April 7, 2021

Docketing Division

Public Utilities Commission of Ohio

180 East Broad Street

Columbus OH 43215

RE: *In the Matter of the Application of The Dayton Power and Light Company for Approval of a Revised Bill Format for Electric Service,* Case No. 21-0146-EL-UNC*.*

Dear Docketing Division:

Enclosed please find Staff Commentsin the Matter of the Application of The Dayton Power and Light Company for Approval of a Revised Bill Format for Electric Service, Case No. 21-0146-EL-UNC.



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Barbara Bossart

Chief, Reliability and Service Analysis Division

Service Monitoring and Enforcement Department

Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

**COMMENTS**

**SUBMITTED ON BEHALF OF THE STAFF OF THE PUBLIC UTLITIES COMMISSION OF OHIO**

**I. BACKGROUND**

In this proceeding, the Dayton Power and Light Company (hereinafter, “Company”) proposed to modify its bill format for all bills to reflect a new name and brand identity, whereby “The Dayton Power and Light Company” is now doing business as “AES Ohio,” effective February 24, 2021. The Company filed the appropriate fictious name change registration with the Ohio Secretary of State on February 19, 2021.

 The Company’s application states that its objective in designing this revised bill format is to align the Company’s bill with its new name and brand identity. This Application is not seeking to change any service terms, conditions, or rates. The Company also intends to notify, inform, and educate its customers about the new branding change through a variety of mediums including advertisements, social media, and a detailed explanation on the Company’s web site.

On March 22, 2021, the Office of the Ohio Consumers’ Counsel (“OCC”) filed motions to intervene in this case and suspend the automatic approval process due to concerns that the proposed changes are contrary to Ohio law and the PUCO rules. Specifically, OCC believes the proposed changes exclude crucial information such as the correct price-to-compare language, distribution and generation rates, and the disconnection notice.

On March 31, 2021, the Company filed a notice of corrected exhibits and a memorandum contra to OCC’s motion to suspend. As part of its Application, the Company included a mock-up of a residential bill as an exhibit, which inadvertently replaced the words “7/15/2015 Payment -Thank You” with “Late Payment Charge” and included language that did not represent true usage, weather, or the current price-to-compare. The Company updated a current residential bill using the proposed logo and branding changes and corrected these clerical errors to ensure the residential bill accurately reflects current practices and language.

**II. COMMENTS**

Staff reviewed the Company’s Application and corrected exhibits along with a sample PIPP bill and a non-commercial bill. Although not directly part of the review, Staff also reviewed the Company’s updated Rights and Responsibilities brochure and disconnection notice. As a result of Staff’s review, the Company updated its bill format to include the price-to-compare, and corrected the errors with the payment line section and the late payment line section.

Staff believes that the corrected bill format complies with Ohio law and the PUCO rules. The OCC’s recommendation for an increased bill detail/breakdown is best suited during the CIS upgrade and the resulting bill format proceeding. The Company is only rebranding in this proceeding, not increasing the capabilities and functionality of its billing system to enhance the billing detail. Likewise, all customer bill formats were not reviewed as the Company was only rebranding its name and logo in this proceeding and keeping all other approved bill format conditions.

**III. RECOMMENDATION**

For the reasons stated above, Staff recommends approval of the Company’s bill format change.