

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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2011 FEB 15 PM 4: 28
PUCO

In the Matter of the Application of)
Columbus Southern Power Company for) Case No. 11-178-EL-UNC
Approval of a Change in Bill Format)

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

**COMMENTS REGARDING COLUMBUS SOUTHERN POWER'S
APPLICATION
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

I. INTRODUCTION

The Office of the Ohio Consumers' Counsel ("OCC"), on behalf of the approximately 670,000 residential electric customers of the Columbus Southern Power Company ("CSP" or "Company"), files these Comments regarding CSP's Application seeking approval of a change in its bill format, by the Public Utilities Commission of Ohio ("Commission" or "PUCO"). CSP also requested an expedited ruling on its Application.¹ Additionally, OCC requests that the Commission deny CSP's request for an expedited ruling in order to consider recommendations or comments from OCC and any other parties.

¹ Ohio Adm. Code 4901-1-12(C) concerns the requests for expedited rulings by the Commission on motions but does not address requests for expedited rulings in Application.

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On February 2, 2011, CSP filed an Application in the above-captioned cases seeking Commission approval, on an expedited basis, for an additional bill format change to reflect rates associated with direct load control (DLC) experimental service.² Direct load control (DLC) experimental service enables CSP to control customers' thermostats during critical times such as load management events in the summer months. On February 7, 2011, OCC filed a Motion to Intervene in this proceeding. The PUCO should order CSP to modify its bill format to accommodate the changes recommended by OCC, based on the reasons set forth below.

II. THE COMMISSION SHOULD MODIFY CSP'S BILL FORMAT, AS CURRENTLY PROPOSED BY CSP, IN ACCORDANCE WITH OCC'S COMMENTS.

On February 2, 2011, Columbus Southern Power ("CSP") filed for approval to change the bill format concerning its experimental direct load control program.³ The Application for the DLC bill format is inadequate as filed and counter-productive to helping customers understand how to reduce energy consumption and costs. In this regard, OCC was involved with the development of the experimental programs but had no opportunity to provide advance input into the bill format.

² In an application filed in this same case, on January 13, 2011, CSP sought Commission approval of bill format changes, on an expedited basis, claiming that the changes were intended to reflect experimental offerings of certain time-of-day ("TOD") rates for residential customers. The Commission approved the application on January 27, 2011.

³ *In the Matter of the Application of Columbus Southern Power Company for Approval of a Change in Bill Format*, Case No. 11-178-EL-UNC. Actually the term "direct load control" does not appear in the February 2nd application but the acronym "DLC" does. Direct load control was referenced in the Company's January 13, 2011 application in which CSP sought bill format approval for the implementation of time-of-day rates.

Ohio Adm. Code 4901:1-10-22(B) requires that bills for electric service must contain language that is clear and understandable in form and content for customers. The proposed CSP bill format, however, is far from clear and understandable. The Company fails to define the terms that are used on the new bill format. For example, the only information on the proposed bill format that mentions direct load control is an inadequate reference to a line item called a “*DLC Rider Credit 0 Opt Out*” along with reference to an \$8.00 credit. (Emphasis added.)⁴ This line item is neither clear nor understandable. Customers must voluntarily enroll in the experimental direct load control tariff and, therefore, the term “opt out” is misleading. CSP should, at a minimum, be required to provide a brief definition of the experimental direct load control program on the bill.

The proposed bill format does not include a reference to the dates or times during the billing period when the Company will exert control over the thermostat to reduce energy usage. Customers who choose the experimental DLC rate should know when the Company exerts such control and the impact of this action should be reflected on their monthly bill. CSP should be required to list the dates, times and duration on the customer bill when it exerts control over the thermostat. In addition, customers should be informed, on the bill, about savings that were achieved as a result of participating in this program. OCC recommends that the CSP billing system be modified to accommodate these requirements.

The proposed bill format is confusing and includes language which is misleading to customers. For example, the proposed bill format states at the bottom of page 1 that

⁴ This reference is on page 1 of Attachment 1 to CSP's application. There are 2 pages to Attachment 1 of the Application but they are not numbered. OCC will number the pages and attach CSP's Attachment 1 to the Motion to Deny.

the: "Due date does not apply to Previous Balance Due."⁵ The proposed bill format, however, reflects the payment that was made the previous month and the date the payment was made. Including superfluous and undefined terms on the bill, like the previous balance due, when no money is due on the account leads to customer confusion and uncertainty. CSP should be required to reflect a due date on the bill and provide a clear statement of the current amount due without referring to previous balances owed.

The proposed bill format does not indicate if customers who enroll on the DLC rate can also participate in budget billing. CSP is required pursuant to Commission rule⁶ to offer a budget (uniform payment plan) for its customers; yet the Application does not include a proposed bill format for budget-billed customers. CSP should be required to clarify if budget bill customers can participate in the DLC rate and if so, to file a proposed bill format for these customers.

The proposed bill format includes information about the PIPP Plus program without explaining whether the Commission has decided if PIPP Plus customers can participate in the experimental DLC program. The Finding and Order which gave rise to the Application for a change to the bill format does not address PIPP Plus eligibility for the experimental DLC program.⁷ The Commission decided that PIPP Plus customers cannot participate in the Time of Day (TOD) service options. CSP should be required to include with any PIPP Plus information that is provided on the bill to DLC customers,

⁵ Id.

