**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Commission’s Consideration of Solutions Concerning the Disconnection of Gas and Electric Service in Winter Emergencies for the 2022-2023 Winter Heating Season. | )  )  )  )  ) | Case No. 22-668-GE-UNC |

**MOTION TO SUSPEND ELECTRIC AND NATURAL GAS UTILITY DISCONNECTIONS FOR AT-RISK OHIOANS IF AND WHEN THERE ARE DELAYS IN THE PROCESSING OF THEIR FINANCIAL ASSISTANCE**

**BY**

**ADVOCATES FOR BASIC LEGAL EQUALITY**

**LEGAL AID SOCIETY OF SOUTHWEST OHIO, LLC**

**OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

**OHIO POVERTY LAW CENTER**

**PRO SENIORS, INC.**

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Advocates for Basic Legal Equality, Legal Aid Society of Southwest Ohio, LLC, Office of the Ohio Consumers’ Counsel, Ohio Poverty Law Center, and Pro Seniors, Inc.[[1]](#footnote-2) respectfully move the PUCO to suspend electric and natural gas utility disconnections of at-risk consumers if and when there are delays in the processing of their financial assistance for those services. The types of assistance that may have been delayed for consumers include: the Home Energy Assistance Program (“HEAP”), Winter Crisis Program, Percentage of Income Payment Plan Plus (“PIPP Plus”), and the Summer Crisis Program.

Recent times have been hard for many Ohioans. Consumers have faced soaring energy prices, inflation, and recovery from a pandemic, among other life challenges.

Unfortunately, there also have been challenges for some agencies that administer energy assistance programs to help Ohioans. Earlier this year the Chief Policy Officer (Ms. Keelie Gustin) at the Miami Valley Community Action Partnership presented important testimony at a PUCO local public hearing regarding AES and its consumers. Out of concern for southwestern Ohio consumers, Ms. Gustin testified about processing delays, due to various operational challenges, in providing energy assistance to at-risk families.[[2]](#footnote-3) Ms. Gustin testified that agency staff are “working as fast as possible and it’s still not enough.”[[3]](#footnote-4)

Ms. Gustin testified that assistance agencies are “bobbing above the waterline to provide assistance with a limited staff, limited resources, [and] overwhelming program requirements.”[[4]](#footnote-5) (We understand that Ms. Gustin’s agency presently is catching up with the processing of assistance for people in need.)

For at-risk consumers and their families, financial assistance can mean the difference between connection or disconnection of their energy utility services. For families, that can be the difference between hope or despair, security or danger.

Also of great concern is Ms. Gustin’s testimony that only *16.83 percent* of the eligible population in Ohio received the HEAP benefit in 2021.[[5]](#footnote-6) She also testified poignantly about the plight of many Ohioans:

[T]the customers we serve are struggling. They are exhausted. They are overwhelmed and have little place to turn.[[6]](#footnote-7) Mothers and fathers worried about keeping their homes, paying their utility bills to cook their family a meal and provide light for their children to complete their homework. Basic, basic human needs are at stake on a daily if not hourly basis at the [community action] agency where I work, and this is happening throughout the state and throughout the nation.[[7]](#footnote-8)

The Assistance Providers under the aegis of the Ohio Department of Development are also known as Community Action Agencies.[[8]](#footnote-9) During staffing challenges, it is possible for at-risk Ohioans to lose assistance under the state’s Percentage of Income Payment Plan (“PIPP Plus”). Through no fault of their own, consumers could lose assistance if they are unable to reverify their PIPP eligibility or secure an in-person appointment to complete applications for winter and summer crisis assistance. More Ohioans than ever may be seeking appointments with local energy assistance providers, due to the recent expanded eligibility from 150% to 175% of the federal income guidelines for the Percentage of Income Payment Plan.[[9]](#footnote-10)

Delays in energy financial assistance are an emergency for Ohio’s most vulnerable utility consumers. Accordingly, disconnections of utility services should be suspended for consumers experiencing delays in financial energy assistance, for any delays now or in the future. With the conclusion of the Winter Crisis Program on March 31, 2023, now is time to develop solutions to prevent the same issues occurring during the 2023-2024 winter heating season. Any needed protection should also be ordered for the summer crisis program as well as the next winter crisis programs in 2023-2024. Further, our recommendations include ways to aid the assistance provider agencies (and the consumers they serve) by reducing the amount of processing needed.

The PUCO recently concluded in this proceeding that “securing a timely appointment with a community action agency or other local energy provider is beyond the Commission’s control.”[[10]](#footnote-11) ***But it is within the PUCO’s control to help at-risk Ohioans.****[[11]](#footnote-12)*

The PUCO can control utility disconnections. And the PUCO does have emergency authority under R.C. 4909.16. The PUCO should use that authority now to protect at-risk populations, per state policy under R.C. 4928.02(L).

Further, the law bars a waiting period for consumers to obtain assistance. R.C. 4928.53(B)(3) states that “The rules shall prohibit the imposition of a waiting period before enrolling an eligible customer in the percentage of income payment plan.”

The Consumer Advocates respectfully move the PUCO to suspend electric and gas utility disconnections for at-risk consumers if and when there are delays in providing HEAP assistance. Even if agencies are caught up or catching up with processing delays affecting people in need (which the PUCO should verify), the PUCO should have a protection plan in place, in advance, to help people if there are future processing delays.

The PUCO should protect at-risk consumers under R.C. 4909.16, R.C. 4928.53(B)(3) and R.C. 4928.02(L), among other authority. The PUCO should order utilities to revise their disconnection procedures.

The reasons for this motion are more fully explained in the following memorandum in support.

Respectfully submitted,

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| Bruce Weston (0016973)  Ohio Consumers’ Counsel  */s/ Angela D. O’Brien*  Angela D. O’Brien (0097579)  Deputy Consumers’ Counsel  Counsel of Record  John Finnigan (0018689)  Assistant Consumers’ Counsel  **Office of the Ohio Consumers' Counsel**  65 East State Street, Suite 700  Columbus, Ohio 43215  Telephone: [O’Brien]: (614) 466-9531  Telephone [Finnigan]: (614) 466-9585  [angela.obrien@occ.ohio.gov](mailto:angela.obrien@occ.ohio.gov)  [john.finnigan@occ.ohio.gov](mailto:john.finnigan@occ.ohio.gov)  (willing to accept service by e-mail)  */s/ David Manor*  David Manor (0100068)  **Advocates for Basic Legal Equality, Inc.**  525 Jefferson Avenue, Suite 300  Toledo, OH 45402  Telephone: (419) 255-0814  [dmanor@ablelaw.org](mailto:dmanor@ablelaw.org)  (willing to accept service by e-mail) | */s/ Stephanie Moes*  Stephanie Moes (0077136)  Managing Attorney  **Legal Aid Society of Southwest Ohio**  215 East Ninth Street, Suite 500  Cincinnati, OH 45202  Telephone: 513-362-2807  Fax: 513-241-1187  [smoes@lascinti.org](mailto:smoes@lascinti.org)  (willing to accept service by e-mail)  */s/ Susan Jagers*  Susan Jagers (0061678)  **Ohio Poverty Law Center**  1108 City Park Ave. Suite 200  Columbus, OH 43206  Telephone: (614) 824-2501  [sjagers@ohiopovertylaw.org](mailto:sjagers@ohiopovertylaw.org)  (willing to accept service by e-mail)  */s/ Michael Walters*  Michael Walters (0068921)  Legal Helpline Managing Attorney  **Pro Seniors, Inc.**  7162 Reading Road, Suite 1150  Cincinnati, Ohio 45237  Telephone: (513) 458-5532  Facsimile: (513) 345-4162  mwalters@proseniors.org  (willing to accept service by e-mail) |

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**MEMORANDUM IN SUPPORT**

# I. INTRODUCTION

Ohio should lead with its heart and protect at-risk Ohioans. For many Ohioans, recent times have been hard. Consumers have faced soaring energy prices, inflation, and recovery from a pandemic, among other life challenges. Unfortunately, there also have been some challenges for consumers who qualify for energy assistance to obtain that assistance.

For at-risk consumers and their families, financial assistance can mean the difference between connection or disconnection of their energy utility services. For families, that can be the difference between hope or despair, security or danger.

This problem was brought to light by the testimony of the Chief Policy Officer (Ms. Keelie Gustin) of the Miami Valley Community Action Partnership at a PUCO local public hearing.[[12]](#footnote-13) The case involves southwestern Ohioans in the AES service area. Ms. Gustin testified that energy assistance to at-risk families had been subject to processing delays.

She testified the agency’s staff have been “working as fast as possible and it’s still not enough.”[[13]](#footnote-14) Ms. Gustin testified that assistance agencies are “bobbing above the waterline to provide assistance with a limited staff, limited resources, [and] overwhelming program requirements.”[[14]](#footnote-15) (We understand that Ms. Gustin’s agency presently is catching up with the processing of assistance for people in need.)

Also of great concern is the other testimony by Ms. Gustin. She testified that only *16.83 percent* of the eligible population in Ohio received the HEAP benefit in 2021.[[15]](#footnote-16)

The types of assistance that may have been delayed for consumers include: the Home Energy Assistance Program (“HEAP”), Winter Crisis Program, Percentage of Income Payment Plan Plus (“PIPP Plus”), and the Summer Crisis Program. Delays are due in part to staffing challenges at some Ohio Department of Development Energy Assistance Providers.[[16]](#footnote-17) Under such circumstances, it is possible that some at-risk Ohioans could lose assistance under PIPP Plus. That could result if they were or are unable to reverify their eligibility or secure an in-person appointment for winter or summer crisis assistance.

Even if agencies are caught up or catching up with processing delays affecting people in need, the PUCO should have a protection plan in place for the future. The plan, which should include guidelines for the PUCO to suspend disconnections, is needed to promptly help people if there are future processing delays for assistance.

Obviously, consumers cannot obtain assistance if they are unable to schedule an appointment (or a timely appointment) with the local energy assistance provider. This is especially concerning when a consumer is facing a disconnection from a utility. Consumers may find it difficult for a number of reasons to call agencies numerous times throughout the day or call at a specific time of the day in accordance with the local energy assistance provider’s appointment schedules.

And consumers apparently may experience challenges with *mailed* energy assistance applications. Mailed energy assistance applications[[17]](#footnote-18) are apparently sent to a central location of the Ohio Department of Development. There, they apparently are processed and sent back to a holding queue at the applicable county community action agency.[[18]](#footnote-19) The applications may have been subject to some delays in processing.

In this regard, Ms. Gustin (of Miami Valley Community Action Partnership) further testified that:

[T]the customers we serve are struggling. They are exhausted. They are overwhelmed and have little place to turn.[[19]](#footnote-20) Mothers and fathers worried about keeping their homes, paying their utility bills to cook their family a meal and provide light for their children to complete their homework. Basic, basic human needs are at stake on a daily if not hourly basis at the [community action] agency where I work and this is happening throughout the state and throughout the nation.[[20]](#footnote-21)

The PUCO’s own data[[21]](#footnote-22) show that consumers have had issues contacting their local community action agency. These issues include consumer calls to try to schedule an appointment to utilize the Winter Crisis Program to stop the disconnection of service. And they include consumer calls to try to apply or reverify for the PIPP Plus program and check the status of pending utility assistance applications.

The PUCO found in this proceeding that “securing a timely appointment with a community action agency or other local energy provider is beyond the Commission’s control.”[[22]](#footnote-23) *But it is within the PUCO’s control to help at-risk Ohioans.*[[23]](#footnote-24)The PUCO can control whether a utility disconnects consumers. Consumers should not be disconnected if there are delays in processing their financial energy assistance.

