

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**REPLY COMMENTS OF
OHIO POWER COMPANY**

Introduction

By Request for Waiver filed on September 13, 2013 in this proceeding, Ohio Power Company (“AEP Ohio” or “Company”) requested a limited waiver of Rule 4901:1-18-06-(A)(2), Ohio Administrative Code, pursuant to Rule 4901:1-18-02, O.A.C. The Company later amended portions of its waiver request on September 5, 2014. On January 6, 2015, additional comments were filed by the Office of the Ohio Consumers’ Counsel (“OCC”) and by the Appalachian Peace and Justice Network and Ohio Partners for Affordable Energy (collectively, the “Consumer Advocates”). Pursuant to the Attorney Examiner’s December 2, 2014, Entry in this case, AEP Ohio submits the following reply comments in response to the comments filed by OCC, APJN, and OPAE.

1. The scope of AEP Ohio’s waiver request is clear.

In their additional comments, both OCC (at 3) and the Consumer Advocates (at 2) comment on the scope of AEP Ohio’s waiver request. AEP Ohio filed the Request for Waiver on September 13, 2013, in order to make the most of the potential cost and efficiency savings afforded by the Company’s Advanced Metering Infrastructure (“AMI”) deployment. On September 5, 2014, AEP Ohio amended portions of the waiver request to clarify the term of the waiver, define the limited number of AMI meter customers that would be part of the remote

disconnect pilot, describe the notification process the Company would follow prior to remotely disconnecting a customer, describe the remote disconnect process, and to commit to providing pilot data to the Commission staff. There is no need for a revised application, as the Consumer Advocates suggest, since AEP Ohio's filings clearly define the Company's Request for Waiver and the manner in which the Company would administer remote disconnection if its waiver were to be approved.

2. AEP Ohio's proposal provides several forms of customer notification prior to disconnecting the customer's electric service, allowing time and opportunity for the customer to avoid disconnection.

In their additional comments, both the Consumer Advocates (at 7) and OCC (at 3, 6) argue that AEP Ohio's proposal does not adequately protect customers and the in-person notice on the day of disconnection is fundamental to residential customers keeping their electric service on. Ohio Power has defined its remote disconnect process to be in line with Ohio law and provide several forms of customer notification prior to disconnecting the customer's electric, allowing time and opportunity for the customer to avoid disconnection and providing the customer with the information necessary to prevent a disconnection of service. The Company has proposed at least two written notices, both clearly stating the customer's rights and remedies regarding the disconnection and including the billing account number, information on the disconnection date and time, the amount due, any deposit requirements, information on financial assistance options, and contact information for the Company for payment arrangements and disputing the reasons for termination. Additionally, 48 hours prior to disconnection, the Company would make at least one automated phone message left at the customer's residence. Under the Company's proposed remote disconnect process, the customer would have the

opportunity to make a payment or arrange for alternative payment options at the last minute to avoid disconnection.

Ohio Power's requested waiver and suggested remote disconnection process is fundamentally different to the one Duke Energy Ohio ("Duke") proposed in *Application of Duke Energy Ohio for a Waiver of Certain Sections of the Ohio Administrative Code for Smart Grid Pilot Programs, Case No. 10-249-EL-WVR, Entry (June 2, 2010)*¹. Duke's notification prior to disconnection was via text message or electronic message. The Company's defined process provides at least three communications to the customer notifying them of the possible disconnection, the date and time of disconnection, their rights and remedies, and the customer's payment options. This notification process is consistent with the Commission's rules regarding disconnection notice and procedure and is consistent with Ohio law.

The Company's notification process provides several opportunities for the customer to avoid disconnection. Further, the remote disconnect/reconnect feature of the AMI meter will allow the Company to reconnect the customer normally within an hour of payment if the customer is able to meet the enumerated, minimum requirements for reconnection. This feature eliminates the need for "one last chance to prevent disconnection by making payment."²

The Company's requested waiver, customer notification, and remote disconnect process provides the customer with required notice of disconnection and opportunities to avoid disconnection. The Company's remote disconnection procedure has a proposed disconnect time of 10am, a time when it is generally light out, the impact to family members is reduced, and the customer has the opportunity go to a payment location during business hours to make payment and have service restored. AEP Ohio will continue to work with the PUCO, customers, and

¹ Application of Duke Energy Ohio for a Waiver of Certain Sections of the Ohio Administrative Code for Smart Grid Pilot Programs, Case no. 10-249-EL-WVR, Application (February 26, 2010) at 7. Entry (June 2, 2010) at 8.

² See id., Entry (June 2, 2010) at 8.

consumer advocates to incorporate necessary adjustments to the remote disconnect procedures, including the time of disconnect.

There is no evidence that the Company's requested waiver would lead to an increase in customers eligible for disconnection for nonpayment. The Company's proposed notification process provides the customer with more information, more contact attempts, and more opportunities to make arrangements to avoid disconnection which benefits the customer.

Additionally, the customer communication would reduce the possibility of a customer not knowing whether the power is off due to disconnection or to an outage. The Company would be providing more information and reaching out to the customer more times than currently required and is an adequate substitute for the in-person notice requirement and ensures customers remain connected to essential energy services. The Company's requested waiver benefits customers.

The remote disconnect/reconnect feature of the AMI meter will allow the Company to reconnect the customer normally within an hour of payment if the customer is able to meet the enumerated, minimum requirements for reconnection. This feature eliminates the need for "one last chance to prevent disconnection by making payment."³ This notification process provides consumer protections and additional benefits.

Granting the requested waiver will not undermine critical consumer protections. Ohio Power has defined its remote disconnect process to be consistent with Ohio law and provide several forms of customer notification prior to disconnecting the customer's electric service. The Company's increased customer communications will provide time and opportunity for the customer to avoid disconnection. This notification process provides reasonable prior notice and reasonable opportunity to dispute the termination in accordance with Ohio law thereby providing

³ Id.

critical consumer protections. The Company's requested waiver benefits customers; therefore, the PUCO should grant the waiver request.

