

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the :
Commission's Review of :
Chapters 4901:1-17 and : Case No. 19-52-AU-ORD
4901:1-18 of the Ohio :
Administrative Code. :

- - -

PROCEEDINGS

before Ms. Greta See, Attorney Examiner, at the
Public Utilities Commission of Ohio, 180 East Broad
Street, Room 11-B, Columbus, Ohio, called at 10:01
a.m. on Tuesday, February 5, 2019.

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1 PANEL MEMBERS:

2 OHIO DEVELOPMENT SERVICES AGENCY:

3 Randall Hunt, Deputy Chief of the Office of Community
4 Assistance, ODSA;

5 Brandy Kolattukudy, Energy Assistance Manager, ODSA.

6 COMMISSION STAFF:

7 Megan DeLisi, Staff Attorney, PUCO;

8 Robert Fadley, Interim Director of the Service
9 Monitoring and Enforcement Department, PUCO;

10 Tonja Stewart Shaw, Low-Income Program Specialist,
11 PUCO;

12 Barbara Bossart, Chief of the Reliability and Service
13 Analysis Division, PUCO;

14 Nicole Moore, Chief of the Consumer Services
15 Division, PUCO.

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Tuesday Morning Session,
February 5, 2019.

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EXAMINER SEE: Good morning. Today we have scheduled a joint workshop on behalf of the Public Utilities Commission of Ohio and the Ohio Development Services Agency, to review the Commission's rules in Chapters 4901:1-17 and 4901:1-18 of the Ohio Administrative Code, and ODSA's rules in Chapter 122:5-3 of the Ohio Administrative Code. The Commission's proceeding is Case No. 19-52-AU-ORD and is entitled "In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18 of the Ohio Administrative Code."

The rules in the aforementioned chapters establish the -- address the establishment of credit for residential utility service and the disconnection of gas, natural gas, and electric service for residential customers as well as the Percentage of Income Payment Plan Plus Program commonly referred to as the PIPP or PIPP Plus Program. And because the ODSA administers the PIPP Plus Program for electric utilities, the workshop will include Chapter 122:5-3.

My name is Greta See, and I am the Attorney Examiner -- an Attorney Examiner in the

1 Legal Department with the Commission, and I'll be
2 moderating the workshop this morning.

3 First, I'd like to note that the web --
4 that the workshop is being webcast so that
5 stakeholders throughout the state are aware of the
6 the workshop and learn what the Commission and ODSA
7 are considering. The workshop is also being
8 transcribed by a court reporter.

9 I hope everyone remembered to sign in.

10 And I want to remind those that may be
11 watching the webcast that you need not be present,
12 today, to submit comments or reply comments in these
13 proceedings. We'll provide more details on that a
14 little later.

15 We, the Commission and ODSA, are holding
16 the workshop as part of our respective rule review
17 process to receive feedback from interested persons
18 and stakeholders on the rules in Chapters 17, 18, and
19 5-3 of the Ohio Administrative Code.

20 The workshop will be divided into three
21 segments. The first segment relates to the
22 Commission's and ODSA's rules for the PIPP Program.
23 The Staff of ODSA and the Commission recognize that
24 PIPP participants may be on the program for both
25 their gas and electric utility services and, to the

1 extent feasible, consistency and clarity is
2 important. We'll go through the PIPP rules by topic
3 areas and take comments, questions, or concerns as to
4 that topic area. We recognize that the rules in the
5 chapters may intertwine and overlap, but we would ask
6 that you focus on the topic area.

7 Next, ODSA Staff will take comments on
8 the other rules in Chapter 122:5-3.

9 In the final segment of the workshop,
10 Commission Staff will take comments and questions on
11 the rules in Chapters 4901:1-17 and 18.

12 The Staffs of the -- the Staff of the two
13 agencies have just begun their respective rule review
14 process. The focus of the workshop is to receive
15 feedback or comments on the rules and any
16 recommendations that you have on how the current
17 rules can be improved.

18 Both the Commission and ODS will be
19 issuing their respective rule proposals in the
20 upcoming months, at which time all stakeholders will
21 have the opportunity to submit written comments and
22 reply comments to each agency's proposal. We'll
23 provide additional information on the filing of
24 written comments when the proposals are issued.

25 As I previously informed you, the

workshop is being transcribed by a court reporter. Nothing that is said today will be considered binding on the parties or any stakeholder in regards to the positions advocated on any issue. The transcript for today's workshop will be filed in the Commission's case docket in approximately two weeks and will also be posted to ODSA's website.