The PUCO has emergency authority under R.C. 4909.16. The PUCO can and should use that authority now to protect at-risk populations, per state policy under R.C. 4928.02(L). The emergency statute authorizes the PUCO to amend, alter or suspend a public utility’s existing rates, schedules, or order in order “to prevent injury to the…interests of the public in case of any emergency.” The PUCO can and should help at-risk Ohioans who are unable to timely secure energy assistance such as HEAP, which includes delays with PIPP reverification.

State policy under R.C. 4928.02(L) requires that Ohio’s at-risk populations be protected. At-risk Ohioans are harmed when they cannot obtain assistance due to significant wait times at community action agencies.

Moreover, the PUCO has the responsibility and authority under R.C. 4928.53(B)(3) for all matters involving disconnections. The Ohio Department of Development has the authority to administer the electric PIPP program and to establish rules pertaining to customer eligibility, policies regarding payment and crediting arrangements and responsibilities, procedures for verifying eligibility, and disbursement of public funds. But the PUCO has the sole responsibility over disconnection and billing policies and procedures under this law. The inability of a consumer to enroll in programs or take advantage of state and federal programs that are necessary to avoid disconnection or to restore service is a statutory responsibility of the PUCO.[[24]](#footnote-25)

Further, the law bars a waiting period for consumers to obtain assistance. R.C. 4928.53(B)(3) states that “The rules shall prohibit the imposition of a waiting period before enrolling an eligible customer in the percentage of income payment plan.”

# II. RECOMMENDATIONS

## A. The PUCO should temporarily suspend disconnections for at-risk consumers seeking financial energy assistance if and when there are delays in the processing of their assistance. The PUCO should also suspend disconnection notices once a consumer completes an emergency crisis program application or HEAP application.

Under its emergency powers in R.C. 4909.16, the PUCO has the authority to order that utilities’ disconnection dates be suspended, or, in the alternative, be extended “when the public utilities commission deems it necessary to prevent injury to the…interests of the public in case of any emergency.”[[25]](#footnote-26)

The PUCO’s goal should be to protect every at-risk Ohioan from the unfortunate circumstance of a loss of energy utility service due if and when there is a delay in processing their assistance. A disconnection under these circumstances puts these vulnerable consumers and their families at risk for their health and safety during Ohio’s cold winters or hot summers. And it burdens them with unnecessary costs that they cannot afford.

Eligible at-risk Ohioans can use emergency utility assistance through the Winter Crisis Program and the Summer Crisis Program. Once a consumer has completed an online application for the Winter or Summer Crisis Program, the utilities should be notified and ordered to suspend the consumer’s disconnection for 30 days. The extension would provide a consumer with the opportunity to schedule an appointment with the community action agency to finalize the application during times when appointments are in high demand.

Currently, consumers can start the application process online. But they are required to schedule an appointment with an energy assistance provider to finalize the application. Once a consumer is able to schedule an appointment for emergency assistance, the local energy assistance provider notifies the utility of the impending appointment. Under the Winter Crisis Program, the utility is required to suspend the disconnection for up to five days past the appointment date once the customer makes an appointment with the local energy assistance provider.

But to keep more consumers connected, the PUCO should require that the utility suspend the disconnection once the consumer completes the application. Under the circumstance of processing delays, it is not fair to consumers to delay suspension of disconnection until an appointment is scheduled.

Also, there should be an application process for consumers who do not have internet access. The process should allow consumers 30 days to obtain an appointment with the local energy assistance provider without being in fear of losing energy service during the summer and winter.

Similarly, the PUCO should suspend disconnection notices for consumers that have completed an application for non-emergency HEAP. Applicants for non-emergency HEAP may have to wait up to 12 weeks to receive assistance. These delays may cause applicants to be disconnected before receiving assistance, through no fault of their own.