3. AEP Ohio's proposed pilot has defined goals, and the Company is working with the PUCO to define the metrics and means of pilot evaluation.

In their additional comments, both the Consumer Advocates (at 2) and OCC (at 7) argue that AEP Ohio's proposal does not adequately protect customers and the in-person notice on the day of disconnection is fundamental to residential customers keeping their electric service on. The Company's pilot has a defined area, customer criteria, and number of customers. The Company has committed to work with the PUCO to determine the relevant data to determine the success of the pilot, as well as potential enhancements prior to any expansion of the pilot. The goal of the pilot is to take advantage of the potential cost and efficiency savings afforded by the Company's AMI deployment and to acquire data and experience related to the remote disconnection process. AEP Ohio is investigating the potential, relevant pilot data which may include:

1. The number of pilot customers who were eliminated from the remote disconnect pilot because they were designated as vulnerable customers.
2. Metrics regarding the number of automated phone calls made to pilot customers within the 48 hour time period, prior to remote disconnection for non-payment including:
 - a) The number of such automated phone calls that were answered by a live person.
 - b) The number of such automated phone calls that were successfully answered by an answering machine.
 - c) The number of such automated phone calls that were not answered by either a live person or by an answering machine.
 - d) The number of pilot customers who received the 48-hour phone call and who avoided disconnection by making the required payment.

- e) The number of pilot customers who received the 48-hour phone call and who were disconnected because they did not make the required payment.
- 3. The number of pilot customers who paid the standard reconnect charge.
- 4. The number of pilot customers who paid the standard reconnect charge for an after-hours reconnect that would otherwise have paid the premium after-hours reconnect charge.
- 5. The number of customer complaints to the PUCO from pilot customers concerning disconnection without personal notice at the premises.
- 6. The number of customer complaints to the PUCO from pilot customers concerning the reconnection charge.
- 7. The number of instances where pilot customers complained to AEP Ohio that they did not receive personal notice prior to disconnection.
- 8. The number of instances where pilot customers complained to AEP Ohio about having to pay a reconnection charge when no technician was dispatched to reconnect service.
- 9. The number of instances where AEP Ohio was unable to execute a remote reconnection due to technical issues and dispatched a field technician to reconnect service.

Additionally, AEP Ohio's requested waiver would allow the Company to realize the benefits that have already been provided to customers for three years through a discounted reconnect fee approved in Case No. 11-351-EL-AIR beginning in January 2012. This discount was provided to reflect the capability of remotely disconnecting and reconnecting the pilot area AMI meters. In addition, AEP Ohio's requested waiver would provide a benefit for all customers in the form of efficiency gains, and increased personnel safety. The suggestion that the

Company would use remote disconnect to increase disconnection is patently untrue. The Company benefits by having customers in service, informed, and in compliance with payment.

Throughout the pilot, AEP Ohio will collect data regarding savings associated with the requested waiver. Data analysis following the 2 year pilot will determine actual amount of savings. Further, data analysis will allow the Company, the PUCO and consumer advocates to evaluate the success of the pilot as well as potential program enhancement prior to a potential continuation or expansion of the remote disconnect program. The Company's requested waiver benefits customers, is consistent with the spirit and intent of notice requirements, therefore, the PUCO should grant the waiver request.

4. Ohio Power Cannot Determine Which Customers are Vulnerable and will be Exempt from Remote Disconnection. (Supplemental Comments of the Appalachian Peace and Justice Network and Ohio Partners for Affordable Energy, pg. 14)

Ohio Power has exempted vulnerable from the remote disconnect pilot. The Company will continue to follow the current practice of not disconnecting vulnerable customers. Customers will continue to self-report conditions that qualify them as a vulnerable customer. Personal notice of disconnection will not result in the identification of vulnerable customers. Ohio Power representatives do not have the training or expertise to identify individuals that suffer from ailments that would qualify as a vulnerable customer, and would not prevent unidentified vulnerable customers from disconnection. Further, if a customer had failed to notify the Company of a qualifying condition, and were to be disconnected, the remote reconnection feature would restore power to the customer upon notification to the Company.

Conclusion

AEP Ohio filed its waiver request to take advantage of the potential cost and efficiency savings afforded by the Company's AMI deployment and to acquire data and experience related to the remote disconnection process. The Company's waiver request, as amended, clarifies the term of the waiver, defines the limited number of AMI meter customers that would be part of the remote disconnection pilot, and describes the notification process the Company would follow prior to remotely disconnecting a customer. Thus, there is no need for a revised application as the Consumer Advocates suggest. Contrary to the comments of OCC and the Consumer Advocates, AEP Ohio's proposal provides several forms of customer notification prior to disconnecting the customer's electric service, allowing time and opportunity for the customer to avoid disconnection. Furthermore, the Company's proposal has a defined area, customer criteria, and number of customers and the Company has committed to work with the PUCO Staff to determine the relevant data to determine the success of the pilot, as well as potential enhancements prior to any expansion of the pilot. Finally, under AEP Ohio's proposal, the Company will continue to follow the current practice of not disconnecting vulnerable customers. Pursuant to Rule 4901:1-18-02(B)(3), O.A.C., AEP Ohio has demonstrated good cause for a limited waiver of Rule 4901:1-18-06(A)(2), O.A.C. Therefore, the Company's Request for Waiver should be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via electronic mail upon the individuals listed below this 20th day of January, 2015.

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Summary: Comments Reply Comments of Ohio Power Company electronically filed by Mr. Yazen Alami on behalf of Ohio Power Company