**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of Duke Energy Ohio, Inc., for a Waiver of Specific Sections of the Ohio Administrative Code. | )  )  )  ) | Case No. 22-0043-GE-WVR |

**INITIAL COMMENTS OF INTERSTATE GAS SUPPLY, INC.**

Pursuant to the Attorney Examiner’s February 11, 2022, Entry, Interstate Gas Supply, Inc. (“IGS”) respectfully submits these comments to assist the Public Utilities Commission of Ohio (“PUCO” or “Commission”) in its review of Duke Energy Ohio, Inc.’s (“Duke”) application for waiver of various Commission rules and sections of its applicable tariffs. Duke filed its waiver application, in part, because its transition from its current customer information system (“CIS”) to its new CIS, Customer Connect, requires it to temporarily suspend several processes that are expected to impact both utility and Choice natural gas and electric program operations as well as the customers those entities serve.[1](#_bookmark0) Duke, therefore, seeks a temporary waiver of rule provisions governing, among other things, billing, payments, Choice transactions, and certain customer transactions for CRES and CRNGS providers. [2](#_bookmark1)

While IGS appreciates Duke’s request to also seek temporary waivers on behalf of all the CRES and CRNGS operating in its service territory, IGS is nonetheless concerned that at least some of the CIS changes that Duke described—both within the

1 *In the Matter of the Application of Duke Energy Ohio, Inc., for a Waiver of Specific Sections of the Ohio Administrative Code* at 1, Case No. 22-0043-GE-WVR (Jan. 19, 2022). (hereinafter “Application”)

2 *Id*. at 2.

context of its application and in stakeholder information sessions with IGS and other Choice suppliers—will fundamentally alter IGS’s IT systems and processes and could negatively impact the customers it serves. IGS is most concerned with two of Duke’s planned changes: (1) Duke’s plan to suspend accepting inbound transactions for CRES and CRNGS residential and commercial customer enrollments, reinstatements, and drops from March 18 until April 6[3](#_bookmark2); and (2) Duke’s plan to separate multi-meter accounts into multiple points of delivery (“POD”) by assigning a new Choice Service ID for each POD located at the customer’s premise. As a result, suppliers will effectively be required to submit a separate enrollment transaction for each POD located at a customer’s premise. IGS notes that while Duke described the planned change in some detail during Choice supplier information sessions [4](#_bookmark3) , it did not specifically address this item in its application.

Although IGS does have concerns with the two items listed above, it generally does not object to Duke’s proposed April 6, 2022 deployment/ “go-live” date for any of the changes described in Duke’s application, so long as those changes are implemented in a manner that ensures compliance for all market participants and causes the least possible inconvenience and expense to IGS and its customers. To that end, Duke should be required to provide all Choice suppliers with a cross reference file that, at a minimum, contains the legacy account number and new Choice Service ID for all residential and

3 *Id*. at 8-9.

4 *See* Attachment A at pp. 11; 15.

commercial customers that have enrollments pending due to the weeks-long suspension of CRES and CRNGS inbound transactions.

Duke’s plan to separate a multi-meter account into multiple points of delivery by April 6 also presents IT challenges for IGS, because the planned change cannot be implemented absent significant internal programming, development, and labor costs. While IGS would prefer that Duke retain the status quo (i.e., one POD for multi-meter accounts), it would likely prove even more costly for all parties to pivot away from the planned change at this late juncture given the amount of time and resources IGS, Duke, and presumably others have already invested to program their systems to support the change.

1. **Duke’s Plan to Suspend Inbound CRES and CRNGS Transactions from March 18 until April 6, 2022 Presents Multiple Operational and Administrative Challenges for IGS.**

### *IGS Must Manually Update Choice Accounts Impacted by the Suspension* Period Unless Duke Provides It with an Additional Cross-Reference List.

As described above, Duke plans to suspend inbound transactions for CRES and CRNGS residential and commercial customer enrollments, reinstatements, and drops for at least 19 days.[5](#_bookmark4) Duke’s application further provides that any such requests received during that time will not only be rejected, but also will not be stored by Duke for later processing.[6](#_bookmark5) Notably, Duke’s planned treatment of the requests it receives from CRES and CRNGS suppliers during the suspension period is a departure from its planned

5 *Id*. at 8-9.

6 *Id*. at 8.

treatment of Budget Billing and extended payment plan enrollments[7](#_bookmark6), which Duke plans to continue to collect from customers while its systems are offline. IGS sees no reason why Duke cannot treat CRES and CRNGS inbound transactions similarly and collect those enrollments in queue. Given that Duke’s plan will create a substantial backlog of unfulfilled CRES and CRNGS residential and commercial customer transactions, it’s decision not to similarly collect requests from suppliers during the suspension period places a heavy burden on IGS and other suppliers to track, monitor, and submit transactions once the suspension period is lifted. IGS anticipates that a significant amount of residential and commercial customer accounts will be impacted during that time.