To stay connected, HEAP applicants may apply for emergency assistance. To keep more consumers connected, the PUCO should require that the utility suspend disconnection when a consumer completes a non-emergency HEAP application. The utility should then place a 30-day disconnection hold on the account from the time the consumer completes the application.

By using its emergency powers under R.C. 4909.16, the PUCO should consider waiving the in-person appointment requirement. If there are processing delays, waiving the in-person appointment is necessary because – even with a 30-day disconnection suspension – an appointment may not be able to be scheduled within the 30-day timeframe.

## B. The PUCO should extend and modify PIPP Reverification Requirements.

The PUCO can also use its authority to require that PIPP reverification be extended or modified to reduce any existing or future bottleneck of emergency assistance applications at community action agencies. At a minimum, disconnection dates should be extended. The PUCO should order that, if a consumer contacts an electric and/or natural gas utility (or PUCO call center) and advises that they are unable to secure an appointment with their local energy assistance provider, the utility should suspend the disconnection date to allow the consumer extra time to schedule the appointment.

Further, to provide increased access to appointments for emergency utility assistance and PIPP Plus, PIPP Plus reverifications should occur only between April 1 and October 31. This would reduce the number of consumers who are unable to reverify their income because they cannot timely obtain an appointment.

Currently, if a consumer does not reverify their income in a timely fashion and is removed from PIPP Plus, the consumer is responsible to make up missed PIPP Plus payments for the number of months the consumer is off the program to be reinstated. Current PIPP rules in O.A.C. 122:5-3-3(B)(3) and O.A.C. 4901:1-1-18(D)(1) should be amended to reflect this proposal. Consumer reverifications could still be done annually, once the Ohio Department of Development transitions current consumers who are scheduled to reverify income between November 1 through May 31 of the following year.

But an even greater help for at-risk consumers would be to change the income reverification timeframe from annual to biennial. This would help reduce the number of consumers trying to schedule an appointment at the same time – and thereby reduce processing time for the assistance providers. For example, transitioning the reverification timeframe to every two years would involve staggering the new reverification dates. This would prevent all reverification dates occurring at the same time (causing a large group of PIPP Plus consumers trying to reverify at once).

Using the consumer’s last name, one-half of the alphabet of PIPP consumers could reverify one year and the other half the next year. PIPP consumers should be informed that at the time of their next reverification date they will be placed on a biennial cycle. Or each community action agency could determine how PIPP consumers could be assigned to the schedules for when they would need to reverify. A database could help determine how to separate PIPP consumers’ reverification dates.

An additional recommendation is to automatically adjust the PIPP Plus amount for those consumers who receive social security or SSI based on any increase from federal government programs. That would eliminate the need for consumers who are on a fixed income to reverify every year. The Ohio Department of Development could require only wage earners to submit proof of income.

OCC and some others filing this motion have also advocated for categorical eligibility.[[26]](#footnote-27) That could help relieve the backlog of applications and low HEAP participation. Categorical eligibility would allow a consumer to qualify for HEAP based on eligibility for SNAP and SSI at Jobs and Family Services, as well as Veterans Programs.[[27]](#footnote-28)

Through categorical eligibility, HEAP funds could be applied to households qualifying for SNAP that are unaware of the HEAP program. In addition, it could raise the percentage of at-risk Ohioans who participate in HEAP, which is currently under 20% of those who qualify.[[28]](#footnote-29)

Consumer Advocates further recommend that the PUCO issue reports that cover April 1 through March 31 of the following year. The reports should disclose the number of calls received from consumers who are unable to secure an appointment with their community action agency to obtain utility assistance. This assistance includes winter and summer emergency assistance, PIPP Plus (new and reverification), regular HEAP, and HWAP. The report should provide the number of calls by county, along with the types of complaints from the public.

