

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy)	Case No. 19-0187-EL-WVR
Ohio, Inc. for a Waiver.)	
)	

**APPLICATION FOR CONTINUATION OF WAIVER BY
DUKE ENERGY OHIO, INC.**

Introduction

Pursuant to Rule 4901:1-18-02, Ohio Administrative Code (O.A.C.), Duke Energy Ohio, Inc., (Duke Energy Ohio or the Company) respectfully requests the continuation of a waiver of O.A.C. 4901:1-18-06(A)(2) that was granted by the Public Utilities Commission of Ohio (Commission) on March 8, 2017. This rule requires an electric utility such as Duke Energy Ohio to attempt personal notice of a pending disconnection of residential utility service for nonpayment on the day of the disconnection. Duke Energy Ohio originally requested this waiver in May of 2016. The waiver was granted for the purposes of beginning a pilot program using an alternative process that included an attempted text and/or a phone message the day of disconnection; an attempted text and/or phone message two business days before disconnection; and extension of the 10-day disconnection notice to be provided all year and not just during winter heating season, ~~a 14-day notice, as required by rule 4901:1-18-06;~~ a one-time bill insert informing customers of the change in process.

The Commission, in its Finding and Order, directed Duke Energy Ohio to file any request to continue the pilot program by March 1, 2019. Accordingly, Duke Energy Ohio is submitting this request to extend the pilot for an additional five years. Other than seeking an extension of the waiver, the Company is not proposing any changes to the program. In support of its application, the Company is pleased to report that the two-year pilot has been a resounding success.

A. The use of more effective communication has reduced the number of disconnections.

As demonstrated by the attachments hereto, the number of electric disconnections for nonpayment completed has been reduced because of the current waiver notification processes. We have seen a reduction in both disconnections for nonpayment and customers eligible for disconnection for nonpayment. It should be noted, as well, that the Company received no complaints with respect to not providing a premises visit on the day of disconnection for nonpayment.

B. Continuing this program allows customers to realize the full benefit of the Company's AMI investment.

In a recent rate proceeding, the Commission approved Duke Energy Ohio's "AMI Transition" to allow the Company to replace aging infrastructure and continue providing additional enhancements to the customer experience. The continuation of the Company's SmartGrid enables many customer benefits, not the least of which is the ability to remotely disconnect and reconnect electric customer service. The effective use of this remote SmartGrid-enabled service, among other benefits, provides better public and employee safety when addressing the requirement to disconnect customers. Although it is rare, customers who must be disconnected can be understandably unhappy with their circumstances. Such situations create tensions that are occasionally directed toward Duke Energy Ohio personnel who must be present at a customers' premises for the limited purpose of providing one notice, after all other required notices of account delinquency have been provided. Continuation of the waiver and eliminating the premises visit on the day of disconnection eliminates any risks associated with physical appearance at the customer's premises.

C. As a continuation of the initial pilot waiver program, Duke Energy Ohio will continue the safeguards

The Company submits that its waiver request is beneficial to customers – more notices are provided; additional information to expedite payment or enter into arrangements to avoid

disconnection is supplied. In eliminating the obligation of utility personnel to complete a premises visit, the Company's waiver request enables efficiency and proper cost alignment while removing potential threats to public and employee safety. The request, therefore, has ongoing, and already demonstrated benefits.

D. Pursuant to its previous commitment, Duke Energy Ohio is providing data to the Commission to evaluate the success of the initial pilot.

Duke Energy Ohio had proposed in its earlier application for a waiver to make the data available to Staff so that Staff may evaluate the success of the pilot and, as appropriate, recommend possible enhancements thereto. The data attached hereto as Attachment 1 consists of the data proposed and made available here to demonstrate the success of the program. For the reasons stated above, Duke Energy Ohio respectfully requests a waiver of O.A.C. 4901:1-18-06(A)(2).