I would also like to point out that today's workshop is being webcast and an archive -- and a video recording of the workshop will be on the Commission's website.

As I said before, the purpose of the workshop is to open the dialogue among interested stakeholders and the staff of the two agencies and is not intended to substitute for the formal rule review and comment process. If you wish to raise a comment, a question, or a concern on a particular issue, please raise your hand and, once you're called upon, stand if you wish and you may make your comments from your chair or, if you prefer, you may come forward and use the podium and the microphone just here to my left. Please identify yourself and state your organization. And in the interest of affording everyone present an opportunity to make comments, we ask that you limit your comments to a reasonable

1 length of time.

2 As I noted previously, there will be an
3 opportunity to file written comments and we certainly
4 hope that you will participate in that manner.

5 With that explanation, are there any
6 questions regarding the procedural process today?

7 Okay. Then let's move forward.

8 First, I'd like the members at the table
9 here to introduce themselves. If you could start
10 with Mr. Hunt.

11 MR. HUNT: Sure. I'm Randy Hunt with the
12 Ohio Development Services Agency. I'm the Deputy
13 Chief of the Office of Community Assistance.

14 MS. KOLATTUKUDY: I'm Brandy Kolattukudy
15 with the Ohio Development Services Agency. I am the
16 Energy Assistance Manager.

17 MS. DELISI: I am Megan DeLisi, Staff
18 Attorney with the PUCO.

19 MR. FADLEY: I'm Rob Fadley, Interim
20 Director of the Service Monitoring and Enforcement
21 Department here on Staff.

22 MS. STEWART SHAW: I'm -- sorry. I'm
23 Tonja Stewart Shaw. I'm the Low-Income Program
24 Specialist here at the Public Utilities Commission.

25 MS. BOSSART: I'm Barbara Bossart and I'm

1 the Chief of the Reliability and Service Analysis
2 Division.

3 MS. MOORE: I'm Nicole Moore and I'm
4 Chief of the Consumer Services Division.

5 EXAMINER SEE: Okay. Let's start with
6 the Percentage of Income Payment Plan for both ODSA
7 and the Commission. The first rule for each program
8 is definitions. Are there any comments, questions,
9 proposals for Rule 1?

10 MS. THOMPSON: Good morning. My name is
11 Melissa Thompson and I'm with Columbia Gas of Ohio.

12 First of all, we want to thank you all
13 for the opportunity this morning to present at a
14 workshop and to take, I'll call it, introductory
15 thoughts about the rules before the actual rule
16 proposed changes are issued, so thank you.

17 Columbia only has one proposed change to
18 the definitions in 4901:1-18-01 and that's at the
19 definition at letter K and that's the definition for
20 the "Former percentage of income payment plan plus
21 customer." Columbia proposes to delete two words of
22 that definition. So the definition reads: "(Former
23 PIPP plus customer) means a customer that
24 remains...." And we propose to delete "that remains"
25 because former PIPP Plus customers may move out of

1 the service territory; they may not stay within that
2 service territory. And that's the only change we are
3 recommending this morning regarding the definitions.
4 Thank you.

5 EXAMINER SEE: Thank you.

6 Are there any other comments, proposals,
7 or recommendations regarding the definitions in
8 Chapter 18 or in ODSA's -- ODSA's rule in Rule 3-1?

9 Okay. Moving right along.

10 Let's move to PIPP Plus eligibility
11 criteria and requirements reflected in Rule 18-12 and
12 ODSA Rule 3-02. Any comments, concerns, questions,
13 or issues?

14 MS. BLEND: Good morning. My name is
15 Christen Blend. I'm counsel for AEP Ohio. Thank you
16 for the opportunity to provide comments regarding the
17 PIPP rules this morning.

18 AEP Ohio has two suggested changes to the
19 criteria for customer eligibility rules contained in
20 122:5-3-02. The first is to subpart C of that rule.
21 The final sentence of subpart C provides that --
22 currently provides that "Any overpayment of PIPP plus
23 or graduate PIPP plus payments shall be applied to
24 future PIPP plus or graduate PIPP plus payments once
25 any default balance has been paid."