O.A.C. 122:5-2 addresses the community action agencies’ annual evaluation to the Ohio Department of Development.[[29]](#footnote-30) Within O.A.C. 122:5-2-04, one of the criteria is “the impact of its activities upon the needs of low-income clients and the community.”[[30]](#footnote-31) As part of this requirement, the PUCO should issue an annual report on any problems consumers are having with assistance processing, including securing appointments with community action agencies, as learned by the PUCO’s call center. The PUCO should be able to take action to address the findings in the report to help consumers.

# III. CONCLUSION

We respectfully move that the PUCO grant this Motion for protection of Ohio families at risk for the despair and danger of energy utility disconnections for nonpayment. The PUCO should promptly adopt the consumer protection recommendations described above. The PUCO has the power to help at-risk Ohioans. The PUCO should do so now.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Suspend Electric and Natural Gas Utility Disconnections for at-Risk Ohioans If and When There Are Delays in the Processing of Their Financial Assistance was served on the persons stated below via electronic transmission, this5th day of June 2023.

*/s/ Angela D. O’Brien*

Angela D. O’Brien

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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1. Advocates for Basic Legal Equality is a nonprofit public interest law firm that represents low-income people in 33 Ohio counties. The Legal Aid Society of Southwest Ohio, LLC serves low-income families and individuals in southwest Ohio to resolve serious legal problems, to promote economic and family stability, and to reduce poverty through effective legal assistance. The Office of the Ohio Consumers’ Counsel is the state legal advocate for Ohio residential utility consumers. *See* R.C. Chapter 4911. The Ohio Poverty Law Center works to reduce poverty by protecting and expanding the legal rights of Ohioans living, working, and raising their families in poverty. Pro Seniors, Inc. provides education, advice, advocacy, representation, and justice for seniors in Ohio through our three programs, all provided at no cost to clients. These advocates are collectively referred to as “Consumer Advocates.” [↑](#footnote-ref-2)
2. Testimony of Keelie Gustin, *Re AES Electric Security Plan*, Case Nos. 22-900-EL-SSO, et al., Transcript of Local Public Hearing (February 2, 2023). [↑](#footnote-ref-3)
3. *Id*. at 21. [↑](#footnote-ref-4)
4. *Id.* at 22. [↑](#footnote-ref-5)
5. *Id.* at 19; <https://www.occ.ohio.gov/docs/NEUAC-LIHEAP-FACTS.pdf>. [↑](#footnote-ref-6)
6. *Id.* at 20. [↑](#footnote-ref-7)
7. *Id.* at 22. [↑](#footnote-ref-8)
8. *See* R.C. 122.66(D), O.A.C. 122:5-2-01(D). [↑](#footnote-ref-9)
9. Executive Order 2022-12D (July 27, 2022), <https://content.govdelivery.com/attachments/OHIOGOVERNOR/2022/07/27/file_attachments/2229578/Signed%20EO%202022-12D.pdf>. [↑](#footnote-ref-10)
10. Case No. 22-668-GE-UNC, Finding and Order at 6 (October 5, 2022). [↑](#footnote-ref-11)
11. R.C. 4928.02(L). [↑](#footnote-ref-12)
12. Testimony of Keelie Gustin, *Re AES Electric Security Plan*, Case Nos. 22-900-EL-SSO, et al., Transcript of Local Public Hearing (February 2, 2023). [↑](#footnote-ref-13)
13. *Id*. at 21. [↑](#footnote-ref-14)
14. *Id.* at 22. [↑](#footnote-ref-15)
15. *Id.* at 19; <https://www.occ.ohio.gov/docs/NEUAC-LIHEAP-FACTS.pdf>. [↑](#footnote-ref-16)
