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## Office of the Ohio Consumers' Counsel

*Your Residential Utility Consumer Advocate*

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Consumers' Counsel

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2010 SEP -7 PM 4:09

PUCO

September 7, 2010

Renee Jenkins  
Chief of Docketing  
The Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

Re: *In the Matter of the Application of Columbus Southern Power Company to Establish New Experimental Rate Schedule Classifications for Residential and Small Generation Service Time-of-Day Rates and Residential Experimental Direct Load Control Rider, Case No. 10-424-EL-ATA.*

Dear Ms. Jenkins:

The Public Utilities Commission of Ohio ("Commission") instructed Columbus Southern Power Company ("CSP" or the "Company") to present its comprehensive gridSMART plan to the Commission during a meeting of the Commissioners on August 18, 2010.<sup>1</sup> The Commission requested that CSP's presentation include an explanation of the Company's strategy to engage consumers in its gridSMART plan. The Commission's Entry was filed in the docket pertaining to CSP's application for approval of the initial two gridSMART residential pilot programs, the residential time-of-day and direct load control programs (the "initial two pilot programs").

The Office of the Ohio Consumers' Counsel ("OCC") intervened in this case on behalf of the residential consumers of CSP, who are eligible to participate in the Company's gridSMART plan. OCC filed an initial set of comments addressing the Company's Application, on July 14, 2010. OCC now presents the following comments on CSP's presentation to the Commission, regarding the interest of residential consumers.

CSP's presentation focused on the its comprehensive gridSMART plan while providing very little information on the two pilot programs that are part of the Application currently pending before the Commission. While the overall marketing and education strategy for CSP's gridSMART plan is important for success of all the programs, the initial two pilot programs may help pave the way for success or failure of the gridSMART plan and should receive close attention and scrutiny. In this regard, the PUCO should consider the following points in connection with CSP's presentation.

<sup>1</sup> Entry at 3 (August 12, 2010).

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1. CSP has not identified a strategy or the timing for the marketing and consumer education for the Company's initial two pilot programs.

In its August 9, 2010 comments, OCC identified the need to educate consumers with specific information regarding the initial two pilot programs prior to the implementation of those programs.<sup>2</sup> If the Commission approves CSP's Application, OCC requests that the Commission establish dates for the Company to commence the customer education strategy and for the subsequent implementation of the programs. OCC also requests the opportunity to view and comment on the program-specific information and CSP's strategy before the information is delivered to customers.

2. CSP's presentation did not identify a plan to address consumer concerns related to the Company's initial two pilot programs.

OCC also requests information on how CSP will train its staff to answer questions on the experimental schedules of the Residential Time-of-Day and Direct Load Control programs. CSP must be able to adequately address customer questions and inquiries to assist those customers interested in participating. Conversely, a lack of adequate assistance for customers may negatively impact customer participation.<sup>3</sup> CSP should provide its training information to OCC and OCC should have the opportunity to comment on the materials prior to the implementation of the initial two programs.

3. Feedback provided by the Company to customers throughout the gridSMART pilot period must be as specific as possible.

Finally, CSP's August 18 presentation included an example of a typical bill for a customer. CSP's bills should be designed to inform customers of their monthly costs and savings to the fullest extent possible.<sup>4</sup> OCC should be a part of this process. CSP's example presented on August 18 will not provide enough information for customers. Customer-specific information would encourage customers to continue their participation in the experimental rates. As an alternative, OCC renews its request for a bill insert that will provide the participating customers with information regarding their usage during peak and off-peak periods, the change in the pattern of consumption in comparison to the previous months and to the same month in the previous year, and, above all, the monthly monetary savings resulting from each customer's participation.<sup>5</sup> The Commission should require, or CSP should commit, that CSP include the insert in the first bill sent to customers.

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<sup>2</sup> OCC Comments at 3 (August 9, 2010).

<sup>3</sup> Id. at 3.

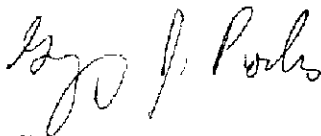
<sup>4</sup> Id. at 4.

<sup>5</sup> Id.

September 7, 2010  
Page Three

In conclusion, OCC supports CSP's efforts to offer the Residential Time-of-Day and Direct Load Control programs to residential customers. But CSP has not done enough for consumers to educate customers about the program and the benefits they could achieve. An informed customer base will increase the likelihood of customer participation and the effectiveness of that participation. Adequate participation in these programs, in good numbers, is a prerequisite to arrive at statistically significant results.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg J. Poulos". The signature is fluid and cursive, with the first name "Greg" and last name "Poulos" clearly distinguishable.

Gregory J. Poulos  
Assistant Consumers' Counsel

CC: Parties of Record