**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 SpecificSections of the Ohio Administrative Code | ))) | Case No. 22-0043-GE-WVR |

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

1. **INTRODUCTION**

Interstate Gas Supply, Inc. (“IGS”) submits these Reply Comments to respond to the comments filed by the NRG Retail Companies (“NRG”)[1](#_bookmark0); SFE Energy Ohio, Inc. and StateWise Energy Ohio, LLC (“SFE Energy”); the Retail Energy Supply Association (“RESA”); and the Ohio Consumers’ Counsel (“OCC”) regarding Duke Energy Ohio, Inc.’s (“Duke”) application for waiver of various Commission rules and sections of its applicable tariffs. Like IGS, each commenter expressed concern that the planned suspension of several of Duke’s normal customer information system (“CIS”) processes during the conversion and/or cutover to its new CIS will unreasonably interrupt competitive market operations and negatively impact shopping and non-shopping customers alike.[2](#_bookmark1) Several

1 Pursuant to the Initial Comments it filed in this proceeding, the “NRG Retail Companies” refers to Direct Energy Business LLC; Direct Energy Services LLC; Direct Energy Business Marketing LLC; Energy Plus Holdings LLC; Energy Plus Natural Gas LLC; Reliant Energy Northeast LLC; Stream Ohio Gas & Electric, LLC; and Xoom Energy Ohio, LLC.

2 Initial Comments of Interstate Gas Supply, Inc. (Feb. 25, 2022) (“IGS Comments”); Joint Initial Comments of Direct Energy Business LLC, Direct Energy Business Marketing LLC, Energy Plus Holdings LLC, Energy Plus Natural Gas LLC, Reliant Energy Northeast LLC, Stream Ohio Gas & Electric, LLC and Xoom Energy Ohio, LLC (Feb. 25, 2022) (“NRG Comments”); Comments of SFE Energy Ohio, Inc. and StateWise Energy Ohio, LLC (Feb. 25, 2022) (“SFE Comments”); Initial Comments of the Retail Energy Supply Association (Feb. 25, 2022) (“RESA Comments”); and Consumer Protection Comments by Office of the Ohio Consumers’ Counsel (Feb. 25, 2022) (“OCC Comments”).

commenters also shared IGS’s concern that the system conversion will force suppliers to undertake extensive IT system changes to interface with Duke’s new CIS[3](#_bookmark2); while others similarly warned that Duke’s prolonged suspension of several system processes (i.e., customer enrollments, drops, etc.) could lead to an increase in customer complaints.[4](#_bookmark3) Although NRG, SFE Energy, and RESA rightfully urged the Commission to adopt shorter suspension periods for certain processes[5](#_bookmark4), no party sought to extend Duke’s planned deployment/ “go-live” date for its new CIS beyond April 6.

All commenters agree that Duke can, and should, do more to mitigate potential negative outcomes associated with the system conversion for competitive market participants and/or customers in its service territory. The solutions that several commenters presented will address many of the deficiencies that were identified either in Duke’s application or during ongoing stakeholder workshops. The Commission, therefore, should require Duke to modify its systems and processes to adopt the solutions described below.

1. **DISCUSSION**

# The Commission Should Require Duke to Provide Suppliers with a Cross- Reference File That Includes, at a Minimum, the Customer’s Legacy Account Number and Choice Service ID.

