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Elizabeth Watts
Associate General Counsel

January 31, 2019

Tanowa Troupe, Secretary
Public Utilities Commission of Ohio
180 E. Broad Street, 11th Floor
Columbus, Ohio 43215

Re: *Application for Continuation of Waiver by Duke Energy Ohio, Inc.*
PUCO Case No. 19-0187-EL-WVR

Dear Ms. Troupe:

Duke Energy Ohio, Inc., is filing the attached clean copy of the Application, previously filed on January 30, 2019. The Application filed on January 30, 2019, inadvertently included information that should have been stricken and should not have been included in the Application.

Please contact me if you have any questions.

Sincerely,

Elizabeth H. Watts
Elizabeth H. Watts

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 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 an 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

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

Duke Energy Business Services LLC

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Event 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
Customer eligible to be disconnected due to nonpayment																								
Total Customers eligible for disconnection	7,632	6,679	6,953	7,272	7,513	7,507	5,841	4,415	6,344	5,177	5,135	5,383	8,179	6,863	7,208	7,418	7,554	7,685	7,700	6,310				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	555	554	575	555	546	529	530	514	522	524	516	533	547	542	569	571	591	600	610	622				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	4,711	3,800	4,115	4,415	4,713	4,703	3,138	2,318	3,321	3,171	3,154	3,321	3,500	3,400	3,600	3,600	3,700	3,800	3,900	4,000				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	1,119	1,000	1,115	1,215	1,315	1,315	824	624	924	824	824	824	824	824	824	824	824	824	824	824				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	92,019	64,949	62,688	109,153	91,600	82,372	99,022	103,121	97,065	87,954	100,370	87,678	88,925	113,664	80,487	100,599	87,235	76,837						
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	62,217	69,070	48,124	62,238	58,475	39,157	56,931	29,154	34,557	35,490	36,937	43,477	51,987	43,609	61,644	52,560	45,544	26,491	86,167	90,160				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	20,149	14,907	12,789	14,977	15,063	14,384	10,635	10,205	8,534	10,045	11,419	10,261	464	11,419	13,974	13,137	14,287	14,228	6,003	11,703				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	1,349	895	717	846	746	648	435	472	260	350	401	464	1,143	821	932	966	987	838	231	432				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	6,449	5,276	4,948	5,282	5,573	5,682	4,551	3,314	6,007	4,538	4,477	4,551	5,138	5,618	6,114	6,105	5,477	5,978	2,381	5,113				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	827	728	683	743	747	747	550	435	2,008	1,770	1,666	1,666	1,770	1,889	2,009	2,009	1,889	1,770	746	1,889				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	5,767	4,600	3,659	4,479	4,479	4,479	3,007	1,907	2,446	2,471	2,471	2,471	2,471	2,471	2,471	2,471	2,471	2,471	1,446	2,793				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	9,578	7,030	6,189	7,011	7,133	6,692	4,777	4,843	3,954	4,805	5,115	5,033	8,478	7,013	7,061	8,007	7,067	6,763	2,508	4,707				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	1,381	1,285	1,113	1,479	1,356	1,322	1,057	758	852	917	2,431	2,088	2,785	2,319	2,259	3,334	2,411	1,913	2,005	3,317				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	2,003	1,514	1,304	1,494	1,508	1,601	1,413	1,178	1,096	1,186	49	48	243	617	189	328	399	212	46	109				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	11,840	8,559	6,713	7,974	8,541	7,678	5,467	5,987	2,000	4,914	6,188	5,062	9,309	7,801	6,614	11,473	7,544	7,212	3,514	5,452				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	944	771	718	851	872	828	612	479	890	717	687	677	816	813	931	952	716	844	324	461				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	2,629	2,199	2,083	2,443	2,373	2,296	1,901	1,420	2,563	1,916	1,865	1,910	2,236	2,236	2,664	2,589	2,373	1,572	1,050	2,347				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	627	557	514	625	614	614	490	352	687	498	530	523	531	760	1,064	1,211	1,017	1,009	545	1,148				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	1,904	1,549	1,673	1,656	1,497	1,471	1,121	1,491	1,283	1,453	1,387	2,809	1,510	1,404	502	1,181	1,154	257	1,047					
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	1,728	1,458	1,441	1,631	1,476	1,522	1,242	953	1,436	1,113	1,078	1,182	1,876	1,583	1,652	1,688	2,054	2,075	758	1,507				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	4	37	90	35	49	56	63	50	85	95	55	33	53	61	85	59	77	110	90	35	97			
Customer eligible to be disconnected due to nonpayment - Critical Care																								
Total Customers eligible for disconnection	61	32	37	38	29	40	29	11	9	18	16	43	62	49	32	43	76	34	21	43				

1. May 2017 includes Two-day test & test data starting April 27th - May 31st, all other data reported is for May 2017.
2. May 2017 includes all instances on May 1st where DCO experienced technical issues. Immediately, DCO proactively suspended all disconnections for that day in order to focus resources on reconnecting customers manually as a number of customers were unable to reconnect.
3. December 2017 - due to low temperatures DCO suspended disconnections for 7 days.
4. January 2018 - due to low temperatures DCO suspended disconnections for 9 days.
5. May - December 2017 updated in January 2018 to reflect correct amounts.

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 19-0187-EL-WVR

Summary: Correspondence Correspondence enclosing clean copy of Application filed January 30, 2019. electronically filed by Dianne Kuhnell on behalf of Duke Energy Ohio, Inc. and Rocco D'Ascenzo and Watts, Elizabeth H.