

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Joint Application of</b>	)	
<b>Constellation NewEnergy, Inc. and</b>	)	
<b>Constellation NewEnergy – Gas Division</b>	)	<b>Case No. 18-0604-GE-WVR</b>
<b>LLC for Waivers of Enrollment</b>	)	
<b>Requirements in Rules 4901:1-21-06(C)</b>	)	
<b>and 4901:1-29-06(B), Ohio Administrative</b>	)	
<b>Code.</b>	)	

**INITIAL COMMENTS OF  
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (“RESA”)<sup>1</sup> submits these initial comments in support of the application filed by Constellation NewEnergy, Inc. and Constellation NewEnergy – Gas Division LLC. The application in this proceeding seeks to make available a 21<sup>st</sup> century technology – specifically on-line chats – for customers to enroll in a competitive retail energy service in Ohio. It not only makes sense that Ohioans should have this additional option available to them *if they choose it for enrolling* in an competitive retail energy service, but this requested option is consistent with multiple statutory policies in Ohio.

For example, it is the policy of this State to recognize the continuing emergence of competitive retail electric and natural gas markets “through the development and implementation of flexible regulatory treatment.” *See* R.C. 4928.02(G) and 4929.02(A)(6). It is also the policy of Ohio to ensure or promote supplies and suppliers by giving customers “effective choices over the election of those supplies and suppliers.” *See* R.C. 4928.02(C) and 4929.02(A)(3). Use of an on-line chats for enrolling is fully consistent with those policies.

---

<sup>1</sup> The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

Importantly, the proposal before the Commission in this matter can provide customers with another efficient, effective, and appropriate way for Ohioans to enroll in competitive retail energy services. The enrollment process will be efficient while gathering the necessary information. It will keep customer proprietary information safeguarded and will not be onerous, overwhelming or unduly lengthy. The enrollment process also reflects how many consumers communicate today with businesses – via on-line chats. The proposal, if implemented, will benefit Ohioans by providing an additional enrollment option.

Lastly, as the Commission is aware, RESA has long advocated through many Commission proceedings, workshops and workgroups for improvements to the customer experience in Ohio's competitive retail markets, including improvements for the process of enrolling for competitive retail energy services. The application in this proceeding presents such an improvement, follows Ohio policy, and will further develop Ohio's competitive retail energy markets if approved.

The Commission can support competitive retail energy choices and help develop the Ohio competitive retail energy market by allowing enrollments through an on-line chat mechanism.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

Gretchen L. Petrucci (0046608)

Vorys, Sater, Seymour and Pease LLP

52 E. Gay Street

Columbus, OH 43215

Telephone 614-464-5462

Facsimile 614-719-5146

[msettineri@vorys.com](mailto:msettineri@vorys.com)

[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Counsel for the Retail Energy Supply Association*

### **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 1st day of August 2019 upon all persons/entities listed below:

Terry Etter:	<a href="mailto:Terry.etter@occ.ohio.gov">Terry.etter@occ.ohio.gov</a>
Amy Botschner-O'Brien:	<a href="mailto:Amy.botschner.obrien@occ.ohio.gov">Amy.botschner.obrien@occ.ohio.gov</a>
John Jones:	<a href="mailto:John.jones@ohioattorneygeneral.gov">John.jones@ohioattorneygeneral.gov</a>
Andy Shaffer:	<a href="mailto:Andy.shaffer@ohioattorneygeneral.gov">Andy.shaffer@ohioattorneygeneral.gov</a>

/s/ Gretchen L. Petrucci  
Gretchen L. Petrucci

---

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/1/2019 5:08:41 PM**

**in**

**Case No(s). 18-0604-GE-WVR**

Summary: Comments -- Initial Comments electronically filed by Mrs. Gretchen L. Petrucci on behalf of Retail Energy Supply Association