3 NRG Comments at 2; RESA Comments at 1.

4 SFE Comments at 5-6; RESA Comments at 6.

5 NRG Comments at 2; SFE Comments at 10; RESA Comments at 2.

IGS and NRG agree that Duke’s decision to replace legacy customer account numbers with new account numbers and new Choice Service IDs as part of its system conversion presents operational and administrative challenges for suppliers.[6](#_bookmark5)

NRG notes that Duke’s plan unnecessarily creates delays because Duke does not plan to disclose the new account numbers and Choice Service IDs to customers until they receive their post-conversion bills, which NRG also correctly points out will be weeks after Duke’s planned deployment/ “go-live” date.[7](#_bookmark6) Indeed, Duke has indicated that the last post-conversion customer bill cycle is scheduled to invoice on or around April 29, 2022.[8](#_bookmark7)

Unfortunately, one of the interim work-arounds that NRG referenced (i.e., customers may obtain the new account and Choice Service ID information by contacting Duke or logging into their account) is no longer an available option.[9](#_bookmark8) Thus, suppliers interested in obtaining the new account information during the time between the suspension and post- conversion invoice periods are now left with a single interim solution: Supply Duke with a Letter of Authorization to obtain the account information through Duke’s new supplier portal. The proposed solution is unreasonable and administratively burdensome in that it may force suppliers to obtain LOAs as a prerequisite to serve customers for at least one month or more (i.e., March 18 through April 29).

6 IGS Comments at 4; NRG Comments at 4-5.

7 NRG Comments at 6.

8 *See* Attachment B.

9 On Tuesday, March 2, Duke confirmed to IGS via email that Choice Service ID information will not be visible to Duke’s customer service representatives until the first bill is issued to customers post-conversion.

To ease the burden associated with obtaining the new customer account information during this prolonged period, IGS and NRG separately recommend that Duke provide all suppliers with a cross-reference list that includes, at a minimum, the customer’s legacy account number and Choice Service ID.[10](#_bookmark9) IGS and NRG also agree that this list should be provided to suppliers in advance of the system conversion.[11](#_bookmark10) Indeed, the lack of available work-arounds for suppliers to obtain new customer account information during the suspension and post-conversion invoice periods underscores the need for Duke to not only provide all suppliers with this list in advance of the “go-live” date, but also on an ongoing and continuous basis until such time as all customers have received their first post-conversion invoice (i.e. on or around April 29, 2022). Duke should also be required to provide this list at the supplier’s request.

Alternatively, if Duke is unable to provide the cross-reference list in a timely manner and in the format requested, IGS supports the recommendations of NRG and RESA to implement a 90-day post-conversion grace period in which Duke would continue to accept supplier transactions using the customer’s legacy account number.[12](#_bookmark11) As SFE Energy noted, Duke has left stakeholders with inadequate time to complete the system changes necessary to interface with the new CIS.[13](#_bookmark12) The interim relief that NRG and RESA requested should enable IGS to efficiently process the significant backlog of unfulfilled

10 IGS Comments at 4; NRG Comments at 4-5.

11 *Id*.

12 NRG Comments at 2-3; RESA Comments at 2.

13 SFE Energy Comments at 2.

CRES and CRNGS customer transactions that the prolonged suspension of inbound supplier transactions is expected to create.

# The Commission Should Require Duke to Distribute Communications Describing the Planned System Changes in Advance of the Conversion/Cutover Period.

Suppliers and the OCC agree that Duke should notify customers about any delays or service interruptions associated with the conversion to the new CIS. Although OCC unreasonably narrows the scope of its intended recipients to customers returning to the SSO or GCR[14](#_bookmark13), the Commission should find that *all* customers must be immediately notified of the system conversion’s service impacts (e.g., the suspension of enrollments, terminations, etc.). No party provided a specific date by which these communications should be issued, and IGS continues to recommend that Duke distribute these communications to all customers in its service territory at least two weeks prior to the start of the cutover period, which is scheduled to begin on March 30.[15](#_bookmark14) By distributing these communications in a timely manner, customers should have sufficient time to understand the impact of the planned changes and thereby mitigate the potential likelihood for customer complaints.

