

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

**Case No. 12-1924-EL-ORD**

## Introduction

AEP Ohio appreciates the Staff's incorporation of its comments from that initial process. AEP Ohio provides these further comments in response to the Commission's pending request for comments. The Company organized the comments by administrative code rule number for ease of reference.

**4901:1-21-03 (D)(1), 4901:1-21-05 (A)(1)(a), 4901:1-21-17 (A)(3):**

AEP Ohio has received customer concerns regarding what generation service means in a fixed price contract due to the language in this section. It would be helpful to adopt an additional clarification which reflects both generation and transmission service. Customers have been unsure if the generation price is only for generation, or if it includes transmission charges. Therefore AEP Ohio recommends the following language addition:

- (1) For fixed-rate contracts, the price per kilowatt hour for generation and transmission service.

**4901:1-21-06 (D)(2):**

AEP Ohio receives many 3-way calls where a confused customer is asking for their account information and is unsure as to who they are speaking too and why they are asking for it. Often as the call progresses, the Company finds out that the customer has been transferred to AEP Ohio by a CRES who is also on the line but does not identify themselves until asked. In order to protect customers privacy (SS number, current account status, etc.) we would like to ask that a new rule state:

“If a CRES provider during a telephone enrollment engages an EDU on a 3-way call, that the CRES provider must immediately disclose that they are present on the call with the customer.”

**4901:1-21-06(D)(1)(e), 4901:1-21-06(D)(2)(a)(viii), 4901:1-21-06(D)(2)(a)(ix)(b), 4901:1-21-06(G)(3):**

The current electric utility rules state that the customer has seven days from receiving the intent to switch notice to contact the electric utility and rescind the enrollment. The CRES rules have changed this language in several places to state now that they have seven business days. This change would be in conflict with the time period

allowed by the electric utility rules. If the rules were changed to seven business days, it would cause IT/computer system changes for the utility, additional labor resources to create the change, as well as a longer lead time for a customer to switch resulting in many switches occurring now in the following month. AEP Ohio suggests changing all references to customers having seven business days to rescind to revert back to the original language, *i.e.*:

- (e) Where enrollment occurs by direct solicitation, customers shall be advised both verbally and in the contract that: (i) the electric utility will be sending a confirmation notice of the transfer of service; (ii) they are allowed a seven ~~business days~~ day period to rescind the contract; and (iii) the customer must ~~should~~ contact the electric utility to rescind the contract.

**4901:1-21-10:**

AEP Ohio believes that additional customer privacy rules should be introduced in this section regarding customer's usage information. This information was previously presented under the privacy rule case numbers 11-277-GE-UNC & 11-5474-AU-UNC.

**4901:1-21-17 (A):**

AEP Ohio has received several customer comments stating that the initial notice provided to them regarding their impending aggregation appears to be similar to junk mail and goes straight into the trash. In order to ensure customer notice, AEP Ohio is asking for the following rule change:

(A) Prior to including a customer's electric account or accounts in an aggregation, a governmental aggregator shall provide each customer written notice that the customer's account(s) will be automatically included in the aggregation unless the customer affirmatively opts out of the aggregation. The notice clearly marked from the outside "important notice regarding your electric service", written in plain language, shall, at a minimum, include:

## **Conclusion**

For the foregoing reasons, the AEP Companies recommend the above changes be adopted by the Commission in finalizing its rule review.

Respectfully submitted,

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Summary: Comments Initial Comments of Ohio Power Company electronically filed by Mr. Matthew J Satterwhite on behalf of Ohio Power Company