



June 24, 2019

Barcey F. McNeal
Secretary, Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Correspondence regarding the Stipulation and Recommendation
Duke Energy Ohio, Case No. 17-2089-GE-COI

Dear Ms. McNeal:

This letter is to inform the Commission of Ohio Partners for Affordable Energy's (OPAE) position with regard to the Stipulation and Recommendation filed June 6, 2019 in the above-captioned docket considering the Commission's Investigation of the Disconnection Practices and Policies of Duke Energy Ohio, Inc. (Duke). OPAE did not sign but does not oppose the Stipulation.

OPAE's position is that the most important and vital notice a residential customer receives of disconnection of utility service is the personal notice to the customer on the day of disconnection as required by Ohio Administrative Code Rule 4901:1-18-06(A)(2). This Investigation analyzed Duke's disconnection process for compliance with Commission rules and the Commission's approved **waiver** of the most important Rule 4901:1-18-06(A)(2). Entry, October 11, 2017, RFP Page 4 of 14; Audit Report of NorthStar Consulting Group, Inc., March 14, 2018 at II-3-4.

The waiver of Rule 4901:1-18-06(A)(2) should be rescinded. See OPAE Comments, April 27, 2018 at 2-5; OPAE Reply Comments, June 1, 2018 at 5, 7. The Audit found several instances of the inadequacy of the various notices of pending disconnection provided by bill inserts, mailed disconnection notices, robotic telephone calls, and text messages. There is no guarantee that any of these notices are received or understood, or that sufficient information is provided to the customer so that disconnection of utility service can be avoided.

Duke has applied to extend the waiver in Case No. 19-187-EL-WVR, and OPAE's Comments in that case urge the Commission to reject the waiver. OPAE Comments, Case No. 19-187-EL-WVR, May 10, 2019. The personal visit to the residential premises on the day of disconnection as required by Rule 4901:1-18-06(A)(2) is necessary to protect Duke's residential customers from the risk of unlawful, unfair, and unnecessary disconnection of service.

Very truly yours,
Colleen L. Mooney, Attorney
Ohio Partners for Affordable Energy

cc: Electronically Subscribed Parties of Record

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Case No(s). 17-2089-GE-COI

Summary: Correspondence Regarding OP&E's Position on the Stipulation and Recommendation electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy