

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

INITIAL COMMENTS OF OHIO POWER COMPANY

INTRODUCTION

By Entry dated June 19, 2019, the Public Utilities Commission of Ohio (“Commission”) proposed amendments to Ohio Administrative Code Chapters 4901:1-17 and 4901:1-18. Ohio Power Company (“AEP Ohio”) appreciates the opportunity to comment on the proposed rules. AEP Ohio’s comments generally are focused on proposed changes that will modernize the rules with respect to how the utility and its customer communicate, as well as those necessary to reflect system improvements that Ohio electric distribution utilities (“EDUs”) have made since the rules were last reviewed.

COMMENTS

Section 4901:1-18-02 – General Provisions

To clarify that all notifications to a customer will be provided electronically if a customer elects to receive electronic notification, AEP Ohio suggests the following addition to subsection D:

The rules in this chapter allow the use of electronic transactions and notices, if the customer and the utility company are both in agreement regarding such use and such use is consistent with commission requirements or guidelines. The utility company shall advise the customer that if he/she chooses this option, any notice, including the disconnection notice, will only be provided electronically.

Section 4901:1-18-06 – Disconnection procedures for electric, gas, and natural gas utilities

4901:1-18-06(A)

To make subsection (A) of Rule 4901:1-18-06 consistent with the language Staff proposes to add to subsection (B)(3) of that rule, AEP Ohio proposes the following addition to subsection (A):

If a residential customer is delinquent, as defined in paragraph (A) of rule 4901:1-18-04 of the Administrative Code, in paying for regulated services, the utility company may, after at least fourteen days' notice, disconnect the customer's service during normal utility company business hours in compliance with all of the following conditions. The notice issued pursuant to paragraph (A) of this rule (fourteen-day notice) shall expire 60 days after the disconnection date stated on the notice. Once the fourteen-day notice expires the utility company must issue another fourteen-day notice.

The effect of this addition would be that all disconnect notices would expire 60 days after the expiration date stated on the notice, regardless of the time of year during which they were issued.

4901:1-18-06(A)(1)

AEP Ohio further suggests certain clarifying revisions to subsection (A)(1), assuming that Staff's proposed language is adopted:

No disconnections for nonpayment shall be made after twelve-thirty p.m. on the day preceding a day on which all services necessary for the customer to arrange and the utility company to perform reconnection are not regularly performed. ~~Where~~If a meter with remote reconnection capabilities is installed at the premise, no disconnections for nonpayment shall be made after three-thirty p.m. on the day preceding a day on which all services necessary for the customer to arrange and the utility company to perform reconnection are not regularly performed.

4901:1-18-06(A)(2)

AEP Ohio also suggests adding language to subsection (A)(2) that requires the utility to provide additional customer notifications when a meter that is capable of remote disconnection is installed. This proposed language is consistent with AEP Ohio's Commission-approved process for remote disconnection. Specifically, AEP Ohio suggests the following addition to that subsection:

On the day of disconnection of service, the utility company shall provide the customer with personal notice. If the customer is not at home, the utility company shall provide personal notice to an adult consumer. If neither the customer nor an adult consumer is at home, the utility company shall attach written notice to the premises in a conspicuous location prior to disconnecting service. If a meter with remote disconnection capabilities is installed at the premise, additional telephonic notices shall be made at least ten-days prior to disconnection in lieu of personal notice on the day of disconnection. If the utility is unable to reach the customer (positive voice to or leave message) regarding the disconnection, a notice will be sent via U.S. mail. Customers may choose to receive the additional notice electronically in lieu of phone calls/mailings.

4901:1-18-06(B)(1)

Providing different time periods for disconnection depending on the time of year is confusing to customers. AEP Ohio suggests that all disconnection notices sent to a customer for a given billing period provide the same disconnection date regardless of the time of year issued.

AEP Ohio also suggests the following modifications to this subsection, assuming that Staff's proposed language is adopted:

Makes contact with the customer or other adult consumer at the premises ten days prior to disconnection of service by personal contact, telephone, or hand-delivered written notice. Utility companies may make personal contact by regular, U.S. mail, however, such notice must allow three calendar days for mailing. This additional notice shall be provided at least extend the date of disconnection, as stated on the fourteen-day notice required by paragraph (A) of this rule by ten additional days prior to disconnection.

Section 4901:1-18-08 – Landlord-tenant provisions

AEP Ohio proposes the following changes to Rule 4901:1-18-08 to streamline the landlord tenant notification processes and make them more consistent with other provisions of this rule. AEP Ohio understands that subsection (H) requires the landlord provide the utility with an accurate list of individual mailing addresses for a master-metered facility. If the utility has an accurate list of individual mailing addresses, disconnection notifications can be mailed directly to the tenants that occupy a master-metered facility. Subsection (K) allows notifications to be mailed to the premise rather than posted. AEP Ohio suggests the following modification to subsection (A) of the rule to be more consistent with these subsections:

The utility company shall give a notice of disconnection of service to the landlord/agent at least fourteen days before the disconnection would occur. ~~If, a~~At the end of the fourteen-day notice period, if the utility has neither received payment nor a ~~the customer has not paid or made payment arrangements for the bill to which the fourteen-day notice relates, the utility company shall then make a good faith effort by mail, or otherwise, to provide a separate ten-day notice of pending disconnection to both the landlord/agent and to the premise, to each unit of a multi-unit dwelling (i.e., each tenant who receives master-metered service), and to single-occupancy dwellings where the utilities are included in the rent.~~ This ten-day notice shall be in addition to the fourteen-day notice given to the landlord/agent. This notice requirement shall be complied with throughout the year. ~~In a multi-unit dwelling, written notice shall also be placed in a conspicuous place.~~

For the same reason, AEP Ohio suggests the following modifications to subsection (G)(4):

If the consumers choose to have their service reconnected by paying the current month's bill and payment is not made by the due date each month, the utility company shall ~~post the notice in a conspicuous location on the premises and make a good faith effort by mail to the premise~~ or otherwise to notify each household unit of a multi-unit dwelling, or tenant receiving service in the master-metered premises, or tenant in a single-occupancy dwelling, of the impending service disconnection. The utility company is not required to reconnect service pursuant to this paragraph where the landlord resides on the premises.

Respectfully submitted,

/s/ Christen M. Blend

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Summary: Comments Initial Comments of Ohio Power Company electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company