

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of :
The Dayton Power and Light Company for a : Case No. 18-1257-EL-WVR
Limited Waiver of Rule 4901:1-18-06(A)(2), :
Ohio Administrative Code :

**REQUEST FOR WAIVER
OF THE DAYTON POWER AND LIGHT COMPANY**

The Dayton Power and Light Company (“DP&L” or “the Company”) hereby requests a limited waiver of the rule requirements set forth in Rule 4901:1-18-06(A)(2), of the Administrative Code (O.A.C.) pursuant to Rule 4901:1-18-02 O.A.C., that provides the basis for the Public Utilities Commission of Ohio to grant such waiver.

Rule 4901:1-18-06 (A)(2) in the O.A.C. states that on the day of disconnection of service, due to non-payment, that the utility company shall provide the customer with personal notice. DP&L seeks a limited waiver to this rule in regards to customers whom DP&L has deemed as “Code Red” customers. The term “Code Red” refers to customers who have acted violently or aggressively towards DP&L representatives in the past. Code Red customers generally require a police escort to visit the premises in order for DP&L representatives to make contact with the customer and to disconnect/reconnect the meter when required.

Customers are classified as a ‘Code Red’ customer when they have done such things as threatened a representative with a weapon, if they have verbally threatened a representative, have physically assaulted a representative or have tried to physically assault a representative, have damaged or attempted to damage company vehicles or equipment, have released or threatened to release a dangerous animal(s) on representatives. While this list of aggressive acts is not all

inclusive of Code Red customer scenarios, it does demonstrate the potential danger/harm DP&L representatives face at times with certain customers. Requiring a police escort to visit these customers, sometimes on a monthly basis, is a poor use of time for the police force and adds wasted time for DP&L representatives whose job is to perform service work at the address. Further, threatening and inappropriate behavior by such customers should obviously not be rewarded.

More importantly, safety is a top priority for DP&L and sending representatives into known hostile locations is a serious concern for the Company. Even with police escorts, representatives are not guaranteed safety while they are at the customer's property. In order to avoid potential incidents in the future, DP&L seeks a limited waiver for only those customers labeled as "Code Red" from the day of disconnect personal contact.

DP&L is planning on installing meters capable of remotely disconnecting and reconnecting service. These meters would allow for the customers to be disconnected without putting DP&L representatives at danger or at risk for a potential life threatening situation. These meters would only be installed on premises of customers who have been coded in the system as "Code Red" customers. The meters could be read and disconnected remotely ensuring DP&L representative safety.

Currently, DP&L has approximately 50 active customer accounts that are coded as Code Red customers which require either special handling or a police escort to disconnect or reconnect service. DP&L would install the meters on these customer premises and any new Code Red customers to help ensure safety. DP&L would continue to contact customers prior to disconnection through its normal course of communications. While the customer would not receive the personal notice of disconnection, the customer would gain a faster restoration time because the meters can also be remotely reconnected. Once the customer has paid their delinquent amount to be reconnected, DP&L would release an order for their reconnection. DP&L would not

need to go to the customer's property to reconnect the service or wait on arranging a police escort to return to the customer's property in order to reestablish the customer's service.

Customers labeled as Code Red continue to be eligible for all of DP&L's assistance programs to help them avoid disconnection, such as payment arrangement plans, budget bill payment plans, PIPP Plus (when eligible), medical certificates, and use of the Winter Reconnect Plan. These programs help customers to avoid disconnection when they struggle in paying their bills. DP&L would send a letter to the customers prior to implementing this program to let them know that they will no longer receive a visit prior to any future disconnections.

DP&L will work with Staff on the communications sent to Code Red customers prior to implementing the waiver. DP&L will submit the proposed notice to the Director of Service Monitoring and Enforcement Department (SMED) or the director's designee, for approval, at least 30 days before the program is initiated. Amendments to the notice will also be submitted to Staff for Staff's approval at least 30 days before it is sent to any customer.

DP&L will maintain and retain on file any and all documentation, which supports a customer being designated as Code Red for as long as the customer account is active. For all accounts not already designated Code Red at the time of this filing, the permanent account note will include, at a minimum, the date of the threat or other aggressive action, the name of the person behaving aggressively or threatening, and the type of threat made, and the date the note was added to the account notes. The Company will make best efforts to provide the aforementioned information in the permanent account notes for all accounts labeled as Code Red prior to the filing of this Application.

DP&L will provide the Director of SMED, or the director's designee, an annual report of the customers designated Code Red. The annual report will include the number of Code Red customers within DP&L's service territory, the number of designated Code Red customers that

have a meter capable of remotely disconnecting and reconnecting service as well as the type of meter installed, and the number of complaints received, either directly by the Company or via the Commission, related to classification as a Code Red status.

DP&L will investigate a customer's claim that the occupants of the household or premises have changed or that the Code Red designation is in error and DP&L will take appropriate action as the Company deems necessary.

For meter installation, DP&L will work with the police to install the new meters at the customer's premise to ensure safety for its representatives.

This waiver will only apply to customers who have threatened the safety of a DP&L representative or have already attacked a representative. New customers who move into locations where a Code Red customer has resided will not be subject to this waiver. On that basis, the Company respectfully requests a waiver of Rule 4901:1-18-06 (A)(2).

Respectfully submitted,

/s/ Michael J. Schuler
Michael J. Schuler (0082390)
The Dayton Power and Light Company
1065 Woodman Drive
Dayton, OH 45432
Telephone: (937) 259-7358
Facsimile: (937) 259-7178
Email: michael.schuler@aes.com
Counsel for The Dayton Power & Light
Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/2/2018 11:21:54 AM

in

Case No(s). 18-1257-EL-WVR

Summary: Request for Waiver electronically filed by Mr. Alan M. O'Meara on behalf of The Dayton Power and Light Company