16. Energy Assistance Providers are also sometimes referred to as Community Action Agencies. *See* R.C. 122.66(D), O.A.C. 122:5-2-01(D). [↑](#footnote-ref-17)
17. [https://liheapch.acf.hhs.gov/sites/default/files/webfiles/docs/2023/state-plans/OH\_Plan\_2023.pdf](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fliheapch.acf.hhs.gov%2Fsites%2Fdefault%2Ffiles%2Fwebfiles%2Fdocs%2F2023%2Fstate-plans%2FOH_Plan_2023.pdf&data=05%7C01%7CAmy.botschner.obrien%40occ.ohio.gov%7Cb7f9202bcd1440485feb08db0f91d7fa%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638120891285800872%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Ef5EcwB%2FRHhCW%2F%2BZJcTkKzgiS8Cq8WHfn9zi4T8cyEs%3D&reserved=0). [↑](#footnote-ref-18)
18. <https://development.ohio.gov/individual/energy-assistance/apply-now-energy-assistance-programs>. [↑](#footnote-ref-19)
19. Tr. at 20. [↑](#footnote-ref-20)
20. Tr. at 22. [↑](#footnote-ref-21)
21. PUCO Call Center Complaint Nos. 786654, 786895, 787123, 787699, 787749, 788842, 788854, 789452, 789607, 790717, 791322, 791841, 791867, 792067, 792225, 792360, 792467, 796243, 797379 and 798442. [↑](#footnote-ref-22)
22. Case No. 22-668-GE-UNC, Finding and Order at 6 (October 5, 2022). [↑](#footnote-ref-23)
23. R.C. 4928.02(L). [↑](#footnote-ref-24)
24. R.C. 4928.53(B)(3). [↑](#footnote-ref-25)
25. R.C. 4909.16. [↑](#footnote-ref-26)
26. Case No. 22-668-GE-UNC, Consumer Protection Comments by the Legal Aid Society of Columbus, Office of the Ohio Consumers’ Counsel, Ohio Poverty Law Center, Pro Seniors, Inc., Southeastern Ohio Legal Services and Legal Aid Society of Southwest Ohio, LLC (September 14, 2022). [↑](#footnote-ref-27)
27. [OH\_Plan\_2023.pdf (hhs.gov)](https://liheapch.acf.hhs.gov/sites/default/files/webfiles/docs/2023/state-plans/OH_Plan_2023.pdf); <https://thelandcle.org/stories/what-is-administrative-burden-and-how-does-it-affect-people-who-need-help-with-utility-bills/>. [↑](#footnote-ref-28)
28. According to the data from the National Energy & Utility Affordability Coalition (NEUAC). *See* [https://www.occ.ohio.gov/docs/NEUAC-LIHEAP-FACTS.pdf](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.occ.ohio.gov%2Fdocs%2FNEUAC-LIHEAP-FACTS.pdf&data=05%7C01%7CAmy.botschner.obrien%40occ.ohio.gov%7C776d4974b37947c0871208db0f9a3070%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638120927148881708%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=y81iVn4FhHBJoie61OfQVjSglerpT0Udyb%2FdaipBzPA%3D&reserved=0). [↑](#footnote-ref-29)
29. [https://codes.ohio.gov/ohio-administrative-code/chapter-122:5-2](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcodes.ohio.gov%2Fohio-administrative-code%2Fchapter-122%3A5-2&data=05%7C01%7CAmy.botschner.obrien%40occ.ohio.gov%7Cf011afc7eaa345cf44d008db191a9ef7%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638131374354126857%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=dJB1pf2hlnqdrxeHc5NgPBVR7kBktwqyhwg3ti2oB%2Bc%3D&reserved=0). [↑](#footnote-ref-30)
30. [https://codes.ohio.gov/ohio-administrative-code/rule-122:5-2-04](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcodes.ohio.gov%2Fohio-administrative-code%2Frule-122%3A5-2-04&data=05%7C01%7CAmy.botschner.obrien%40occ.ohio.gov%7Cf011afc7eaa345cf44d008db191a9ef7%7C50f8fcc494d84f0784eb36ed57c7c8a2%7C0%7C0%7C638131374354126857%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=92jy%2B8%2FiN3P4IqL84OFjEkclpB1%2FMeF1VL4a9LegnCo%3D&reserved=0). [↑](#footnote-ref-31)