1 AEP Ohio suggests this morning that after
2 the words "shall be applied to," the phrase "the
3 customer's accrued arrearage and then to" should be
4 inserted. So the sentence would read: "Any
5 overpayment of PIPP plus or graduate PIPP plus
6 payments shall be applied to the customer's accrued
7 arrearage and then to future PIPP plus or graduate
8 PIPP plus payments once any default balance has been
9 paid."

10 AEP believes that this would bring the
11 electric -- this portion of the electric rules into
12 harmony with the gas rules and would enable customers
13 who make overpayments to reduce their accrued
14 arrearage and, therefore, reduce the overall revenue
15 requirement for the utility before they begin to
16 build credits for future PIPP payments.

17 The second -- the Company's second
18 suggestion relates to Rule 122:5-3-02(H). In subpart
19 (H)(1)(b)(i) or per (H)(1)(b)(i), customers are
20 required to be current with their monthly PIPP
21 payments only once a year. AEP Ohio believes that
22 this rule does not encourage on-time and in-full
23 payments each month, and to better encourage that
24 customers continue to make on-time and in-full
25 payments and, therefore, obtain the credits

1 applicable to those payments, that the Commission
2 consider a rule change that would provide that after
3 a second consecutive nonpayment of a monthly PIPP
4 amount, the consumer would be dropped from PIPP Plus
5 until they paid those default PIPP payments at which
6 point they could be reactivated. And the Company
7 will provide specific amendment language to that
8 effect in comments. Thank you.

9 EXAMINER SEE: Any other comments?

10 MR. WILLIAMS: Good morning. My name is
11 Jim Williams, I'm with the Ohio Consumers' Counsel,
12 and I'm going to be talking about 4901:1-18-12(D) and
13 ODSA 122:5-3-02(H)(1) concerning the anniversary date
14 requirement.

15 The issue with this rule is that all
16 payments have to be made, PIPP payments have to be
17 made within one month of a customer's anniversary
18 date; otherwise, they could be ineligible to
19 participate in the program. We believe that this
20 rule could be overly restrictive in terms of
21 encouraging the participation for customers that
22 definitely need the program, could benefit from the
23 program.

24 This specifically pertains to areas where
25 there are medical emergencies in the home at the

1 time, where services have been disconnected for
2 nonpayment, where customers voluntarily stop service,
3 where it's just cost-prohibitive for customers to
4 restore services.

5 We believe that the rule -- or, we would
6 ask that the PUCO and ODSA consider a little more
7 flexibility in this rule so that customers have more
8 than one month to try to make missed PIPP payments.
9 Thank you very much.

10 EXAMINER SEE: Thank you.

11 Any other comments regarding PIPP Plus
12 eligibility or requirements, including income
13 reverification and payment requirements?

14 Okay. The PIPP Plus installment payment
15 amount, the application of assistance to PIPP
16 customers' accounts, as reflected in Rules 18-13 and
17 3-04. Any comments, recommendations, questions?

18 Quiet group this morning. Did everybody
19 get coffee?

20 (Laughter all around.)

21 EXAMINER SEE: Okay, just checking.

22 Moving to PIPP and Graduate PIPP
23 incentives or arrearage credits contained in Rules
24 18-14 and 3-04. Any comments, questions, or
25 recommendations?

1 MR. WILLIAMS: Thank you. Again, Jim
2 Williams with the Ohio Consumers' Counsel.

3 This rule -- this comment pertains to
4 ODSA Rule 122:5-3-04 and this concerns a rule where
5 there are periodic reviews or where the ODSA Director
6 may require periodic reviews of PIPP. One of the
7 things that we would benefit from is to the extent
8 that ODSA or the PUCO have conducted any types of
9 analysis of PIPP since the rules were last reviewed,
10 we would ask for the benefit of any of those types of
11 reviews that might help kind of refine our thinking
12 as we work on comments in the case. Thank you.

13 EXAMINER SEE: Okay. Any other comments,
14 recommendations, or questions on that matter?

15 Moving right along. Let's look at the
16 general provisions of the PIPP in the gas rules at
17 18-15 and 3-04. Any comments?

18 Mr. Williams, getting your steps in
19 today, aren't you?

20 MR. WILLIAMS: Thank you, Your Honor.
21 Yes. We do have a couple comments concerning
22 1-18-15(G) as well as the ODSA Rule 122:5-3-05. This
23 concerns the Post PIPP Program. We think this has
24 been a very beneficial program for customers.

