the consolidated billing requirements detailed in this section be modified to address the three different types of consolidated billing, independently. Mon Power suggests that the requirements for the information required on each type of consolidated bill be reviewed to determine if all of the "traditional" requirements detailed in 4901:1-10-22 and in the CRES rules (4901:1-21-14) are still necessary in today's competitive services environment. Because there is very few areas across the country that has successfully implemented CRES consolidated billing, Mon Power recommends that CRES consolidated billing be addressed under its own forum and set of rules to best accommodate the myriad of differences that it will present.

As commented above in 4901:1-10-22, Section (B)(5), Mon Power objects to the suggested language required by Section (B)(16) and suggests it be revised to direct the billing party to include reference to the Commission's and the Ohio Consumers Counsel's phone numbers and websites.



Under Section (G) "Partial payments priority," Mon Power objects to the proposed order of crediting in Sections (1) and (2)(c). This is inconsistent with current credit procedures. Secondly, there is no reason why CRES providers should have a priority over the EDU. The proposed payment priority will create numerous additional disconnects for customers because they will be required to pay CRES past due charges before the EDU charges. The EDU cannot make arrangements with the customer for the CRES charges so unless the amount paid at time of disconnect includes the CRES past due amount, the customer will still be disconnected. Also, with payment arrangements, the customer can make arrangements with the EDU that would otherwise remove the customer's arrears. However, under this payment priority the customer will still be obligated to pay the CRES charges additionally or be subject to disconnection. The CRES has the ability to drop a customer for poor payment. The EDU can disconnect for poor payment, but only for the EDU charges and only after offering the customer several alternatives to make arrangements to meet their obligation. Furthermore, changes to the payment posting priority will create additional costs for the EDUs who have automated systems in place to post payments as they have been doing since the beginning of the market period, and requires the utilities operating in other jurisdictions to create a system for Ohio that is different than any other market area. Mon Power, therefore recommends the current procedure continue to be used and sees no compelling reason for any change.

As explained in 4901:1-10-22 (G), Mon Power objects to Section (G)(2)(a) and suggests it should be removed. This paragraph creates the condition that



would require special handling for payments on accounts for which there is a billing dispute.

Mon Power appreciates the opportunity to comment on these important rule changes. It is willing to provide any additional information that is necessary for the Commission to review this matter.

Dated this 17<sup>th</sup> day of April, 2002.

MONONGAHELA POWER COMPANY

By Counsel

A handwritten signature in black ink, appearing to read "G. Jack", written over the printed name and address.

Gary A. Jack, Esq.  
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