

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
Power Company for a Limited Waiver of) Case No. 13-1938-EL-WVR
Ohio Adm.Code 4901:1-18-06(A)(2).)

ENTRY

The attorney examiner finds:

- (1) Ohio Power Company d.b.a. AEP Ohio (AEP Ohio or the Company) is a public utility, as defined in R.C. 4905.02, and an electric utility, as defined in R.C. 4928.01(A)(11). As such, AEP Ohio is subject to the jurisdiction of this Commission.
- (2) On September 13, 2013, as amended on September 5, 2014, AEP Ohio filed an application for a temporary waiver of Ohio Adm.Code 4901:1-18-06(A)(2). Ohio Adm.Code 4901:1-18-06(A)(2) requires that the utility company provide a residential customer with personal notice on the day of disconnection. AEP Ohio requests a waiver of the personal notice provision for those customers, excluding vulnerable customers, whose residence is equipped with advanced metering infrastructure (AMI) within its gridSMART Phase 1 project area. Vulnerable customers, as defined by AEP Ohio, are customers advanced in age, have demonstrated difficulty understanding AEP Ohio's disconnection practices or procedures, mental impairments, life support equipment or medical certificates. AMI allows the Company to, among other things, remotely connect, disconnect and establish electric utility service. The Company requests the waiver be approved for two years, including two winter heating seasons.

AEP Ohio proposes to initially notify affected customers of the change in the disconnection notice process by bill insert and then by postcard mailed directly to the customer. Thereafter, AEP Ohio plans to include a permanent message on the customer's bill. The bill message would state that the customer has an AMI meter and indicate that a utility company representative will no longer provide personal notice prior to the disconnection of service for non-payment.

According to the application, a residential customer with installed AMI capabilities who fails to pay the bill by the due date, will continue to receive a disconnection notice with the bill. If the bill remains unpaid, a 10-day notice call will be made to the customer. While 10-day notices are required during the winter months (November 1 to April 15), the Company proposes as a provision of its waiver request, to provide a 10-day notice for residential customers within the gridSMART Phase 1 project area year-round. If the Company is unable to reach the customer by telephone, a 10-day notice will be mailed to the customer. If the bill remains past due or no payment arrangements are made, AEP Ohio will initiate an automated call to the customer 48 hours prior to the scheduled disconnection of service directing the customer to call the Company to discuss a service order on the customer's account. When the customer calls customer service, customer service would inform the customer that written notice at the premises will not be provided.

- (3) On September 23, 2013, Ohio Partners for Affordable Energy (OPAE) filed a motion to intervene and protest, to which AEP Ohio filed a memorandum contra on October 8, 2013. OPAE filed a reply on October 15, 2013.
- (4) On October 18, 2013, Ohio Consumers' Counsel (OCC) and Appalachian Peace and Justice Network (APJN) filed motions to intervene.
- (5) On September 22, 2014, APJN, OCC and OPAE (jointly Consumer Advocates) filed a request for clarification of the Company's application for waiver. Consumer Advocates ask that the Commission direct AEP Ohio to refile its application to clearly explain, in a single document, the details of its waiver request and to specifically state the data to be collected. Consumer Advocates also request that AEP Ohio make the data collected available to intervenors.
- (6) In order to assist the Commission in its review of AEP Ohio's waiver application, the attorney examiner finds that the following procedural schedule should be established:
 - (a) January 6, 2015 - Deadline for the filing of motions to intervene.

- (b) January 6, 2015 – Deadline for the filing of initial comments.
- (c) January 20, 2015 – Deadline for the filing of reply comments.

It is, therefore,

ORDERED, That the procedural schedule set forth in Finding (6) be adopted. It is, further,

ORDERED, That a copy of this Entry be served upon all interested persons of record in this case.

THE PUBLIC UTILITIES COMMISSION OF OHIO

s/Greta See

By: Greta See
Attorney Examiner

JRJ/dah

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in

Case No(s). 13-1938-EL-WVR

Summary: Attorney Examiner Entry that the procedural schedule set forth in Finding (6) be adopted; electronically filed by Debra Hight on behalf of Greta See, Attorney Examiner.