25 The only suggestion that we would make is

1 that when ODSA and PUCO are considering rules
 2 revisions is to, again, try to provide more latitude
 3 for more customers to be able to participate in the
 4 Post PIPP. We think that 12 months or that the
 5 eligibility requirements where the Post PIPP only
 6 applies for 12 months after a customer finalizes an
 7 account may be too restrictive, and that if payments
 8 are made after the 12 months, it would serve to
 9 benefit both the USF as well as the PIPP Riders.
 10 Thank you for your consideration.

11 EXAMINER SEE: Any other comments on that
 12 matter?

13 Let's move to the Graduate PIPP Program
 14 including the rules in 18-16 and 3-4. Any
 15 recommendations, comments, concerns?

16 Hearing none, let's talk about
 17 termination or removal from the PIPP Program as
 18 reflected in Rules 18-17 and 3-02.

19 Ms. Thompson.

20 MS. THOMPSON: Thank you, Your Honor.

21 Columbia Gas is proposing one minor
 22 change to Rule 4901:1-18-17(C) regarding "Fraudulent
 23 act." In this rule, the rule reads, in the first
 24 sentence, that: "The gas or natural gas utility
 25 company shall terminate a customer's participation in

PIPP plus or graduate PIPP plus when it is determined by the gas or natural gas utility company that the PIPP plus or graduate PIPP plus customer was fraudulently enrolled in the program or when the customer is found to be non-compliant by ODSA."

There, we'd like to insert the following language:
"or by the gas or natural gas utility company."

There are times when the gas company and any other utility may understand when a customer has fraudulently enrolled and we also would like the ability to determine that as well, in partnership with ODSA. Thank you, Your Honor.

EXAMINER SEE: Any other comments or recommendations?

MR. WILLIAMS: Thank you, Your Honor.

There is one suggested change that we would like to see made in 4901:1-18-17 and also 122:5-3-05 concerning default payment plans. This issue concerns when customers are taken off of PIPP that there could be substantial balances that are due and the requirement for those arrearages to be due and payable under the standard what we'd assume to be the Commission-ordered payment plans.

We believe that since these balances could be substantial, that more flexibility would

benefit customers in being able to have longer payment terms; as well as for other social service agencies, that may be working on behalf of customers, to be able to come up with payment arrangements that can allow the customer or can enable the customer to continue to have utilities. Thank you.

EXAMINER SEE: Any other comments?

Are there any general comments or recommendations regarding the electric or gas PIPP Program that may not be currently contained in the rules?

Very quiet group.

Okay. With that, let's move to Phase 2 of the rules workshop. Let's move to the other rules in ODSA Chapter 122:5-03- -- -03, and let's start with the definitions unrelated to the PIPP Program. Are there any comments or recommendations to that rule?

Moving right along. The next rule, excluding the PIPP rules, would be procedures for disbursing public funds to electric utilities contained within Rule 122:5-3-05.

If there are no comments on that rule, we'll move to the next rule which is aggregation, 3-06.

1 If there are no comments regarding
2 aggregation, the next rule in the chapter is
3 procedures for administering funds under director's
4 jurisdiction. That's Rule 3-07. Any comments or
5 recommendations?

6 Next rule, 3-08, regarding energy
7 efficiency and weatherization services and consumer
8 education.

9 Rule 3-09, delegation of functions. Any
10 comments or recommendations?

11 And the final rule in the chapter,
12 severability, Rule 3-10.

13 Okay. Are there any other comments or
14 recommendations for any of the provisions in Chapter
15 122:5-3 that may not be reflected in ODSA's current
16 rules?

17 Let's move to the third segment of the
18 workshop and that's the Commission's rules in
19 Chapters 17 and 18 of the Ohio Administrative Code.

20 Let's start with the definitions in
21 Chapter 17; the establishment of credit for
22 residential service.

23 Any comments or recommendations as to
24 Rule 1?

25 Any comments or recommendations as to

1 17-02, the general provisions?

2 Let's try Rule 3, the establishment of
3 credit.

4 Rule 4, the deposit to reestablish
5 creditworthiness.

6 Any comments or recommendations regarding
7 the deposit administration provisions in Rule 5?

8 Okay. Next, refund of deposit and
9 release of guarantor in Rule 17-06.

10 Record of deposit in Rule 7. Any
11 comments, recommendations?

12 Okay, hearing none.

13 Rule 17-08, applicant and/or customer
14 rights.

15 Okay. We've covered Chapter 17 in record
16 time.

17 Moving to Commission Chapter 18.
18 Termination of residential service. Let's start with
19 the definitions. Any comments or recommendations
20 regarding the definitions outside of the PIPP Plus
21 Program?