Since Duke is unwilling to work with the supplier community on the content of its messaging campaign, RESA recommended that the Commission direct Duke to publicly file its communication plan and messaging in this docket, which would be subject to

14 OCC Comments at 7.

15 IGS Comments at 5.

Commission review and approval.[16](#_bookmark15) IGS supports that recommendation so long as Duke is able to distribute the approved communications to customers on or around IGS’s suggested March 15 deadline. Given that suppliers have experienced ongoing issues directly related to utility system conversions in other service territories[17](#_bookmark16) , IGS also supports RESA’s recommendation for Duke to convene regular ongoing meetings with suppliers to address any issues that may arise after the conversion is complete.[18](#_bookmark17)

# The Commission Should Grant Duke’s Request for Waivers on Behalf of CRES and CRNGS Suppliers.

IGS continues to support Duke’s request to seek temporary waivers on behalf of all CRES and CRNGS operating in its service territory[19](#_bookmark18) and agrees with SFE Energy that the waivers are necessary since suppliers may encounter issues related to transaction processing not only during the system conversion, but also sometime after implementation of the new CIS.[20](#_bookmark19) As noted by several commenters, the suspension of Duke’s CIS processes will create issues that are beyond suppliers’ control. Thus, suppliers should not be penalized for any dissatisfaction or complaints that may arise due to delays in effectuating transaction requests received during the suspension period or shortly thereafter. Duke’s waiver request on behalf of CRES and CRNGS suppliers is just and reasonable; therefore, IGS respectfully urges the Commission to grant the

16 RESA Comments at 8.

17 SFE Energy Comments at 12; RESA Comments at 11.

18 RESA Comments at 12.

19 IGS Comments at 1.

20 SFE Energy Comments at 12.

request and insulate suppliers from any violations that may arise while suppliers and their customers await the completion of Duke’s conversion to its new CIS.

1. **CONCLUSION**

The comments filed in this proceeding make clear that Duke must make swift and deliberate changes to its planned conversion and cutover processes. Based on the foregoing, IGS respectfully requests that the Commission, at a minimum, direct Duke to do the following: (1) Provide all suppliers with a cross-reference list that includes the customer’s legacy account number and new Choice Service ID information. This list should be provided in advance of the “go-live” date and on an ongoing and continuous basis until such time as all customers have received their post-conversion invoice; (2) distribute communications to all customers in its service territory that describe the planned changes in detail at least two weeks prior to the cutover period; and (3) grant Duke’s request for waiver on behalf of all CRES and CRNGS suppliers operating in its service territory.

Respectfully submitted,

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**(Willing to Accept Service Via Email)**

**CERTIFICATE OF SERVICE**

I certify that this *Reply Comments of Interstate Gas Supply, Inc.* was filed electronically with the Docketing Division of the Public Utilities Commission of Ohio on this 4th day of March 2022.

*/s/ Michael Nugent*

Michael Nugent

**SERVICE LIST**

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**ATTACHMENT B**

**Billing Cycle Timeline (March – May)**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **SUN** | **MON** | **TUE** | **WED** | **THU** | **FRI** | **SAT** |
| **MAR 27** | **28** | **29** | **30*** Last date to return 810

transactions for March billing* Last date to request changes, reinstatements, historical usage
 | **31** | **APR 1** | **2** |
| **3** | **4** | **5** | **6****Bill Cycle 1** | **7****Bill Cycle 2** | **8****Bill Cycles 3 & 4** | **9****Bill Cycle 5** |
| **10** | **11****Bill Cycle 6** | **12****Bill Cycle 7** | **13****Bill Cycle 8** | **14****Bill Cycle 9** | **15****Bill Cycle 10** | **16** |
| **17** | **18****Bill Cycle 11** | **19****Bill Cycle 12** | **20****Bill Cycle 13** | **21****Bill Cycle 14** | **22****Bill Cycle 15** | **23** |
| **24** | **25****Bill Cycle 16** | **26****Bill Cycle 17** | **27****Bill Cycle 18** | **28****Bill Cycle 19** | **29****Bill Cycle 20** | **30** |
| **MAY 1****Normal Billing Resumes****for 20 Cycles** | **2** | **3** | **4** | **5** | **6** | **7** |

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