Further complicating matters is Duke’s decision to replace legacy customer account numbers with new account numbers and new Choice Service IDs.[8](#_bookmark7) At present, that decision will require IGS to manually update each residential and commercial customer enrollment transaction held in IGS’s systems during the suspension period prior to submitting the inbound transaction to Duke.

Alternatively, Duke should provide IGS and all suppliers with an additional cross- reference list that includes, at a minimum, the customer’s legacy account number and new Choice Service ID. Additional identifying information such as the customer’s name, address, and meter number would also be helpful to include on the cross-reference list to streamline processes. Such a list would alleviate the burden on IGS to manually update impacted accounts by allowing it to use an automated process to seamlessly update the

7 *Id*. at 3-4.

8 Attachment A at 11.

customer enrollment transactions with the new Choice Service ID information. In doing so, IGS expects that it will be able to release the most accurate and updated transaction information to Duke by the April 6 “go-live” date.

### *The Planned Suspension Period Could Lead to an Increase in Customer* Complaints.

Next, IGS cautions that the length of the planned suspension could lead to a substantial uptick in customer complaints. Although Duke indicated during a recent choice supplier information session that it plans to create a communications plan to notify customers of suppliers’ limited ability to serve them during the suspension period, Duke has yet to provide any detail or specific insight into the content of the messaging campaign. A specific timeline as to when Duke plans to distribute any communications to customers also has not been provided. With the April 6 “go-live” date rapidly approaching, IGS recommends that the Commission require Duke to distribute all customer communications no later than March 15 so that customers will have at least two weeks’ notice to review the upcoming changes prior to when the cutover period (i.e., March 30-April 6) begins. To mitigate the potential likelihood for customer complaints, IGS also recommends that the communications include, at a minimum, a detailed description of the planned changes, their associated impacts on shopping and non- shopping customers, as well as the telephone number to contact Duke in the event the customer has any questions concerning the upcoming changes.

Duke should also be required to provide customers with supplemental communications on or shortly after April 6 that include the customer’s new Choice Service ID since it is IGS’s understanding that the Choice Service ID may not be available on

some customer invoices until one month after the changes are implemented (i.e., May). By including the Choice Service ID in Duke’s supplemental messaging materials, customers and suppliers will have the information necessary to complete a Choice enrollment on or around Duke’s April 6 “go-live” date

1. **Duke’s Plan to Separate Multi-Meter Accounts into Multiple PODs Threatens to Fundamentally Alter IGS’s IT Systems and Processes.**

Although not expressly mentioned in its waiver application, Duke indicated that as of April 6, 2022, it plans to separate multi-meter accounts into multiple points of delivery (“PODs”) and, in doing so, will create multiple Choice Service IDs for a single customer premise. To illustrate: a residential homeowner with a detached garage that is separately metered is currently assigned a single account number in Duke’s system for both PODs/meters (i.e., the POD/meter to the home; the POD/meter to the garage). Assuming Duke’s plan is implemented, then that same customer will be assigned separate Choice Service IDs for each POD/meter. Duke indicated in Choice supplier information sessions that a supplier must submit a separate enrollment transaction for *each POD* on the customer’s premise to serve that customer. It is IGS’s understanding that no other gas or electric utility in Ohio utilizes the multi-meter/POD construct that Duke plans to implement. This approach threatens to fundamentally alter IGS’s IT systems and processes and is administratively burdensome.

While other utilities such as AEP Ohio, for example, utilize Choice Service IDs to identify shopping customers in its service territory, AEP Ohio assigns a single account number to a customer’s premise regardless of the number of meters/PODs at a location. IGS—and presumably all other suppliers operating in Duke’s service territory—codes its

IT systems to reflect the one-to-one relationship between the customer’s account number and the premises served. Since IGS’s IT systems are designed to manage the customer relationship on a per-account basis, the residential customer cited in the example above would receive a second set of contract documents, notices, and/or an early termination fee (“ETF”), where applicable, for each meter/POD located at the premises if Duke’s plan were implemented today. Although IGS has no intention of enforcing any duplicate ETFs that its system may issue, Duke’s planned approach will undoubtedly create customer confusion unless IGS overhauls its IT systems.