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Elizabeth H. Watts

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Complaint Date	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19
Complaints																								
Complaints eligible to be reconnected due to 30-day period	7,632	6,679	6,551	7,272	7,513	7,507	5,941	4,415	6,344	5,177	5,135	5,343	6,178	6,863	7,006	7,418	7,558	7,685	7,760	6,310				
Total customers excluded from waiver because designated as "Critical Care"	31	575	555	548	548	529	530	514	521	524	516	533	547	562	569	571	591	600	610	622				
Customers newly designated as "Critical Care"	31	575	555	548	548	529	530	514	521	524	516	533	547	562	569	571	591	600	610	622				
Customers disconnected due to nonpayment	4,791	3,689	3,653	4,435	3,413	4,301	3,698	2,136	3,433	3,311	3,111	29	18	24	23	19	12	14	20	19				
Customers reconnected	3,139	3,002	2,707	3,049	2,757	3,278	2,814	1,724	2,318	2,241	2,186	2,400	2,707	2,891	2,984	3,031	3,018	2,928	3,001	2,783				
Arrests, court orders																								
14-day written disconnection notice sent out	92,019	64,948	61,688	109,151	97,005	99,125	82,338	82,327	99,002	102,321	97,955	87,956	100,320	87,678	88,925	111,464	80,487	109,599	87,226	75,827				
14-day written disconnection notice sent out	62,237	40,970	44,124	62,228	58,475	58,475	39,931	39,931	58,475	58,475	58,475	58,475	58,475	58,475	58,475	58,475	58,475	58,475	58,475	58,475				
Two-day written notice																								
Day of disconnection text messages	26,149	14,807	12,789	14,777	15,003	14,944	10,018	10,005	8,534	10,045	11,419	10,241	17,185	14,481	13,974	18,117	14,287	14,228	6,003	11,703				
Customer avoided disconnection by taking action in response to text message	6,449	5,216	4,958	5,883	5,571	5,682	4,531	3,314	6,007	4,538	4,871	4,533	5,184	5,611	6,118	6,106	5,477	5,477	2,341	5,513				
Customer avoided disconnection by taking action in response to text message	857	728	685	803	743	747	550	439	1,846	776	566	502	720	731	1,052	805	897	897	746	889				
Two-day phone call																								
Answered by customer of record	5,787	4,408	3,659	4,357	4,479	4,160	3,107	2,807	2,446	2,871	3,316	3,409	4,759	3,833	3,823	4,882	3,792	4,015	1,346	2,793				
Answered by person other than customer of record	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Answered by person other than customer of record	9,578	7,030	6,189	7,013	7,133	6,692	4,777	4,842	3,958	4,805	5,315	5,033	8,478	7,023	7,083	8,907	7,067	6,763	2,508	4,707				
No answer (text, fax, no answer, network announcement)	2,001	1,513	1,113	1,419	1,555	1,422	1,007	758	852	917	2,431	2,048	2,785	2,319	2,359	3,334	2,411	2,093	2,005	3,817				
No answer due to call failure	2,001	1,513	1,113	1,419	1,555	1,422	1,007	758	852	917	2,431	2,048	2,785	2,319	2,359	3,334	2,411	2,093	2,005	3,817				
Received two day call and avoided disconnection by taking action in response to call	11,880	8,559	6,713	7,974	8,541	7,492	5,497	5,097	2,600	4,314	6,188	5,002	9,389	7,801	6,814	11,475	7,544	7,122	3,514	5,452				
Days of disconnection phone call																								
Answered by customer of record	765	601	544	664	679	718	483	321	621	451	308	419	572	531	659	634	688	677	215	471				
Answered by person other than customer of record	944	773	728	851	877	828	612	479	930	777	687	877	818	813	921	852	716	844	321	461				
Answered by person other than customer of record	2,619	2,199	2,083	2,441	2,272	2,295	1,901	1,420	2,543	1,916	1,865	1,910	2,216	2,385	2,664	2,589	2,373	2,571	1,650	2,347				
No answer (text, fax, no answer, network announcement)	827	557	514	625	614	614	480	352	687	668	580	523	531	760	1,064	1,111	1,037	1,039	545	1,248				
No answer due to call failure	1,983	1,468	1,373	1,656	1,497	1,743	1,371	1,121	1,491	1,283	1,483	1,387	2,609	1,510	1,404	562	1,181	1,154	257	1,047				
Received day of call and avoided disconnection by taking action in response to call	1,718	1,458	1,411	1,821	1,816	1,822	1,242	853	1,486	1,111	1,078	1,162	1,876	1,583	1,852	1,868	2,054	2,075	758	1,507				
Complaints																								
Customer complaints to DUK regarding waiver	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Customer complaints to PUCO regarding waiver	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Technology																								
Instances in which DUK was unable to execute remote disconnection due to technical issues	4	37	30	36	49	56	63	50	65	55	33	53	61	85	59	77	110	90	16	37				
Instances in which DUK was unable to execute remote reconnection due to technical issues	61	32	37	38	29	40	29	11	9	18	35	43	62	49	32	43	76	34	21	43				

1. May 2017 includes two day text & call data starting April 17th - May 31st, all other data reported by May 1st - May 31st
2. May 2017 includes an instance on May 11th where DUK reported technical issues. Immediately, DUK proactively reconnected all disconnections for that day in order to focus resources on reconnecting customers manually as a number of priority.
3. January 2017 - due to two technical DUK reported disconnections for 7 days.
4. January 2018 - due to two technical DUK reported disconnections for 6 days.
5. May - December 2017 updated to January 2018 to reflect correct amounts.

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Summary: Application Application for Continuation of Waiver by Duke Energy Ohio, Inc. electronically filed by Dianne Kuhnell on behalf of Duke Energy Ohio, Inc. and Rocco D'Ascenzo and Watts, Elizabeth H.