⁶ Ohio Adm. Code 4901:1-18-05(D)

⁷ *In re the Application of Columbus Southern Power Company to Establish New Experimental Rate Schedule Classifications for Residential and Small General Service Time of Day Rates and Residential Experimental Direct Load Control Rider*, Case No. 10-424-EL-ATA, Finding and Order (December 1, 2010) at 10.

any limitations that exist for going off of the DLC program to participate in the PIPP Plus program.⁸

III. CONCLUSION

As discussed herein, the bill format attached to the Application does not comply with the Commission's rules for bill formats including the requirement to "contain clear and understandable form and language."⁹ To protect consumers, the Commission should adopt OCC's comments and recommendation and require CSP to submit an updated, revised version of its bill format which properly reflects DLC charges.

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER
CONSUMERS' COUNSEL



Richard C. Reese, Counsel of Record
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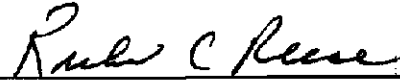
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⁸ The Finding and Order, at 8 indicates that DLC tariff customers have a minimum stay of May through September. The order does not specify if customers can go off of the DLC tariff and onto the PIPP Plus program during these months.

⁹ Ohio Adm. Code 4901:1-10-22(B).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments Regarding Columbus Southern Power Company's Application by the Office of the Ohio Consumers' Counsel* was served on the persons stated below via regular U.S. mail, postage prepaid, this 15th day of February 2011.



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Bill Date: 11/30/2010

Total Amount Due \$ 106.89

Due Date Dec 16

Send Inquiries To:
 PO BOX 24401
 CANTON, OH 44701-4401
 R-C-640367407

Amount Enclosed

The Neighbor to Neighbor program helps disadvantaged customers pay their electric bill. I want to help. My payment reflects my gift of \$_____

Make Check Payable and Send To:
 AMERICAN ELECTRIC POWER
 PO BOX 24417
 CANTON OH 44701-4417

CUSTOMER NAME
 CUSTOMER ADDRESS
 CITY, ST. ZIP
 0000114890000114890100000000001019149500030111612002900003

Account Number XXX-XXX-XXX-X-X CYC 2 55

Please tear on dotted line and return top portion with your payment

SERVICE AT:

For Billing, Outage or
 Service Inquiries, Call:
 1-800-277-2177

Account Number
 XXX-XXX-XXX-X-X
 Bill Date 11/30/10

CUSTOMER NAME
 CUSTOMER ADDRESS
 CUSTOMER LOCATION
 CITY, ST. ZIP

PREVIOUS CHARGES:

	Account Balance	Amount Due
Total Amount Due at Last Billing	\$ 114.53	
Payment 11/15/10 - Thank You	114.53 CR	
Previous Balance	\$.00	\$.00

CURRENT AEP CHARGES (1-800-277-2177):
 11/30/Tariff 013 - RESIDENTIAL SERVICE

Service Delivery Identifier Number: XXXX-XXXX-XXXX-XXXX-X

Generation Service	\$ 58.04	
Transmission Service	7.43	
Distribution Service	44.90	
Customer Charge	4.52	
DLC Rider Credit 0 Opt Out	8.00 CR	
Current AEP Charges Due	\$ 106.89	\$ 106.89
Total Amount Due		\$ 106.89

Due Date Dec 16

\$3.48 is your average daily cost for current electric service XXX-XXX-XXX-X

Price To Compare

For tariff 013, in order to save you money a new supplier must offer you a price lower than 6.6 cents per KWH for the same usage that appears on this bill. You may contact AEP at the phone number shown on this bill to receive additional information, including a written explanation, about this Price-To-Compare.

Due date does not apply to Previous Balance Due.
 See other side for important information.

SERVICE AT:

CUSTOMER NAME

Account Number
101-914-950-0-0

CUSTOMER ADDRESS
CUSTOMER LOCATION

Page 2 of 2

USAGE:

Meter Number	Service Period From	To	Prev	Meter Reading CD	Pres	CD Multiplier	Metered Usage
XXXXXXXXXX	10/29/10	11/30/10	013010	Y	014000	Y 1.0000	990 KWH
CD - Read Code	Y -Ami Reading		33	Billing	Next Scheduled	Read Date	01/03/11
Month Usage	Month Usage	Month Usage	Month Usage	Month Usage	Month Usage	Month Usage	Month Usage
Dec 09 1,123	Feb 10 1,163	Apr 10 962	Jun 10 1,505	Aug 10 2,131	Oct 10 1,441		
Jan 10 1,305	Mar 10 931	May 10 1,097	Jul 10 1,685	Sep 10 1,601	Nov 10 986		
Average Monthly Usage: 1327 KWH				Total Usage (Past 12 Months): 15930 KWH			

AEP MESSAGES:

Ohio customers needing assistance may be eligible to participate in the Percentage of Income Payment Plan. Under the program, called PIPP Plus, customers receive incentives for making monthly payments based on household income on time and in full. If you have any questions about the program or your eligibility, please contact the Ohio Department of Development at 1-800-282-0880.

Turn in your old, working refrigerator or freezer with AEP Ohio's Appliance Recycling Program and get FREE, convenient pickup and recycling of the appliance, a \$50 rebate check and long term savings on your electric bill. Visit gridSMARTOhio.com or call 1-877-545-4112 to sign up. Hurry, the \$50 rebate offer expires 12/31/10.

Visit us at www.AEPOhio.com

2

Due date does not apply to Previous Balance Due.
See other side for important information.