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Elizabeth.Watts@duke-energy.com Elizabeth Watts Associate General Counsel

January 31, 2019

Tanowa Troupe, Secretary Public Utilities Commission of Ohio 180 E. Broad Street, 11<sup>th</sup> 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.

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Customers newly designated as "Critical Care"	31	25	318	21	12								24	13	19	12	14		19			
Customers disconnected due to nonpayment	4,791		3,953	4,435	3,812	4,303 3,	3,699 2,136	36 3,352	1127 25		3,547		3,890	4,063	4,281	3,918	4,228	1,301	3,783			
Customers reconnected	3,139	2,902	2,707	3,049	2,757	3,278 2,	2,824 1,724	24 2,339	19 2,247	7 2,386	2,480	3,707	2,851	2,694	3,122	2,798	1,231		2,653			
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34 day written disconnection notices sent out	92,039	L	82,688	109,153	92,605	99,125 82,	82,358 82,322	22 99,002	121,102,121	1 97,955	87,956	100,320	87,678	88,925	111,464	80,487		L	75,827	-	L	L
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Customer avoided disconnection by taking action in response to text message	657	728	589	803	743	747	550	439 1,886	770	995	543		935	1,099	808	168	906	746	649	100000		
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Answered by customer of record	5,787	4,409	3,659	4,357	4,479	4,260 3,	3,107 1,907	07 2,446	1,871	3,396	2,809	4,759	3,833	3,823	4,882	3,792	4,015	1,346	2,793		L	L
Answered by person other than customer of record	0	0	0	0	0	0	0	0	0	0	٥	0	0	0	0	0		0	0			
Answered by answering machine	9,578	7,030	6,189	7,011	7,133	L	4,777 4,8	4,842 3,95	58 4,805	5,315	5,033	8,478	7,023	7,061	106.8	7,067		2,508	4,707			L
No answer (Busy, Fax, No Answer, Network Announcement)	1,381		1,113	1,439		1,322 1,		758 857		7 2,431		2	2,319	2,259	3,334	2,411			3,817			
No answer due to call failure	2,003	1,514	1,304	1,494	1,508		413 1,173		96 1,186	6 49	48	241	617	189	228	199	217	46	109	1000		
Received two-day call and avoided disconnection by taking action in response to call	11,880	8,559	6,713	7,974	8,541	7,678 5,	5,467 5,987		4,914	4 6,188	5,062	9,309	7,801	5,614	11,473	7,544	7,212	3,514	5,452			
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Answered by customer of record	765		544	469				L			419		523	599	624	809	229	215	471			
Asswered by person other than customer of record	944	773	738	951	872	828	L	479 930	L	7 687		816	813	921	952	736	884	324	161			
Answered by answering machine	2,629		2,083	2,441				1					2,385	2,664	2,589	2,373	2,572		2,347	100	4	
No answer (Busy, Fay, No Answer, Network Announcement)	627		514	625	614	П	490 3	352 68		8 530	523	531	760	1,064	1,211	1,027	1,089	245	1,248			Ц
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Received day of call and avoided disconnection by taking action in response to call	1,728	1,458	1,441	1,621	1,876	1,622	1,242 9:	953 1,436	1,111	1,078	1,162	1,876	1,583	1,452	1,868	2,054	2,075	758	1,507			
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3. May 2017 Instantes Two-day test & call data starting April 27th - May 31st, all other data captured is for May 31st -	14																					
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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.