22 Hearing none, let's move to Rule 18-02.
23 The general provisions.

24 Hearing none, let's move to Rule 3.
25 Reasons for disconnecting residential electric gas or

1 natural gas service.

2 Ms. Thompson.

3 MS. THOMPSON: Thank you, Your Honor.

4 Columbia Gas and other utilities face a
5 challenge that's not really addressed in the rules
6 and that's 4901:1-18-03, specifically (E). (E) walks
7 through when a customer, property owner, landowner,
8 or agent does one of the following: (1) is prevent a
9 utility from reading the meter once a year; (2) is
10 after notice and a reasonable period of time,
11 prevents utility company personnel from accessing,
12 calibrating, maintaining, or replacing the utility
13 company's meter, metering equipment, or other company
14 property used to supply service at the premises.

15 The issue faced by many utilities,
16 including Columbia, is the fact that we have certain
17 manifold meters that are in homes that we do not have
18 access to; homes where there may be multi-unit
19 properties where there are good-paying customers as
20 well as customers who are not paying and that we
21 would need to disconnect for nonpayment.

22 Unfortunately, because there are good-paying
23 customers and we don't have access to those meters,
24 we can't shut off those accounts.

25 We'd like to propose some language to

1 address it, but we are definitely interested in the
2 Commission's thoughts on how to address this issue in
3 the future because the rules don't contemplate times
4 when we cannot get into a premises but do need to
5 shut off the gas. Thank you.

6 EXAMINER SEE: Ms. Thompson, before you
7 leave the podium, could you just explain or give us a
8 couple of examples of situations that you're thinking
9 of when you're proposing revisions to this rule.

10 MS. THOMPSON: So, for example, in a home
11 that is a duplex, so it's one premises but the meters
12 are manifolded, they're together in the basement.
13 One customer on the left side of the premises is a
14 good-paying customer. The customer on the right side
15 of the premises is not a good-paying customer, and so
16 we would have the right to disconnect under these
17 rules. The problem is when we go to turn off that
18 meter in the basement, we can't get access. The
19 good-paying customer may not have access to the
20 basement. It might be the landlord, and the landlord
21 is prohibiting us from getting access into the
22 premises.

23 The only way to shut off gas to the
24 customer who is not paying their bill is to turn off
25 at the street at the curb valve and, right now, the

1 rules don't contemplate an ability for us to do that
2 because we do have a good-paying customer there who
3 may not be able to provide us access.

4 So one of the rule considerations,
5 language considerations we had was to put that burden
6 on the property owner or the landowner, somebody who
7 does have control of the premises, to give adequate
8 notice to the customers that are in the premises, so
9 then we can try to disconnect service to those
10 customers who are not good-paying customers, who may
11 be stealing service, fraudulent issues, safety
12 issues. We just -- we don't really have a rule that
13 defines what our rights are to at least take care of
14 that customer.

15 EXAMINER SEE: Okay.

16 MS. THOMPSON: Any other questions from
17 Commission Staff?

18 Thank you, Your Honor.

19 EXAMINER SEE: Thank you.

20 Any other comments on 18-03?

21 Moving to 18-04, delinquent bills. Any
22 comments, concerns, recommendations?

23 Moving to the next rule. Extended
24 payment plans and responsibilities, 18-05. Comments
25 or recommendations?

1 Hearing none.

2 The next rule is disconnection procedures
3 for electric, gas, and natural gas utilities as
4 contained within Rule 18-06.

5 Please step forward.

6 MR. CASTO: Thank you. I am Scott Casto,
7 here on behalf of The Cleveland Electric Illuminating
8 Company, The Toledo Edison Company, and The Ohio
9 Edison Company; the FirstEnergy Ohio utilities.

10 Three comments; one overarching.

11 The rules do not currently contemplate
12 what happens when there's full deployment of smart
13 meters, and so we would ask the Commission Staff to
14 take into account any changes in technology or
15 abilities that the utilities might have once smart
16 meters are fully deployed. That's not really
17 contemplated right now in the current version of the
18 rules.

