



Direct and IGS do not believe that shopping customers should be required to pay more to fix this uneven approach to utility administration of switching and implement seamless move capabilities. However, as noted in the MDWG at the time, suppliers were willing to contribute toward the cost to facilitate a timely solution. Despite several years of delay, suppliers still would like this fix to the uneven approach for moving customers, but what the costs would be today, nearly six years later, and what that fix would look like are unknown. If suppliers are ultimately asked to share in the cost allocation, that share should be based on a few specific criteria, as the discussions with EDUs on the implementation of proper seamless move systems continue.

First, the total amount paid by suppliers should be capped. Cost overruns remain a concern for suppliers who are building these costs into our products. Suppliers need the ability to plan for the recovery. A cost cap also ensures that the fee, as discussed below, ends once costs are fully recovered by the utilities. In addition, Direct and IGS believe that on-going compliance and operational costs will be recoverable from all customers, given that the program implementation ensures all customers retain their option of default or choice service.

Second, the fee should be per-use and not a flat total amount across all suppliers. This will ensure that free ridership, where late entrants freely benefit from the early adopters that paid for the full system, does not occur.

Finally, there needs to be a consideration of the per-customer costs when determining the fee. For instance, a fee of \$100 per switch is cost prohibitive and will discourage use of the system, while a de minimis amount such as \$1 per switch is likely not enough to ensure timely recovery of system costs.

## II. CONCLUSION

All customers benefit from the availability of seamless move capabilities. Direct and IGS appreciate the Commission recognizing this fact and adopting it as the standard in the state. As these systems are implemented, costs should be reasonably capped and allocated fairly; shopping customers should not be asked to pay twice.

Dated: March 9, 2018

Respectfully submitted,

/s/ Rebekah J. Glover

Mark A. Whitt (0067996)  
Andrew J. Campbell (0081485)  
Rebekah J. Glover (0088798)  
WHITT STURTEVANT LLP  
The KeyBank Building, Suite 1590  
88 East Broad Street  
Columbus, Ohio 43215  
Telephone: (614) 224-3946  
Facsimile: (614) 224-3960  
whitt@whitt-sturtevant.com  
campbell@whitt-sturtevant.com  
glover@whitt-sturtevant.com

ATTORNEYS FOR DIRECT ENERGY  
SERVICES, LLC AND DIRECT ENERGY  
BUSINESS, LLC

/s/ Michael Nugent

Michael Nugent (0090408)  
Email: mnugent@igsenergy.com  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
Telephone: (614) 659-5000  
Facsimile: (614) 659-5073

ATTORNEY FOR IGS ENERGY

(All counsel willing to accept service by  
email)

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Comments was served by electronic mail this 9th day of March, 2018 to the following:

william.michael@occ.ohio.gov	mwalters@proseniors.org
kevin.moore@occ.ohio.gov	jkoooper@hess.com
fdarr@mwncmh.com	Rocco.DAscenzo@duke-energy.com
mpritchard@mwncmh.com	Elizabeth.Watts@duke-energy.com
dboehm@BKLLawfirm.com	Judi.sobecki@aes.com
mkurtz@BKLLawfirm.com	haydenm@firstenergycorp.com
jkylercohn@BKLLawfirm.com	jlang@calfee.com
cmooney@ohiopartners.org	lmcbride@calfee.com
jmaskovyak@ohiopoverlylaw.org	tallexander@calfee.com
cgoodman@energymarketers.com	coneil@calfee.com
srantala@energymarketers.com	lsacher@calfee.com
stnourse@aep.com	jeanne.kingery@duke-energy.com
gkrassen@bricker.com	cdunn@firstenergycorp.com
mwarnock@bricker.com	mkl@smxblaw.com
meissnerjoseph@yahoo.com	BarthRoyer@aol.com
ejacobs@ablelaw.org	trent@theoec.org
nmorgan@lascinti.org	wsundermeyer@aarp.org
plee@oslsa.org	carlwood@uwua.net
rjohns@oslsa.org	markbrooks@uwua.net
gbenjamin@communitylegalaid.org	Bojko@carpenterlipps.com
julie.robie@lasclev.org	mdortch@kravitzllc.com
anne.reese@lasclev.org	
storguson@columbuslegalaid.org	

/s/ Rebekah J. Glover

---

Rebekah J. Glover

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/9/2018 4:49:55 PM**

**in**

**Case No(s). 12-3151-EL-COI, 14-2074-EL-EDI**

Summary: Text Joint Comments electronically filed by Ms. Rebekah J. Glover on behalf of Direct Energy Services, LLC and Direct Energy Business, LLC and Interstate Gas Supply, Inc.