IGS initiated that process shortly after it received the first conversion file necessary to begin coding from Duke on December 7, 2021 – just under four months prior to the planned “go-live” date. Similarly, IGS projects that a significant number of customer accounts will be impacted by the planned change. IGS also projects that its IT team will need to dedicate at least 2,000 hours to analyze, develop, and code its internal systems to accommodate a process that just one Ohio utility (i.e., Duke) will utilize.

Given the amount of time (and expense) necessary to comply with the planned change as well as the brief four-month lead time IGS was allotted to make the necessary system modifications, IGS does not anticipate that its systems will be fully operational by Duke’s “go-live” date. Therefore, IGS plans to implement a short-term solution whereby its systems will automatically run a daily report that identifies each impacted account. Any accounts flagged by that report will be manually updated with the requisite Choice Service ID information to avoid issuing any duplicate literature, ETFs, etc. to customer accounts impacted by the change.

IGS believes that the more logical solution, however, is for Duke to abandon the planned change and retain the status quo. However, IGS also recognizes that Duke and other suppliers may have already invested a substantial amount of time and resources to program their IT systems to support the conversion.

IGS is not aware of any specific reason why Duke plans to split multi-meter accounts into multiple PODs, and its application is completely silent on this issue. Regardless, the Commission should not overlook the fact that the planned change places a hefty burden on CRES and CRNGS suppliers to build out their IT systems to accommodate a process that only one Ohio utility will utilize. Despite the concerns described in these comments, IGS will be prepared to comply with the planned changes by Duke’s April 6 “go-live” date.

Respectfully submitted,

*/s/ Michael Nugent* Michael Nugent (0090408) Counsel of Record

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### *Attorneys for IGS Energy*

**CERTIFICATE OF SERVICE**

I certify that this *Comments of Interstate Gas Supply, Inc.* was filed electronically with the Docketing Division of the Public Utilities Commission of Ohio on this 25th day of February 2022.

*/s/ Michael Nugent*

Michael Nugent

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**ATTACHMENT A**

# Deployment Timeline\*

As of February 13, 2022 | Applicable to both electric and gas suppliers unless otherwise noted

*\*The dates below may be revised and updated due to technical requirements, as well as any additional legal or regulatory requirements.*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *February*  *2022* | *March 2022* | *Thurs 3/31 – Tues 4/5* | *Wed 4/6* | *May 2022* |
|  | | **Cutover** | alert.png | |

**2/18**

Last date to complete **supplier integration testing**\* for the new system

(\*Supplier integration

**3/10**

Last date to submit any **aggregation enrollments\***

**3/18**

**3/25**

Last date to submit new supplier **rates or price changes**

***Legacy System is Read Only***

**3/31 – 4/5**



 Duke Energy cannot receive supplier transactions

 Portal unavailable

**4/6**

* Duke energy’s new customer information **system is available**
  + EDI and SFTP

**communications resume**

**May TBD\*** Integration testing window opens in the new system for new suppliers or existing suppliers with significant changes

testing activities will resume approx. 1 month after conversion to the new system)

**3/1 – 3/2**

**3/15**

Last date to **submit enrollment and drop transactions** in the current format

**3/30**

Last date to return **810 transactions** for March billing

Last date to request

**4/5**

* Cross-reference

list with **new customer account numbers** provided to all suppliers

* + **New customer account number / Choice Service ID required** for all

transactions

***\*****Exact timing is subject to system performance*

Final opportunity to

participate in **dress rehearsal**

Last date to submit new or updated **electric supplier logo** for customer bill

**changes,**

**reinstatements and**

**historical usage**

**4/6**

* New **certified supplier portal is available** for electric and gas suppliers





**3/30**

Late date for electric suppliers to access

secured **certified supplier information page**

**\****We are requesting large volume transactions be limited, if possible*

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# Go-Live: April 6

* Electric EDI transactions use existing **Common Code**
* **EDI transactions** will be enabled for Gas suppliers
* Suppliers remaining on Gas Flat file will begin using the **updated flat file layout**
* The **primary supplier identification** is changing to DUNS number for all supplier transactions

## Utilize the **new Choice Service ID** from the cross-reference list for all transactions. Transactions will be processed at

the Choice Service ID level. Note that one account may have more than one Choice Service ID.

* We will begin using an **Aggregation Identifier Code** for aggregation enrollments (e.g., 22-0001-EL)
* Duke Energy will address a pain point for aggregations by **accepting an aggregation enrollment if the customer has a pending drop with their current supplier**. If the current supplier also serves the aggregation, they may submit a Change request to add the aggregation identifier (and rate code if applicable) for the customer.

## Duke Energy **rate codes are changing**, however, supplier rate codes for rate-ready billing are being converted “as is”

* The account identifier on the **pre-enrollment list** is changing
* Starting in April there will be **20 billing cycles**

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