19 The second comment is 4901:1-18-06(A)(1).
20 It reads: "No disconnections for nonpayment shall be
21 made after 12:30 p.m. on the day preceding a day" and
22 then it goes on. We would recommend that when smart
23 meters are fully deployed that there be a separate
24 section to move that time to 3:30 p.m. instead of
25 12:30 p.m.

1 And the last comment dealing with the
2 medical certification in 4901:1-18-06(C) (3) (h). A
3 consumer may renew their certification two additional
4 times for 30 days each. We would recommend that that
5 be only for one additional time, and remind Staff
6 that customers have the winter option for the winter
7 months from November 1st to April 15th, two
8 occurrences to utilize the medical certification, the
9 initial time and then their one renewal, and they
10 also have the potential to enroll in our utility's
11 Critical Customer Program which is defined in
12 4901:1-10-08(L). That is all I have.

13 EXAMINER SEE: Thank you, Mr. Casto.

14 Are there any other comments,
15 recommendations, or comments regarding Rule 18-06?

16 Did I hear some excitement and rumbling
17 back there?

18 (Laughter all around)

19 MS. BOTSCHNER O'BRIEN: 06 were you on?

20 EXAMINER SEE: Yes.

21 MS. BOTSCHNER O'BRIEN: Good morning.
22 I'm Amy Botschner O'Brien from the Office of the Ohio
23 Consumers' Counsel.

24 The winter disconnection rules,
25 4901:1-18-06(B), should clarify that the winter rules

1 apply to disconnections that occur during the winter
2 season, November 1st through April 15th, regardless
3 of when the usage occurred or the original
4 disconnection notice was given to the customer.

5 This was an issue in a complaint case.
6 The PUCO ruled that the winter rules applied whenever
7 the usage occurred or the notice was given. It
8 should be codified in the rules. Thank you.

9 EXAMINER SEE: Thank you.

10 Any other comments or recommendations?

11 Moving on to Rule 18-07. The
12 reconnection of service. Comments, concerns, issues?

13 Mr. Williams.

14 MR. WILLIAMS: Thank you, Your Honor.

15 The one suggestion that we would like
16 Staff to consider on the reconnection of service is
17 to consider the utility companies that have AMI
18 meters that have the remote-reconnection capabilities
19 and to provide for more accelerated reconnection of
20 service if customers have AMI meters and the service
21 can be restored from the utility back office as
22 opposed to sending a truck out to turn on service.

23 The current rules, as I understand them,
24 require that payments have to be made by 12:30 in
25 order for service to be reconnected the same day. We

1 believe that with the remote-reconnect capabilities,
2 that could perhaps be accelerated. Customers could
3 pay later in the day and still get services.

4 That's all I have. Thank you.

5 EXAMINER SEE: Thank you.

6 Any other comments?

7 Moving on to Rule 18-08. Landlord-tenant
8 provisions. Are there any comments or
9 recommendations on that rule?

10 Combination utility companies as
11 reflected in Rule 18-09.

12 Okay. Hearing no comments, let's move to
13 Rule 18-10. Insufficient reasons for refusing
14 service or for disconnecting service. Any comments,
15 recommendations, or issues?

16 Hearing none, Rule 18-11. Restrictive
17 language prohibition. Any comments?

18 Hearing none, that concludes the rules in
19 Chapter 18 since we addressed the PIPP Program first.

20 Are there any other comments or
21 recommendations for provisions that are not currently
22 reflected in Chapter 18 of the Commission's rules?
23 Any proposals?

24 Very quiet group today.

25 If there are no other comments or

1 recommendations for proposal or proposals, the
2 Commission Staff and ODSA Staff would like to thank
3 you all for coming out today. We appreciate your
4 participation. That concludes the workshop, and we
5 hope that you will file written comments in the
6 formal proceeding. Thank you very much.

7 (Thereupon, the proceedings concluded at
8 10:42 a.m.)

9 - - -

10 CERTIFICATE

11 I do hereby certify that the foregoing is a
12 true and correct transcript of the proceedings taken
13 by me in this matter on Tuesday, February 5, 2019,
14 and carefully compared with my original stenographic
15 notes.

16
17 Carolyn M. Burke
18 Carolyn M. Burke, Registered
19 Professional Reporter, and
20 Notary Public in and for the
21 State of Ohio.

22 My commission expires July 17, 2023.

23 - - -



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Case No(s). 19-0052-AU-ORD

Summary: Transcript In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18 of the Ohio Administrative Code, hearing held on February 5th, 2019. electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Burke, Carolyn